Dear Mr Kemp

HEARING STATEMENT – MATTER 9 ‘EMPLOYMENT’

KETTERING PART 2 PLAN EXAMINATION

Harris Lamb Planning Consultancy has been instructed by Robert Dixon Limited to submit this Statement in relation to Matter 9. This should be read in conjunction with the representations that Harris Lamb submitted on behalf of Robert Dixon Limited to the pre-submission consultation undertaken by the Council (User ID. 78; Comment ID 198).

Robert Dixon Limited maintains that its site on Pytchley Lodge Road should be released for residential development due to the allocation of the adjoining site – McAlpine’s Yard (KE/184a) – for a predominately residential development and the impact this will have on the commercial demand for Robert Dixon’s site going forward.

We do not intend to rehearse the case for the release of this site for residential development again here; however, if the Inspector decides to support the Council in their position that this site should continue to be safeguarded, then the provisions of Policy EMP3 need to be changed to reflect the less restrictive provisions of the National Planning Policy Framework.

5. Is the approach to non-employment uses in safeguarded employment areas justified, effective and consistent with national policy and the JCS?

6. Are MM2 and MM3 justified and required in terms of soundness? How will ‘support’ be given to ancillary proposals?

7. With regard to criterion a, how will a ‘reasonable price’ be determined and is a period of 12 months proposed in MM3 justified and appropriate? How can it be demonstrated that there is no reasonable prospect of the site being viably used for employment? What is an ‘over concentration’ referred to in criterion d? How will this be measured? Do all the criteria apply? Is an
‘and’ required after criterion e?

The requirement for 12 months marketing is not justified. 6 months would be more than enough to demonstrate whether market demand exists for a site.

The requirement should not be for both marketing and viability to be demonstrated. This should be either / or requirement. If there is no market demand, then an assessment to says it is viable in principle should not stop the release of the site. Similarly, if a site is proven not to be viable, what is the purpose of an extended marketing period.

Criteria d) and e) should be removed from EMP3 as they serve no purpose and there only potential effect is to artificially keep sites in employment use when there is no prospect of them being occupied for this purpose. For example, if it has been demonstrated that there is no market interest in a site or it is unviable for employment use, what is the point in protecting that site to artificially boost supply figures on paper? Similarly, why artificially protect a site for employment use when its neighbours are in non-employment use when that site has no demand and/or is unviable. Both of these provisions are contrary to the NPPF which makes it clear that sites should not be rigorously protected when that site no longer serves its purpose.

Yours sincerely

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