



Local Plan Part 2 – Protected employment areas (Policy EN19)

January 2021

Purpose of the report

This background paper will address the following:

1. This report has been prepared to explain the process for identifying specific employment protection areas across the District. Ultimately, it will make proposals for designating employment protection areas in the Local Plan Part 2.
2. The report has been informed by the Aspinall Verdi review of the market for employment provision in East Northamptonshire (March 2019).

1.0 Introduction and background

1.1 Aspinall Verdi was jointly commissioned by Kettering Borough Council and East Northamptonshire Council in 2018 to undertake a review of the market for employment provision in the two authority areas, and to assess the suitability and achievability of employment sites from a market and business perspective. The Aspinall Verdi¹ study was finalised and published in March 2019. It is split into two main elements:

- to assess the potential demand for new employment floor space; and
- to provide an assessment of the property market for the mix of development sites that the new Local Plan should identify.

1.2 This assessment would cover offices, general industrial space and strategic distribution. The purpose of the analysis is to inform and determine:

- How far the existing floor space stock is meeting current and foreseeable occupier requirements;
- How far there is likely to be demand for more or different space, now or in the future;
- If property and land is found to be oversupplied, overall or in particular sections of the market.

¹ https://www.east-northamptonshire.gov.uk/downloads/file/11259/190307_east_northants_elr_report_final

- 1.3 The North Northamptonshire Joint Core Strategy (JCS) 2011-2031, adopted July 2016 (the Local Plan Part 1) includes a requirement for: “*Safeguarding existing and committed employment sites for employment use unless it can be demonstrated by an applicant that there is no reasonable prospect of the site being used for that purpose*” (Policy 22(c)), as one aspect of delivering a strong sustainable economy.
- 1.4 The National Planning Policy Framework advises that plans should be deliverable (para. 16(b)) and planning should avoid safeguarding employment sites that have no reasonable prospect of being used for that purpose (para. 120). Local Plans should identify sites for proposed employment, only if they are likely to be deliverable within the duration of the Plan period.
- 1.5 There are two approaches that the Local Plan Part 2 may take to deliver the required JCS outcome; i.e. “a sustainable balance between local jobs and workers and a more diverse economy”:
- To focus upon allocating further employment sites within the District, to maximise the numbers of jobs across the District that the market could deliver; or
 - To focus upon protecting existing employment sites while additional sites, above and beyond those not already committed or allocated through the JCS, could be allocated through Neighbourhood Plans.

2.0 Current planning policy framework for protected employment areas

- 2.1 The 1st draft Local Plan Part 2 (November 2018) was supported by an analysis, of significant employment sites that had already been delivered, and were anticipated to come forward over the remaining duration of the Local Plan period. This assessment found that over 9,300 jobs could be anticipated to come forward from major strategic sites, exceeding the Joint Core Strategy requirement (7,200 jobs) by over 2000 (paragraph 7.22).
- 2.2 Given that there are already sufficient employment sites coming forward to meet the Local Plan jobs requirements, the overall focus for the Local Plan Part 2 should be the identification, retention and/ or consolidation of the area’s existing / established employment base. Initial/ interim draft findings of the Aspinall Verdi study (autumn 2018) were utilised to inform the 1st draft Local Plan Part 2 text to be found in Chapter 7: Economic Prosperity (paragraphs 7.31 – 7.40 / Policy 18) and the index of Protected Employment Areas to be found in Appendix 1.
- 2.3 The JCS (Policy 22) already provides overarching policy criteria for safeguarding existing employment areas. The Local Plan Part 2, as a site specific development plan document (DPD), should add value, by identifying those industrial and commercial sites that should be designated as protected employment areas.
- 2.4 The following adopted Neighbourhood Plans have already designated protected employment areas:

- Chelveston cum Caldecott Neighbourhood Plan 2016-2031, “made” July 2017;
- Higham Ferrers Neighbourhood Plan 2011-2031, “made” April 2016;
- Raunds Neighbourhood Plan 2011-2031, “made” November 2017;
- Rushden Neighbourhood Plan, “made” June 2018;
- Brigstock Neighbourhood Plan “made” January 2019 and
- King’s Cliffe Neighbourhood Plan “made” October 2019.

2.5 Furthermore, the current Local Plan Part 2, the Rural North, Oundle and Thrapston Plan (RNOTP), adopted in July 2011 also designated a number of protected employment areas (Policy 16 / Appendix 5). The criteria-based policy (16) seeks to ensure that there will be no net reduction in the quantum of established employment sites or that alternative use is only acceptable where it can be proven under strict circumstances that it would be appropriate for the site.

2.6 In line with the findings and recommendations of the Aspinall Verdi review of the market for employment provision in East Northamptonshire (2019), the new Local Plan Part 2 should:

- Review and update RNOTP Policy 16;
- Consider the most appropriate approach in cases where a Neighbourhood Plan has designated protected employment areas;
- Take account of the existing policy framework (e.g. JCS Policy 22, RNOTP Policy 16 and Neighbourhood Plans).

2.7 This paper will consider the following matters:

- Approach and methodology for identifying protected employment areas;
- Summary details for proposed protected employment areas.

3.0 Approach and methodology for identifying protected employment areas

3.1 The council anticipates that their job growth target can be satisfied through their strategic site allocations, where specific sites for employment uses have been allocated. These key strategic sites, which have/ are expected to come forward during the current Plan period (2011-2031), are:

- Primark site, Islip
- Irthlingborough West SUE
- Warth Park, Raunds
- Rushden East SUE
- Rushden Gateway (Nene Valley Farm)
- Rushden Lakes

Cambridge-Milton Keynes-Oxford corridor

- 3.2 East Northamptonshire District is located at the northern edge of the Cambridge-Milton Keynes-Oxford (CMKO) corridor (now known as the Ox-Cambs Arc). The Ox-Cambs Arc (OCA) corridor is a national corridor of urban and rural areas, within an 80-kilometre radius of London and stretching approximately 209 kilometres from Cambridgeshire, via the south-east midlands, to Oxfordshire. The corridor is bookended by two world-class universities (Oxford and Cambridge), and contains a number of research locations and educational institutions - including nine of the UK's top 100 'high growth tech firms'. The corridor hosts some of the most productive, successful and fast-growing cities within the United Kingdom.
- 3.3 In terms of connectivity, the principal transport arteries bisect the corridor in a north – south direction, providing strong links to London, the Midlands and north England (e.g. M40, M1, A1 and A14 / M11). However the corridor is not currently served by high-quality east to west transport links; therefore the delivery of improved east-west strategic connections is a priority outcome for the OCA.

Proposed principal use

- 3.4 The Aspinall Verdi (AV) report has set out the procedure for categorising each employment space. For each site, the predominant employment use must be determined. This first step is important because different types of occupier will have different requirements. For example, excellent strategic road access is more important for strategic logistics rather than general industrial uses. They have identified four main typologies/ mixes of use, based around functions formerly known as 'B' Class employment uses (under the 1987 Use Classes Order, and subsequent updates to 2015²); i.e. non-town centre uses, with reference to the typical requirement of each sector:
- Business use;
 - Research, technological and light industrial uses;
 - General industry; and
 - Storage and distribution –warehousing and logistics.

Quality, Vacancy and Recommendation

- 3.5 The AV Report considered the following issues/ questions:
- The quality of existing stock at a number of sites across the District, by assessing the condition of the units; including their age and specification. This is also an important step, as it indicates whether or not a unit is fit for purpose or is coming to the end of its economic life.
 - Other market intelligence to include any information, which has been collected as part of the study that may have a bearing on a site's attractiveness to occupiers. For example, if an occupier has recently

² <https://www.legislation.gov.uk/ukxi/2015/597/contents/made>

invested in their accommodation or expanded it, this can indicate that they expect to remain in the area in the short to medium term.

- Vacancy³ is a key criterion, as it indicates the health of an employment area (estate); i.e. High vacancy rates may indicate that the estate is unattractive to occupiers, while Low vacancy may indicate that a specific commercial estate is in high demand.
- If the site retains its current use, will it continue to be occupied? (This is a simple binary question and is self-explanatory).
- Opportunities and constraints for redevelopment, intensification, extension and refurbishment were considered. In a scenario that an opportunity should arise, the consideration should be how much land is available to be developed and whether there are any constraints that could affect the ability of an established business/ operation to expand. For each of the sites assessed, these potential opportunities have been outlined in the AV report and identified based on whether they are likely to be, or can be, resolved within the plan period.
- Finally, in each case a conclusion is drawn, as to whether the employment area should be safeguarded or earmarked for managed release in the emerging Local Plan Part 2.

