Kettering Site Specific Part 2 Local Plan (SSP2)

Examination – Hearing Statement – Inspector’s Matters, Issues and Questions

**Matter 9 – Employment**

Week 2 - Day 2 – 14th October 2020

By: David Lock Associates (User ID No. 57)

On behalf of: Hanwood Park LLP
1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared by David Lock Associates (‘DLA’) on behalf of Hanwood Park LLP (‘HPL’), the promoter and principal developer of Hanwood Park, formerly known as the East Kettering Sustainable Urban Extension. As Paragraph 9.1 of the Site-Specific Part 2 Local Plan (‘the Plan’ or ‘SSP2’) states, ‘the majority’ of the growth over the plan period within Kettering Borough will be provided through the Hanwood Park development. The Hanwood Park development comprises up to 5,500 dwellings, schools, district and local centres, healthcare, employment, formal and informal open space including playing facilities, roads and associated infrastructure.

1.2 This Statement responds to the Inspector’s Matters, Issues and Questions relating to Matter 9 – Employment but does not respond on each and every question just those having a bearing upon Hanwood Park, its “Emerging Employment Land” and related matters.

1.3 This Statement should be considered and read in conjunction with previous representations made on behalf of Hanwood Park LLP, including Statements made in response to other Matters raised by the Inspector as part of the Examination of the Plan.
2.0 CONTEXT

2.1 Hanwood Park has an extant outline planning permission (KET/2015/0967) granted in 2018 for a large-scale urban extension, comprising 5,500 residential units, 119,300sqm of non-residential accommodation and 42,400 sqm of B1 employment space on 14 hectares of employment land. Within the approved development there is an allowance for the provision of one new district centre and three local centres. In total, the district centre has permission for up to 28,000sq m of non-residential floorspace, with up to 3,100sq m for the local centres. In addition to this the site allocates traditional employment space over three separate dedicated employment parcels.

2.2 In terms of non-residential floorspace, the district centre has permission for the following:
   • 2,100sq m of convenience goods (A1) floorspace
   • 3,000sq m of comparison goods (A1) floorspace
   • 250sq m of specialist A1 floorspace
   • 2,000sq m of Class A2 floorspace
   • 800sq m of Class A3/4/5 floorspace
   • 6,500sq m of Class D1 floorspace
   • 1,800sq m of Class D2 floorspace
   • 11,550sq m of Class B1 Floorspace

2.3 For the local centres, the non-residential floorspace is as follows:
   • 400sq m of convenience goods A1 floorspace
   • 700sq m of Class A3/4/5 floorspace
   • 1,400sqm of Class D1 floorspace
   • 600sqm of Class D2 floorspace

2.4 For the “traditional” employment parcels, these have permission for B1 use only with 50% of the entire employment offer anticipated to provide B1a office accommodation. 1 key parcel is proposed to provide approximately 24,000 sqm of floorspace, with the remaining floorspace split over the other two employment parcels.
2.5 Once the project is built out the retail centres, B1 employment, hotel and other non-residential accommodation is expected to provide a net increase of approximately 3,600 jobs across a wide range of activities/skills.

2.6 The original outline planning permission for Hanwood Park dates back to April 2010 (KET/2008/0274); this and the subsequent s73 permission (KET/2015/0967) required all reserved matters to be submitted before 1st April 2020; this has subsequently been extended to 1st May 2021 by the Business and Planning Act, 2020. The development is well underway with primary infrastructure in place, reserved matter approvals for 1,222 dwellings, pending reserved matter applications for a further 925 dwellings and well over 355 occupations.

2.7 HPL are preparing a new outline planning application and Environmental Impact Assessment for the remainder of Phase 1 and Phase 2 of the development, including the district centre in the “heart” of the development and local centres, including a Retail Assessment and commercial capacity advice from Avison Young. This new application is to be submitted in the Autumn 2020.
3.0 MATTERS, ISSUES & QUESTIONS

EMP1 - Safeguarding Employment Land

Question 1 - Is the approach to safeguarding employment land justified, effective and consistent with national policy and the JCS?

3.1 The adopted JCS sets out the job creation target for Kettering of 8,100 net job growth (in all sectors). The JCS allocates strategic employment sites (5+ hectares) and the Plan allocates additional smaller scale sites to meet employment requirements.

3.2 The National Planning Policy Framework (NPPF) advises that Development Plans should be deliverable and planning should avoid safeguarding employment sites that have no reasonable prospect of being used for that purpose (Paragraph 120).

3.3 Policy 22 of the JCS requires the safeguarding of existing and committed employment sites including those on SUEs unless it can be demonstrated that the loss or change of the employment use is required as there is not a realistic prospect of the use being realised and the proposed re-use would not have an adverse impact on the balance of uses on the site as a whole. This is consistent with the NPPF. The SSP2 Plan should identify only sites that are not safeguarded through this policy (e.g. site-specific).

