South Northamptonshire
Submission Draft Local Plan Part 2
– Representations on behalf of IM Properties Plc
Land North of Towcester

November 2018
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**Client**  
IM Properties Plc  
**Our reference**  
IMPQ3006  
1 Nov 2018
1. **Introduction**

1.1 These representations are made on behalf of IM Properties Plc (IMP) in response to the South Northamptonshire Local Plan Part 2 Submission Draft consultation.

**Sustainable Employment Opportunity at Towcester**

1.2 IMP control a 21 hectare greenfield site on the northern edge of Towcester which is included within the Local Plan Part 2 Submission Draft as an employment allocation under policy AL3: Land at Tiffield Lane, Towcester.

1.3 The site, currently in agricultural use, is located immediately to the north of the A43 and is bound to the west by Tiffield Lane. Visibility into the site is currently limited by the presence of substantial landscaping around the site. Views from existing residential development to the south of the site are obscured by the presence of existing dense vegetation, the A43 carriageway, and by a significant level change between the boundary of the nearest residential properties and the southern-most part of the site.

1.4 The site is split into two parcels; with the majority of the site located to the east of Tiffield Lane, and a smaller parcel to the west. The site can be accessed via a proposed new roundabout junction on the A43. The site lies adjacent to the draft employment land allocation referred to as the Bell Plantation site (‘Policy AL1: Bell Plantation’), which is also currently a predominantly greenfield site to the north of the A43. The draft allocation of the site, together with the Bell Plantation site, establishes that there is Council support for major employment development to the north of Towcester.

1.5 The IMP site continues to provide an excellent opportunity for a high quality and sustainable employment scheme that will help to enhance the prosperity of the District and its economic competitiveness.

1.6 It is IMP’s intention to bring forward such a proposal at the site that will deliver a number of significant benefits including the creation of local jobs for the residents of Towcester as well as economic growth for the District as a whole to respond to identified need across a range of employment sectors within this area.

1.7 New employment development at Towcester would be wholly consistent with the Council’s spatial strategy and settlement hierarchy (as confirmed by the draft Local Plan Part 2), given that Towcester is a First Tier settlement and is therefore recognised as one of the most sustainable locations within the District to accommodate development to meet identified employment needs.

1.8 The potential to create new jobs and additional economic development at a sustainable location on the edge of Towcester significantly enhances the prospect that levels of out-commuting from the District can be reduced over the period of the plan (up to 2029).

1.9 This is an important objective of the draft Local Plan Part 2, meaning that sites which are capable of meeting local employment needs in a sustainable way, and without resulting in any adverse impacts that would significantly and demonstrably outweigh the benefits of development, should be considered positively by the Council through their
preparation of the Plan. This is especially the case where it can be demonstrated that such sites are suitable and deliverable when considered reasonably on the basis of the evidence available.

1.10 As set out within these representations and as supported by the accompanying Delivery Document (Appendix 1), IMP have undertaken a comprehensive analysis of the various technical considerations affecting the suitability of the land north of Towcester within their control. The results of this work show that the site is entirely suitable for the development of a medium scale employment scheme, focusing on industrial and logistic uses, that will be highly accessible, will relate well to the settlement edge, will be well contained in terms of any potential landscape character and visual impacts, and will provide the opportunity for high quality design that responds sensitively to the site context and the local landscape.

1.11 An additional benefit of bringing forward new high quality industrial and logistics employment development at this location is that it provides the potential to complement the existing and planned provision for the high performance technology and motorsport engineering sectors at nearby Silverstone further to the south-west along the A43.

1.12 As research and development facilities and offices uses are catered for at Silverstone Technology Park, it is intended that the IMP site will provide a different employment offer, focusing on industrial and logistic uses. Furthermore, with its direct access via the new roundabout onto the A43, the IMP site is the most logical location to focus industrial and logistics uses, rather than at other employment sites which do not have the same level of connectivity to the motorway.

1.13 The IMP site is relatively unconstrained as demonstrated fully by the accompanying Delivery Document. It is within the control of one landowner and is being promoted by a developer with an exemplary track record for successful design-led employment schemes to meet varying employment sector requirements. The Delivery Document confirms that the site is a sustainable location for new employment development having regard to its economic, social, and environmental merits as a site for economic growth.

1.14 The development of the site will bring forward wider infrastructure benefits including highway improvements to address existing safety concerns relating to an existing junction of the A43 as well as enhanced connectivity and pedestrian routes for local residents.