3.6 Aspinall Verdi (AV) classified employment sites/ area in terms of three categories of protection. These are:

- **Safeguard:** this category is self-explanatory. The existing employment site should be in enough demand from occupiers to be viable and should be kept in employment use over the plan period.
- **Safeguard in the short term:** when undertaking site assessments, AV found that there are a number of sites in the district which are occupied by a single occupier, often with bespoke buildings or comprising smaller units with multiple occupiers. They noted that this is at a time in the property cycle where demand is strong and general vacancy is low. However, should the market weaken, these sites would be most at risk and it would be difficult to fill – should a vacancy occur. As they are functioning well in the short-term, the report considers it reasonable to safeguard these sites and not promote them for managed release. If the market does weaken and vacancy becomes a concern, these sites should be re-assessed on a site by site basis—; to avoid unnecessarily safeguarding employment sites that have no hope of being re occupied.
- **Allow managed release:** some sites have been deemed to be already at the end of their economic lives, not fit for purpose or unattractive to occupiers. For these, the report recommends that they should be considered for release and for alternative uses.

³ Vacancy is scored on a system based on the perception of the number of available units, compared to the size of the commercial estate: this includes the criteria - none; to low; to middling; to high up to 100% vacant.

4.0 Existing evidence base

4.1 The updated Employment Land Review (ELR) considered a long list of 44⁴ (initially 43 sites, with the subsequent addition of the Sudborough Road, Brigstock employment area⁵) established employment areas, of greater than 1ha, with potential for designation as protected employment sites. A further 8 smaller employment areas (i.e. less than 1ha) were also assessed, in order to provide a balanced portfolio. A key reference point was the previous list of sites considered by the previous ELR (Atkins, December 2006⁶). The 2006 ELR was prepared in accordance with in accordance with 2004 guidance issued by the Government on undertaking employment land reviews.

National guidance/ best practice

4.2 The 2004 guidance was replaced by the Planning Practice Guide (PPG) re housing and economic needs assessment, paragraphs 030-034⁷. The PPG advises that plan makers should consider a number of issues in respect of employment land; including recent patterns of employment land supply and loss to other uses, market information and the existing stock of employment land, so as to indicate the demand for and supply of employment land and determine the likely business needs and future market requirements (paragraph 030).

4.3 While now outdated, the 2006 ELR provided a useful reference/ “start point” for assessing the existing stock of employment land across the District. More recently, the 2009 Strategic Employment Land Assessment (SELA) and 2013 Strategic Housing Land Availability Assessment (SHLAA) provide a basis for identifying further potential land allocations (those sites, >0.25ha).

4.4 In 2012/13, officers began a process of reviewing established employment areas; focusing upon the south of the District (Higham Ferrers, Irthlingborough, Raunds, Rushden and surrounding villages), to support the preparation of the former Four Towns Plan. The decision in 2016 to discontinue the Four Towns Plan and replace this with a new District-wide Local Plan entailed new evidence gathering. To support this, sites identified in the 2006 ELR, were considered, together with other employment areas not previously assessed through the ELR.

⁴ Elliot’s Yard (Park Street, King’s Cliffe) was initially put forward as a potential employment protection area. However, this was not taken forward for assessment, due to its exclusion from the King’s Cliffe Neighbourhood Plan (“made” October 2019) and being situated within Flood Zone 3.

⁵ Additional site identified in 2018, after preparation/ approval of Employment Land Review project brief. Site protected in any event through Neighbourhood Plan designation, “made” after publication of 1st draft Local Plan Part 2 (November 2018), so not therefore included within numbering sequence.

⁶ https://www.east-northamptonshire.gov.uk/downloads/download/275/ldf_evidence_base_-_employment_land_review

⁷ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

“Top 40” companies, in terms of Business Rates

- 4.5 Around 2013, officers began to review the earlier evidence base, with a view to updating the ELR. Around the same time, changes to legislation regarding the collection and retention of Business Rates (The Non-Domestic Rating (Rates Retention) Regulations 2013) now requires the Council to take a more pro-active approach to managing data collection in respect of monitoring employment land supply changes across the District. The Council regularly publishes and updates the “Top 40” list of companies within the District, in terms of their rateable values. This list provides a key indicator as to the most significant businesses currently trading within the District.
- 4.6 The “Top 40” list includes the following businesses that are not considered appropriate for designation as protected employment areas:
- Three schools (Oundle School, Prince William School and The Ferrers School);
 - Two strategic infrastructure sites (Broadholme Sewage Treatment Works and Chelveston Renewable Energy Park); and
 - Two town centre/ edge of centre retail sites (Asda and Lidl, Rushden).
- 4.7 As at 2018 (time of the AV survey), the other 33 businesses that fall within the “Top 40” list provided a clear basis for defining the most significant employment areas within the District. This recognises that businesses with the largest rateable values should be recognised for their current contribution to the District’s economy.
- 4.8 Of the 52 sites considered through the ELR, 20 are already designated as protected employment areas, by virtue of their status in other recently adopted development plan documents. Of these 20 sites, 8 Rushden sites (forming the Sander’s Lodge/ Crown Park, Northampton Road/ Wellingborough Road employment area) are covered by single designations in the Minerals and Waste Local Plan and Rushden Neighbourhood Plan. The other 11 such areas are similarly designated through Neighbourhood Plans and the LPP2 should recognise this position.
- 4.9 Sander’s Lodge (Rushden), Kimbolton Road (Higham Ferrers) and the Nene Valley Business Park (Oundle) employment areas are identified in the Minerals and Waste Local Plan (adopted July 2017) as suitable locations for waste management facilities (Policy 13). It is important to ensure that the adverse environmental impacts arising from waste management uses are minimised, through robust application of development management policies from the Minerals and Waste Local Plan and Joint Core Strategy (Policy 8), alongside associated licencing regimes. In addition, the suitability of these sites can be revisited through the review of the Minerals and Waste Local Plan.
- 4.10 The remaining 34 established employment areas were deemed to need more detailed detailed assessment through the ELR. Aspinall Verdi assessed 21 of the 52 identified sites, to provide a balanced range of sites across the District.

Many of the areas assessed contain one or more “Top 40” businesses in East Northamptonshire, in terms of rateable value. This provides a strong indicator as to the relative value or importance of a site as part of the existing employment land portfolio.

- 4.11 Rushden Lakes hosts a number of top 40 businesses, including House of Fraser, Marks & Spencer and Next. This was not included in the employment land assessment, which focuses upon the quality and marketability of long established employment areas that may (in some cases) be coming to the end of their operational lives. Employment areas assessed by Aspinall Verdi, which hosted one or more of the top 40 businesses as at 2018, were listed in the 1st draft Local Plan Part 2 (Table 13).
- 4.12 The Aspinall Verdi study noted that Whitworths has expressed a desire to retain its current premises at Irthlingborough for the medium/ long term. Previous proposals for comprehensive redevelopment of the site for housing and wholesale relocation of Whitworths’ operation have been replaced by proposals for the release of part of the site for residential development; while concentrating the existing business on part of the site.
- 4.13 Designated employment protection areas (i.e. those that ought to be safeguarded) will be shown on the Policies Map. A list of proposed sites for consideration as employment protection areas, which informed the ELR project brief, was published in the 1st draft Local Plan Part 2 (Appendix 1⁸) in support of draft Policy EN18 (below). This should also be utilised in conjunction with the Joint Core Strategy (Policy 22(c)), relevant Neighbourhood Plan policies.

Policy EN18: Protected Employment Areas

The existing employment sites, as shown on the Policies Map, are protected for employment use⁹. Proposals for re-development or changes of use of existing buildings should ensure that the overall provision of employment after development is no less than that of the current or most recent use. A reduction in the level of employment or development for non-employment uses where it can only be supported where it can be demonstrated that:

- a) There is no realistic prospect of the site or buildings being used or re-used, including redevelopment, for employment purposes¹⁰;
- b) Constraints associated with the site or buildings mean these would be unsuitable for re-use, in terms of siting, design, access, layout

⁸ https://www.east-northamptonshire.gov.uk/downloads/file/11035/appendix_1_-_protected_employment_areas_cover_sheet

⁹ Appendix 2 indicates that other employment type uses outside the B Class may be possible on these sites in appropriate circumstances

¹⁰ In relation to criterion a) a suitable time period would be to sites being marketed for employment purposes for at least 12 months without success

and relationship to neighbouring buildings and uses; and

- c) Development contributions will be made to support economic development across the district¹¹.

4.14 The 1st draft Local Plan Part 2 consultation (November 2018 – February 2019) generated a number of representations regarding the list of potential sites at Appendix 1 and the extent of these. In response to the consultation, the following amendments to the list of protected employment areas are proposed:

- Kimbolton Road, Higham Ferrers (EPA09) – Removal of Federal Estates land (eastern part of the site) from the protected employment area, in light of the draft Policy EN37;
- Nene Park/ Nene Business Park, Irthlingborough (EPA12) – Removal of land to the East of Attley Way (Land Adjacent Marsh Lane) from the protected employment area, given that construction of new residential development commenced in early 2020;
- Rectory Business Centre, Rushden (EPA39) – Removal of site from list of protected employment area, in light of Aspinall Verdi findings and draft Policy EN36 proposals; and
- Windmill club/ Business Centre, Glassbrook Road, Rushden (EPS03) – Removal of site from list of protected employment area, in light of Aspinall Verdi findings.

