

HUNTINGDONSHIRE LOCAL PLAN EXAMINATION IN PUBLIC

HEARING STATEMENT

MATTER 3 DEVELOPMENT STRATEGY

ON BEHALF OF EXTRA MSA GROUP

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

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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 basis for the overall strategy for development and the broad distribution of growth set out in Policy LP2? What options were considered and why was this chosen? Is it justified?**

- 2.1 Local Plan Policy LP2 does not encourage dispersal of economic growth and relies too heavily on the Spatial Planning Areas delivering the majority of the housing and economic growth. Three quarters of the growth in the District is focused in the Spatial Planning Areas. If these four strategic locations are slow to proceed and deliver the projected housing and economic growth, this will have serious implications on the delivery of housing and jobs during the plan period.
- 2.2 It is not clear if an alternative strategy has been evaluated by the Council which assesses the ability of smaller economic development opportunities which could come forward outside of the SPAs to help assist the Council in providing the employment requirement. It may be necessary for the Council to measure their over-reliance on Alconbury and the other SPA's with an acceptance of sustainable economic opportunities throughout the District in order to provide a flexible supply of economic development, as encouraged by the National Planning Policy Framework (NPPF) paragraph 19 which supports sustainable economic growth.
- 2.3 There is a need for economic development sites to provide for the employment needs of both Huntingdonshire and Peterborough City Councils which could come forward in the short term outside the parameters of the SPA's in order to meet an immediate shortfall in employment floorspace in this location. The potential slow delivery of the large and complex strategic allocations will not be able to meet the

immediate demand for employment space in the District and neighbouring Peterborough.

3. Q4) What is the scale of development actually planned (including commitments) in and is this in line with the distribution set out in Policy LP2?

- 3.1 There is concern regarding the balance with housing supply and job growth in the District. In order to ensure that there are adequate jobs available for both new and existing residents, it is important to provide an appropriate level of job creation alongside the new housing in the Local Plan. The Local Plan in LP1 provides for 20,100 homes and 14,400 jobs. The employment land provision (not including the strategic allocation at Alconbury) is 42.2 hectares.
- 3.2 The Employment Land Review (**ECON/01**) which forms part of the Local Plan evidence base is out of the date and therefore does not provide an accurate justification of the level of employment need in the District. In 2014, the date of the report, it was suggested that in addition to Alconbury, the gross requirement for employment land was 42-46 hectares of land. At the time of that Review, it is not clear if the housing requirement in the District was the level that is now proposed and therefore it is necessary to provide an update of this employment target to ensure it is adequate for the level of housing provision now proposed.
- 3.3 A significant proportion of this requirement (22 hectares) is to be provided in one SPA at St. Neots East. This out of date requirement and over-reliance on the strategic allocations could have serious implications to the delivery of the Council's economic strategy.
- 3.4 There is also no reference to the role that land in Huntingdonshire can play in assisting Peterborough City Council in meeting and enhancing their economic offer. The emerging Peterborough Local Plan proposes to allocate 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. It is important that there is an understanding of cross-border economic needs and how land in Huntingdonshire may be able to assist Peterborough in providing a range of employment opportunities not available within the confines of the City.

4. TESTS OF SOUNDNESS

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

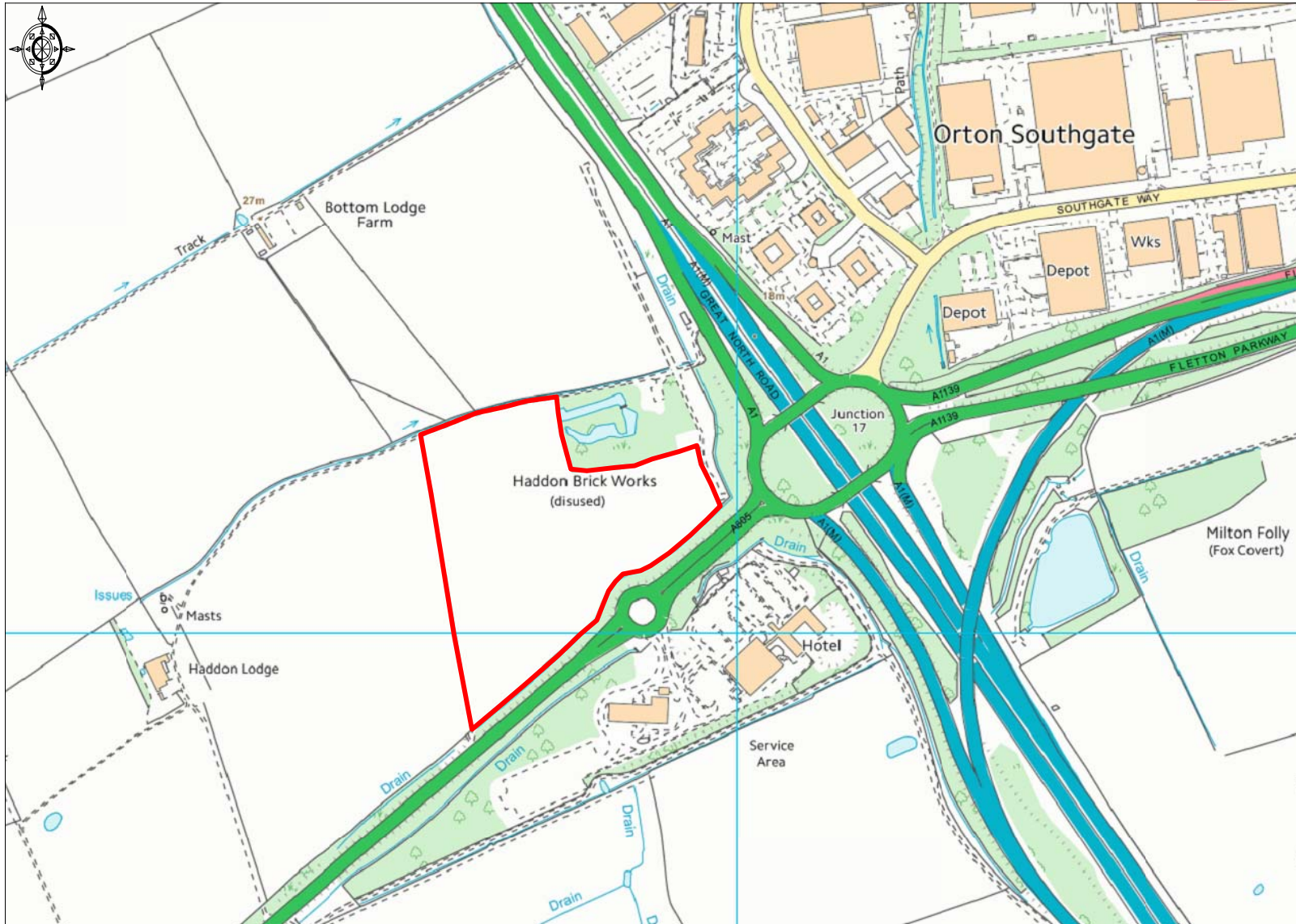
- **Positively Prepared** – the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **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.

4.2 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.

4.3 Local Plan LP2 fails the following tests of soundness as it is:

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

Site Location Plan



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