

East Northamptonshire Local Plan Part 2 (2011-2031) Examination

Matter 8 - Employment

Matter Statement by North Northamptonshire
Council

March 2022



North
Northamptonshire
Council

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1. Introduction

1.1. This statement sets out the Council's response to Matter 8: Employment, questions 1 - 16, in respect of the following issue(s):

- Whether the 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.

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 either hyperlinked, or refer to specific references contained in the Index of Submission Documents which can be accessed as follows:

1.4. https://www.east-northamptonshire.gov.uk/downloads/file/12227/index_of_evidence_base_and_supporting_documents

2. Matter 8 – Question 1: Does the Plan make sufficient provision to meet the job creation target set out in the JCS of 7,200 net job growth (in all sectors) within the Plan period (2011 – 2031)? Where is the evidence to support this?

2.1. The Local Plan makes more than sufficient provision to meet the JCS net growth figures, in full. Background Paper 5: Jobs ([F-07](#)) explains the main sources of jobs growth over the Plan period and is divided into a jobs trajectory, with five-year blocks, to show how these jobs will be delivered over the duration.

2.2. Background Paper 5 also explains the sources for each of the jobs figures cited; in all cases the best available data at the time. It also cites examples of where jobs are anticipated to be lost.

3. Matter 8 – Question 2: How many jobs have been provided to 2021 and how does this compare to the net requirement?

3.1. Background Paper 5: Jobs, estimates job growth in excess of 6,000 dwellings (6,185), over the first decade of the Plan period. As stated in the answer to Q1 (above), these figures are based on the best available data.

3.2. Background Paper 5 was prepared with reference to the former Head of Economic and Commercial Development at East Northamptonshire Council, who maintained regular liaison with the Local Economic Partnership regarding jobs creation throughout his tenure (which ended with the creation of the new unitary North Northamptonshire Council on 1st April 2021), and the North Northamptonshire Joint Planning Unit.

4. Matter 8 – Question 3: What is the residual net jobs requirement 2021 – 2031 and how is this to be met?

4.1. Background Paper 5 (F-07) estimates a small residual requirement, 1,015 jobs, as at April 2021 (halfway point of the Plan period). The Jobs Paper (tables 3 and 4) cites the key employment sites anticipated to deliver jobs during the second half of the Plan period. This includes sites anticipated to come forward within the next decade, at:

- Chelveston Renewable Energy Park – 800 jobs
- Raunds (West End) – 350 jobs
- Rushden Gateway – 240 jobs
- Rushden Living (west of Rushden Lakes) – 150 jobs
- Irthlingborough East (former Rushden and Diamonds FC Stadium Site) – 300 jobs
- Irthlingborough West – 340 jobs
- Rushden East – 1,400 jobs

4.2. In addition, the Background Paper notes that further jobs are likely to be created at Tresham Garden Village (500 jobs, by 2031), although these should be considered over and above the 7,200 jobs target. Similarly, Background Paper 5 anticipates that around 200 jobs will be created at Rockingham Enterprise Area, although these would be counted against the jobs requirements for Corby, and not the Plan area.

5. Matter 8 – Question 4: Does the Plan include any smaller scale employment allocations? Are Policies EN40 Former Rushden and Diamonds FC Stadium site, and EN41 Riverside Hotel Oundle intended to be employment allocations? Or are they identified as town redevelopment sites with criteria that set out the parameters for their redevelopment?

5.1. The Local Plan does not allocate any new strategic employment sites, as there is sufficient land supply to deliver the entire jobs requirements to 2031. However, Policy EN19 (see also Appendix 3 of the Plan) safeguards a range of key employment sites throughout the East Northants area.

5.2. The site allocations at the Former Rushden and Diamonds FC Stadium site (EN40) and Riverside Hotel (EN41) are both key waterfront/ gateway sites, to Irthlingborough and Oundle respectively. As such, the role of these sites is primarily to secure the reimagination of these two market towns, although it is recognised that these will deliver wider benefits in terms of job creation (approximately 350 jobs, combined).

