Kettering Site Specific Part 2 Local Plan (SSP2) (2011-2031) Examination

Matter 9 – Employment

Matter Statement by Kettering Borough Council

September 2020
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1. Introduction

1.1. This statement sets out the Council’s response to Matter 9: Employment, questions 1 - 11, in respect of the following issues:

- 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.

*The 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.*

1.2. The statement also addresses any representations which the Council considers are of particular significance or concern, where this is the case the relevant respondent number and comment id are provided.

1.3. All documents referred to in this statement are listed in Appendix 1, submission document numbers are provided throughout where applicable.

2. Matter 9 – Question 1: Is the approach to safeguarding employment land justified, effective and consistent with national policy and the JCS?

2.1. Policy 22 (criterion b) of the JCS seeks to prioritise the enhancement of existing employment sites and the regeneration of previously developed land. Criterion c) of this policy states that ‘safeguarding existing and committed employment sites for employment use unless it can be demonstrated by an applicant that there is no reasonable prospect of the site being used for that purpose and that an alternative use would: Not be detrimental to the mix of uses within a Sustainable Urban Extension and/or resolve existing conflicts between land uses’.

2.2. The Inspector’s Report of the JCS considered Policy 22 to be consistent with national policies and was considered sound, subject to MM18 being made to this policy. This change was subsequently reflected in the adopted JCS document.

2.3. As summarised in paragraph 6.1 of EMP2, paragraph 120 of the NPPF implies that ‘the sites should only be identified for employment if they can reasonably be expected to be in demand and viable’. Therefore, this was considered in Section 8 and Appendix 2 of EMP2, which assessed existing employment sites, considering whether keeping sites in employment use is viable and whether there is ‘scope for future development or can they be released for alternative uses’ (paragraph 6.4). The Council therefore considers the approach taken in relation to the assessment of potential safeguarded employment sites to be in accordance with the NPPF.

2.4. The demand based assessment of existing employment sites in the Borough in EMP2, sought to categorise these into 3 categories to inform policies in the
Plan (EMP1 and EMP2) which would identify sites to safeguard. These 3 categories are shown below, further detail on these categories can be found on page 46 of EMP2.

- Safeguard
- Safeguard in the short term
- Allow managed released

2.5. The Council considers that this approach to existing employment sites is based on robust evidence and reflects the most up-to-date available evidence of the employment market in the context of existing employment areas in the Borough. Therefore, the identification of sites within Policy EMP1 of PKB1 to safeguard these sites is considered to be justified and effective.

3. **Matter 9 – Question 2: Is Policy EMP1 in accordance with JCS Policy 22 which seeks to safeguard employment sites, unless a number of circumstances apply?**

3.1. Given that the JCS already provides criteria for safeguarding existing employment areas, the Council considers that Policy 22 of the JCS allows the Part 2 Local Plan to ‘identify those industrial and commercial sites that should be designated as protected employment areas’ as set out in paragraph 10.4 of the Employment Allocations Background Paper (EMP1). The criteria set out in Policy 22 would be applied to proposals for the sites identified in EMP1.

3.2. EMP1 is therefore considered to be in accordance with JCS Policy 22.

4. **Matter 9 – Question 3: Is proposed MM1 justified and necessary in terms of soundness? What does it seek to achieve?**

4.1. MM1 in EXAM2D sought to respond to representations received from Weetabix and Buccleuch Property (comment id’s 154 and 194) provided on the Publication Plan (PKB1) in relation to Policy EMP1.

4.2. Firstly, in relation to the representation received from Armstrong Rigg Planning on behalf of Weetabix (comment ID 154), the Council considered there is a need to make a main modification to the plan to respond to the issues raised in this representation. The representation focused on the omission of an area of land to the north of the existing Weetabix site, which is identified as Station Road Industrial Estate, Burton Latimer in EMP1, from the proposed employment area within Policy EMP1 (Safeguarding Employment Land). This area of land has been identified by Weetabix as an area for future expansion. The representation also sought for this area to be included within the settlement boundary, this is discussed in section 9 of Matter Statement 2.

