Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

Comment ID 194
Response Date 12/02/20 13:26
Consultation Point 5 Employment (View)
Status Processed
Submission Type Email
Version 0.2

Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
Chapter 5 – Employment(Pages 34-40)

Tests of Soundness

Do you consider the Local Plan is sound in terms of being:

- Justified . Yes
- Effective . No
- Positively prepared . No
- Consistent with National Policy . Yes

Legal and Procedural requirements

Do you consider the Local Plan has been prepared in line with legal procedural requirements? Yes

Duty to Cooperate

Do you consider the Local Plan to be compliant with the Duty to Cooperate? Yes

Reasons

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.
This representation has been prepared by DLP Planning Ltd, on behalf of our client, Buccleuch Property (Kettering) Ltd, in response to the current consultation on the Publication Version of the Kettering Site Specific Part 2 Local Plan. Our client welcomes the opportunity to be involved in the creation of policies that will form part of the statutory Development Plan for Kettering Borough.

It is prepared in the context of our client's land ownership at Kettering Business Park and Kettering North, the latter which is allocated in the North Northamptonshire Joint Core Strategy (July 2016) (Policy 36) for a minimum of 40ha of Use Class B1 (Business), Use Class B2 (General Industrial) and small scale Use Class B8 (Storage and Distribution), along with approximately 3ha of Use Class D2 (Assembly and Leisure). To confirm, the Boughton Estate owns part of the Kettering North site, as well as surrounding land. Buccleuch Property also owns part of the site and represents the commercial property interests of the Buccleuch Group, whilst Buccleuch Property (Kettering) Ltd represents its interests at Kettering, including those at Kettering Business Park.

The Buccleuch Group / Boughton Estate has a track record of delivering high quality development across Kettering, including Kettering Business Park. The development of land at Kettering North will deliver a high-quality business park, which is in a sustainable location, adjoining the existing built up area of Kettering Business Park and Kettering.

Our client has been actively involved in the preparation of planning policy in Kettering Borough, having made representations to the previous stages of the Site Specific Part 2 Local Plan and also the Joint Core Strategy.

These representations have regard to the National Planning Policy Framework (NPPF, 2019) which sets out the four tests that must be met to enable Local Plans to be considered sound:

• Positively Prepared: Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
• Justified: An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
• Effective: Deliverable over the plan period, and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
• Consistent with National Policy: Enabling the delivery of sustainable development in accordance with the policies in the Framework.

Comments focus on the Employment Chapter (Chapter 5), in particular, draft Policies EMP1 and EMP3 and supporting text paragraphs 5.20 to 5.23.

Draft Policy EMP1 (Safeguarding Employment Land)

The Joint Core Strategy (2016) provides policy criteria for safeguarding existing employment areas. The role of the Part 2 Local Plan should therefore be to identify the specific areas that should be designated as safeguarded employment areas. North Kettering Business Park is identified in draft Policy EMP1 as a safeguarded employment area, which is supported. Notwithstanding this, it is considered the policy wording should cross-refer to draft Policy EMP3 (Non-Employment Uses (non-B use class) in Safeguarded Employment Areas). Currently draft Policy EMP1 confirms the identified employment areas will be safeguarded for B1 (Business), B2 (General Industry) and B8 (Storage or Distribution). Draft Policy EMP3 however infers that uses which are ancillary to the employment use are also acceptable in safeguarded employment areas (this should be made clear – see comments below).

Draft Policy EMP1 should therefore confirm that non-B class uses, which are ancillary to the employment uses, are also acceptable in safeguarded employment areas. Suggested wording is outlined in the next section.

Draft Policy EMP3 (Non-Employment Uses (non-B use class) in Safeguarded Employment Areas)

Whilst the aims of this policy are supported, it is considered that in order for it to be positively prepared, amendments to the wording are required. The policy should be clear in that it should first confirm that uses which are ancillary to the employment use are acceptable in safeguarded employment areas. It should then go on to set out the criteria for non-ancillary uses. Suggested wording is outlined in the next section.