6. Matter 8 – Question 5: Is the approach to new commercial employment space in Policy EN18 justified, effective and consistent with national policy and the JCS? How will proposals be ‘supported’ in practice? It is clear what is expected of a decision maker or a developer?

- 6.1. Policy EN18 originated as a mechanism to deliver the East Northamptonshire Enterprise Centre (see 1st Draft Local Plan Part 2, November 2018, Policy EN17; [B-05](#)); subsequently successfully delivered and opened at Raunds (Warth Park) in June 2020, despite being at the height of the Covid-19 pandemic. Consideration was given at the time of drafting the Pre-Submission version of the Local Plan during 2020-21 as to whether the policy was effectively rendered redundant, given this success.
- 6.2. It was decided to retain the policy in some form, to enable the potential delivery of other enterprise centres; e.g. as an element of the Rushden East or Tresham Garden Village developments (JCS policies 33 and 14, respectively). However, EN18 has been broadened from its earlier iteration, in part to take account of economic realignment arising from recent changes to working patterns arising from the Covid-19 pandemic and other potential economic changes over the next decade.

7. Matter 8 – Question 6: Are some of the criteria covered by other more general development management policies in the JCS or elsewhere in the Plan? What is the business pipeline’ referred to in criterion a?

- 7.1. See answer to Q5, above. The ‘business pipeline’ phrase is a recognition of the major economic changes that are anticipated to take place over the coming decade (remainder of the Plan period); in response to the Covid-19 pandemic and other economic realignments.
- 7.2. The phrase refers to the set-up, incubation and rolling out of new small and micro-businesses, as these progress towards becoming established as SMEs.

8. Matter 8 – Question 7: Is MM15 required for soundness?

- 8.1. Yes, MM15 is considered helpful to ensure Local Plan soundness. The additional text has been developed with reference to guidance and discussions with Natural England (e.g. through the Statement of Common Ground, reference EXAM-13).

9. Matter 8 – Question 8: Is the approach to protecting existing employment areas in Policy EN19 justified, effective and consistent with national policy and the JCS?

- 9.1. Yes, Policy EN19, which focuses upon the portfolio of existing employment sites is considered to be consistent with national policy. NPPF paragraph 20 requires that policies should make sufficient provision for “...*housing (including affordable housing), employment, retail, leisure and other commercial development*” (paragraph 20(a)).
- 9.2. Policy EN19 is also considered to fulfil the requirements of NPPF paragraph 119, by promoting “*effective use of land in **meeting the need for homes and other uses**, while safeguarding and improving the environment and ensuring safe and healthy living conditions*”. This aspiration is achieved by safeguarding employment sites that are expected to continue to function over the remainder

of the plan period, with reference to the quality of sites assessed for the employment land review (F-10).

9.3. Finally, the NPPF specifies that: “*Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans*” (paragraph 123). Therefore, if land is not safeguarded for specific uses, the NPPF effectively sets a presumption in favour of release of such sites for alternative uses. It is emphasised that the protection of key established employment sites is effective, justified and consistent with national policy.

10. Matter 8 – Question 9: Is it in accordance with JCS Policy 22 which seeks to safeguard employment sites, unless a number of circumstances apply? Should these circumstances also apply in Policy EN19?

10.1. In determining proposals, both JCS Policy 22 and Policy EN19 should be applied, in combination. Policy EN19 takes JCS Policy 22 to a site-specific level, by specifying which particular sites are designated protected employment areas.

10.2. Policies 22 and EN19 are considered to complement one another and should be read, in combination, in assessing planning applications. This is explained in paragraph 7.44.

11. Matter 8 – Question 10: The policy states that proposals should ‘ensure that overall, the provision of employment after development is no less than that of the current or most recent use’. Does this concern the provision of employment on the site or in the area? And how will be measured? Does proposed MM16 address this point?

11.1. Policy EN19 has been reconsidered in light of Regulation 19 representations from the Crown Estate. It is accepted that the policy wording, as submitted, does not provide sufficient clarity for monitoring purposes. MM16 was therefore introduced to address this particular concern.