4.3. The Council has engaged in discussion with the agent representing Weetabix in relating to the representation. A Statement of Common Ground (SoCG) is being prepared with Armstrong Rigg Planning on behalf of Weetabix. This SOCG will set out the areas of agreement and areas of disagreement between
the parties. The SoCG will be added to the Examination webpage before the hearing sessions commence.

4.4. The Council considers that MM1 is necessary to provide a positive approach to proposals for the redevelopment or expansion of existing employment areas within the Borough, whilst ensuring that the degree of conflict with policies for the open countryside is taken into account. This approach is consistent with JCS Policy 22 b) which prioritises the enhancement of existing employment sites and paragraph 80 of the NPPF which requires planning policies to help create conditions in which businesses can invest, expand and adapt.

4.5. With regards to representations received from DLP Planning Ltd on behalf of Buccleuch Property, (comment ID 194), the Council considers that the additional wording proposed through this representation provides clarity through the cross-referencing between policies EMP1 and EMP3. This is in relation to ancillary, non-B class uses, and provides consistency, given that Policy EMP3 includes a reference to Policy EMP1.

4.6. The Council considers MM1 to be justified and necessary to ensure the plan is sound, it ensures that there is a clear approach to providing the opportunity for businesses within existing employment areas to expand, in accordance with paragraph 80 of the NPPF, providing benefit to the economy, adapting and growing to meet the needs for employment in Kettering Borough in the plan period as set in criterion b) of paragraph 81 of the NPPF.

5. Matter 9 – Question 4: Is the approach to local employment areas justified, effective and consistent with national policy and the JCS? Is Policy EMP2 accordance with JCS Policy 22? What does it seek to achieve over and above EMP1 in local areas?

5.1. Policy EMP2 (Local Employment Areas) of PKB1 recognises that there are existing employment sites in the Borough which as a result of changes in the employment market could become vacant. This became evident through the assessment of these sites in Section 8 and Appendix 2 of the Employment Land Review (EMP2), where it became apparent that there is potential for these sites to be difficult to re-occupy if they became vacant because they are ‘single occupier, with bespoke buildings, or are small in nature with multiple occupiers’.

5.2. EMP2 recognises that at the time of the assessment these sites were ‘functioning well in the short term’ and Aspinall Verdi considered it reasonable to ‘safeguard these sites and not promote them for managed release’ (page 46).

5.3. This is translated into Policy EMP2, where recognition is given to the likelihood that certain sites, identified in the Employment Land Review (EMP2) and Policy EMP2 of PKB1 may become unviable and therefore ‘proposals for alternative, non B-class uses will not be resisted’. The purpose of this to provide a flexible approach to safeguarding employment land and to ‘avoid unnecessarily
safeguarding employment sites that have no hope of being re occupied’ as emphasised on page 46 of EMP2.

5.4. The difference between Policy EMP1 (Safeguarding Employment Land) and Policy EMP2 (Local Employment Areas) is primarily based on certainty in the market. The Employment Land Review found that there was greater certainty that those sites recommended to be safeguarded in Policy EMP1 were in demand and viable and they ‘should be in enough demand from occupiers to viably keep in employment use over the plan period’, as shown on page 46 of EMP2.

5.5. Policy EMP2 reflects the conclusions of a robust and up to date assessment of existing employment sites in the Borough and has been given flexibility to respond to changing market conditions. Therefore, it is considered to be justified and effective and in accordance with the NPPF as well as JCS Policy 22, where the policy provides a mechanism for sites which will not be safeguarded where there is ‘no reasonable prospect of the site being used for that purpose’.

6. Matter 9 – Question 5: Is the approach to non-employment uses in safeguarded employment areas justified, effective and consistent with national policy and the JCS?

6.1. This policy was first considered in response to comments received through the Draft Plan Consultation (PKB4). The representation (comment ID 441) suggested amendments to Policy EMP1 of PKB4 to reflect changes in working practices and economic circumstances, as set out in paragraph 81 d) of the NPPF, in relation to non-employment uses on safeguarded employment sites, such as those identified in Policy EMP1.