4.15 In its submission form, the protected employment areas policy will relate to all sites identified by Aspinall Verdi as being worthy of retention, plus other sites that that satisfy relevant criteria for retention; e.g. due to their current status/ designation. The JCS, emerging Local Plan Part 2 and/ or relevant Neighbourhood Plan policies provide overall safeguarding for the specified employment areas. Within these areas it should be recognised that some changes of use are permissible under permitted development rights and this Policy cannot protect against this.

5.0 Collating potential employment area development plan allocations

5.1 In preparing the project brief for the ELR, ENC and KBC officers engaged in a process of assessing potential sites for consideration. In the case of East Northamptonshire, this process identified 43 (later 44) sites >1ha. A further 8 smaller sites were subsequently added to the Aspinall Verdi assessment. The process by which a long list of these sites was prepared is set out below.

5.2 The first part of the process for setting the prospective long list of protected employment areas involved recording potential protected employment areas, through applying a series of search criteria. It did not include existing employment land commitments or allocations that have come forward since

¹¹ The mechanism for calculating development contributions will need to be progressed via an item of Supplementary Planning Guidance

2011 and are, as yet, undeveloped; e.g. Rushden Gateway/ Nene Valley Farm (JCS Policy 35). These sites are already safeguarded for employment uses in any event by virtue of their current planning status.

- 5.3 Sites are identified as protected employment areas in the Local Plan Part 2, where these are already allocated, or are proposed for allocation, through the:
- Minerals and Waste Local Plan, adopted July 2017;
 - “Made” (adopted) Neighbourhood Plans; or
 - Neighbourhood Plans that have reached publication or submission stage (i.e. at an advanced stage of preparation).
- 5.4 Otherwise, further analysis of suitability of sites of 1ha gross area or above, with at least one currently operational business or employment use was undertaken by Aspinall Verdi during 2018, where these were previously:
- Assessed through the 2006 ELR (significant changes noted);
 - Allocated through the RNOTP (current Local Plan Part 2);
 - Identified through previous evidence gathering (2012/13); or
 - Hosting at least one “Top 40” business.
- 5.5 Annex 1 to this report lists those employment areas that fulfil the criteria above. It summarises the current situation for these established employment areas, setting out summary information regarding gross site areas (hectares), the presence (or otherwise) of a “Top 40” business, the current development plan status and key characteristics of each site.
- 5.6 This information provided a starting point for Aspinall Verdi to undertake more detailed site assessment work. Of the 44 longlisted sites (>1ha), 13 were assessed in detail by Aspinall Verdi, with the others already designated/ proposed as protected employment areas by virtue of their current status and/ or known characteristics. In finalising the project brief, the additional 8 smaller employment sites (<1ha) were assessed by Aspinall Verdi, using the same approach/ template as for the larger sites.

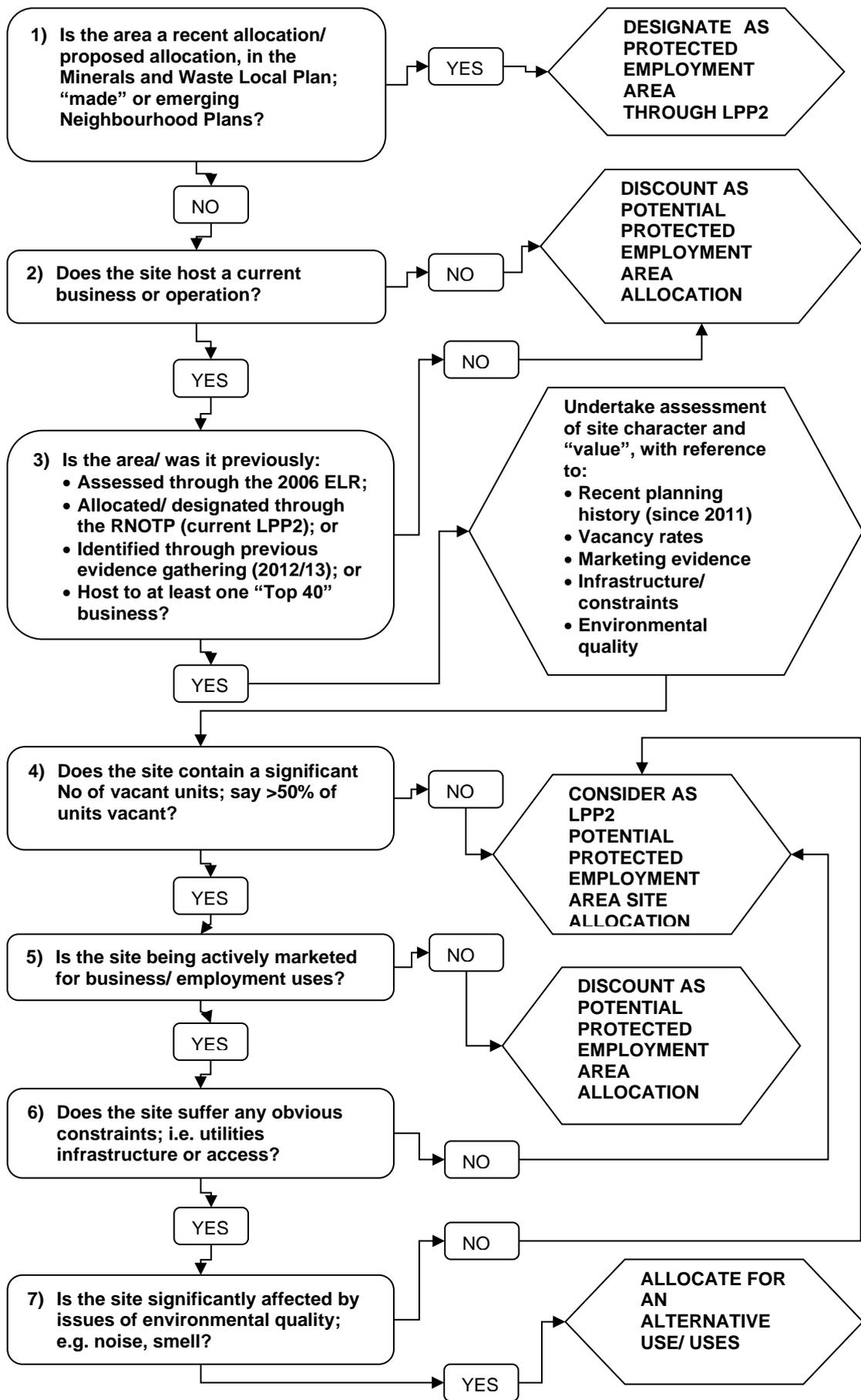
Process for assessing the quality of existing employment areas

- 5.7 Aspinall Verdi’s assessment process analysed which of the 21 employment areas assessed in detail are appropriate to be considered for allocation in the Local Plan Part 2. Also, this analysis identified sites that could be more productively redeveloped and/ or released for alternative uses.
- 5.8 The quality of existing employment sites were assessed by Aspinall Verdi with reference to a broad range of considerations, including the following:
- The presence of a “Top 40” business – It is assumed that the presence of a “Top 40” business is significant evidence as to the wider value of the employment area concerned;

- Recent planning history – Applications and/ or pre-application enquiries relating to industrial or commercial sites in, or in close proximity to, the established employment areas;
- Vacancy rates – Number and percentage of vacant units for each identified employment area compared to number of business premises; also considering levels of interest from prospective occupiers (i.e. market intelligence and signals from property agents);
- Constraints – Infrastructure and/ or physical constraints that limit the marketability or attractiveness of existing industrial or commercial premises (public sector bodies and/ or utilities companies);
- Environmental factors – The ability of sites to accommodate the future needs of businesses may be affected by both to the general quality of the environment (e.g. age or physical condition of existing premises, or the impacts of existing operations upon the surrounding locality).

5.9 These measures were identified with reference to the Planning Practice Guide (PPG). This national guidance relates to both the need and demand for employment land, and its availability and suitability. The PPG has informed the range of measures set out above.

5.10 Figure 1 (below) summarises the shortlisting process for considering the suitability of individual employment areas as site specific designations in the Local Plan.