1.15 IMP are invested in ensuring the earliest delivery of development at the site, and are progressing the necessary work to move towards a planning application. Furthermore, IMP continues to be committed to supporting the delivery of the football club facility on the neighbouring employment allocation – AL1: Bell Plantation, and realising the football club’s objectives; as well as associated economic benefits that the employment development can bring to Towcester.

**Deliverability and Sustainability**

1.16 These representations are accompanied by a Delivery Document that provides further site specific evidence on the deliverability of a sustainable industrial and logistics employment development at the IMP site.
This report focuses on policy representations to the Submission Draft of the Local Plan Part 2. These representations are made following the earlier submission and representations made on behalf of IMP to the Call for Sites process in June 2016 and the simultaneous ‘Options’ Stage consultation (set out in Appendix 2), as well as the most recent representations made in November 2017 to the Pre Submission Draft consultation.

The following policies have been reviewed and are the subject of our support of the Submission Draft Local Plan Part 2, on behalf of IMP. Detailed representations are made within the subsequent Section of this report.

**Table 1.1 Summary of policies covered within this representation**

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It should be noted that since the submission of the Pre Submission Draft representation, the IMP site has been identified as an employment land allocation within the Submission Draft Local Plan Part 2 (Policy AL3: Land at Tiffield Lane, Towcester).

For the avoidance of doubt, and not withstanding references to the amended National Planning Policy Framework (NPPF) (2018) within the Draft Submission Local Plan, these representations refer to the NPPF (2012). This is on the basis that it is our understanding that South Northamptonshire Council aim to submit the emerging Local Plan for examination prior to the 24th January 2019. The transition provisions within the NPPF (2018) confirm that up to this date, the NPPF (2012) will continue to apply for the purposes of plan making.

**Pre Submission Draft Local Plan Consultation**

Table 1.2. set out the policies which were reviewed as part of the representations made to the Pre Submission Draft Local Plan consultation.

**Table 1.2 Summary of policies covered within the Pre Submission Draft Local Plan representations**

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<th>Pre Submission Draft Local Plan Part 2 Policies</th>
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<td><em>Policy Site Development Principles 5: Health, Education and Community Facilities</em></td>
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The following summarises the comments made on behalf of IMP, and how these have been addressed within the Submission Draft Local Plan.

- **Policy Site Development Principles 4: Health and Wellbeing:** IMP raised concerns regarding whether the policy applies to employment development and whether the policy is based on the most up-to-date evidence. *We note that an updated Infrastructure Delivery Plan (WNCS IDP Update 2017) has been prepared which addresses the second point. Whilst it is still not clear as to whether the policy applies to employment developments, it is assumed that this will be dependent upon the specifics of each development on a case by case basis.*

- **Policy Site Development Principles 5: Health, Education and Community Facilities:** IMP raised concerns regarding the evidence to support the policy. *We note that an updated Infrastructure Delivery Plan (WNCS IDP Update 2017) and Viability Review (South Northamptonshire Viability Review 2018) have been prepared which addresses the concerns raised.*

- **Policy Settlement Hierarchy 1: Settlement Hierarchy:** IMP supported the inclusion of Towcester as a First Tier settlement, however raised concerns regarding the detailed wording of the policy and how this could restrict development of the land north of Towcester as a sustainable and logical extension to the town. *The changes to the policy wording combined with the allocation of IM Properties’ site at Tiffield Lane, Towcester under Policy AL3 address the comments raised.*

- **Policy Employment 1: Existing Employment Sites:** IMP raised no objection to the policy, but highlighted issues within the district relating to limitations of the current supply, and the relationship between supply and demand. *No significant changes have been made to the policy.*

- **Policy Employment 2: New Employment Development:** IMP raised concerns that the policy should be better related to the settlement hierarchy, and that the policy fails to recognise the opportunity presented by IM Properties’ site north of Towcester, which is a suitable, sustainable and deliverable option to meet the identified need for employment land. *The changes to the policy including the allocation of IM Properties’ site at Tiffield Lane, Towcester under Policy AL3 addresses the comments raised.*
• **Employment Allocation Policies:** IMP raised concerns that the policies failed to recognise the opportunity presented by IM Properties’ site north of Towcester, which is a suitable, sustainable and deliverable option to meet the identified need for employment land. *The inclusion of IM Properties’ site at Tiffield Lane, Towcester as an employment allocation under Policy AL3 addresses the comments raised.*
2. Representations

2.1 The representations made below confirm IMP’s support for the Submission Draft of the Local Plan Part 2, specifically in relation to the soundness of policies and text relating to employment and the employment site allocations.