12. Matter 8 – Question 11: Are all the criteria intended to apply? Does proposed MM16 address this point and is it justified and necessary in terms of soundness?

12.1. See answer to Q11, above. As stated, Policy EN19, as submitted was not sufficiently clear as to when criteria need to be applied in decision making. The introduction of “or” to criterion (a) (MM16) was intended to address this particular concern; i.e. criterion (a) or criteria (b) and (c) should apply in decision making.

13. Matter 8 – Question 12: In terms of criterion a, should the requirements of footnote 118 be in the policy itself to ensure it is effective? Is the 12 months marketing period justified?

- 13.1. Footnote 118 is considered to be effective and justified. The use of a footnote allows the 12 months standard to be more clearly highlighted than might be the case if this was included within the main body text.
- 13.2. Typically, policies that seek to safeguard existing uses apply standards ranging between 6 and 12 months, before release for development. The Council is keen to maximise the level of protection to established employment areas and this is why a 12 months standard has been applied. It is considered the use of a 6 months standard does not provide sufficient evidence that a redundant site has been adequately marketed for employment uses before release for alternative (normally higher value) uses; e.g. housing.

14. Matter 8 – Question 13: Are the development contributions required by criterion c justified? What types and sizes of development will be expected to provide them? How will the contributions be calculated and where will the monies be spent? When is the SPD expected? Are such contributions reasonable if criteria a and/or b have been met?

- 14.1. Criterion (c) is considered justified, as a means of ensuring that jobs numbers are maintained within the Plan area in the event that an existing employment site is released for alternative uses. If jobs are lost through new residential development, then development contributions may provide an important mechanism to mitigate the medium/ longer term impacts of these losses. Contributions are negotiable through the development management process, dependent upon development viability.
- 14.2. It is accepted that there is a need to update adopted developer contributions SPDs, to provide aligned standards for the whole of North Northamptonshire. This is a key project for development planning and is included within the informal work programme for the Council. Recognition of the importance of this work stream has been further concentrated through recent auditing and monitoring of S106 agreements, which has led to a working group being established, to address the issue of developer contributions across the former councils that now comprise North Northamptonshire Council. A clear timetable will need to be set out to inform when Policy EN19 could be effectively implemented.

15. Matter 8 – Question 14: Is the approach to the relocation or expansion of existing businesses in Policy E20 justified, effective and consistent with national policy and the JCS?

- 15.1. Policy EN20 recognises that many established businesses may seek to retain their current premises but may need room to expand. It is important that established businesses are not encouraged to relocate to alternative locations due to a lack of potential to expand at an existing location. This accords with the economic objective of achieving sustainable development (NPPF paragraph 7(a)).
- 15.2. Policy EN20 is not considered to weaken protections for sensitive sites, through ensuring that all criteria need to be met for expansion of businesses

to be supported. All criteria ((a) – (e)) need to be satisfactorily fulfilled for proposals to be acceptable.

16. Matter 8 – Question 15: In practical terms how will proposals be ‘supported’? Does the policy duplicate general development management requirements that are already contained in the JCS or elsewhere in the Plan? Is there repetition between criteria a and b?

- 16.1. Policy EN20 is intended to highlight the aspirations of the Local Plan for a sustainable balance between local jobs and workers (Plan outcome 5, Figure 5). There may be some degree of duplication between this and other development management policies, although the wording is specifically directed towards individual applications seeking expansion for established businesses within the Plan area.
- 16.2. It is accepted that there is some degree of overlap between criteria (a) and (b). However, these provide differing direction; insofar as (a) relates to broader/ macro landscape impacts, while (b) relates to amenity/ micro impacts; e.g. for neighbouring properties.

17. Matter 8 – Question 16: Does MM17 address the points raised by Natural England and is it justified and necessary in terms of soundness?

- 17.1. Yes, MM17 is considered helpful to ensure Local Plan soundness. The additional text has been developed with reference to guidance and discussions with Natural England (e.g. through the Statement of Common Ground, reference EXAM-13).