Shortlisting of sites (Q1-Q3)

- 5.11 In responding to the project brief, Aspinall Verdi assessed the shortlist of 21 established employment areas across the District that were identified by officers using the process detailed at Figure 1 (above). The initial “long list” of potential sites is set out at Annex 1.
- 5.12 Annex 2 sets out a more detailed site-by-site commentary for sites >1ha, with reference to questions 1-3 (Figure 1, above). The assessment was undertaken in 2018 (prior to completion and publication of Aspinall Verdi report) on a presumption that all of the identified employment areas ought to be protected; unless there are specific reasons that a more sustainable approach would require a site to be released for an alternative use/ uses.
- 5.13 The “seven question” assessment process at Figure 1 (above) applied an iterative process, to identify potential protected employment areas. This was necessary to inform the shortlisting process for individual sites to put forward to Aspinall Verdi to undertake a more detailed analysis. The sites that were fully assessed by Aspinall Verdi are highlighted in yellow, in the 1st draft Local Plan Part 2 (Appendix 1¹²).
- 5.14 This section explains the preliminary assessment process, undertaken in preparing the project brief for Aspinall Verdi. Aspinall Verdi, in preparing the ELR during 2018, used the project brief to undertake detailed assessments for each of the sites subsequently listed in the 1st draft Local Plan Part 2. The subsequent publication of the final ELR (March 2019) informed the Council’s responses to consultation representations (Planning Policy Committee, 1st April 2019, Item 6¹³), and amendments the draft Policy EN18 wording or the list of protected employment sites.

Q1: Is the area a recent allocation/ proposed allocation, in the Minerals and Waste Local Plan; "made" or emerging Neighbourhood Plans?

- 5.15 Several recently adopted and draft development plan documents have designated one or more protected employment areas. **Table 1** (below) identifies sites that should be designated as protected employment areas, by virtue of designation of in an adopted or emerging development plan document since March 2012 (1st version NPPF start date). This represented the current position as at autumn/ winter 2018; at the time of the 1st draft Local Plan consultation (November 2018 – February 2019), prior to publication of the finalised Employment Land Review (Aspinall Verdi, March 2019).

¹² https://www.east-northamptonshire.gov.uk/downloads/file/11035/appendix_1_-_protected_employment_areas_cover_sheet

¹³ https://www.east-northamptonshire.gov.uk/meetings/meeting/949/planning_policy_committee

Table 1			
Development plan document	Site Name	Location	Site reference (ENC/ Annexes)
North Northamptonshire Joint Core Strategy (JCS) 2011-2031, adopted July 2016	Rockingham Enterprise Area, Mitchell Road	Deene/ Corby	EPA06
Northamptonshire Minerals and Waste Local Plan (MWLP), adopted July 2017	Kimbolton Road	Higham Ferrers (also HFNP)	EPA09
	Nene Valley Business Park	Oundle	EPA22
	Rushden Business Park, Brindley Close	Rushden ¹⁴	EPA30
	Crown Park	Rushden	EPA31
	Express Business Park, Shipton Way	Rushden	EPA32
	Sanders Lodge North	Rushden	EPA33
	Norris Way / Elan Court	Rushden	EPA34
	Francis Court	Rushden	EPA36
	Sanders Lodge South	Rushden	EPA37
Chelveston cum Caldecott Neighbourhood Plan (CCNP) 2016-2031, "made" July 2017	Manor Farm/ Poplar Farm	Caldecott	EPA04
	Carr Brothers Depot, Upper Higham Lane	Chelveston/ Higham Ferrers	EPA05
Higham Ferrers Neighbourhood Plan 2011-2031 (HFNP), "made" April 2016	Kimbolton Road	Higham Ferrers	EPA10
	Chowns Mill, Station Road	Higham Ferrers	EPA10
	Lakeside House, Bypass	Higham Ferrers	EPA11
Raunds Neighbourhood Plan (RNP) 2011-2031, "made" November 2017	Warth Park	Raunds	EPA25
	Enterprise Road	Raunds	EPA26
	New Barn Farm, Brick Kiln Road	Raunds	EPA27
	East of A45 Roundabout, Brick Kiln Road	Raunds	EPA28
Brigstock Neighbourhood Plan (BNP), "made" January 2019	Sudborough Road	Brigstock	n/a

5.16 20 (out of 44¹⁵) of the sites identified through the initial shortlisting "trawl" were identified for designation as protected employment areas, by virtue of their status in other recently adopted development plan documents. Of these 20 sites, the eight Rushden sites are covered by a single designation in the

¹⁴ Rushden employment area, covered by the MWLP, is also designated a protected employment area in the Rushden Neighbourhood Plan, "made" June 2018. This corresponds to the MWLP area.

¹⁵ An initial long list of 43 sites was assembled for the project brief and 1st draft Local Plan Part 2. The Sudborough Road (Brigstock) employment area (Neighbourhood Development Plan (NDP), Policy B17) was subsequently added to the list of Protected Employment Areas, upon "making" of the Brigstock NDP (January 2019).

Minerals and Waste Local Plan. This designation is similarly incorporated into the Rushden Neighbourhood Plan.

Q2: Does the site host a current business or operation?

- 5.17 Sites that are less than 1ha gross area were initially proposed for discounting from the site assessment process. In order to provide a more balanced portfolio of potential protect employment areas the scope of the “trawl” was subsequently amended to include a limited list of 8 sites <1ha within the urban areas or large villages.
- 5.18 Sites which, as at autumn 2018, did not have a current business/ employment use (e.g. longstanding/ unimplemented employment land commitments) were also discounted from the list of potential protected employment areas. The updated NPPF explains that: “*Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan...they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped)*” (paragraph 120). As such, it is considered that there could be no reasonable justification for rolling forward unimplemented employment sites from earlier development plan documents such as the 1996 District Local Plan.

Q3: Is the area/ was it previously...Assessed through the 2006 ELR etc?

- 5.19 The shortlisting process recognised that earlier studies and evidence base provided a good reference point for considering possible candidate sites to be designated as Protected Employment Areas. The 2006 ELR, superseded/ replaced by the 2019 Aspinall Verdi study has, nevertheless, provided a good starting point for assessing the suitability of the existing portfolio of employment sites (21 different sites across the District assessed in more detail by Aspinall Verdi).

Sites needing a more detailed assessment (Q4-Q7)

- 5.20 The shortlisting process has excluded 20 sites (Table 1), by virtue of their current (post 2012) development plan status. These sites need to be safeguarded in order to ensure that the Local Plan Part 2 and other development plan documents are in alignment. An exception is the Kimbolton Road, Higham Ferrers employment area (EPA10), for which the 1st draft Local Plan Part 2 proposed that the eastern part of the area be released for residential development (draft Policy EN37), despite its current designation as protected employment land in the Minerals and Waste Local Plan and Higham Ferrers Neighbourhood Plan.
- 5.21 In the case of the Kimbolton Road employment area, the majority of the eastern part of the site (owned by Federal Estates) has been vacant and derelict for over 10 years; such that national policy directs that the Local Plan should reallocate the site for a more deliverable use (NPPF paragraph 120(a)). This status was confirmed (November 2020) by the granting of planning permission (subject to s106) for the redevelopment of this land (owned by Federal Estates) for 120 dwellings and relocation of existing

businesses to a new Chelveston Innovation Energy Park, adjacent to the Chelveston Renewable Energy Park (reference 19/01781/FUL).

5.22 A further assessment of shortlisted sites was undertaken to inform Aspinall Verdi in preparing the ELR. Sites were considered as to whether or not it is deemed necessary to undertake detailed site specific assessment. Sites >1ha were “discounted” where sufficient evidence/ rationale is available to indicate that these should be protected, for one or more of the following reasons:

- Open countryside locations, with limited opportunities for alternative uses other than equivalent rural diversification schemes;
- Single occupier sites;
- Major established employment areas on strategic A14 corridor; e.g. Islip Furnace; or
- Employment sites delivered during the current Plan period (since 2011).

5.23 This enabled a manageable shortlist of sites, to be fully assessed. Aspinall Verdi undertook the assessment during 2018 and interim findings were received in autumn 2018, coinciding with the 1st draft Local Plan Part 2 consultation.

5.24 Annex 2 sets out more detailed information about the larger employment sites (>1ha) and their overall status and quality. It provides a brief qualitative officer level analysis, complemented by the more detailed quantitative assessment by Aspinall Verdi. Over and above sites that are already designated protected employment areas by virtue of policies in other adopted development plan documents (i.e. Minerals and Waste Local Plan and/ or Neighbourhood Plans), Aspinall Verdi assessed shortlisted sites, as to whether or not these should be recognised by virtue of their current contribution to the economic base of the District.

5.25 Annex 2 and the Aspinall Verdi assessment together, consider factors that should determine an existing employment area’s continued importance to the District’s economic portfolio. In many cases this may be the result of the development of significant strategic employment developments since 2011, or whose economic contribution is already recognised; e.g. Primark, Islip. Table 2 (below) summarises this information, identifying employment areas that fit into this category.

