Dear Sir / Madam,

South Northamptonshire Local Plan Part 2a Consultation – Representations

South Northants Council (SNC) is undertaking consultation on the Local Plan Part 2a document from 4 April until 10 June 2016. These representations are prepared in response to the current consultation exercise and relate to land in our clients ownership (Rufford and Ralston PPC Limited), known as ‘Woolgrowers Field’ (hereafter referred to as ‘the Site’).

The Site

As defined by the Proposals Map (1997), the Site is designated Open Countryside located outside, but at the edge of, the built up area of the settlement of Towcester.

The Site is bound by the A5 to the east and Towcester Road and the A43 to the south which connects the Site to the M1 motorway. The Site is bound by Open Countryside to the north.

Despite the Open Countryside designation the surrounding area is predominantly commercial in nature and includes a Volkswagen (Wayside) car showroom; a garden centre / nursery / farm shop, Shell petrol station and a building supplier.

The Site also falls within the Northern Gateway (Site TI) – ‘Tove Valley Business Park’ area which is occupied by a range of commercial operators including Tesco, Porsche, ALDI, Countryside Stores and a recycling centre. A Site Location Plan is enclosed with this correspondence.

Background

SNC is currently in the process of preparing the Local Plan Part 2a which will shape the future of the district over the next 15 year period. The Council is currently consulting on the Local Plan Part 2a Options Consultation and Questions document and undertaking a Call for Sites exercise.

The Council adopted the West Northamptonshire Joint Core Strategy (WNJCS) ‘Local Plan Part 1’ in December 2014. The Local Plan Part 2a will build on, and provide detail to, the framework for growth provided by the WNJCS, including determining appropriate levels of growth at the local level and allocating land for housing and employment uses.

West Northamptonshire Joint Core Strategy (WNJCS) Local Plan Part 1 (2014)

The West Northamptonshire Joint Core Strategy (WNJCS) was adopted in December 2014 and sets out the long-term vision and objectives for West Northamptonshire up to 2029, including strategic policies to steer and shape new development over the plan period.
Policy S1 of the adopted WNJCS sets out the overarching distribution of development for West Northamptonshire. Generally development will be concentrated in and adjoining the principal urban area of Northampton. Appropriate development of a lesser scale will be located in and adjoining the sub-regional centre of Daventry town. The development needs of the Rural Service Centres of Towcester and Brackley will also be provided for.

Policy S8 relates to the distribution of jobs and states that the majority of new job growth will be concentrated within the principle urban area of Northampton and Daventry. Beyond those areas and within South Northamptonshire District, the WNJCS indicates that employment allocations at a scale of 40 hectares (ha) or below (non-strategic) should be considered positively during the preparation of Part 2 Local Plans, where they comply with the objectives of the WNJCS alongside fulfilling local priorities and considerations. WNJCS Policy T1 (Spatial Strategy for Towcester) further indicates that the role of Towcester as a Rural Service Centre will be supported and enhanced.

In line with those policy aspirations highlighted above, there is a requirement to identify non-strategic employment sites (of less than 40ha) to assist and support the growth of Towcester as a Rural Service Centre up to 2029 and beyond.

**South Northamptonshire Local Plan Part 2a Options Consultation Document and Questions (April 2016)**

The Local Plan Part 2a consultation document sets out the key issues affecting the District, including suggested options covering scale of development, settlement hierarchy and local green space. In response to key questions asked within the consultation documents:

**Question 1 ‘Vision’: Do you consider that the vision is appropriate for South Northamptonshire District?**

We support SNC’s aspirations to deliver strong business growth on a range of employment sites supporting businesses of all sizes and thus encouraging a diverse economy. We emphasise that a broad range of employment sites should be allocated to allow choice and competition in the market.

Towcester is a Market Town\(^1\) in a sustainable and highly accessible location due to its close proximity to the strategic highway network (A5, A43 and M1 motorway). Locating new employment development in, and at the edge of, Towcester will help to reduce the high level of out commute and maintain the sustainable economy that the District currently enjoys.

In view of the above, we strongly agree that the town of Towcester should continue to prosper and provide services, facilities and employment opportunities for the wider rural community, particularly given its status as a key market town / rural service centre in the settlement hierarchy. In this case, our client’s land, situated at the edge of the settlement of Towcester in a highly accessible location could deliver a sustainable employment site to meet the requirements of the emerging Local Plan Part 2a Vision.

**Question 2 ‘Objectives’: Do you agree with the suggested objectives?**

The Vision for South Northamptonshire will be delivered through a number of key objectives. We support the objective to facilitate economic growth and encourage investment and job creation. This objective will encourage job growth and reduce levels of unemployment across the District.

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\(^1\) For the purpose of our response to the South Northamptonshire Local Plan Part 2a Options Consultation Document and Questions Towcester is referred to as a Market Town. In accordance with the adopted WNJCS, Towcester is referred to as Rural Service Centre in all other sections of this representation.
In order to deliver the above objectives, non-strategic employment sites (of less than 40ha) should be identified and allocated through the Local Plan Part 2a document, in order to ensure SNC meet their minimum target of 28,500 net additional jobs over the period 2008-2029.

