Is your representation supporting or objecting?  Supporting

Representation

SITE SPECIFIC PART 2 LOCAL PLAN - DRAFT PLAN EMPLOYMENT ALLOCATION SITE D1

Berrys has been instructed by Rigid Group Ltd (RGL) to provide comments in relation to the Site Specific Part 2 Local Plan (SSP2) and the Potential Employment Allocation Site D1 identified in Paragraph 5.8 and Picture 10.2 of the document (referred as to Site D1 from here on in). This allocation is subject to further work through the Council's Property Market Review and Assessment of Employment Sites. This document will seek to establish the Borough's employment land needs and associated employment land allocations.

These representations SUPPORT the proposed allocation and will seek to demonstrate that there is a genuine local requirement for additional employment land in Desborough and that the site is available, suitable and deliverable in accordance with the requirements of Planning Practice Guidance tests.

THE SITE & SURROUNDINGS

Site D1 is situated on the northern fringe of Desborough and immediately adjacent to the western boundary of RGL on Stoke Road, Desborough. It is regular in shape and is located between Harborough Road (8576) to its west and the existing RGL and Paves Packaging plant to its south and southeast. Whilst land to its north and northwest are predominately in agricultural use, there is further development in close proximity to the site along Harborough Road which includes various industrial units, a hotel and a restaurant.

The site measures 8.1 hectares and comprises a parcel of undeveloped land currently in agricultural use (Grade 3). In planning policy terms, the site lies on the edge of the defined settlement limits for Desborough and in the open countryside.

An existing track provides access onto Harborough Road (8576) which in turn provides excellent links to Desborough town centre and the A6 via the wider highways network. The site lies within Flood Zone 1 and is therefore in an area with the lowest risk of flooding.
POLICY CONTEXT

National Planning Policy Framework

The overarching emphasis of national planning and economic policy set out in the NPPF and PPG is to support long term growth, sustainability and prosperity through new economic development, the expansion of existing businesses and new inward investment.

This is reinforced by Para 8 which identifies three dimensions to sustainable development: economic, social and environmental. It identifies the economic role as being "to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure".

Paragraph 11, 1st bullet point, describes what the presumption in favour of sustainable development means. For plan-making, it establishes a positive approach: “plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change”.

Further clarification is provided in the ‘Building a strong, competitive economy’ set out at Paragraph 80 of the NPPF which sates: “Planning policies and decisions 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”.

The main economic development and business requirements of the NPPF are broadly summarised as follows:

- set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment;
- be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances; and
- recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Planning Practice Guidance

The Housing and Economic Development Needs Assessments PPG guides councils in how to assess their housing and economic development needs. In considering matters relating to economic development, the following matters are relevant:

- Plan makers are required to liaise closely with the business community to understand their current and potential future requirements;
- The use of market intelligence (from local data and discussions with developers and property) is encouraged;
- market intelligence and market;
- to recognise that the location and premises requirements of different types of business will be important.

The Housing and Economic Land Availability Assessment seeks to assist in identifying suitable sites for the delivery of housing and employment requirements. It highlights the importance of identifying a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period, thus increasing the prospects of development coming forward.

Joint Core Strategy 2016

Section 4 ‘Delivering Economic Prosperity’ states that the Plan seeks to make North Northamptonshire
more self-reliant by achieving a sustainable balance between local jobs and workers and a more prosperous and diverse economy. It intends on doing this by:

1. "Planning for enough jobs to match the forecast growth in labour force. A target for 31,100 net additional jobs alongside the strategic opportunity for 40,000 new homes over the period 2011-31 is identified;"

2. "Ensuring that the right amount and type of employment land is available...................."

Paragraph 8.7 the JCS acknowledges that a "major constraint to economic growth is the lack of available sites to support the expansion of existing businesses. The provision of smaller parcels of land within larger, strategic sites can help to support the expansion of existing businesses, and their retention in North Northamptonshire."

Para 8.18 deals with the logistics industry and recognises the importance that the industry has for the area given the excellent central location and excellent strategic road connections. Technical studies and market analysis have identified that this sector remains strong and that failure to meet this demand in North Northamptonshire through the provision of suitable sites will lead to activity being displaced away from the area and opportunities to capture investment, unlock other uses and the potential for high quality investment will be lost.

Policy 24 deals with proposals for logistics and states that large scale strategic distribution will be supported where development complies with the spatial strategy, facilitate the delivery of a mix of jobs and are of the highest viable standards of design and sustainability.

**ASSESSMENT**

As detailed above, when considering strategic employment land allocations, both the NPPF and NPPG advocate the following approach:

- Economic development needs - identifying future quantity of land or floorspace required for economic development uses including both the quantitative need for new development and providing a breakdown of that analysis in terms of quality and location, indicating gaps in current land supply; and
- Employment land availability - identifying a future supply of land which is suitable, available, and achievable for economic development uses over the plan period

We address each in turn below.

