KETTERING SITE SPECIFIC PART 2 LOCAL PLAN EXAMINATION
INSPECTOR’S MATTERS ISSUES AND QUESTIONS – MATTER 9
WRITTEN STATEMENT BY WILLIAMS GALLAGHER ON BEHALF OF P R KETTERING LTD
(C/O ELLANDI LLP)

1. This Written Statement has been prepared by Williams Gallagher Town Planning Solutions Ltd (t/a Williams Gallagher) on behalf of our client, P R Kettering Ltd (c/o Ellandi LLP) (‘Ellandi’), owners of the Newlands Shopping Centre in Kettering Town Centre, in connection with the Kettering Site Specific Part 2 Local Plan Examination.

2. It responds to Matter 9 (Employment) as defined by the Inspector’s Schedule of Matters, Issues and Questions (‘MIQs’) dated July 2020. [Please also refer to our Written Statements in connection with Matters 1 and 10].

3. It is submitted further to representations submitted on Ellandi’s behalf in connection with the Kettering Site Specific Part 2 Local Plan (‘SSP2’ / ‘the Plan’) Publication Plan (February 2020).

INSPECTORS MIQs

4. In regard to Matter 9, we note that the Inspector has raised the following issue:

5. “Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards the building a strong, competitive economy”.

6. A series of Questions are subsequently posed by the Inspector (11 no. in total). The Questions of particular relevance to our client (and our subsequent responses) are set out below.

 Policy EMP3 Non Employment Uses (Non B Class Use) in Safeguarded Employment Areas

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

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

7. We welcome and consider sound the Council’s stated intention to make an amendment to Para 5.19 which clarifies that proposals which seek to deliver non-B class employment uses within Safeguarded Employment Areas will be supported where they comply with Policy EMP3 and other policies in the Development Plan (i.e. TCE5 and TCE6) (MM2).

8. Nevertheless, it is of concern that the Council has not sought clarify this through an
amendment to the Policy itself (MM3). Allied to this, it is also unclear precisely what the Council would consider to constitute ‘ancillary non-B Class development’ and indeed whether such ancillary development would need to be subject to other policies in the Development Plan (i.e. TCE5 and TCE6) (or indeed whether these policies would only apply where it relates to non-ancillary development).

9. We thus conclude that Policy EM3 (as proposed to be amended by MM3) remains ambiguous and could result in unintended consequences (particularly in terms of impacts on the vitality and viability of the Borough’s network of allocated centres).

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’?

10. Referring to our comments made in respect of Matter 1, the Council should make sure that any amendments this Policy to account for the amendments to the Use Classes Order effective 1 September do not result in certain E Class uses being permitted by this Policy which could then be converted to other E Class uses which could ultimately prove harmful to the vitality and viability of the Borough’s network of allocated centres.

Heather Arnell
Williams Gallagher
On behalf of P R Kettering Ltd (c/o Ellandi LLP)
9 September 2020