

East Cambridgeshire Local Plan Review Examination – Stage 2, Matter 9

Hearing Statement on behalf of Hermes
Property Unit Trust

September 2018

Turley

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1. Introduction and Overview

- 1.1 This Hearing Statement is submitted by Hermes Property Unit Trust in relation to Matter 9: Building a strong, competitive economy.
- 1.2 Under Matter 9, Issue 1 is *“Whether the plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its approach towards building a strong and competitive economy?”*
- 1.3 Hermes owns property which forms part of the employment cluster south of Fordham. It has been engaging in the Local Plan review process to demonstrate the suitability of this land for Use Class B8 logistics and distribution uses (and to align the land use allocation of the property with the six other sites which make up the Fordham Employment Cluster). The other Fordham Employment Cluster sites are proposed to be allocated for B1, B2 and B8 Uses.
- 1.4 This Hearing Statement expands the representations submitted by Hermes in respect of the Further Draft Local Plan Consultation, January 2017 and East Cambridgeshire Local Plan Proposed Submission, November 2017.

2. Matter 9: Building a strong, competitive economy

- 2.1 Hermes' interest is in Fordham, a Large Village in the settlement hierarchy under draft Policy LP3 – the second tier of settlements under 'Main Settlements' in the policy. The policy states that the allocation of development sites in the Local Plan has been informed by the hierarchy, with allocations for housing and employment purposes being made for all settlements in the top two tiers (Main Settlements and Large Villages) and some in the third tier (Medium Villages).

Question 29: Is the provision of employment sites consistent with the Council's development strategy?

- 2.2 Policy LP2 indicates the distribution of growth and investment will be main towns-led, together with an element of proportionate growth across the district, *"with specific allocations having been subject to consideration of the deliverability and infrastructure capacity, constraints and opportunities"*.
- 2.3 With specific reference to the allocation of the Employment Cluster, South of Fordham (FRD.E1) referred to under Policy LP8, this focus of employment sites for B1, B2 and B8 uses at a Large Village is considered generally consistent with the Council's development strategy – and is therefore supported in principle.

Question 31: Is the approach set out in Policy LP8 effective, particularly in terms of flexibility and is it justified and consistent with national policy? Does the policy satisfy Paragraph 154 of the Framework? In particular, is the terminology clear?

- 2.4 Policy LP8 states that the Council will support proposals which assist the delivery of economic prosperity and job growth. Lancaster Way is referred to, then the 'Other Strategic Employment Allocations' are listed in the table forming part of the policy. *"Such sites are reserved for B1, B2 and B8 Uses, and the presumption will be for these sites to meet the needs for large scale investment that requires significant land take"*.
- 2.5 Site reference FRD.E1 'Employment Cluster, South of Fordham' is then included – with cross-reference provided to policy Fordham6.
- 2.6 Paragraphs 17, 21, 158 and 160-161 of the National Planning Policy Framework (NPPF) 2012 promote sustainable economic growth and recognition of the needs of businesses. Section 6 of the New NPPF July 2018 refers to 'Building a strong, competitive economy'. Paragraph 80 states that planning policies (and decisions) should help to create the conditions in which businesses can invest, expand and adapt, with significant weight to be placed on the need to support economic growth and productivity. The approach taken should allow each area to build on its strengths.
- 2.7 Paragraph 81 of the NPPF 2018 states that planning policies should:

- (a) Set out a clear vision and strategy which positively and proactively encourages sustainable economic growth, having regard Local Industrial Strategies and other local policies for economic development and regeneration...; and
 - (d) Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable rapid response to changes in economic circumstances.
- 2.8 Paragraph 82 of NPPF 2018 also states that planning policies should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters and for storage and distribution operations at a variety of scales and in suitably accessible locations. Similar requirements to the above are provided at paragraphs 21 and 160-161 of NPPF 2012.
- 2.9 **Hermes considers that the flexibility built into Policy LP8 with regard to ‘reserving’ the South of Fordham Employment Cluster for B1, B2 and B8 Uses is effective, in terms of flexibility and is justified and consistent with national policy – specifically NPPF 2012 paragraphs 17, 21, 158 and 160-161 and NPPF 2018 paragraphs 80, 81 and 82. The terminology is clear.**
- 2.10 Hermes representations in respect of Matter 15: Proposed Site Allocations – Large Villages show that policy Fordham6 is not consistent with Policy LP8. The former provides that each of the Fordham Employment Cluster sites is allocated for B1 or B2 or B8 use, **with the exception** of B8 Use for Site FRD.E1(d). The evidence does not in any way justify this departure from Policy LP8 (or the limitation of the flexibility advocated by the NPPF) which clearly allows B1, B2 and B8 Use for all of the Fordham cluster sites.
- 2.11 Hermes raises no further points in respect of the other Inspector’s questions under Matter 9.

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