We strongly agree with the objective to deliver appropriate new employment opportunities in both the urban and rural areas. The delivery of appropriate new employment opportunities in, and at the edge of Towcester is acceptable due to its sustainable and highly accessible location in close proximity to the strategic highway network.

More specifically, the ‘Tove Valley Business Park’ is an established employment location to the north of Towcester which is occupied by a range of employment uses. The ‘Tove Valley Business Park’ could be extended to provide additional non-strategic employment land to meet the employment requirements laid out in the WNJCS and emerging Local Plan Part 2a. In this case, our clients’ land could provide a natural extension to the existing development at the ‘Tove Valley Business Park’, contributing to job creation.

Question 39 ‘Economic Advantage’: Are there other economic advantage options that need to be included?

We strongly agree that new sites for additional non-strategic employment uses should be identified in Towcester to fulfil the requirements of the WNJCS and emerging Local Plan Part 2a.

As a market town and rural service centre, Towcester is one of the most appropriate and sustainable locations for new employment development in South Northamptonshire. In addition to providing (Use Class) B1/B2/B8 employment development, a flexible approach to other employment uses should be applied to include out of town food outlets and other employment generating uses such as car showrooms (sui generis). We therefore suggest the positively worded policies should be sufficiently flexible to include quasi-employment uses, ultimately contributing towards a diverse economy.

Site Suggestion

The WNJCS (2014) and Local Plan Part 2a consultation documents identify a need to identify non-strategic employment sites (of less than 40ha) in and around the Rural Service Centres of Towcester and Brackley.

The following considers the suitability of the site to accommodate new employment development, with a view to securing an employment allocation at the Site, through the emerging Local Plan Part 2a.

The site (4.5ha) is in single ownership and comprises underutilised agricultural land. There are no buildings contained within the site boundary which would require demolition. On this basis the site is available and could be redeveloped for employment uses within years 1-5 of the emerging plan period.

The South Northamptonshire Local Plan (1997) defines the Site as lying outside, but at the edge of, the built up area of Towcester, within the Open Countryside. Despite the Site’s current land use allocation, the site is bounded by commercial development to the east, south and west. Furthermore the Towcester Masterplan – Volume 2, adopted by SNC in March 2011 to guide regeneration proposals in Towcester, identifies the Site as being within the ‘Tove Valley Business Park’ (Site TI - Northern Gateway) which is an established business and edge of centre retail location. The Masterplan states that the ‘Tove Valley Business Park is the northern gateway to the town and there are opportunities here for creating a sense of arrival to attract people off the A43 and into Towcester town centre’.
The Masterplan identifies the Site as being suitable for additional business and general industrial development (B1/B2/B8 Use Classes). In this location, employment densities should be increased to maximise the opportunity to deliver a wide range of employment uses and capitalise on the close proximity to the A43. In light of this there is scope to deliver high density employment uses at the Site.

The Masterplan also states ‘there are opportunities to landmark the entrance to the town with new buildings that create a distinctive and attractive gateway to Towcester, including two landmark buildings on the corners of the roundabout, as it forms the northern gateway to the town’. Aside from the sought after B1/B2/B8 uses proposed by the Masterplan, there may also be scope to deliver alternative commercial development to reflect the mix of uses in the surrounding area (car showroom, retail, out of town food outlets).

In view of the Masterplan aspirations, the Site offers a suitable location for new employment development at the edge of the settlement of Towcester, in an established employment and edge of town retail area, with good links to the strategic highway network. Furthermore, the Site is well screened by existing commercial development to the east, south and west, ensuring unrestricted sprawl into the Open Countryside would not result.

In terms of potential constraints, the topography of the Site is relatively flat. There are no public rights of way through the Site nor are there considered to be any environmental (biodiversity, ecology or archaeology) constraints. Furthermore, the Site is located in Flood Zone 1 where a low probability of flooding is anticipated. On this basis, there are no known constraints which may affect future development. Where evidence is identified and recorded, appropriate mitigation measures could be applied.

Overall, it is demonstrated that our clients land could deliver new non-strategic employment development (of less than 40ha) to meet the Joint Core Strategy target of 28,500 net additional jobs over the plan period and the Vision of the emerging Local Plan Part 2a. A range of employment uses could come forward at the Site and/or alternative quasi-employment uses such as technology / research facilities or a car showroom, to further support the principles of ‘Tove Valley Business Park’ and more generally the Towcester Masterplan – Volume 2. The redevelopment of the Site for employment uses would also help to reduce the high level of out commute the District currently experiences by providing jobs in an accessible location close to Towcester and the surrounding villages.

On the basis set out above, we request that the Site is considered for a mixed employment allocation in future stages of the emerging Local Plan Part 2a.

I trust the above is clear but should you have any queries please do not hesitate to contact me.

Yours sincerely

[Signature]

Associate
For and on behalf of GVA Grimley Limited