

BRIDPORT AREA DEVELOPMENT TRUST

West Dorset District Council
Stratton House
58/60 High West Street
Dorchester
Dorset DT1 1UZ

For the attention of Andrew Martin

Principal Planning Officer

22nd May 2012

Dear Sir

Proposals for the development of land at St Michael's Trading Estate by the erection of 105 dwellings (66 houses, 4 maisonettes, & 35 flats), new commercial floor space, provision for 'the Trick Factory', associated car parking, & vehicular & pedestrian access.

Outline planning application nos. 1/D/11/2012 and 1/D/11/2013:

I am writing on behalf of The Bridport Area Development Trust (BADT) in response to the further submissions made by the applicant dated April 2012 which address Employment Issues; Scheme Viability and Sinking Fund and comments on the representations made by English Heritage. In making these further representations the BADT has also taken into account the recent publication of the National Planning Policy Framework (NPPF March 2012) which is a material consideration in assessing applications for development.

The NPPF makes clear that there is a presumption in favour of sustainable development unless the impacts of the development would 'significantly and demonstrably' outweigh the benefits that the Framework seeks to promote. It confirms that planning law requires that applications must be determined in accordance with policies of up to date plans (para 210) unless material considerations indicate otherwise and that decision takers may continue to give full weight to relevant policies adopted since 2004 (para 214) for a period of 12 months after publication.

The approved policies of the WDDC Local Plan (2006), as applied to Bridport's South West Quadrant and St Michael's Trading Estate, and the South West Quadrant Regeneration Framework, provide excellent and up to date policy guidance to officers and members on which to base their recommendations and decisions for dealing with the above applications. These make clear, inter alia, that the regeneration of the area should 'reinforce historic patterns and reflect these in new development' (SWQRF para 3.4.9) and that on St Michael's Trading Estate 'employment continues as its main function' (para 4.6.1).

In its various additional representations the applicant seeks to show that the outline proposals offer 'substantial environmental, social and economic gains' which should outweigh 'any perceived loss of low status older buildings within the conservation area' (Comments on Representations from English Heritage). The BADT has already lodged objections to the applications on the basis of the inappropriate development of an historically important industrial/commercial area and the loss of existing (occupied)

commercial/employment floorspace. A copy of the earlier representation (dated 3 February 2012) is attached for ease of reference. The BADT wishes to add to its earlier comments as follows:

1. **Inappropriate Development of the Site:** The applicant's proposals effectively split the site in two – providing a separate residential zone unrelated to and compromising the historic layout and distinctive character of the St Michael's Trading Estate. As a result the proposals do not provide for an integrated mixed use development of the site as required by planning policy.
2. Two key locally important buildings within the remainder of the Estate are proposed for redevelopment – the Lilliput and Stover buildings – the catalyst for which is clearly the need to provide affordable housing. However the applicant recognises that further detailed surveys are needed with regard to the Lilliput building in order to justify its demolition. Without the proper supporting information the redevelopment of the buildings should not be approved.
3. **Loss of Commercial/Employment Floorspace:** It is a fact that the application proposes the residential development of approximately half the St Michael's Trading Estate. The opportunity cost of the proposal is the loss of potential employment space. In the applicant's response statement on Employment Issues the narrowly focussed calculations on existing and proposed commercial floorspace lose sight of this fact and no consideration has been given to the land that might otherwise have been developed for employment purposes. The BADT considers that the loss of commercial land and potential employment is contrary to the Council's local plan policies.
4. **Viability Issues:** The applicant recognises that the site must work as a whole with the residential development cross subsidising the affordable housing and 'sinking fund' for improvements in the retained commercial buildings - however no detailed phasing plan or programme of phasing redevelopment/works and investment in the commercial parts of the site is provided as part of the viability appraisal. This raises concern over the extent to which the residential element of the site will be sold/developed independently of the remainder of the Estate and irreversibly affect the distinctive character of the area which has historically functioned as a whole.
5. The scheme proposals appear to be driven by residential redevelopment with no proposals for the retained commercial areas other than to provide a 'sinking fund'. The BADT considers that an investment management plan should be provided as part of the proposals to demonstrate the intention to regenerate and invest in the commercial area/buildings. The profitability of the residential element of the scheme must be fed back into the restoration and regeneration of the commercial land and buildings or the result will be a new housing estate and a range of neglected industrial buildings.
6. The applicant has raised the issue of 'gentrification' (Comments on Representations by English Heritage) and has defended the past lack of investment in the area and proposed continued 'minimal refurbishment' as a strategy for supporting low rents and the 'artisan community'. This seems a perverse strategy based on hindsight and should be rejected by the Council. A positive and constructive strategy of investment and regeneration should be sought, with a management plan to maintain and invest in low rent accommodation to support seed bed activities and economic growth in Bridport.
7. The overall scheme proposals are currently 'unviable' (para 4.3 - Response to Scheme Viability and Sinking Fund) and questions are raised over the deliverability of the scheme (Comments on Representations from English Heritage). It is clear that these outline proposals lack the detail necessary to allow proper consideration of the development of

such an important area and any benefits proposed in terms of the negotiated planning obligations (sinking fund for future improvement works to retained commercial buildings and 35 units of affordable housing) are uncertain. The proposals must therefore be considered speculative.

The BADT remains of the view that there is nothing in the further submissions that would alter its concern about the harmful impact of the proposed development on this historic and distinctive area and considers that the outline proposals are contrary to guidance contained in the NPPF and Local Plan policies. The Committee is urged to reject the above outline applications.

The BADT would welcome the opportunity to work in partnership with the landowner and St Michael's Enterprise on an alternative approach to the restoration, regeneration and development of the St Michael's Estate - an approach which would promote the longer term regeneration and investment opportunity rather than the short term residential development approach currently being pursued.

Yours faithfully

Diane May

Director and Trustee

Bridport Area Development Trust

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