6.2. This representation also suggested that criteria be added to Policy EMP1 whereby proposals for non-employment uses within safeguarded employment areas would have to meet these to be considered acceptable in planning policy terms. Where this would be primarily based on ‘marketing evidence, viability, suitability of the land/building in question and assessment on supply of employment land across the Borough’ as stated in representation 441 to the Draft Plan Consultation (PKB4).

6.3. The Council’s response clearly set out that further work would be undertaken to look at the merits of included wording in Policy EMP1, to address the concerns presented through consultation on the Draft Plan (PKB4) in the context of Policy 22 of the JCS. Responses to comments on this chapter of PKB4 were reported and subsequently agreed by Members of the Planning Policy Committee on 28th November 2018.

6.4. Further consideration was given to the approach to non-employment uses on safeguarded employment sites and it was concluded that the inclusion of a separate policy to clearly set the Council’s approach to this matter would be
included in the next version of the Plan, the Publication Plan (PKB1). This is Policy EMP3.

6.5. The Council considers this policy to be in accordance with paragraph 81 d) of the NPPF, given that it allows ‘for new and flexible working practices’, and allows a response to ‘changes in economic circumstances’ which reflects up to date evidence of working practices by a current occupier within a safeguarded employment area. In the context of Policy 22 of the JCS, Policy EMP3 follows the same principles of the JCS policy whilst providing additional clarity and criteria whereby proposals for non-employment uses can be considered on safeguarded employment sites.

6.6. Therefore, the Council considers Policy EMP3 to be justified, effective and consistent with national policy and the JCS.

7. **Matter 9 – Question 6: Are MM2 and MM3 justified and required in terms of soundness? How will ‘support’ be given to ancillary proposals?**

7.1. MM2 seeks to respond to a representation received from P R Kettering Ltd c/o Ellandi LLP, comment ID 156, which sought to ensure consistency between Policy EMP3 and other policies in PKB1, regarding references to other policies in the development plan.

7.2. The Council considers the additional text provides greater clarity on the relationship between policies EMP1 and EMP3 of PKB1 and that these policies should not be considered in isolation, where other relevant policies in both the JCS and the SSP2 still apply. This provides clear guidance on how Policy EMP3 will be applied and provides consistency with regards to policy wording for all policies in PKB1.

7.3. MM3 of EXAM2D, seeks to respond to representations received from Eskmuir Securities, comment Id 13, which raised concerns relating to the criteria of Policy EMP3 and Buccleuch Property, comment Id 194, which sought clarity on the relationship and sought cross-reference between Policy EMP3 and Policy EMP1.

7.4. The amendments to Policy EMP3 seek to provide clarity and detail to the criteria contained with the policy as well as the supporting text on page 37 of PKB1.

7.5. Support will be given to ancillary proposals through Policy EMP3 in the areas safeguarded employment areas in Policy EMP1 through the granting of planning permission where proposals for these uses are in accordance with other policies in the development plan.

7.6. The proposed modification to criterion a) of Policy EMP3 clarifies the period of marketing that would be required to demonstrate that an employment would not be viable and by merging criteria a) and b) prevents confusion and improves clarity on how this criteria need to be applied to proposals. The Council considers this amendment to be in accordance with paragraph 117 of the
NPPF, given that it reflects an ‘effective use of land’ preventing land remaining vacant and instead providing a mechanism, based on a number of considerations, set through the criteria in Policy EMP3 to allow non-B class uses on safeguarded employment sites identified in Policy EMP1. In relation to Policy 22 of the JCS, the Council considers that this amendment, and the policy as a whole is in accordance with the approach taken to safeguarding employment land, as set out in criterion c) of this policy.

7.7. The Council considers the amendments to Policy EMP3 proposed through MM2 and MM3 to be justified and necessary to ensure the plan is sound, the Council considers that they are in accordance with paragraph 117 of the NPPF and Policy 22 of the JCS.

