

# **HUNTINGDONSHIRE LOCAL PLAN EXAMINATION IN PUBLIC**

## **HEARING STATEMENT**

### **MATTER 5 BUILDING A STRONG, COMPETITIVE ECONOMY**

**ON BEHALF OF EXTRA MSA GROUP**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

## **Pegasus Group**

Suite 4 | Pioneer House | Vision Park | Histon | Cambridgeshire | CB24 9NL

**T** 01223 202100 | **W** [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester  
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## 1. INTRODUCTION

1.1 This Hearing Statement is prepared by Pegasus Group on behalf of Extra MSA Group (hereinafter known as 'Extra') who have land interests within the District.

1.2 Extra has an interest in a site to the north of Haddon and to the west of Peterborough, located within the administrative boundary of Huntingdonshire District Council, which represents a good opportunity for commercial and employment uses. The development of this site for employment uses would assist the Council in delivering the economic strategy within the plan period. A site location plan is attached in **Appendix 1**.

## 2. **Q1) What is the overall need for employment land that has been identified? What is the evidence for this? What is the situation regarding existing commitments and the residual need for additional land allocations? What is the past trend in take up rates for employment land?**

2.1 It would appear that the basis for overall need for employment land has been derived from the Employment Land Review (**ECON/01**). This was undertaken in 2014 and is considered to be out of date to now provide an accurate justification for employment provision for the plan period. It is considered necessary to provide an updated addendum to ensure that the predictions and forecasts in this report remain valid and justified.

2.2 The overall need as concluded in the report is 42-44 hectares excluding Alconbury. This has been derived from various modelling undertaken in the report based on existing commitments and historic take up rates. However, some of the information in the report dates back to 2008 which was the most up to date information available in 2014 (date of the report). This is now over ten years old and relates to differing market conditions. Therefore, it is unclear how a sound and justified employment strategy can be based on out of date data which has not been reviewed to ensure that it is still relevant to the current period.

2.3 The other economic reports in the evidence base which have informed the economic strategy are similarly out of date. The Economic Growth Plan (**ECON/02**) is dated July 2013 and this relies on the Local Economic Assessment (**ECON/04**) for the baseline information. This assessment was undertaken in 2013.

- 2.4 The Economic Growth Plan (**ECON/02**) sets out a 10-year delivery programme in order to successfully deliver the objectives by 2023. This should be updated as to whether these objectives are on target considering that by the time the Local Plan is adopted, a significant period of this Growth Plan will have lapsed and it is important to assess whether new targets and objectives are more relevant. There are a number of short, medium and longer-term delivery actions listed in the Growth Plan. The delivery of economic opportunities in the SPA's appear in all stages of the Plan (short, medium and longer-term). This is considered unrealistic that large complex strategic allocations can be relied upon to deliver in the short term of a Plan and again, it is necessary to assess whether this has been achieved in the five years since the Growth Plan was created.
- 2.5 Local Plan Policy LP19 refers to established employment areas and their retention. Local Plan Policy LP20 discusses the policy requirements of the rural economy, but does not identify new employment allocations. Therefore, Local Plan Policy LP2 is the policy which controls economic growth in the District and this is not considered flexible enough to allow for all sustainable opportunities to be considered appropriately, especially in view of the potential for delay in the delivery of the large scale strategic allocations.
- 2.6 A more realistic strategy would be to incorporate opportunities for small scale economic development opportunities outside of the SPA's in order to deliver economic growth in the immediate/short term of the Local Plan period.
- 3. Q2) What are the inter-relationships with other authorities in terms of employment land provision and how have these been taken into account?**
- 3.1 The Duty to Co-Operate Statement (CORE/06) produced by the LPA as part of the Local Plan evidence base provides an overview of the engagement between neighbouring Councils and other statutory bodies. When discussing the interaction in relation to planning for additional jobs, the report focuses on the engagement with Greater Cambridge Greater Peterborough Local Enterprise Partnership to ensure the success of the 150-hectare enterprise zone at Alconbury Weald. There is a strong focus on Alconbury and the duty to co-operate should relate to all cross-border economic opportunities. The Duty to Co-operate statement (**CORE/06**) refers to Huntingdonshire's Economic Growth Plan (2013-2023) (**ECON/02**) and the Local Economic Assessment (**ECON/04**). However, both of these reports are

dated 2013 and are considered to be out of date and may not reflect the current economic profile of Huntingdonshire or the surrounding districts.