ENC Annexes site reference	Address	Location	Commentary
EPA14	Islip Furnace Site, Kettering Road	Islip	Major strategic employment development since 2011 (Primark)
EPA16	Westhay employment area, Stamford Road	King's Cliffe	Major “Top 40” companies – PC Howard/ Augean
EPA17	Kingsmead	King's Cliffe	Adjoins King's Cliffe Neighbourhood Plan site allocation
EPA19	King's Cliffe Industrial Estate	King's Cliffe/ Nassington	Significant strategic employment development since 2011

Table 2			
ENC Annexes site reference	Address	Location	Commentary
EPA23	Oundle Marina	Oundle/ Barnwell	Consent for significant strategic development since 2011
EPA07	Horizon Centre, Gretton Road	Deene/ Corby	Significant strategic/ Top 40 employment development since 2011
EPA12	Nene Park/ Nene Business Park etc (Irthlingborough East)	Irthlingborough	Principal/ key regeneration site, including established business park, therefore should be retained as predominant employment area
EPA13	Whitworths, Wellingborough Road	Irthlingborough	Top 40 company/ main employer at Irthlingborough
EPA24	Polebrook Airfield	Polebrook	Significant site (warehousing/ distribution), but open countryside (away from established settlements)
EPA29	Rushden Lakes	Rushden	Significant strategic employment development since 2011
EPA35	Spire Road, John Clark Way	Rushden	Significant strategic employment area
EPA38	Recycling Plant, Bedford Road	Rushden	Top 40 company
EPA40	Ravensden Farm, 265 Bedford Road	Rushden	Significant strategic employment development since 2011
EPA41	Halden's Parkway	Thrapston	Significant strategic employment development since 2011
EPA43	Top Close	Thrapston	Significant/ long established employment area

5.26 The remainder of employment areas need to be subject to further assessment, to determine whether these are appropriate to be designated for protection, or whether the site could be better utilised or redeveloped for alternative uses. Table 3 (below) identifies those sites that were shortlisted for Aspinall Verdi to undertake a detailed assessment for the ELR.

5.27 The assessment above (Tables 1 and 2) identified an initial list of 35 sites that are considered appropriate for designation as protected employment areas, plus a further 9 sites >1ha requiring further assessment to determine their suitability as functional employment areas. Key sites at Higham Ferrers and Irthlingborough were also proposed for inclusion within the Aspinall Verdi assessment; a necessity to understand the underlying economic situations of these sites. In these cases it was deemed that these should be assessed further to systematically identify the key issues affecting these older significant employment sites.

Table 3			
Annex 1 and 2/ Aspinall Verdi site reference	Address	Location	Commentary/ justification for inclusion within Aspinall Verdi detailed assessment
EPA01/ ENE16	Barnwell Turn, Oundle Road	Barnwell	Open countryside location, including a range of uses; e.g. garden centre,

Table 3			
Annex 1 and 2/ Aspinall Verdi site reference	Address	Location	Commentary/ justification for inclusion within Aspinall Verdi detailed assessment
			waste management plant
EPA02/ ENE6	Barnwell Workshops, Home Farm, Armston Road	Barnwell	Rural location; assess for current function and quality
EPA08/ ENE5	Cliffe Road/ Stamford Road	Easton on the Hill	Rural location; assess for current function and quality
EPA09/ ENE8	Kimbolton Road ¹⁶	Higham Ferrers	Significant employment area, but some units/ parts are vacant/ under-occupied
EPA10/ ENE7	Chowms Mill, Station Road ¹⁵	Higham Ferrers	Significant employment hub along A45/ A6 corridor
EPA12/ ENE10	Nene Park/ Nene Business Park etc (Irthlingborough East) ¹⁷	Irthlingborough	Principal/ key regeneration site, including established business park, therefore should be retained as predominant employment area
EPA13/ ENE2	Whitworths, Wellingborough Road	Irthlingborough	Top 40 company/ main employer at Irthlingborough
EPA15/ ENE1	Acorn Industrial Estate	Islip	Rural location; assess for current function and quality
EPA18 / ENE15	East Road	Oundle	Character of area has fundamentally changed with Waitrose development
EPA20/ ENE4	Addington Park/ Hill Farm Industrial Estate	Little Addington	Rural location; assess for current function and quality
EPA22/ ENE3	Nene Valley Business Park	Oundle	Predominantly single business premises (Fairline); significant employment area within rural north area
EPA40 EPA39/ ENE14	Rectory Business Centre/ Albert Road/ Victoria Road	Rushden	Historic urban employment area
EPA42/ ENE13	Cottingham Way/ Cosy Nook	Thrapston	Historic urban employment area

Smaller sites: <1ha

5.28 As stated, in preparing the project brief for the Employment Land Review, the addition of a range of smaller employment sites (<1ha) was considered necessary, to ensure that a balanced portfolio of employment sites could be systematically assessed. Eight sites across the District were identified; to be the subject of detailed assessment by Aspinall Verdi, all of which are long established and situated within current built up areas.

¹⁶ The Kimbolton Road and Chowms Mill sites are designated protected employment areas in the Higham Ferrers Neighbourhood Plan. However it was subsequently determined that these should nevertheless be assessed in detail by Aspinall Verdi in order to ensure a balanced portfolio of employment sites for the Employment Land Review.

¹⁷ The two principal employment (long established) sites within Irthlingborough (EPA12 and 13, above) are recognised as being appropriate for protection (Table 2, above). However, it was determined that these should be assessed in detail by Aspinall Verdi in order to determine what (if any) parts of these sites may be appropriate to be released for alternative uses.

5.29 Table 4 (below) sets out the initial rationale/ justification for this site selection. These smaller sites were assessed using the same template/ methodology as the larger sites (Tables 1-3, above).

Table 4			
Annex 1 and 2/ Aspinall Verdi site reference	Address	Location	Commentary
EPS01/ ENE9	Katz Shoes, 20 Midland Rd/ Coal Yard/ Garage south of Bridge Street	Thrapston	Long established employment area (Thrapston)
EPS02/ ENE12	Factory, Shirley Road	Rushden	Long established factory/ employer (Rushden)
EPS03/ ENE11	Windmill club/ Business Centre, Glassbrook Road	Rushden	Long established SME area (Rushden)
EPS04/ ENE19	61-65/ 78 Station Road	Irthlingborough	Long established employment area (Irthlingborough)
EPS05/ ENE18	Ringstead Business Centre, 1-3 Spencer Street,	Ringstead	Established rural employment hub (Ringstead)
EPS06/ ENE21	Travis Perkins, 150 High Street	Rushden	Long established business/ employer (Rushden)
EPS07/ ENE20	Coles Builders Merchant, 38 West Street	Oundle	Long established business/ employer (Oundle)
EPS08/ ENE17	Hawkes Technical, Spencer Parade	Stanwick	Long established factory/ employer (Stanwick)

5.30 Tables 3 and 4 (above) set out the portfolio of sites that were considered in detail by Aspinall Verdi. The long-listing and subsequent short-listing process set out above has been undertaken on the presumption that identified employment sites/ locations should be designated as protected employment areas through the development plan (be it the Local Plan and/ or a Neighbourhood Plan), except where Aspinall Verdi has recommended that these should be released for alternative uses.

6.0 Key findings of Employment Land Review (Aspinall Verdi, March 2019) and subsequent updates

6.1 The Aspinall Verdi study forms a key element of the evidence base for the emerging Local Plan Part 2. The list of sites for assessment was prepared for the project brief; a shortlist of 21 (out of 52) potential Protected Employment Areas that were deemed to require detailed independent market and quality analysis, to assess their suitability for retention as employment hubs.

6.2 Of the 21 sites assessed by Aspinall Verdi, all but two were proposed either for safeguarding (“green”) or safeguarding in the short term (“amber”). By virtue of their characteristics and quality, for the following sites Aspinall Verdi recommended that these should be allowed for managed release for alternative uses:

- The Windmill Club / Business Centre, Glassbrook Road, Rushden (Aspinall Verdi reference ENE11); and
 - Rectory Business Centre, Rushden (Aspinall Verdi reference ENE14).
- 6.3 Aspinall Verdi also recommended a number of other sites that should be safeguarded in the short term. However, since publication of the Employment Land Review two of the smaller sites assessed have been consented for demolition/ clearance and/ or residential development:
- Ringstead Business Centre, 1-3 Spencer Street, Ringstead (Aspinall Verdi reference ENE18)
 - Coles Builders Merchant, 38 West Street, Oundle (Aspinall Verdi reference ENE20)
- 6.4 Two further employment areas, recommended by Aspinall Verdi for safeguarding are to be reduced in extent, due to the subsequent release of parts of the site for residential development. These changes were highlighted through the 1st draft Local Plan Part 2 consultation and reported to the Planning Policy Committee on 1st April 2019¹⁸:
- Kimbolton Road, Higham Ferrers (Aspinall Verdi reference ENE8) – removal of 4.4ha Federal Estates land (eastern part of site); and
 - Nene Park/ Nene Business Park, Irthlingborough (Aspinall Verdi reference ENE10) – removal of Nene Business Park site (planning reference 19/00402/REM).
- 6.5 The publication/ Pre-Submission Draft Local Plan should reflect the latest position. The updates identified above may be accommodated within the published version of the Plan.
- 6.6 The Aspinall Verdi report also considered wider economic factors affecting East Northamptonshire. It identified the importance of the LPP2 reinforcing the Council’s Economic Strategy (“Enterprising East Northants”) by recognising the importance of major developments in delivering the vision. Three particular projects are highlighted for their importance in delivering local economic growth:
- Rushden East Sustainable Urban Extension;
 - Tresham Garden Village; and
 - The East Northamptonshire Enterprise Centre.
- 6.7 Aspinall Verdi’s analysis has enabled the broader economic situation to be assessed. However, its focus has been upon the characteristics and quality of existing/ established employment areas; similarly the focus of this Background Paper.