8. Matter 9 – Question 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?

8.1. The reference to ‘reasonable price’ referenced in criterion a) of Policy EMP3 will need to be demonstrated and justified through the marketing evidence required for relevant proposals by criterion a) of Policy EMP3. The evidence will need to be considered through the planning application process and an assessment made as to whether there is sufficient evidence and justification for the price that the site was marketed for over the 12 month period. This approach will ensure that what the ‘reasonable price’ is considered to be is reflective of the market situation at the time the proposal is considered.

8.2. The Council considered that providing a specific time period in relation to criterion a) provides greater clarity when applying this policy as proposed in MM3. The representation received from Eskmuir Securities, comment ID 13, suggested six months would be an appropriate time period and has been used in the Basingstoke Local Plan and the Swindon Local Plan. However, the Council considers that twelve months is necessary to take into account changes in the market which take place throughout the year. This will ensure that the Council has greater certainty that the site in question was not needed for an employment related uses and that a non-B class use would be a suitable alternative use, rather than leaving the site to remain vacant.

8.3. The requirement to demonstrate that there is no reasonable prospect of the site being viably used for employment will be demonstrated through a site-specific viability assessment submitted through the planning application process. This assessment would need to demonstrate that an employment use would no longer be viable, whilst showing that an alternate non-B class use would be viable on the site in question. This approach would be used through the application of EMP3 to ensure consistency and compliance with Policy 22 of the JCS.
8.4. The term ‘over-concentration’ referenced in criterion d) in MM3 of EXAM2D is best defined through the related monitoring indicator set out in Chapter 15 (page 160) of PKB1 (Table 15.1). This will allow for a measurement based on the number of proposals that come forward for non-B class uses in these areas. If a significant amount of applications seeks to come forward in safeguarded employment areas for non-B class uses, this will be recorded and reported through the AMR and will be used to inform decisions on non-B class applications in these areas. A judgement will be made as to whether a proposal would result in an over-concentration based on this evidence.

8.5. MM3 responds to the representation from Eskmuir Securities, comment ID 13, which sought clarity on whether all criteria had to be met for the proposals to be in compliance with Policy EMP3. Punctuation and the word ‘and’ added as part of the penultimate criteria (d) have clarified that all criteria must be met when applying criterion a) of this policy.

9. Matter 9 – Question 8: Is the approach to live work units justified, effective and consistent with national policy and the JCS? How will they be ‘encouraged’?

9.1. Paragraph 81d) of the NPPF requires planning policies to ‘be flexible enough….to allow for new and flexible working practices (such as live-work accommodation)’. Policy EMP4 allows for proposals that reflect these changing work arrangements set out in national policy to come forward, with a clear support for live-work units, as explicitly referenced in the NPPF. The Sustainability Appraisal (SA1) also recognises the benefits of live work units in paragraphs 11.3.15, 11.4.16, 11.4.17 and 11.5.13, particularly the reduction of vehicle traffic and greenhouse gas emissions, resulting in an improvement, although minor to air quality.

9.2. Policy 25 of the JCS also provides support for live/work units as part of rural diversification schemes.

9.3. Policy EMP4 was included in the previous version of the SSP2, the Draft Plan (PKB4). Through consultation on this document support was given to this policy through comment ID 162 and subsequently supported through the same representor through consultation on the Publication Plan (comment ID 157).

9.4. The Council considers the approach to live work units is justified, effective and consistent with national policy and the JCS, as demonstrated above. Policy EMP4 provides the opportunity for proposals which seek to explore new working practices, with criteria used to ensure that these proposals are in suitable locations and premises and not having a detrimental impact on residential amenity as set out in paragraph 5.24 of PKB1. The Council considers the inclusion of Policy EMP4 shows clear support for this type of proposal is sufficient to encourage proposals for live work units to come forward throughout the plan period.
10. **Matter 9 – Question 9: Are the other criteria effective and logically set out and do they all apply? Are some of the criteria covered by other more general development management policies in the JCS or elsewhere in the Plan? Can ‘inappropriate’ local air quality be defined in criterion e? In terms of criterion h, where are the primary, secondary and core shopping areas of the town and local centres defined and set out?**

10.1. The Council considers the criteria to be effective given that they clearly consider a variety of factors when determining the suitability of proposals, providing clarity on where such proposals need to be located and ensuring they remain ancillary with not being negatively impacted by, or detrimentally impacting on, the sites immediate context.

