

EiP Statement

Settlements and Countryside Local Plan (Part 2) for Daventry District

Our ref 16336/02/JG/MW1
Date 17 May 2019
To Daventry District Settlements and Countryside (Part 2) Local Plan Examination
From Lichfields

Subject Matter 4: Employment and Economy

1.0 Introduction

- 1.1 Lichfields is instructed by Prologis UK Limited (Prologis) who is the developer of Apex Park, Daventry; and its proposed extension. These representations are prepared by Lichfields on behalf of Prologis [Proposed Submission Representation Reference: PSo86] in relation to Daventry District Council's Settlements and Countryside Local Plan (Part 2) for Daventry District [the Local Plan] 2011 to 2029.
- 1.2 This Statement is submitted in the context of Prologis's interest in Daventry, namely land at Apex Park Phase 4, Daventry, part of Allocation EC7 – Daventry, Land North West of Nasmyth Road. This Statement sets out the basis of the representations to be made on behalf of Prologis at the Examination in Public [EiP] hearing session concerning Matter 4: Employment and Economy.
- 1.3 These representations supplement previous submissions submitted by Berrys, on behalf of Prologis, in relation to the Proposed Submission Part 2 Local Plan (October 2018), the Emerging Draft Part 2 Plan (January 2018) and the Issues and Options Consultation (2016).
- 1.4 This Statement responds to the Inspector's Matters, Issues and Questions. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [NPPF] and the National Planning Practice Guidance [NPPG].

2.0 Matter 4: Employment and Economy

Issue 2: Whether the approach towards the supply and delivery of employment development is justified, effective and consistent with national policy and the JCS.

Allocation EC7 – Daventry, Land North West of Nasmyth Road

- 2.1 The following questions are answered in respect of Prologis's interest in Allocation EC7.

Q8. Are the proposed employment allocations appropriate and justified in light of potential constraints, infrastructure requirements and adverse impacts? Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect deliverability or viability?

- 2.2 Prologis fully supports the proposed employment allocation and considers it is appropriate and justified in light of potential constraints, infrastructure requirements and adverse impacts. Prologis has submitted a hybrid planning application to Daventry Council for the development of allocation EC7.
- 2.3 The hybrid application is supported by a number of technical assessments. These technical reports and an Environmental Impact Assessment [EIA] have been undertaken to assess any potential impacts the development of the site would have on environmental receptors. The outcome of the EIA identified that the development is unlikely to have a significant adverse impact; and any impacts can be adequately mitigated for. This conclusion is supported by the Sustainability Appraisal [SA] which states that the site (EC7) “*was deemed to have the least environmental constraints associated with it*”. When considered against alternatives, it is considered that the development of the site would also bring about benefits in terms of an improved footpath/cycleway route to promote sustainable travel in the area.
- 2.4 Prologis has undertaken due diligence on the site and has not identified any issues in respect of site conditions or other constraints that would delay or adversely affect the deliverability or viability of the site. Suitable access can be provided from the existing Apex Park development and from Nasmyth Road. Prologis considers that there are no overriding issues that would affect it progressing the development of this site. Furthermore, Prologis has entered into an agreement with Cummins, who is an intended occupier for the site, to develop part of the site for its use.
- 2.5 Prologis welcomes the allocation of the site at Apex Park and looks forward to working with the Council to progress its delivery in accordance with Policy EC7.

Q9. Are the site boundaries correctly defined?

- 2.6 Prologis considers that the site boundary has largely been correctly defined. The hybrid planning application submitted by Prologis in April 2019, incorporates the majority of the proposed site boundary as set out in the Local Plan. The application incorporates additional land to the south of the allocation. A copy of the red line boundary for the application is appended to this Statement.

Q10. What are the assumptions regarding the capacity of the site allocations for development and what is this based on?