¹⁸ Item 6: https://www.east-northamptonshire.gov.uk/meetings/meeting/949/planning_policy_committee

7.0 Conclusion/ recommendations

- 7.1 A total of 52 separate employment areas have been assessed as potential employment protection areas. A significant number of these have been designated since 2016 (20 sites), by virtue of their current designation in the Minerals and Waste Local Plan, the Joint Core Strategy (Rockingham Enterprise Area) or a Neighbourhood Plan.
- 7.2 A further 15 sites were identified as protected employment areas, by virtue of their current position or situation. These are recognised as forming part of the established portfolio of employment areas, by virtue of their status as a “Top 40” company or the consenting of significant new strategic employment developments since 2011. Sites within this category include Islip Furnace, Oundle Marina, Rushden Lakes and the Horizon Data Centre (Corby).
- 7.3 This process of elimination has identified a residual of 16 (out of a long list of 52) that required further analysis as to whether they are still “fit for purpose” and should continue to be protected for employment uses. In addition, the following sites were added to the Employment Land Review, to ensure an appropriate and balanced selection for assessment by Aspinall Verdi:
- Higham Ferrers – Kimbolton Road and Chowns Mill employment sites;
 - Irthlingborough – Nene Park/ Nene Business Park and Whitworths employment sites; and
 - Oundle – Nene Valley Business Park.
- 7.4 In line with the Aspinall Verdi recommendations and feedback from the 1st draft Plan consultation (November 2018 – February 2019), amendments have been made to the draft LPP2 document (Chapter 7: Economic Prosperity) to reflect and reinforce the need to protect existing employment sites. It was concluded that there are three categories of protection for employment areas, those that should be:
- Safeguarded;
 - Safeguarded in the short term, and
 - Allow managed release.
- 7.5 The Joint Core Strategy already provides detailed direction for delivering the major schemes at Rushden East, Rushden Gateway and Tresham Garden Village (policies 33, 35 and 14 respectively). These are anticipated (at least in part) to come forward during the remaining decade of the current Plan period. The Local Plan Part 2 therefore focuses upon the retention of existing employment areas. These include notable major/ strategic employment developments delivered since 2011, including Primark (Islip Furnace), Rushden Lakes and Warth Park (Raunds). The latter includes major employers such as Howdens and the Enterprise Centre (Michael Way). It is important to ensure that the latter continues to function as an incubator for start-up businesses over its lifetime, through setting clear terms for the new business incubator units.

- 7.6 Overall, the process described in this Background Paper has led to the proposed designation of a total of 47 such sites/ locations across the District. On the basis that significant strategic employment sites have already been delivered or are committed over the remainder of the Local Plan period the focus should be to support the economic outcomes of the Plan. This should focus upon both the implementation of the remaining schemes, but protect established employment areas and businesses; to deliver a diverse range and quality of jobs and business opportunities, and encourage enterprise and entrepreneurship along with opportunities for residents to work locally.

Prepared by:
Anne Dicks (Planning Policy Officer)

Annex 1: Long list/ index of employment sites within the District identified for consideration as protected employment areas

Site reference (1st draft Local Plan Part 2, November 2018)	Site Name	Location	Area (ha)	"Top 40" RV Businesses (Y/N)	Most significant "Top 40" Business (2018)	Existing development plan status	Notes
EPA01	Barnwell Turn, Oundle Road	Barnwell	9.57	NO		None	
EPA02	Barnwell Workshops, Home Farm, Armston Road	Barnwell	2.63	NO		None	SME business units, beyond built up area of Barnwell village
EPA03	Lilford Lodge Farm, Thrapston Road	Barnwell	2.04	NO		None	SME business units; farm diversification scheme
n/a	<i>Sudborough Road</i>	<i>Brigstock</i>	4.30	NO		<i>Brigstock Neighbourhood Plan Policy B18</i>	<i>Industrial or rural uses sought</i>
EPA04	Manor Farm/ Poplar Farm	Caldecott	1.97	NO		Chelveston cum Caldecott Neighbourhood Plan Policy EC1e	Farm diversification: equestrian, business or warehouse uses sought
EPA05	Carr Brothers Depot, Upper Higham Lane	Chelveston/ Higham Ferrers	7.20	YES		Chelveston cum Caldecott Neighbourhood Plan Policy EC1d	Single business site
EPA06	Rockingham Enterprise Area, Mitchell Road	Deene/ Corby	300.00	YES	Rockingham Motor Speedway Ltd	JCS Policy 27	
EPA07	Horizon Centre, Gretton Road	Deene/ Corby	15.10	YES	Lloyds Bank plc	None	Single business site
EPA08	Cliffe Road/ Stamford Road	Easton on the Hill	2.84	NO		None	
EPA09	Kimbolton Road	Higham Ferrers	11.62	NO		Higham Ferrers Neighbourhood Plan, Existing Employment Area (JCS Policy 22)	Site includes two significant large vacant warehouse units

Site reference (1st draft Local Plan Part 2, November 2018)	Site Name	Location	Area (ha)	"Top 40" RV Business (Y/N)	Most significant "Top 40" Business (2018)	Existing development plan status	Notes
EPA10	Chowns Mill, Station Road	Higham Ferrers	2.28	NO		Higham Ferrers Neighbourhood Plan, Existing Employment Area (JCS Policy 22)	
EPA11	Lakeside House, Bypass	Higham Ferrers	6.40	YES	RPC Containers Ltd	Higham Ferrers Neighbourhood Plan, Existing Employment Area (JCS Policy 22)	Single business site
EPA12	Nene Park/ Nene Business Park etc (Irthlingborough East)	Irthlingborough	29.69	NO		None	
EPA13	Whitworths, Wellingborough Road	Irthlingborough	9.00	YES	Whitworths	None	Single business site
EPA14	Islip Furnace Site, Kettering Road	Islip	36.50	YES	Primark Stores Ltd	RNOTP Policy 16 protected employment area	
EPA15	Acorn Industrial Estate	Islip	0.93	NO		RNOTP Policy 16 protected employment area	SME business units, on edge of built up area of Islip village
EPA16	Westhay employment area, Stamford Road	King's Cliffe	4.72	YES	Augean PLC	RNOTP policies 16/ 17	Site area figure excludes Augean PLC landfill site, west of Stamford Road
EPA17	Kingsmead	King's Cliffe	1.03	NO		King's Cliffe Neighbourhood Plan Policy SA1	SME business units, on edge of built up area of King's Cliffe village
EPA18	Elliot's Yard, Park Street	King's Cliffe	-	NO	-	None	-
EPA19	King's Cliffe Industrial Estate	King's Cliffe/ Nassington	5.78	NO		RNOTP Policy 16 protected employment area	

Site reference (1st draft Local Plan Part 2, November 2018)	Site Name	Location	Area (ha)	"Top 40" RV Business (Y/N)	Most significant "Top 40" Business (2018)	Existing development plan status	Notes
EPA20	Addington Park/ Hill Farm Industrial Estate	Little Addington	3.90	NO		RNOTP policies 16/ AP1	SME rural business units
EPA18	East Road	Oundle	2.07	YES	Waitrose Ltd	RNOTP Policy 16 protected employment area	
EPA22	Nene Valley Business Park	Oundle	7.50	YES	Fairline Boats Plc	RNOTP Policy 16 protected employment area	
EPA23	Oundle Marina	Oundle/ Barnwell	9.21	NO		RNOTP Policy 16 protected employment area	Comprehensive redevelopment scheme already approved
EPA24	Polebrook Airfield, Lutton Road	Polebrook	4.50	NO		None	
EPA25	Warth Park	Raunds	63.63	YES	Indesit Company UK Ltd	Raunds Neighbourhood Plan, Policy R13(1)	
EPA26	Enterprise Road	Raunds	2.82	NO		Raunds Neighbourhood Plan, Policy R13(3)	
EPA27	New Barn Farm, Brick Kiln Road	Raunds	1.59	NO		Raunds Neighbourhood Plan, Policy R13(4)	SME business units; periphery of Raunds urban area
EPA28	East of A45 Roundabout, Brick Kiln Road	Raunds	1.61	NO		Raunds Neighbourhood Plan, Policy R13(5)	
EPA29	Rushden Lakes	Rushden	12.00	NO	Crown Estates' development	None [Phase 2/3 development u/c]	Phase 1 under construction
EPA30	Rushden Business Park, Brindley Close	Rushden	4.54	NO		None	
EPA31	Crown Park	Rushden	19.54	YES	Waitrose Ltd	None	
EPA32	Express Business Park, Shipton Way	Rushden	15.73	YES	Belkin Ltd	None	