Section 2: Vision and Objectives

2.2 The vision and objectives identified within the Local Plan are considered suitable and sound against paragraph 35 of the NPPF. IMP support the vision of ensuring there continues to be strong business growth on a range of appropriate employment sites, which supports businesses of all sizes to deliver a diverse economy within South Northamptonshire. Furthermore, support is given to the vision to enable Towcester to continue to proposer through the provision of employment opportunities, services, and facilities.

2.3 Support is given to the objectives identified within the Local Plan; specifically objectives 1 and 2 which look to facilitate economic growth, encourage investment and job creation, and deliver appropriate new employment opportunities. In addition to objectives 5, 6, and 7 which aim to ensure appropriately scaled new development to meet identified needs on suitable sites in sustainable locations; quality and a broad range of services are provided which are accessible to all and promote the vitality and viability of Towcester; and new developments are supported by the necessary provision/improvements to infrastructure to minimise the impact of development.

2.4 Both the vision and objectives ensure that the Plan is positively prepared in accordance with the paragraph 11 of the NPPF.

Policy SS1: The Settlement Hierarchy

2.5 Support continues to be provided for the identification of Towcester as a First Tier settlement (Rural Service Centres) within Policy SS1, and its promotion of the IMP site through the employment allocation (Policy AL3).

2.6 As identified in Section 2 of the Delivery Document submitted in support of these representations, Towcester is a key settlement within the District. It is strategically located, with good accessibility to the M1 to the east, M40 and A5 to the west, and A43 along its southern boundary. Towcester is seen as a key economic and residential settlement within the District; and Policy SS1 satisfactorily responds to this by identifying it as a First Tier settlement.

2.7 On this basis IMP believe this policy to be sound in accordance with paragraph 35 of the NPPF (2012). It has been positively been prepared to meet the needs of the District; it is justified in that it is a reasonable strategy; it is effective in being deliverable over the plan period, and is consistent with national policy to enable the delivery of sustainable development in accordance with the NPPF (2012).
Section 5: The Economy

2.8 Section 5 of the Local Plan identifies how the Plan aims to ensure South Northamptonshire maintains and grows its economic competitiveness, and minimise levels of out-commuting.

2.9 IMP support the aims set out within the Context of Section 5 in so much as it identifies economic competitiveness as the key to providing employment opportunities for all residents and encourages increasing levels of self-containment to minimise out-commuting. Support is further given to the Plan to reinforcing its approach to business and economic development within Towcester, identified in paragraph 5.1.3, which looks to secure business friendly and well-functioning towns, and strengthen international connections and an export driven economy. It is considered that, as stated within paragraph 5.1.4, these economic opportunities can be achieved through new employment allocations.

2.10 IMP consider Section 5 of the Local Plan to be sound, and that it has been positively prepared to meet the area’s objectively assessed needs; it is justified on proportionately based evidence; it looks to deliver employment opportunities over the plan period; and looks to enable the delivery of sustainable development.

Policy EMP3: New Employment Development

2.11 Policy EMP3 part 1 sets out that new employment and commercial development will be directed to the most sustainable locations in accordance with Policy SS1. IMP are in agreement that new employment should be located within sustainable locations as identified within the settlement hierarchy, and that the site allocation (Policy AL3) accords with Policy EMP3 by being located to the north of Towcester – a First Tier sustainable settlement, as identified within Policy SS1. Furthermore, Sections 4 and 5 of the Delivery Document submitted in support of these representations, sets out the sustainability and deliverability of the IMP site.

2.12 As set out in Section 2 of the Delivery Document, over a number of years there has been a shortfall and need for employment sites within South Northamptonshire. IMP consider that Policy EMP3 positively responds to addressing the shortfall and need for employment sites within South Northamptonshire; helping to provide a choice of sites which can be delivered in the short term, and throughout the plan period.

2.13 IMP support the amendment to point 2 of the policy which enables employment development on suitable sites outside of the settlement confines where sites are allocated for employment uses. As previously identified the IMP site is allocated as an employment development site to the north of Towcester, and therefore conforms with Policy EMP3.