- 3.2 The Employment Land Review 2014 (**ECON/01**) is also referred to. The report does list potential employment allocations in neighbouring districts but does not analyse the relationships or impacts these may have on job growth between the districts. Paragraph 3.32 of the Duty to Co-Operate Statement (**CORE/06**) states that there is analysis in the Employment Land Review (**ECON/01**) of adjoining districts. However, we consider this to be limited and not useful in identifying the specific nature of how commercial sites in the east of Huntingdonshire District can assist in the provision of employment opportunities to the west of Peterborough. This report is considered to be out of date and these relationships change and need updated analysis in order to ensure the correct type of employment opportunities are offered in the most suitable location.
- 3.3 Following our own consultation with local Commercial Property Agents, it is anticipated that there will be an increased demand for future economic needs relating to Peterborough. The emerging Peterborough Local Plan is seeking to allocate a substantial level of employment land in order to meet the needs, as informed by the Peterborough Employment Evidence report (July 2017). However, there is concern that a proportion of these allocations include already committed land and therefore there may be a shortfall of new provision in meeting future needs. For example, the strategic allocation at Gateway Peterborough (Roxhill Park) is now built out and is nearing full occupation so it will not be able to assist in meeting any new future forecasted need of the area. The Employment Evidence report (July 2017) states that Peterborough is forecast to experience steady sustainable economic growth between 2016-2036. It is anticipated that there will continue to be demand for larger B1 and B8 premises on the edge of the city and there is a consensus view that employment land to the west of the city would be highly desirable.
- 3.4 This relationship between the two economic markets of Huntingdonshire and Peterborough is not explored in any detail in the Employment Land Review. It is considered that employment provision in the SPA's will not provide the cross-border relationship between Huntingdonshire and Peterborough Councils which our client's site on the A1 can. The location of the site ensures good links with the major road network as well as providing employment opportunities for the residents of both administrative areas. Commercial development in this location can assist in

addressing any future shortfall in Peterborough's employment provision as well as providing sustainable economic opportunities within Huntingdonshire.

**4. Q3) What provision does the Local Plan make for additional employment land through allocations? Is this an appropriate and justified amount? How has the Alconbury Enterprise Zone been taken into account in overall employment land provision?**

- 4.1 It is considered that there is an over-reliance on the SPA's and Alconbury to deliver the employment land in the District. The total employment land proposed to be allocated, excluding Alconbury is 42.4 hectares which is just within the out-of date range of 42-44 hectares as set out in the Employment Land review **(ECON/O1)**. 22 hectares of this 42.2 hectares is to be provided in a single allocation at St Neots East. All but 5.8 hectares of employment land will be located within the SPAs. It is considered that the strategy should be more flexible in allowing smaller scale sustainable economic sites to come forward outside of the SPA's which have the ability to meet immediate needs and will not be susceptible to delay and therefore will assist in the delivery of the strategy in the short-term.
- 4.2 In order to remedy this inflexibility of the Local Plan, it will be necessary for the Council to provide a flexible supply of development sites which are not as complex and constrained to deliver as the strategic allocations and which have the ability to be delivered within the first phase of the Local Plan.
- 4.3 It is considered that Extra's proposed employment site to the west of Peterborough, east of Haddon, could assist Peterborough Council in meeting their future economic needs and also assist Huntingdonshire in delivering additional employment sites within their District especially in view of the over-reliance on strategic allocations which may be stalled in their delivery due to their complex nature.
- 4.4 The location of the site to the west of Peterborough ensures good links with Peterborough and the western parts of Huntingdonshire. Also, the proposed new urban extension at Great Haddon with Peterborough City Council, which will provide approximately 5,300 new homes to the south of Peterborough, is located to the southeast of this site and will retain good links with the adjacent area and therefore a proposed new employment use on Extra's site can assist the sustainability goals and objectives of Great Haddon by providing nearby employment.