10.2. It can also be confirmed by the Council that criteria a-c in Policy EMP4 must be applied to relevant proposals. Whilst criteria d-g and h-k will only need to be applied where considered necessary based on the location of the proposal. The Council would support a modification to the policy to ensure this clear if the Inspector considers this is necessary.

10.3. The way in which the Policy is ordered is considered logical because the criteria are clearly separated into general criteria (a-c) with more specific criteria related to locations which would not be appropriate (d-g) and locations where live work units would be supported (h-k). This approach is clear and will be effective in ensuring these units are in suitable locations, minimising the impact caused and experienced by new working practices and function as envisaged by the Council.

10.4. It is considered that the criteria in this policy provide specific guidance in relation to live-work units and while these cover areas which are addressed in more general policies, such as Policy 8 of the JCS, the criteria provide further clarity and detail compared to more general policies and are specific to live-work units.

10.5. The Council does not consider criterion e) of Policy EMP4 could define ‘inappropriate air quality’, this will be judged through the planning application process dependent on the location of the proposal, and based on the most up to date guidance at the time of the application.

10.6. The Council recognises that Policy EMP4 does not set out where the areas referenced in criterion h) are defined in PKB1. The Council would support a modification to the policy to set out that these are defined on the policies maps contained in the SSP2. The Council will update the Schedule of Proposed Changes to the Publication Plan and will add this to the Examination webpage before the hearing sessions commence.

10.7. It should be noted that those areas referenced as ‘town centres’ do not include Kettering town centre, because this is covered by Kettering Town Centre Area Action Plan (AAP1). Therefore, this is only intended to apply to the Market Towns (Rothwell, Desborough and Burton Latimer). Local centres are
considered to those areas included in Policy TCE7 (Protection of Local Centres) of PKB1.

11. Matter 9 – Question 10: Are the employment land allocations set out in the Plan (below) justified by appropriate available evidence, having regard to national policy and local context, including meeting the requirements of the JCS?

11.1. Paragraph 80 of the NPPF states that ‘Planning policies and decisions should help create the conditions in which businesses can invest expand and adapt’ and that ‘Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development’.

11.2. In addition, paragraph 81(a) sets out that ‘Planning policies...should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration’. Further to this, there is a need for planning policies to ‘set criteria or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period’.

DES6 – Land adjacent to Magnetic Park, Desborough

11.3. The Employment Allocations Background Paper (EMP1) sets out the approach taken with regards to ‘Land adjacent to Magnetic Park, Desborough’ and justifies its inclusion in the Publication Plan (PKB1), following a site assessment undertaken by the Council on the site. Paragraphs 13.8 to 13.12 provide a summary of the assessment for this site and provide a justification for the inclusion of the site in the Plan, as set in the response to the Initial Question 5 (EXAM2). Here, clarity was sought on the approach taken to include this site, given its size, above 5ha, which is above the strategic site threshold.

11.4. In response to Question 5, of EXAM2, the Council sought to justify the inclusion of the site by stating that the ‘purpose of the allocation is to meet local needs for employment provision and to provide choice and opportunity’. The Sustainability Appraisal (SA1) paragraph 11.3.95, also states that this allocation will ‘support additional employment opportunities locally’ and ‘enables existing residents and those from the new developments to access jobs locally thus reducing the need for long distance commuting’.

