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.

Our comments on Policy EMP2, in the context of the Appletree Industrial Estate, are as follows:

a. The new NPPF (published in July 2018) highlights the importance of building a strong and successful economy. Paragraph 80 states that local planning policies should help create the conditions in which businesses can invest, expand and adapt. 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. Paragraph 81 goes on to state that local planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. Paragraph 82 confirms that provision should be made for high technology industries, which includes the automotive sector;

b. In the context of plan making, NPPF Paragraph 20 provides that strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for inter alia employment development. Paragraph 23 goes on to provide for allocations of sufficient sites to deliver the strategic priorities of the area. Meeting assessed needs is also a fundamental part of the ‘positively prepared’ test of soundness;

c. Policy E1 in the West Northamptonshire Joint Core Strategy (adopted in December 2014) sets the strategic context for existing employment sites in the area. It states that "to help support a vibrant, successful and developing local economy existing and allocated employment sites and industrial estates across West Northamptonshire will be retained for uses within Classes B1, B2, B8 and appropriate non-B employment generating uses". It also requires that the Local Plan Part 2 should secure the detailed implementation of the policy;

d. South Northants Council’s evidence base includes the South Northants Employment Land Study (published in February 2014), which acknowledges the high value added sectors in the District. It also ranks Appletree Industrial Estate as average in physical terms and good in market terms (site reference W11);

e. Overall, it is considered that continued employment uses of the Appletree Industrial Estate would be well aligned with the national and strategic planning policy context and with South Northants Council’s evidence base. Continued employment uses in this location would support economic
growth and productivity including in the high value high skill automotive sector in accordance with both the NPPF and Policy E1 of the Joint Core Strategy;

f. It is noted that a potential weakness of the Local Plan Part 2 is that it does not list existing employment sites in the District. Moreover, it does not include formal allocations of existing employment sites on the Proposals Map. On this basis, we have considered whether Policy EMP2 provides a sufficient basis on which to guide future development in the context of the relevant ‘soundness’ criteria including the requirements to be ‘positively prepared’ (ie to meet objectively assessed needs as a minimum) and to be ‘consistent with national policy’;

g. Policy EMP2 requires that, as an existing employment site, the Appletree Industrial Estate should be retained for employment uses, subject to criteria associated with change to other uses. It also requires that further employment generating development including intensification will be permitted within the existing curtilage or through appropriate exceptions;

h. Having considered the actual wording of Policy EMP2, which is unambiguous in its applicability to the Appletree Industrial Estate, it is considered that Policy EMP2 provides an appropriately sound policy basis for the Appletree Industrial Estate over the plan period;

i. The reference to “appropriate exceptions” in Policy EMP2 is considered to be vital in order to ensure that the policy is sufficiently flexible to meet the ‘positively prepared’ and ‘effective’ tests. In relation to the Appletree Industrial Estate, there are foreseeable exceptions over the forthcoming plan period, as follows:

   o Part of the existing employment area may be affected by the construction area required in connection with the implementation of HS2, which would require changes to the operational site layout;

   o The existing employment allocation at RE1(D) of the adopted Local Plan seeks to limit development at the Appletree Industrial Estate until a relief road for Chipping Warden (A361) is provided. However the relief road has now been funded by HS2 and Northamptonshire Highways have advised that it will be completed by Spring 2019;

j. These circumstances are already acknowledged at Paragraph 5.4.5 of the draft Local Plan, which notes that proposals for business development displaced by HS2 will be considered favourably, particularly where they are located close to their existing location.

Notwithstanding these comments on EMP2, at this stage there appears to be some inconsistency between the wording of EMP2 and EMP3. Representations have been submitted pursuant to EMP3 in order to rectify the inconsistency.