1. **Introduction**

1.1 This submission supports the representation previously made on behalf of Burry and Knight Ltd.

1.2 The submission addresses Question 4 regarding consistency with policy CS17 as it relates to existing employment sites and allocations. An associated statement addresses Question 4.13.

2. **Consistency with CS17**

2.1 RING2 is identified in Figure 13 of the Core Strategy as an existing identified site and CS17 seeks to keep all existing employment sites and allocations for employment use (criterion (d)). In this respect the allocation of RING2 is consistent with policy CS17. However, other aspects lead to uncertainty about whether RING2 can deliver employment uses, and this has potential to undermine the council’s strategy. Key points are elaborated below.

**Making best use of employment land**

2.2 The Core Strategy seeks to make better use of employment land and encourage redevelopment and intensification (Para 7.5.5) and this is in part to be achieved through the continued allocation of historic allocations, such as RING2.

2.3 However this policy approach does not have a track record of success with regard to generating new jobs on RING2. Even though the site owners are experienced in promoting employment sites, having successfully brought forward neighbouring land (see representation 546), RING2 has been vacant for 25 years.

2.4 The owners have actively promoted the site but unfortunately this has not generated take-up (see below and a Goadsby report in the accompanying statement on Q4.13).

2.5 In May 2008 the owners gained planning consent for B1 units to generate interest in the site. For illustrative purposes, refer to the site plan in Appendix 1. The consent was due to expire within three years so in June 2011 the owner discussed with council officers the ability to renew the consent. Officers advised that this would not be appropriate and a new submission would need to be made to accord with policy on BREEAM standards. Given pressure on rents, combined with additional costs associated with BREEAM, the owners decided to implement the current permission to keep it extant, with the hope of maintaining a viable consent. The conditions have since been discharged, the access has been implemented and the LPA has provided written confirmation that the consent is extant.

2.6 This information is provided to demonstrate that the owners are committed to encouraging the take-up of employment land, and are seeking to attract new
businesses. However this is becoming more challenging, and in particular with pressure on rents, the ability to provide new office units to higher environmental standards can be challenging. The viability of delivering new employment buildings is a key consideration of delivery, but this does not appear to have been taken into account in the assessment of employment land nor in the council’s ability to be flexible when advising on the delivery of employment land.

2.7 In August 2012 the owner invited the council to explore the potential to consider the Burry and Knight landholding more comprehensively. This correspondence is attached in Appendix 2. The opportunity was not endorsed by the council.

2.8 However, the owner is concerned that the continued presence of a vacant site is not a positive contribution to the town and is underutilising land within the built up area, in a sustainable location.

2.9 There is a lack of robust justification for the employment allocation and clear evidence to demonstrate a lack of market demand (refer to accompanying statement Q4.13). The owners therefore consider that, if they were minded to submit a planning application for a proposal on RING2, weight could be given to material considerations and the presumption in favour of sustainable development. The review of RING2 should also be considered within this context.

Assessment of RING2

2.10 NPPF (paragraphs 10 and 17) provides guidance that plans should take into account local circumstances and be kept up-to-date. The council’s Employment Land Review assessment (Background paper 14) was carried out in 2005 (para 1.5) and is based primarily on physical characteristics of the site, and excludes consideration of deliverability and market factors. The assessment is now relatively old and current local market factors do not appear to have been taken into account, although the council has been made aware.

2.11 The RING6 assessment (Castleman Crossing Business Park), which from the site description appears to cover RING2, does not clearly identify the vacant site of RING2, and therefore the extent to which it has been adequately assessed is uncertain. The assessment does however appear to generally apply to the wider Burry and Knight land holding.

2.12 The Sustainability Appraisal (Background Paper 46, Annex 2) identifies the following site characteristics of RING2 (referenced as South of Castleman Way, pages 833, 834):

- A reasonably sustainable location, with good access to footpaths, communities and facilities, and adequate access to cycleways. It has poor access to public transport connections: The reference to poor access to public transport connections is not consistent with its good location close to bus services on Castleman Way
- The site is not suitable for residential development: There is no evidence to support this and other descriptions would appear to support the site for residential use
Issue 4
Employment allocations at Ringwood
Respondent rep: 546 Burry & Knight

- **The site has no direct link to the Hampshire HGV advisory route network:** We accept this is not advantageous for B2 and B8 employment uses.
- **No circumstances have been identified which would inhibit the delivery of BREEAM Standards:** This is contrary with the owners concerns about viability impacts of delivering buildings to BREEAM standards.
- **The ability of this site to address the needs of or help sustain existing local businesses or increase the level of higher skilled jobs is unknown as it has not been investigated:** This statement appears to endorse the owners’ view that the site has not been properly assessed for its ability to deliver new employment jobs.
- **Given the distance to most facilities this is considered to be a sustainable location:** This statement is endorsed.

