These representations are made on behalf of Ramac Group Ltd, which is the owner of the Appletree Industrial Estate in Chipping Warden, to which Policy RE1(D) of the previous South Northants Local Plan makes reference as an employment allocation.

Appletree Industrial Estate is well occupied and the economic activities on the site are particularly focussed on the automotive sector (including BCA Marketplace plc). These economic activities are highly skilled and well aligned with the objective of Policy EMP1 to support the retention of a skilled resident workforce in the District, which itself consolidates Theme 1 of the South Northants Economic Growth Strategy.

As an existing employment site, proposals for further economic development at Appletree Industrial Estate over the forthcoming plan period would be considered under Policy EMP2. Representations have been submitted pursuant to EMP2.

However, as currently drafted, proposals for further economic development at Appletree Industrial Estate would also be considered under Policy EMP3. Policy EMP3 states *inter alia* “Employment generating development on suitable sites outside of the settlement confines will be considered acceptable where the proposal (a) is allocated for employment uses; or [...] is on brownfield land”.

The wording of EMP3 is more restrictive than EMP2, for the following reasons:

- South Northants Council’s policy approach in EMP2 applies to both existing employment sites and the proposed new employment allocations, whereas EMP3 as currently drafted only refers to the new employment allocations;
- Under the provisions of EMP2, proposals for additional employment generating development on existing employment sites including intensification will be permitted within the existing curtilage or through appropriate exceptions, whereas EMP3 as currently drafted makes no provision for appropriate exceptions.

Therefore, in order to accord with the tests of soundness, particularly the ‘positively prepared’ and ‘effective’ criteria, it is considered that a minor modification to the second bullet point of EMP3 is required.

The suggested update to EMP3 is provided below and the recommended additional text is shown as underlined.

2 Employment generating development on suitable sites outside of the settlement confines will be considered acceptable where the proposal:

   a is for development of an existing employment site or land allocated for employment uses in accordance with Policy EMP2; or
i is for a change of use, conversion or extension of a suitable permanent building; where the proposal; and either would not result in the requirement for another building to fulfil the function of the building being converted or replaced; or

ii is on brownfield land; or

iii can only operate in a countryside location.