3.4 Policy 23 of the JCS requires that Kettering provides 8,100 new jobs. Based on the Employment Background Paper prepared for the JCS, 65% (5,265) of employment will be in B class jobs with 35% (2,835) of jobs being created through the service industry. Sites such as Hanwood Park which are strategic sites with permission are currently contributing to this job creation according to the JCS and are safeguarded under the JCS Policy 22. The recent Employment Allocation Background Papers suggest that 2,997 jobs are anticipated through the delivery of Hanwood Park.

3.5 Policies EMP1, EMP2 & EMP3 as proposed appear to seek to protect only site-specific employment areas which are not generalised or protected through Policies 22 & 23 of the JCS. In addition the JCS focuses on the safeguarding of B use employment despite acknowledging that around 35%
of job creation would be through non B Uses. As such, the SSP2 Plan seeks to acknowledge the need to safeguard alternative uses which also contribute to a diverse economic and employment market, which is in the spirit of the NPPF and other documents (e.g. UK’s Industrial Strategy).

3.6 The Employment Land Review indicates that B1 office space is generally not viable unless cross subsidised by higher value uses. SUEs are regarded as being sufficient to fulfil the borough’s office needs having regard to this cross subsidisation and SUEs such as Hanwood Park’s contribution to employment floorspace and job creation, This is secured through Policy 22 of the JCS.

3.7 It is acknowledged in the Employment Allocations Paper (August 2019) that there is an oversupply of B1 use employment land in North Northamptonshire and having regard to the challenges and competitiveness of the office market, it would be unrealistic to safeguard Hanwood Park’s employment prospects, based on their current permitted use which is primarily restricted to B1 use with a higher proportion at B1a office space, as it would be difficult to proof viability and deliverability for just these uses in a oversubscribed market. As such, it is considered that the consideration of the land and sites for specific safeguarding is consistent with the NPPF and JCS. Therefore, the policy in the SSP2 should only seek to safeguard sites which are required to support the job growth over the plan period and have a realistic prospect of being delivered.

**EMP4 Live Work Units**

**Question - 8 Is the approach to live work units justified, effective and consistent with national policy and the JCS? How will they be ‘encouraged’?**

3.14 HPL have concerns about the justification for this policy and are not clear how the policy will be implemented. There is no specific employment or housing policy in the JCS which refers to the need to justify each development to provide work/live units. The JCS housing mix policy seeks to encourage homes that can be adapted to cater for lifestyle changes but with an emphasis on changing family/lifestyle needs based on aging populations, rather than an emphasis in providing live/work units. Whilst it
is acknowledged that the Covid-19 pandemic has given rise to changes in the way that people work and live and that more homes should have the flexible study/work space for technological and other changes in work patterns, there is no evidence base within the JCS or in the supporting SSP2 documents, which support this proposed policy.

3.15 It is not considered that “encouraged“ is a suitable word for a policy which is required to be complied with. Given the growing demands for different adaptable homes to meet changing demands and needs of future generations, it is considered that a standalone policy for live/work accommodation is not justifiable or evidenced as meeting a quantifiable need. This would be better suited to a housing mix policy as a further option of types of suitable accommodation (as found in the JCS).

3.16 HPL are considered that the introduction of a varied commercial or residential proposal not previously envisaged could be detrimental to the overall SUE and the approved Strategic Master Plan. It is considered this could have implications for the viability and land use budget of the overall development, which could be detrimental to s106 obligation roof tariffs impacting upon infrastructure and other matters.

3.17 In addition, the policy also makes reference to restricting the uses to A2 and B1 uses. These uses have now been superseded/encapsulated by Class E under the amended Use Class Order as of the 1st September 2020. Class E (commercial, business and service) is a new class that subsumes the existing Class A1 (Shops), Class A2 (Financial and professional services), Class A3 (Restaurants and cafes), and Class B1 (Business) use classes. As such it is difficult to see how this policy would seek to reconcile the matter that all uses within Class E could be considered acceptable for live/work units not just those previously listed and included in this policy.

3.18 For the reasons set out above, the proposed policy is not sound, reasoned of fully evidenced, nor in accordance with national planning policy and the Development Plan. Therefore the policy should be deleted from the emerging Plan.
4.0 CONCLUSION

4.1 Overall, HPL has concerns about the soundness of some of the elements of Chapter 9 – Employment for the reasons set out in this Statement. Hanwood Park LLP consider this Chapter could be made sound subject to modifications as set out in this Statement.

4.2 Hanwood Park is listed as being one of the SUEs which contributes towards job creation to support housing growth over the plan period, which reflects the existing outline planning permission, large number of approvals and the emerging sustainable urban extension, which is identified as a committed SUE in the adopted JCS.

4.3 Unfortunately, parts of this Chapter and the supporting evidence base have not paid proper regard to market conditions, the NPPF and JCS nor properly engaged with HPL to check the deliverability and viability of the proposed policies and proposals. The lack of flexibility within the Plan may have a detrimental impact upon the SUE, which would be undesirable for many reasons (e.g. roof tariff, infrastructure, etc.).