11.5. This was also raised by the North Northamptonshire Joint Planning and Delivery Unit through representation made during the Publication Plan consultation (comment ID 102). Through their representation they were satisfied that the ‘the identification of employment land at the Market Town of Desborough is consistent with the spatial strategy set out in the JCS’ and ‘although greater than 5ha, is unlikely to result in significant impacts beyond Kettering Borough’. Therefore, in principle the inclusion of this site within the Plan (PKB1) is ‘suitable’ for inclusion as an employment allocation.
11.6. In paragraph 13.9 of EMP1, the Council concluded that because of a ‘lack of supply in the wider area for this type of use and therefore this site is likely to be attractive to occupiers’. Further detail on this can be found in the Employment Land Review (EMP2), both in Appendix 1 ‘Proposed/identified site assessments’ and paragraph 7.3 on page 49 of the same document. The former, as part of the site assessment for the site, found that with factors considered in relation to the local context of the site, such as the compatibility of surrounding uses, gradient, access to the road network, alongside market factors, the site was suitable to put forward as allocation.

11.7. With these market factors taken into account, the Employment Land Review (EMP2), found that ‘the site would be very attractive to developers as there is a proven market in the area’ and ‘due to the severe under supply it would still prove attractive to B2 and B8 occupiers alike’.

11.8. Specifically relating to the proposed use for this site, paragraph 4.36 of EMP2 states that ‘the site would likely be most attractive to general industrial occupiers’ and is further emphasised in 4.44 to 4.53 of EMP2 which found a demand for small and medium size industrial units. This is referenced in the Council’s response to the Initial Question 5 (EXAM2).

11.9. Also, in response to Question 5 of EXAM2, the Council made it clear that are ‘no strategic employment sites identified in the JCS in Desborough, therefore without this allocation there would be no opportunity for employment growth in the town’.

11.10. As a Market Town, Desborough should, as set out in Policy 11 of the JCS, provide a strong service role to provide ‘a strong service role for their local communities and surrounding rural areas with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town’. Therefore, to conclude on this site, the council considers the ‘Land adjacent to Magnetic Park’ as designated through Policy DES6 of the Publication Plan document (PKB1) is in accordance with Policy 11 of the JCS.

KET9 – McAlpine’s Yard

11.11. The Employment Allocation Background Paper (EMP1) provides background information on the site, setting out that the site was initially put forward at Planning Policy Committee on 1st November 2016 for a mixed residential and employment uses.

11.12. The housing element of the proposed allocation was assessed using the housing site assessment, and it was agreed that additional work was required in the Employment Land Review to assess the loss of this employment site (EMP2).
11.13. Specifically, in relation to the employment element of this site, EMP2 found that B1c and B2 uses would be the most suitable uses on this site (13.3) and is likely to be attractive to the market (13.5). This is notwithstanding the constraints identified through the Council’s assessment of the site, primarily relating to highways and flooding related issues. Further detail on this will be provided below.

11.14. Through the assessment of the site in the Employment Land Review (EMP2), it was found that given the location of the site, within ‘a proven employment area, it ‘benefits from existing services and infrastructure, any new industrial development on the site would be attractive to both occupiers and developers’.

In addition, in relation to the existing Pytchley Lodge and Orion Way Industrial Estate, it was found that this employment area is ‘well occupied and in good enough condition to viably kept in employment use’. Appendix 1 of EMP2, in relation to this site, suggests ‘a severe undersupply of small industrial unit’ and ‘there would be occupier interest’.

11.15. The Council’s current position on this site has been provided in response to Question 30 of EXAM2. The outstanding issue is regarding the risk of reservoir breach flooding, which was raised initially through the Level 1 Strategic Flood Risk Assessment (ENV14) and was further raised by the Environment Agency through consultation on the Publication Plan (comment ID. 241). At present, as set out in the Council’s response to Question 30 of EXAM2, this issue has yet to be addressed by the site promoter.

GED5 – Geddington South West

11.16. As above, the Employment Allocations Background Paper (EMP1), sets out the justification for the site’s inclusion as an employment allocation in the Publication Plan (PKB1), following a market based assessment in EMP2 and a planning focused assessment in EMP1.

11.17. As set out in paragraph 7.4 of EMP2, it evident that the site ‘would likely attract occupiers similar to the Grange Road Estate’ which the site is located adjacent to, which is occupied by a number of B1c units. Paragraph 8.13 of EMP2 also reports that ‘there is an acute demand in the local market for these small format units’, further emphasised in Appendix 1 of EMP2, which states that the Grange Road Estate ‘is popular with occupiers and has very little vacancy’.