Site reference (1st draft Local Plan Part 2, November 2018)	Site Name	Location	Area (ha)	"Top 40" RV Businesses (Y/N)	Most significant "Top 40" Business (2018)	Existing development plan status	Notes
EPA33	Sanders Lodge North	Rushden	10.16	YES	Croyland Motors Ltd, St Davids Road	None	
EPA34	Norris Way / Elan Court	Rushden	4.70	NO		None	Predominantly SME business units within Rushden urban area
EPA35	Spire Road, John Clark Way	Rushden	11.25	YES	DHL Supply Chain Ltd, 2 Spire Road	None	
EPA36	Francis Court	Rushden	3.11	NO		None	
EPA37	Sanders Lodge South	Rushden	13.24	YES	DSV Solutions Ltd, 10-14 Sanders Lodge Ind Est	None	
EPA38	Recycling Plant, Bedford Road	Rushden	3.64	YES	Biogen UK Ltd	None	Single business site
EPA39	Rectory Business Centre/ Albert Road/ Victoria Road	Rushden	1.32	NO		None	Predominantly SME business units within Rushden urban area; including former Telephone Exchange/ Job Centre
EPA40	Ravensden Farm, 265 Bedford Road	Rushden	3.55	NO		None	
EPA41	Halden's Parkway	Thrapston	39.89	YES	W M Morrison Supermarkets Plc	RNOTP Policy 16 protected employment area	
EPA42	Cottingham Way/ Cosy Nook	Thrapston	4.17	NO		RNOTP Policy 16 protected employment area	SME business units within Thrapston urban area
EPA43	Top Close	Thrapston	2.30	NO		RNOTP Policy 16 protected employment area	SME business units on edge of Thrapston urban area
Smaller sites (<1ha)							

Site reference (1st draft Local Plan Part 2, November 2018)	Site Name	Location	Area (ha)	"Top 40" RV Businesses (Y/N)	Most significant "Top 40" Business (2018)	Existing development plan status	Notes
EPS01	Katz Shoes, 20 Midland Rd/ Coal Yard/ Garage south of Bridge Street	Thrapston		NO		None	
EPS02	Factory, Shirley Road	Rushden		NO		None	
EPS03	Windmill club/ Business Centre, Glassbrook Road	Rushden		NO		None	
EPS04	61-65/ 78 Station Road	Irthlingborough		NO		None	
EPS05	Ringstead Business Centre, 1-3 Spencer Street	Ringstead		NO		None	
EPS06	Travis Perkins, 150 High Street	Rushden		NO		None	
EPS07	Coles Builders Merchant, 38 West Street	Oundle		NO		None	
EPS08	Hawkes Technical, Spencer Parade	Stanwick		NO		None	

Annex 2: Initial assessment of large sites (>1ha), for potential detailed/quantitative analysis

Site reference (where applicable)	Site Name	Location	Site specific information	Notes
Question 1				
Is the area a recent allocation/ proposed allocation, in the Minerals and Waste Local Plan; "made" or emerging Neighbourhood Plans?	The following sites have been identified, that are already designated/ allocated through one or more of the above development plan documents		Relevant development plan document and site reference (as at autumn 2018, prior to completion of Aspinall Verdi assessment)	
n/a	Sudborough Road	Brigstock	Brigstock Neighbourhood Plan (Policy B18)	
EPA04	Manor Farm/ Poplar Farm	Caldecott	Chelveston cum Caldecott Neighbourhood Plan 2016-2031 (Policy EC1e)	Neighbourhood Plan "made" 17 July 2017
EPA05	Carr Brothers Depot, Upper Higham Lane	Chelveston/ Higham Ferrers	Chelveston cum Caldecott Neighbourhood Plan 2016-2031 (Policy EC1d)	Neighbourhood Plan "made" 17 July 2017
EPA06	Rockingham Enterprise Area, Mitchell Road	Deene/ Corby	North Northamptonshire Joint Core Strategy (JCS) 2011-2031 (Policy 27)	Area predominantly undeveloped, although a number of businesses already operate from Rockingham MRC
EPA09	Kimbolton Road	Higham Ferrers	Higham Ferrers Neighbourhood Plan 2011-2031; Minerals and Waste Local Plan (Policy 13(WL20))	Site identified for more detailed analysis, due to recent Federal Estates' consent for redevelopment/ relocation to new Chelveston Innovation Park (Aspinall Verdi reference ENE8)
EPA10	Chowns Mill, Station Road	Higham Ferrers	Higham Ferrers Neighbourhood Plan 2011-2031	Site identified for more detailed analysis, in order to provide a balance/ mix of sites/ locations (Aspinall Verdi reference ENE7)
EPA11	Lakeside House, Bypass	Higham Ferrers	Higham Ferrers Neighbourhood Plan 2011-2031	
EPA17	Kingsmead	King's Cliffe	King's Cliffe Neighbourhood Plan (Policy SA1)	Policy SA1 proposes expansion to existing employment area

Site reference (where applicable)	Site Name	Location	Site specific information	Notes
EPA22	Nene Valley Business Park	Oundle	Minerals and Waste Local Plan (Policy 13(WL21))	Site identified for more detailed analysis, due to its prime position as the main employment area/ employer (Fairline) for the rural north (Aspinall Verdi reference ENE3)
EPA25	Warth Park	Raunds	Raunds Neighbourhood Plan 2011-2031 (Policy R13(1))	Neighbourhood Plan "made", 27 November 2017
EPA26	Enterprise Road	Raunds	Raunds Neighbourhood Plan 2011-2031 (Policy R13(3))	Neighbourhood Plan "made", 27 November 2017
EPA27	New Barn Farm, Brick Kiln Road	Raunds	Raunds Neighbourhood Plan 2011-2031 (Policy R13(4))	Neighbourhood Plan "made", 27 November 2017
EPA28	East of A45 Roundabout, Brick Kiln Road	Raunds	Raunds Neighbourhood Plan 2011-2031 (Policy R13(5))	Neighbourhood Plan "made", 27 November 2017
EPA30	Rushden Business Park, Brindley Close	Rushden (Rushden/ Higham Ferrers - Sanders Lodge)	Minerals and Waste Local Plan (Policy 13(WL19))	Adopted July 2017
EPA31	Crown Park	Rushden (Rushden/ Higham Ferrers - Sanders Lodge)	Minerals and Waste Local Plan (Policy 13(WL19))	Adopted July 2017
EPA32	Express Business Park, Shipton Way	Rushden (Rushden/ Higham Ferrers - Sanders Lodge)	Minerals and Waste Local Plan (Policy 13(WL19))	Adopted July 2017
EPA33	Sanders Lodge North	Rushden (Rushden/ Higham Ferrers - Sanders Lodge)	Minerals and Waste Local Plan (Policy 13(WL19))	Adopted July 2017
EPA34	Norris Way / Elan Court	Rushden (Rushden/ Higham Ferrers - Sanders Lodge)	Minerals and Waste Local Plan (Policy 13(WL19))	Adopted July 2017
EPA36	Francis Court	Rushden (Rushden/ Higham Ferrers - Sanders Lodge)	Minerals and Waste Local Plan (Policy 13(WL19))	Adopted July 2017
EPA37	Sanders Lodge South	Rushden (Rushden/ Higham Ferrers - Sanders Lodge)	Minerals and Waste Local Plan (Policy 13(WL19))	Adopted July 2017
Question 2				