**Economic development needs**

The NPPF states that Local Planning Authorities are required to positively seek opportunities to meet the development needs of their area and in doing so they are required to liaise closely with the business community to understand their current and potential future requirements.

Whilst we understand that this is presently being investigated through the 'Property Market Review and Assessment of Employment Sites', there is genuine 'business need' by RGL for development on Site D1. This is summarised below.

RGL was founded in 1896 in Desborough and is the UK's longest continuously running corrugated cardboard manufacturing business. It is part of the VPK Packaging Group, is a leader in manufacturing premium secondary packaging and is one of the fastest growing independent European manufacturers of recycled paper and corrugated cases. RGL is one of the largest employers in Desborough and presently employs approximately 300 people, many of who are from the local area.

RGL have an urgent requirement to extend their existing site to include a storage and distribution warehouse. This requirement principally stems from a business and operational need to address a number of issues with the existing logistics operations.

Presently, there is insufficient onsite storage space to accommodate the necessary raw materials required for the production process and the finished product (cardboard packaging). As a result, the bulk of the raw materials required for the production process are presently stored elsewhere in other distribution warehouses in the region. To meet operational needs, raw materials are delivered to the site on a very frequent basis. The same equally applies to the storage of the finished cardboard products which can only be stored on site in limited quantities and for a limited period of time, before being transferred to other regional distribution warehouses.

These issues combined not only result in significant logistical costs (transportation costs associated with moving materials/ goods to and from the site and their subsequent storage), but also impede RGL's ability to meet their current output needs. As a result, the existing plant is unable to increase output and this is unsustainable for the business.
To address this issue, RGL has an urgent requirement for a circa 10,0000 m² storage and distribution warehouse either on or adjoining their existing premises. Whilst the requirement can be accommodated in a separate building, the locational imperatives dictate that it needs to be located immediately next to the existing RGL plant. The existing RGL plant does not have any suitable areas which could accommodate the proposed warehouse and it would be unfeasible to redevelop the existing site due to the need to remain operational during construction works.

The proposed warehouse will be fully automated and linked to the main RCG plant by an automated track. This will allow automated picking / storing of raw materials and finished products in line with modern practices.

As a direct result, the existing premises are considered to unsustainable for RGL. On the basis that there are no alternative sites within Desborough which meet their needs, RGL could be forced to relocate to an alternative premises outside of the Borough. Being a genuine local firm, RGL are keen to avoid this scenario.

Having regard to the above, it is clear that there is an urgent need for RGL to expand their premises and address the inefficiencies with their existing operations. The proposed allocation is clearly consistent with both the NPPF and the NNJCS which requires LPAs to recognise the importance that economic development has to achieving 'sustainable development' and allocate suitable sites to meet the needs of existing businesses.

**Employment land availability**

To consider the above matter, 'Housing and Economic Land Availability Assessments' are required to identifying suitable sites for the delivery of employment requirements and highlights the importance of identifying a future supply of land that is suitable, available and achievable.

(\text{Table 1.1 and Site Assessment table are included within the attachment to this comment})

Having regard to the assessment above, it is clear that there are no sever site constraints that would impede development. On this basis, the site is considered to be suitable for development.

**Availability and Achievability**

The NPPG states that for assessing viability, there should be reasonable confidence that, on the best information available, there are no legal or ownership problems with a particular site. This often means the land is controlled by a single developer or the land owner is willing to sell. Assessing achievability is judging whether there is a reasonable prospect that a development will occur. It involves making judgements on the economic viability of a site.

Due to the business needs and the sites proximity to the existing Rigid site, Site D1 has an RGL 'in principle' board approval giving the green light to secure the site for future expansion. Discussions between RGL representatives and the landowner are progressing.

A pre-application enquiry is also being prepared to establish the principle of development and this provides further evidence that there is a strong appetite to bring Site D1 forward for development by all interested parties.

**CONCLUSION**

Having regard to the the NPPF and NNJCS, we are of the opinion that the draft allocation of D1 Site for employment use would meet the tests of sustainable development as defined by the NPPF and the NNJCS.

In summary, the proposed allocation would:

- respond positively to a specific local need from RGL, recognising the importance role that economic development has in achieving sustainable development;
  - comply with the NPPF / PPG requirements in that the site is sustainable, available and achievable;
  - support the long term retention of up to 300 jobs in Desborough;
  - be well located to existing employment uses demonstrating compatibility; and
  - have only a very limited impact on the surrounding natural

On this basis, the allocation of Site D1 is considered to be acceptable and therefore appropriate for allocation in the Site Specifics Local Plan Part 2.