11.18. The allocation of these sites, is considered to be in accordance with the NPPF (paragraph 80), supporting economic growth in the Borough and responding to local business needs and providing wider opportunities for development. Whilst recognising that the JCS identifies strategic sites, those sites identified in the Plan (PKB1) can meet the needs over the plan period (paragraph 80) and assisting the Borough and North Northamptonshire in meeting the job targets set in Table 3 in Policy 23 of the JCS.

11.19. The Employment Land Review provides local evidence to support the allocation of these sites, by demonstrating the demand in different sectors and locations,
whilst considering national and strategic policies. Therefore, the Council considers that these allocations are justified by appropriate available evidence, having regard to national policy and local context, including meeting the requirements of the JCS.

11.20. Section 8 of the Sustainability Appraisal (SA1) clearly sets out the methodology as to how these sites where considered, specifically in paragraph 8.2.12, which outlined that following the Options consultation in 2012, sites that were ‘identified as reasonable employment options were subject to more detailed assessment’. These are the sites which been considered through the Employment Allocations Background Paper (EMP1) and the Employment Land Review (EMP2).

11.21. The SA (SA1) considered the context for employment growth and distribution, paragraphs 5.2.19 to 5.2.21 identify one reasonable alternative which is the approach taken in the SSP2, paragraphs 5.3.10 to 5.3.16 consider two unreasonable alternatives, these were to propose additional employment allocations or to not allocate any employment land.

12. Matter 9 – Question 11: Do they show how they will contribute to the achievement of the employment requirement in the JCS and its timescale for delivery?

12.1. Policy 23 of the JCS requires Kettering Borough to deliver 8,100 jobs in the plan period, 2011-2031. Table 11 of the Joint Core Strategy Employment Background Paper (EMP4) sets a target of 65% of these jobs to be provided within B class uses, resulting in a figure of 5,265 jobs for Kettering Borough.

12.2. As a result, the Employment Allocations Background Paper (EMP1) undertook an analysis of job provision, calculated using floorspace. Using 2018 as a base date, information on previous completions for sites in the B-class use class since 2011 was collated.

12.3. The findings of this analysis initially showed that using both measures to convert floorspace to job numbers, by use class, the ‘Technical Note for partner Local Planning Authorities on translating job numbers into employment land requirements (TN)’ and the ‘Employment Density Matrix’ resulted in an under-provision of B-class jobs between 2011 and 2018. This was based on a yearly target of approximately 265 jobs to achieve the 5,265 target over the plan period. This is shown in Figure 7 of EMP1.

12.4. Further analysis, was then undertaken to seek to project the job provision between 2018 and the end of the plan period, using existing commitments and strategic sites. The conclusions of this analysis showed there was evident over supply when the projected jobs numbers for these sites was calculated, as shown in Figure 10 of EMP1. This over supply was further added to when those sites already completed between 2011 and 2018 were included (Figure 12), which estimated a total of between 13,191 and 20,963 B-class jobs to be created within the plan period.
12.5. Despite an evident oversupply of jobs, employment allocations in the Plan (PKB1) were considered necessary ‘to provide the appropriate level of additional supply to the employment market, offering different types of employment in varying locations throughout Kettering borough’ (paragraph 13.1 – EMP1).

12.6. Therefore, to determine the most suitable sites to meet this need, the Employment Land Review sought to assess a number of sites that the Council identified, with regards their attractiveness to the market. Whilst the Council undertook its own site assessment, to provide a well-rounded, holistic approach to identify the benefits and constraints associated with these sites.

12.7. As a result, the Council has included three sites as employment allocations, including one mixed-use allocation. When adopting the same approach to converting floorspace to job numbers, based on the type of B-class use, the three proposed allocations are estimated to provide between 844 and 1337 jobs in the plan period, in addition to those already considered. When added to together the job provision in the plan period, including the three allocations, is between 14,036 and 22,300 jobs.