2.14 Confirmation and further clarification is sought to the wording of part 3 of the policy. It is unclear whether both points a and b of part 3 relate to both changes of use and new developments or whether these apply respectively to the different forms of development. It is also unclear as to whether part 3 applies to allocated sites.
2.15 Notwithstanding this, IMP consider that Policy EMP3 is positively prepared to meet the employment needs of the District, is based on proportionate evidence, and will apply over the plan period to deliver sustainable employment development in accordance with the NPPF (2012). IMP therefore considered the policy is sound against the criteria set out within paragraph 35 of the NPPF (2012).

**Section 13: Employment Allocations**

2.16 Section 13 confirms that the Plan should positively and proactively encourage sustainable economic growth in line with the NPPF, and should meet anticipated employment needs over the plan period; as well as be flexible enough to accommodate needs not anticipated in the Plan to allow for a response to changes in economic circumstances.

2.17 IMP support the requirement for the Local Plan to meet anticipated need, and to ensure flexibility to accommodate any need not anticipated. It further supports the need for sufficient land of the right type and in the right place to come forward to allow growth and innovation. The inclusion of the IMP site as an employment allocation (AL3) ensures that Towcester and South Northamptonshire meet the anticipated need; and is a site with is of the right type and right location - as identified in the Delivery Document.

2.18 Additionally, IMP support paragraph 13.1.2 which specifies that there is to be a sufficient number a variety of available employment sites to allow employment generating development to come forward in sustainable locations to enable existing and new companies to form and grow.

2.19 Furthermore, IMP support paragraph 13.1.4 which identifies the allocation of additional employment land to help facilitate more local employment growth; helping attract new investment and minimise the levels of out commuting. IMP also support the recognition within paragraph 13.1.4 that the District will deliver a slightly higher level of housing than required by West Northamptonshire's Joint Core Strategy (WNJCS). Therefore there is a need to ensure that this is complimented by additional provision of employment land. The allocation of the IMP site, alongside the other employment allocations within Towcester, will help compliment the projected high level of housing to come forward within the District.

2.20 Paragraph 13.1.5 identifies criteria for new employment sites identified through the Plan. The allocated IMP site within the Plan meets with the criteria set out and will help support and grow the economy of Towcester and the District.

2.21 Paragraph 13.2.5 discusses the IMP allocation, identifying it as a ‘natural expansion to the urban area of a sustainable town, and would adjoin and employment cluster’. It further states that the allocation of the land will create a ‘significant number of jobs to support recent housing development in the area’ and would ‘allow improvements to the dangerous road crossings at Northampton Road/A43 and Tiffield Lan/A43’. IMP strongly support the text set out within paragraph 13.2.5, and the Delivery Document (Appendix 1) provides further detail on deliverability and economic benefits development of the allocated site is expected to deliver.
2.22 IMP are engaging in ongoing discussions with Highways England and Northamptonshire County Council with regards to the detail of the new roundabout access junction off the A43 into the site and onto Northampton Road, to help improve the safety of the existing junctions.

2.23 Section 13 of the Local Plan is considered to be sound against paragraph 35 of the NPPF. It has shown that it seeks to meet the employment allocation needs of the District, based on proportionate evidence, and provide sustainable employment allocations which can deliver employment opportunities over the plan period.

**Employment Allocation - Policy AL3: Tiffield Lane, Towcester**

2.24 Three Towcester employment sites are allocated within the Submission Draft Local Plan. These are:

- Policy AL1: Land at Bell Plantation, Towcester;
- Policy AL2: Land at Woolgrowers Field, Towcester; and
- Policy AL3: Land at Tiffield Lane, Towcester

2.25 IMP strongly supports the allocation Policy AL3: Land at Tiffield Lane, Towcester, for employment development. As identified within Sections 4 and 5 of the Delivery Document, the site is suitable, deliverable, sustainable, and achievable for new employment. Furthermore, the opportunities at the IMP site could help promote the economic competitiveness of Towcester and South Northamptonshire, whilst meeting a demand for high quality employment development of B1c, B2, and B8 uses.

2.26 Additionally, the allocation of the IMP site enables a choice of sites, providing a site which can be delivered in the short term, alongside those sites which may be more complex and realised further into the plan period.