- 2.7 Table 8 of the Local Plan details the existing commitments and proposed employment allocations at Daventry Town. Land off Nasmyth Road (EC7) has a developable area of 13.4 hectares of which (subject to masterplanning) 6.7ha (50%) will provide for units less than 10,000 sqm.
- 2.8 The maximum unit size restriction at the Apex Park extension under allocation EC7 is 20,000 sqm, with at least 50% of the total floorspace to be provided by units not exceeding 10,000 sqm.

¹ PSD03 Sustainability Appraisal incl NTS November 2017 – ‘Housing and Employment Sites’ §5.3 and Table 6.1.

Alternative unit sizes will be considered where demonstrated that they are required for an existing business located in Daventry District.

- 2.9 The hybrid application submitted by Prologis seeks full planning permission for one commercial building and ancillary office space with outline permission for the creation of up to three smaller commercial buildings. Approximately 4ha of the allocated site will provide for a range of small units (all less than 10,000sqm). As noted, there is interest in the site from a local business, Cummins, who requires a unit of 40,000sqm. This accords with the provisions of EC7 which states '*alternative unit sizes will be considered where demonstrated they are required for an existing business located in Daventry District*'.
- 2.10 Cummins is looking to consolidate its existing operations within Daventry, which has the added benefit of freeing up some of their current smaller sites for businesses requiring smaller units. If this was not possible on allocation EC7, Cummins would have to look outside of Daventry, which would be a loss to the Daventry economy. This is explored within the Employment Study² submitted as part of the Council's evidence base. The amended scope of the policy to allow larger units, if an established local need is evidenced, ensures that Daventry Town retains and supports its economic base. These assumptions still protect the site's allocation from larger scale units such as those found at DIRFT.
- 2.11 The submitted planning application for the site, and market interest evidenced in the Employment Study provide clear evidence in support of the capacity of allocation EC7.

Q11. What is the expected timescale for development in terms of lead in times and delivery, are these assumptions realistic and supported by evidence?

- 2.12 The hybrid application for Apex Park Phase 4 has been submitted to Daventry District Council in May 2019. It will be subject to a 16-week determination period. Prologis anticipates that subject to discharging any necessary pre-commencement planning conditions, construction on the site could commence in Autumn 2019.
- 2.13 The build out time for the "full" aspect is expected to be 12 months in line with the requirements of the occupier, Cummins. The "outline" area will come forward thereafter and it is considered it will be delivered over a period of between three and five years (depending on market conditions).
- 2.14 Prologis has evidenced its commitment to progressing the site through the submission of a planning application and entering into an agreement with Cummins, who is the intended occupier.

Q12. Are the suitable employment uses indicated and the restriction on unit sizes, including any differentiations for existing business in Daventry District, justified and consistent with national policy?

- 2.15 The Employment Land Study makes the case for a demand for a need for small and medium sized industrial units in Daventry Town. Apex Park is identified in the Study as '*the highest quality industrial estate*' in Daventry Town where stock is of a larger scale and '*is more suited to B8 strategic distribution*'. The Study identifies that much of the potential demand comes from businesses already established in Daventry who are looking to expand or relocate. Whilst the Study relates this to smaller units, this is equally true of medium-sized units. Prologis supports

² Employment Land in Daventry District: The Demand for Small and Medium Units' (October 2017), Peter Brett Associates and Aspinall Verdi - §3.57

this assertion, which is evidenced by the commitment it has with Cummins, who is the intended occupier for part of the site.

- 2.16 Allocation EC7 proposes to provide for B1 (b,c), B2 or B8 uses. This is in line with the local need as set out above and it is considered that the allocation can support non-strategic B Use Class development. Strategic Distribution (larger B8 units) will be delivered at DIRFT unless there is an Occupier with a specific need elsewhere. Furthermore, it is noted that the allocations should be in Daventry Town (where Apex Park is situated) as this is where there is most demand for the space.
- 2.17 The evidence base and Local Plan has been the subject of engagement with the commercial development sector and has the potential to achieve a form of development that is responsive to the needs of the commercial sector and employees in line with national policy, whilst respecting the environmental context of the site. The policy includes the necessary flexibility for the sector to respond appropriately to local employer's needs and to accommodate them as necessary to support the local employment stability and future opportunities. This accords with the requirements of national policy which requires local authorities to have an understanding of both existing business needs and likely changes in the market³. Furthermore, §161 of the Framework requires a local authorities' evidence base to assess its "*sufficiency and suitability to meet identified needs.*"
- 2.18 The Employment Study makes specific reference to Cummins⁴ being unable to fulfil their requirement in the district. Prologis has engaged with Cummins to provide adequate space to meet their requirement within the EC7 allocation. In line with national policy, the flexibility within the Policy to meet the needs of local occupiers and retain and support the local economy is fully justified.
- 2.19 Policy EC7 is therefore justified and consistent with national policy.