Employment Allocations - Paragraphs 5.20 to 5.23The Government is committed to ensure that the planning system supports sustainable economic growth and productivity, and creates the conditions in which businesses can invest, expand and adapt (NPPF, paragraph 80). The Joint Core Strategy seeks to increase the self-sustainability of North Northamptonshire by providing additional jobs to
reduce the area’s reliance on out-commuting. Policy 23 identifies an overall job creation target of 8,100 new jobs between 2011 and 2031. The Sustainability Appraisal (December 2019), at paragraph 5.2.21, confirms that completions, sites with planning permission and strategic allocations identify sufficient land for employment to meet the requirements set out in Policy 23 for B-class jobs. However, a review of the employment market provision was undertaken by Aspinall Verdi (November 2018), concluding that there is a need to consider provision for smaller scale general industrial sites, alongside the strategic employment allocations.

Given the above, it is therefore considered the principle of allocating additional employment sites to complement the strategic employment sites identified in the Joint Core Strategy (i.e. including Kettering North), to provide choice and opportunity in the supply of employment sites, is a sound approach. By providing a mix of strategic allocations and smaller employment allocations in terms of their size, location and suitability for various employment uses, there will be a range of employment opportunities available over the Plan period to ensure the required level of jobs can be delivered.

Notwithstanding the support for this strategy, it is important to note that the Kettering North strategic allocation, adjacent to the existing North Kettering Business Park, is considered to be available and deliverable for development in the short term. Indeed, a planning application for the development of Phase 1 of the site is due to be submitted shortly and our client is committed to bring forward the remaining phases. The Part 2 Local Plan should therefore continue to make clear that the strategic allocations identified in the Joint Core Strategy (i.e. including Kettering Business Park), are important sites which will make a significant contribution towards job creation in the Borough.

Proposed Actions/Changes

Please explain what changes or actions are needed to make the Local Plan legally compliant.

To ensure that the Local Plan is sound in relation to employment matters, we suggest that the wording of draft Policies EMP1 and EMP3 is amended as follows (additions in **bold**):

Draft Policy EMP1 (Safeguarding Employment Land)

“The following employment areas, identified on the proposals map, will be safeguarded for B1 (Business), B2 (General Industry) and B8 (Storage or Distribution):

• North Kettering Business Park
• Telford Way Industrial Estate, Kettering
• Pytchley Lodge and Orion Way Industrial Estate, Kettering
• Kettering Parkway
• Northfield Avenue, Kettering
• Desborough Industry (including Magnetic Park)
• Latimer Business Park, Burton Latimer
• Station Road, Industrial Estate, Burton Latimer
• Eckland Lodge, Desborough

In accordance with Policy EMP3 (Non-Employment Uses (non-B use class) in Safeguarded Employment Areas), non-B class uses, which are ancillary to the employment uses, will be supported.

Within safeguarded employment sites the modernisation of buildings will also be supported.”

Draft Policy EMP3 (Non-Employment Uses (non-B use class) in Safeguarded Employment Areas)

“Within the Safeguarded Employment Areas as defined in Policy EMP1, proposals which include non-B class uses, which are ancillary to the employment uses, will be supported.

Proposals which include non-employment uses within the Safeguarded Employment Areas as defined in Policy EMP01, which are not ancillary to existing employment uses, will: a. Provide evidence to show the site has been marketed at a reasonable price and period, as well demonstrating that there is no realistic prospect of the proposal site being used for an employment use. b. Provide evidence to demonstrate that employment use on the site would no longer be viable. c. Be suitable in the location in which it is proposed and ensure that it does not impact current and future operations of adjoining businesses. Not undermine the existing employment uses and adversely affect the character of the area. Not result in an over-concentration of non-B class uses within a Safeguarded Employment Area. Not adversely affect the supply of employment opportunities within a Safeguarded Employment Area”

Attendance at the examinations hearings
If you are seeking to change the Plan, would you like to attend the examination hearings? Yes

If Yes, please outline the reason(s) why, below.

Our client is a major landowner in the Borough, with a vested interest in the success of Kettering Borough. Valuable contributions could therefore be made at the Examination in Public.

Notifications

Do you wish to be notified?

- When the Plan is submitted for independent examination?
- When the Inspector's Report is published?
- When the document is adopted?