**Part 3: Land Uses**

2.27 A minor alteration is put forward by IMP to amend the description of the use classes identified within part 3 of the policy to identify the likely mix of uses to be included within the IMP site. As stated previously, an industrial and logistics employment development is considered to be the most appropriate mix of uses to respond to the site's context and recognising the role of other employment sites within the district, such as Silverstone Technology Park which already cater for office and research and development uses. Some occupiers will look to co-locate offices with their other activities at the site, and these would be considered ancillary to principal B1c, B2 and B8 uses.

2.28 It is accepted that any planning application would need to be supported by a clear statement and evidence for the need and mix of uses being proposed. It is considered that any market evidence put forward for the proposed uses of the site could be independently reviewed and therefore suggested wording has been put forward. Details of the suggested policy wording amendments are provided in paragraph 2.38 below.
Part 4: Access and Transport

2.29 Part 4 of the policy sets out four transport related tests against which the development will be tested as follows:

(a) “A new roundabout facility will be provided at the junction of the A43 and the Northampton road (Hulcote Turn) and the layout of the proposal will enable the closure of the central reservation turn at the Tiffield Lane junction in order to improve road safety on the A43;

(b) Good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services and to promote sustainable travel;

(c) A transport assessment and travel plan will be required to assess the transportation implications of the proposed development and to identify appropriate mitigation measures; and

(d) Provision of new footpaths and cycleways that link to existing networks and safe crossing points on the A43.”

2.30 A TRICS assessment undertaken by IMP’s appointed transport consultants for a mixed employment (B1, B2, and B8 use) scheme confirms upgrading the existing Northamptonshire Road junction to a new roundabout would operate within capacity and improve safety. There have been a number of collisions near to the existing junction, one being fatal. The upgraded junction will therefore offer significant highway safety benefits. It will also allow for the closure of the central reservation at Tiffield Lane. A junction improvement plan for Northamptonshire Road/A43 junction is included within the Delivery Document provided in support of the representations. On this basis development of the site can and will fully meet the first policy test.

2.31 In terms of accessibility the site is located in close proximity to Towcester. The scheme will deliver improved connectivity between the Site and Towcester town centre through pedestrian improvement works (supporting Policies S10, C1, and C2 of the West Northamptonshire JCS). Most notably, the A43 junction improvements that would be delivered by the development site access would provide safe crossing facilities for pedestrians and cyclists onto Northampton Road, providing access to the town centre. There is also potential for improved pedestrian/cycle connectivity to the neighbouring employment allocation (Policy AL1: Bell Plantation); providing a safe access from the Bell Plantation into Towcester via the improved A43 junction.

2.32 Although there have been changes to local bus services, there is significant potential to improve bus access for the site and for the town in general. At present a number of buses run along the A43. In particular, the X89 runs from Milton Keynes to Northampton on an hourly basis. This could diverted into the site and frequency significantly enhanced as a result of the development. There are also options for reintroducing the local town circle service (no. 87 bus route) which ran on a loop through Towcester town centre, passing the IMP site. There is potential for the reinstated route to be diverted into the IMP site, providing a service for local people to access the employment site. On this basis the scheme can and will fully meet the second and fourth policy tests.
As set out above, a detailed scoping assessment has been submitted to the County Council to inform the Transport Assessment for the site. As part of this, IMP have committed significant investment in updating and running the Northamptonshire Strategy Transport Model. This will test the development in terms of impacts on local roads and take into account wider growth in the area. The outputs of the model will inform off site mitigation if required and will also feed into the Air Quality assessments that will be required as part of a planning application. Initial assessments as part of the scoping report have confirmed that the wider impact will be limited in terms of peak hour capacity.

**Part 5: Key site specific design and place shaping principles**

2.34 Part 5 of the policy sets out a series of detailed criteria for development of the site, including heritage and landscape considerations, a contribution towards delivery of facilities for Towcester Town Football Club, and other appropriate contributions to mitigate the impact of the development.

2.35 Minor wording alterations are suggested for Part 5 a and b in relation to heritage and archaeology. As Historic England is a statutory consultee, and not the decision making body, it is felt that the policy wording needs to reflect this. Under the Arrangements for Handling Heritage Applications Direction 2015, Historic England is consulted on some but not all heritage matters; this should also be reflected with Part 5a. We recognise and support the need for heritage assessments to inform emerging proposals, and a heritage impact assessment to assess the impact of development on heritage assets. We have therefore worded the policy accordingly. This is provided within paragraph 2.38.