Q13. Is the approach to include the proposed site allocations within the scope of Policy EC4 once complete, justified?

- 2.20 Prologis is supportive of the approach to include site allocation EC7 within the scope of Policy EC4 once complete. The existing Apex Park development falls under Policy EC4 therefore it is justified that the expansion of this area (allocation EC7) is also included.
- 2.21 This is an appropriate strategy to safeguard employment sites for non-strategic B Uses and employment generating uses. This is necessary as the Employment Land Study concludes that there is a current and likely future demand for small to medium industrial units in Daventry Town. The Study is considered robust; therefore, this approach is justified.

Q14. Has the SA adequately assessed the employment allocations against relevant environmental, social and economic objectives? Can suitable mitigation measures be achieved in order to address any potential adverse effects identified? Are these assumptions realistic?

- 2.22 Prologis considers that the SA has adequately assessed the employment allocations against relevant environmental, social and economic objectives.

³ National Planning Policy Framework 2012 - §160

⁴ Employment Land in Daventry District: The Demand for Small and Medium Units' (October 2017), Peter Brett Associates and Aspinall Verdi, §3.57

- 2.23 As set out earlier, an EIA has been undertaken as part of the planning application for the development of this site. A number of mitigation measures have been identified and will be implemented to address any adverse effects of the development. These have been reviewed by Prologis and its technical team to ensure they are suitable. The following mitigation is proposed as part of the Environmental Statement:
- Transport: Implementation of a Framework Travel Plan and travel demand strategy to encourage sustainable transport measures and contribution towards the provision of a footpath/cycleway extension on Drayton Way.
 - Landscape and Visual: Retention of existing boundary planting and new planting where possible and elevational treatment (light to dark banding) to minimise impact on sensitive visual receptors. The layout has been designed to minimise visual impact on surrounding residential receptors.
 - Biodiversity: The provision of new areas of wildflower grassland, native woodland and native hedgerow planting to establish new habitats and retention of perimeter trees and hedgerows where feasible. Green Infrastructure principles have been incorporated into the development to promote the link to the disused railway corridor and establish new green links to existing green space and countryside. The lighting strategy ensures that there will not be an adverse impact on Bat species.
 - Noise and Vibration: Construction will follow best practice means with details set out within a CEMP. A landscape bund along the western perimeter of the site provides mitigation to nearby residential properties.
- 2.24 It is not considered that the proposed development would impact on heritage or archaeological assets. It is expected, as stated in the SA that there will be a positive impact in respect of socio-economic objectives as development of the site will provide employment opportunities.
- 2.25 The above sets out how suitable mitigation measures are proposed, in line with Policy requirements, to address any potential adverse effects of the development.
- Q15. Are the proposed employment allocations and the associated development requirements and principles in the related policy, including any necessity for master planning, justified, effective and consistent with national policy?**
- 2.26 Prologis supports the allocation of the site at Apex Park under Policy EC7. The development requirements and principles are based on a sound evidence base that has been fully justified. The site is under the ownership of Prologis, who can bring it forward with a comprehensive masterplan for the whole site, within the plan period.
- 2.27 There are a number of principles within the Policy including the requirement to retain landscape features, ensure good design and encourage sustainable travel. These measures are incorporated into the application and enable the delivery of a sustainable development in line with the Framework. Consequently, Prologis believes the Policy is justified, effective and consistent with national policy.