## 5. TESTS OF SOUNDNESS

5.1 The tests of soundness are set out in the National Planning Policy Framework (NPPF). For a Local Plan to be sound it must be:

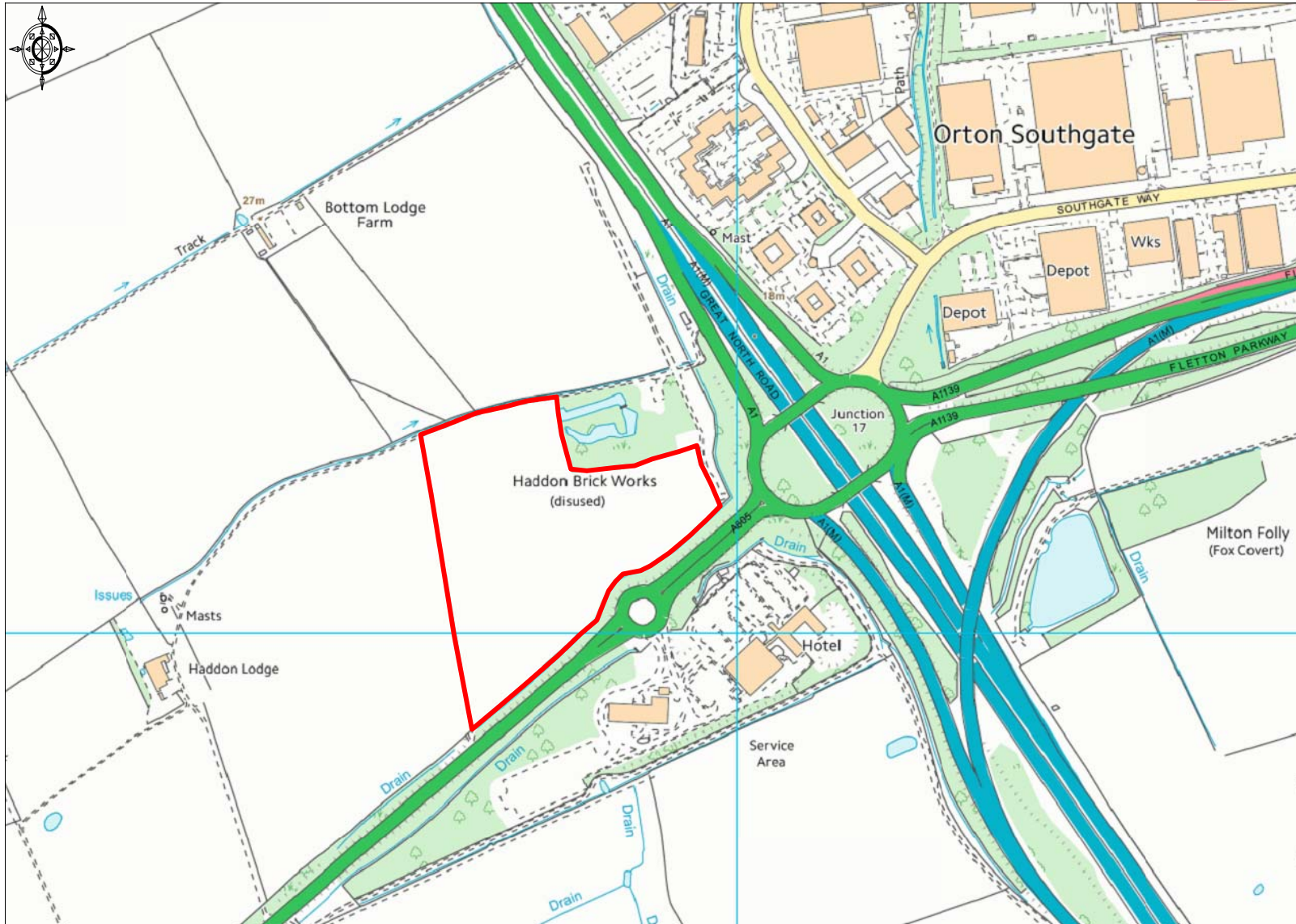
- **Positively Prepared** – the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

5.2 For the reasons set out above, the employment policies in the Local Plan (Policy LP2 and LP19) are unsound and over-reliant on the role of the four strategic locations in delivering the housing and employment needs of Huntingdonshire District. The expectations of the Council as to when these four strategic sites will deliver development are unrealistic and therefore the housing and economic needs of the District may not be met within the plan period. In order to remedy this situation, it will be necessary for the Council to provide a flexible supply of development sites which are not as complex and constrained to deliver and which have the ability to be delivered within the first phase of the Local Plan.

5.3 Local Plan LP2 and LP19 fail the following tests of soundness as they are:

- not positively prepared;
- not justified;
- not effective;
- nor consistent with National Policy.

Site Location Plan



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