2.13 The site is clearly identified as being in a location that can help deliver sustainable communities.

3. **A comprehensive approach to encourage the take-up of employment land**

3.1 The opportunity is available to plan for the future and to make the best use of the land asset available.

3.2 The land parcels comprising RING2 and the neighbouring land within the control of Burry and Knight is either vacant, has an unimplemented consent, or tenancies due for renewal. RING2 as currently drafted will not meet the objectives of CS10 and CS17 to deliver sustainable communities and jobs.

3.3 By encompassing the entire landholding and planning for the future, the principles of sustainable development will be better able to be achieved.

3.4 RING2 site boundary could be extended to cover the Burry and Knight land holding. The policy wording could be amended to deliver an employment-led mixed-use proposal that would also help to meet local housing needs.

3.5 Objectives of CS10 and CS17 could still be met. A more focused and intensive use of employment land, in combination with releasing some land for residential use, would continue to meet objectives for supporting and encouraging business, while contributing to the creation of a vibrant community. Burry and Knight wish to retain their business of developing and managing employment sites and see this land holding as an important asset in continuing their role in Ringwood.

4. **Summary**

4.1 In summary, while RING2 is in conformity with CS17 as it carries forward the employment allocation, the policy itself is not enough to attract new business. To unlock RING2 a more comprehensive solution is suggested.

4.2 This statement should be read alongside the Burry and Knight statement in relation to Q4.13.
Appendices

Appendix 1  Site plan for 10 office units (Castleman Crossing planning application 8/91782)

Appendix 2  Correspondence with the LPA
Dear Mr Elliott

Castleman Crossing, Ringwood

We are the owners and developers of the above commercial area which presently consists of 4 buildings and a vacant site benefiting from an extant permission for 10 units.

Please find enclosed a plan showing the extent of our ownership.

The sites I have denoted in red are currently occupied although leases are due to expire within the next 3 years. At present we have no reason to believe that the present occupiers will not remain beyond the lease period, although this is undecided at the moment.

The premises highlighted in blue was occupied by a Company who are now in liquidation. The cost to repair the building is high and we are advised by agents that there is little chance of finding a new tenant given the current state of the market.

The site marked in green on the attached plan has planning permission for 10, B1 units. However the accommodation has been actively marketed for more than 2 years with insufficient interest to justify a commencement of development.

From a commercial point of view we cannot allow the situation to remain and I would have thought that locally, vacant sites and empty buildings would also have a degrading effect.
Therefore we are giving thought to the potential re-planning of at least the blue and green sites. In this respect we have no preconceived plans or proposals and therefore it would be premature to enter into a pre-app process. We have spoken to consultants and developers on a very superficial basis and given thought to the prospect of providing private sheltered accommodation or perhaps leisure facilities such as a cinema complex; nor would we rule out market housing.

However, prior to progressing proposals which are not consistent with the current use of these sites, we would welcome the opportunity to discuss the Councils’ likely position with yourself. I appreciate that up until now you have been unaware of the situation. However I would hope that with the Council playing a proactive role at this stage, the results would be advantageous to both ourselves and local interests. To assist us to take this forward I would welcome the opportunity to meet with yourself as soon as is practicable.

I look forward to hearing from you.

Yours sincerely

Guy Peirson-Hagger
Head of Planning and Development
Dear Mr Peirson-Hagger

CASTLEMAN CROSSING, CASTLEMAN WAY, RINGWOOD

I refer to your recent letter and plan regarding the above and would respond as follows. Please note that as I dealt with this as a policy issue no charge has been levied as would be required for a formal pre application response.

Whilst I note the contents of your letter I can only advise that the green land is allocated for employment use in our emerging sites allocation document and the remaining land being currently in employment use is protected as such by current and emerging policies. This being the case I would not be able to support any of the options you propose.

Please contact me if I can help any further and I would ask you to note that the above solely comprises officer level advice and is not binding on the Council.

Yours sincerely

Mr D Groom
Development Control Manager

Tel: 023 8028 6345
Email: dev.control@nfdc.gov.uk