12.8. It is evident that this is significantly in excess of the JCS target of 5265 B-class jobs, even without the inclusion of any employment allocations in PKB1. Therefore, although the requirements of Policy 23 of the JCS, could have been met without the need for employment allocations in the PKB1, the Council considers the approach taken on this matter is proactive and provides greater choice for employment opportunities and growth within the Borough. This is especially with regards to the clear demand for small and medium industrial units across the Borough as set out in paragraph 4.44 of EMP2.

12.9. In terms of timescales of these sites, the Employment Land Review (EMP2), through its assessments of the sites, considered the estimated time of delivery obtained through a review of the site’s suitability and achievability.

12.10. All three sites allocated in PKB1, following their assessment in EMP2 were considered to be deliverable, given their attractiveness to the market because of an evident demand for both the different uses and in the locations where the allocations are located.

12.11. Firstly, with regards to ‘Land adjacent to Magnetic Park’ (DES6), EMP2 explicitly sets out in paragraph 7.3, that this site ‘would likely deliver in the short to medium term’, if allocated. Evidence, also suggests that this site is likely to available to deliver in these timescales given that ‘A comment was received at draft plan stage which supported the proposed allocation and set out the requirements for additional employment land for one business which is located adjacent to the allocation’, as set in response to Question 5 of EXAM2.

12.12. The same can be said for McAlpine’s Yard (KET9), which following the assessment of the site in EMP2, concluded in paragraph 7.2, that the site could
‘deliver a mixed-use scheme in the short to medium term’. The Council also considers the site to be available given the site promoter is looking to bring forward a mixed-use scheme. Although it is recognised that the allocation of this site is dependent on the issue of reservoir breach flooding being addressed.

12.13. Lastly, in relation to Geddington South West (GED5), although timescales for delivery are not specifically referenced in EMP2, the Council considers that this site is likely to be delivered within the plan period. This is because the existing services in place on the Grange Road Industrial Estate, and an evident demand for this type of unit in this location. A comment (ID 70) from the site promoter has also been received to support the inclusion of this site as an employment allocation in PKB1.

12.14. The Council is therefore confident that the three proposed employment allocations will be delivered in the plan period 2011-31.

13. Conclusion

13.1. The Council considers that the submitted Kettering Borough Site Specific Part 2 Local Plan, with the proposed Main Modifications is sound in relation to the Issues and Questions set out in Matter 9. This is founded on the assessment provided in this statement, which has outlined consistency with national policy and the JCS. This is because the policies included in Chapter 5 of PKB1 consider the importance of existing employment areas in Borough, ensuring the safeguarding mechanism is effective in securing sites remain in employment uses (B-class) which are key contributors to the area’s economy (Policy EMP1). This is whilst simultaneously recognising that changes in the employment market can result in vacancies. The Council considers that Policy EMP2 provides flexibility that responds to these changes in the plan period, in accordance with Policy 22 of the JCS.

13.2. There is also a recognition of the changing nature of employment practices and the makeup of employment sites. Again, the Council considers that policies EMP3 and EMP4 provide a positive and effective mechanisms, supported by local evidence, as required by paragraph 81 of the NPPF.

13.3. Whilst it has been demonstrated that the supply of B-class employment sites is likely to exceed the requirements of Policy 22 of the JCS. A positive and pro-active approach has been taken by the Council with regards to the allocations in PKB1, ensuring choice in terms of location and specific type of employment, responding to local demand to compliment the more strategic sites within the Borough.

13.4. Therefore, to conclude, the Council considers the Plan (PKB1) to be positively prepared, justified, effective and consistent with national policy in relation to the approach towards building a strong, competitive economy.
Appendix 1 – List of Reference Documents

PKB1 – SSP2 Publication Plan
EXAM2D – Schedule of Proposed Changes to the Publication Plan
PKB4 – Site Specific Part 2 Local Plan – Draft Plan consultation
EXAM2 - KBC Response to Inspector’s Initial Questions
EMP1 – Employment Allocations Background Paper
EMP2 – Employment Land Review (Aspinall Verdi)
EMP4 – North Northamptonshire Joint Core Strategy – Employment Background Paper
SA1 – Sustainability Appraisal