2.36 To ensure alignment with the national planning policy (NPPF 12) which states: ‘Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation’ (Paragraph 189), amendments are suggested to part 5b within paragraph 2.38.

2.37 Initial conversations have been held with Towcester Town Football Club and IMP confirm the commitment to supporting the delivery of the football club facility on the neighbouring employment allocation – AL1: Bell Plantation. IMP suggest however that the policy is suitably flexible to reflect any changes in circumstances in relation to the football club facility in the future; for example should the scale of the requirement change, or confirmation of other sources of funding become apparent. Details of the suggested wording amendments are provided within paragraph 2.37.

**Suggested Amendments to Policy AL3**

2.38 We set out suggested policy wording amendments below:

“POLICY AL3: LAND AT TIFFIELD LANE, TOWCESTER

……..
3. **Land uses: employment**

   a. A market-evidenced proportion of B1c (light industrial), B2 (general industrial) and B8 (storage and distribution) and ancillary uses that are of an appropriate scale and demonstrably complementary to an existing or proposed B class use.

5. **Key site specific design and place shaping principles (whole development), in addition to those required under policies SS2 and SDP1, include:**

   a. The height of any proposed buildings and the layout and extent of the development should be informed by a detailed heritage impact assessment, prepared in consultation with Historic England. Any application should be accompanied by an assessment of any impacts on the significance of designated and non-designated heritage assets and subject to the findings of that assessment, mitigation should be included; and

   b. prior to submission of an application, detailed assessment will be undertaken to establish the archaeological potential of the site. Planning permission will be conditional upon identifying the likely direct impact of development proposals on archaeological remains, in order to inform development design and a programme of archaeological mitigation if required; which could involve preservation in situ by design or record or a combination of the two. This shall be agreed with the appropriate statutory consultee(s); and

   d. a financial contribution towards the implementation of the Towcester Town Football Club based on the land value for employment use of 17% of the total undeveloped allocated site (index linked from the date of date of the first planning permission on the site). 40% of the contribution would be payable on the completion of 20% of the net site area and the remaining 60% on the completion of 80% of the of the net site area. **Should circumstances relating to the delivery of the football club requirement change, an appropriate alternative planning obligation to support this objective will be considered at the planning application stage.**

2.39 The Delivery Document submitted in support of these representations confirms that Policy AL3 is justified on the basis of supporting evidence confirming the need for additional employment land within the district, the associated benefits of development at this site, and that the site is deliverable and achievable, with no significant constraints to sustainable development. It also reinforces that the policy will be effective in facilitating delivery against key objectives within the plan.

2.40 Notwithstanding the suggested amendments to Policy AL3, IMP strongly support the policy and consider that it is sound in accordance with paragraph 35 of the NPPF
The suggested amendments would ensure that the policy is even more effective in delivering objectives 1, 2, 3 and 9 of the plan.

**Sustainability Appraisal**

2.41 Separate representations have been prepared to the Sustainability Report Addendum (2018) supporting the Local Plan Part 2 Submission Draft consultation on behalf of IM Properties.

2.42 These representations confirm that an SA Addendum has been prepared to support the Submission Draft Local Plan It identifies the IMP site as an employment allocation (AL3) which will have a significant positive effect on the economy of South Northamptonshire, given its deliverability and market demand for high quality employment land.

2.43 IMP are fully supportive of the conclusions and methodology utilised in the preparation of the SA Addendum, and that the IMP site fully justifies its allocation as a sustainable employment site within the Local Plan given its scoring within the SA; alongside its deliverability, lack of constraints to development, and the social, economic and environmental benefits that will arise from employment development at this site.

2.44 The representations further confirm that allocation of employment land represents a highly sustainable option, given that Towcester is identified as one of the most sustainable settlements in South Northamptonshire.

**Conclusion**

2.45 IMP support the Submission Draft Local Plan Part 2 and consider the plan is sound in accordance with paragraph 35 of the NPPF (2012). IMP strongly support Policy AL3 which allocates land at Tiffield Lane, Towcester for employment development. The Delivery Document accompanying these representations confirms that the site is suitable, sustainable, achievable and deliverable for a high quality mixed use employment development. On this basis the Plan is considered to be sound.

2.46 A number of minor amendments have been suggested to the wording of Policies EMP3 and AL3 within this report to provide clarity to the policy requirements.
Appendix 1: Delivery Document (2018)
Appendix 2: Call for Sites Submission (2016)