Site reference (where applicable)	Site Name	Location	Site specific information	Notes
Does the site host a current business or operation?	[Sites that do not fulfil these criteria have already been discounted]			
Question 3				
Is the area/ was it previously...? [commentary]			Policy reference/ source of information/ commentary	Conclusion: is site appropriate to be assessed in more detail, to be designated a protected employment area?
EPA01	Barnwell Turn, Oundle Road	Barnwell	Identified through previous evidence gathering (2012-13)	YES - Aspinall Verdi reference ENE16
This site hosts a varied range of operations. While previous complaints regarding noise and dust are noted, there are few "sensitive receptors" within the vicinity of this area. This area is well related to the strategic road network and is also considered to be an appropriate location for uses having significant environmental impact.				Given its location away from established settlements, on the basis of current uses and their significant environmental impacts its retention as a protected employment area could be considered as an EPA. This would depend on a more detailed site assessment.
EPA02	Barnwell Workshops, Home Farm, Armston Road	Barnwell	Identified through previous evidence gathering (2012-13)	YES - Aspinall Verdi reference ENE6
Barnwell Workshops was established in the early 1990s. It continues to accommodate a significant range of rural businesses and, as such, positively contributes towards Barnwell's economic base. It is located beyond the main Barnwell built up area, but within easy walking distance.				Together with the nearby Barnwell Turn and Lilford Lodge employment areas Barnwell Workshops provides a significant established employment base along the A605 corridor. Its possible status as an EPA would depend upon a more detailed site assessment.
EPA03	Lilford Lodge Farm, Thrapston Road	Barnwell	Identified through previous evidence gathering (2012-13)	NO - Established employment hub, so SHOULD be designated an EPA

Site reference (where applicable)	Site Name	Location	Site specific information	Notes
Lilford Lodge Farm is an established rural diversification scheme. It continues to function as such, although it is situated in open countryside, away from established settlements.				Lilford Lodge Farm provides a significant established employment base along the A605 corridor. It is a rural diversification site, occupied by a range of small businesses.
EPA07	Horizon Centre, Gretton Road	Deene/ Corby	"Top 40" business	NO - Recently built "Top 40" employment site; therefore SHOULD be designated an EPA
New business site, closely related to Rockingham Enterprise Area. Now a significant (self-contained) business site within East Northamptonshire.				As a significant employment site constructed since 2011, the Horizon Centre (data centre) could be considered as being at the forefront of 21st century businesses.
EPA08	Cliffe Road/ Stamford Road	Easton on the Hill	Identified through previous evidence gathering (2012-13)	YES - Aspinall Verdi reference ENE5
The Cliffe Road/ Stamford Road area at Easton hosts a range of former garage/ engineering uses, together with the listed Exeter Arms pub.				The site may play a significant role in the employment portfolio for Easton. Its status as an EPA may depend upon issues such as the impact of existing operations upon the setting of the listed pub.
EPA12	Nene Park/ Nene Business Park etc (Irthlingborough East)	Irthlingborough	2006 ELR (site 27)	YES - As a whole, the site forms a significant employment hub, although further analysis is needed to see which (if any) of the constituent parts could be released for alternative uses - Aspinall Verdi reference ENE10
Irthlingborough East is a significant brownfield/ under-utilised employment site at Irthlingborough. It is one of the major potential regeneration sites within the District.				Irthlingborough East has been identified as having six distinctive elements. Some of these host current businesses/ employment uses; others are vacant and/ or awaiting delivery of longstanding commitments.
EPA13	Whitworths, Wellingborough Road	Irthlingborough	"Top 40" business	YES - While previously recognised as a significant redevelopment opportunity (subject to relocation of the Whitworths factory), Whitworth's current proposals suggest an intention to remain in its current location, at least in the short/ medium term - Aspinall Verdi reference ENE2

Site reference (where applicable)	Site Name	Location	Site specific information	Notes
Whitworths have long argued that its current site cannot accommodate the medium/ longer terms of the business, so the company would need to relocate to a more suitable premises. Persimmon Homes have a longstanding option to redevelop the site; permission for this was granted in 2010, but expired in November 2015.				Recent pre-application enquiries indicate that Whitworths and Persimmon are still pursuing plans to relocate the existing business and redevelop the site accordingly. It is recognised as a longer term major brownfield land windfall site; anticipated in the 2017 AMR to come forward beyond 2026.
EPA14	Islip Furnace Site, Kettering Road	Islip	RNOTP Policy 16	NO - Strategic employment site, so SHOULD be designated an Employment Protection Area (EPA)
Islip Furnace has increased in importance since adoption of the RNOTP. The Primark development and some additions to the Dodson and Horrell premises reflect the significance of this location to the District economy.				Given its importance as a major strategic employment site hosting Primark's regional headquarters, the area SHOULD be designated as an EPA; therefore no need for further assessment
EPA15	Acorn Industrial Estate	Islip	RNOTP Policy 16	YES - Aspinall Verdi reference ENE1
The Acorn Industrial Estate is dominated by the KG Wright builders' yard. That said, there is no evidence of environmental concerns regarding the current operation.				Site designated a protected employment area in current Local Plan; therefore should require more detailed assessment to confirm if appropriate for designation to continue
EPA16	Westhay employment area, Stamford Road	King's Cliffe	RNOTP policies 16 and 17	NO - Significant employment area, so SHOULD be designated an EPA
The Westhay area is dominated by two operations; Augean PLC waste site ("Top 40" business) and PC Howard (haulage). The former is part of the national waste infrastructure network, while the latter remains a single operation at Westhay Farm.				Given the importance of Augean as a Top 40 business and the established haulage business at Westhay Farm, both sites form an important part of the local economy. It is therefore appropriate that the protected employment area designation should continue.

Site reference (where applicable)	Site Name	Location	Site specific information	Notes
EPA18	Elliot's Yard, Park Street	King's Cliffe	Identified through previous evidence gathering (2012-13)	YES
	-	-	-	Elliot's Yard forms a significant aspect of the established portfolio of employment sites at King's Cliffe. Subject to more detailed assessment it is likely that this site would be appropriate to be designated an EPA.
EPA19	King's Cliffe Industrial Estate	King's Cliffe/ Nassington	RNOTP Policy 16	NO - Significant employment area, so SHOULD be designated an EPA
	King's Cliffe Industrial Estate is a significant employment area within the Rural North. It continues to host significant employment growth; with recent permission for a new 825 sq m B2 industrial unit (16/00656/FUL), granted 13 June 2016.			The recent planning permission reiterates the importance of King's Cliffe Industrial Estate as a significant Rural North employment site; therefore it is appropriate that the RNOTP protected employment area designation should continue.
EPA20	Addington Park/ Hill Farm Industrial Estate	Little Addington	RNOTP policies 16 and AP1	YES - Aspinall Verdi reference ENE4
	The status of the industrial estate at Little Addington is recognised in the current LPP2 (RNOTP Policy AP1). Its future status was challenged in 2015, with proposals to redevelop the site for housing having been put forward in response to pre-submission version Joint Core Strategy (LPP1).			Recent planning history has included consent to use certain units as dog care facilities and for waste recycling. It is recognised that the site hosts a number of businesses, although further assessment should be undertaken to establish whether the RNOTP designation(s) are appropriate.
EPA18	East Road	Oundle	RNOTP Policy 16	YES - Aspinall Verdi reference ENE15
	The character of the East Road employment area was significantly altered by construction of the Waitrose superstore (2013) and new auction house. This may have implications for the future status of this site.			The site hosts a significant number of businesses (Eastwood Road). However, its continued status as a protected employment area ought to be reviewed, in light of recent developments.

Site reference (where applicable)	Site Name	Location	Site specific information	Notes
EPA23	Oundle Marina	Oundle/ Barnwell	RNOTP Policy 16	NO - Significant employment area, so SHOULD be designated an EPA
	Oundle Marina is currently the subject of a comprehensive redevelopment scheme (17/01398/REM). Therefore, it is anticipated that this should continue as a significant employment site.			It is anticipated that the Oundle Marina redevelopment scheme will be built out within 3-5 years. Its role as a significant employment area is anticipated to continue, as/ when the scheme is implemented.
EPA24	Polebrook Airfield, Lutton Road	Polebrook	Identified through previous evidence gathering (2012-13)	NO - Significant employment area, so SHOULD be designated an EPA
	Polebrook Airfield includes a long established B8/ warehousing business. It is an open countryside location, although links to the strategic highways network (A605) are well established.			Questions may be raised as to whether the location of the established warehouses is appropriate. That said, the premises remain functional and fully operational and are anticipated to do so for the remainder of the Plan period.
EPA29	Rushden Lakes	Rushden	2006 ELR (site 17)	NO - Significant new employment area, so SHOULD be designated an EPA
	Newly established out-of-centre retail location. It is anticipated to be a significant employer throughout the remainder of the Local Plan period (to 2031).			Rushden Lakes accommodates a major new strategic development, consisting of main town centre uses in an out-of-centre location. The current spatial strategy (e.g. Rushden's status as a Growth Town) is based upon the substantial development at Rushden Lakes.
EPA35	Spire Road, John Clark Way	Rushden	2006 ELR (site 23)	NO - Significant haulage/ distribution hub, so SHOULD be designated an EPA
	Recently established B8 warehousing/ distribution hub (developed around 2007/8); implementing a site specific allocation from the former 1996 District Local Plan.			The Spire Road haulage/ distribution hub is a purpose-built warehousing development. It is therefore considered appropriate that this site should continue to be safeguarded as an EPA.
EPA38	Recycling Plant, Bedford Road	Rushden	n/a - "Top 40" business	NO - Purpose-built "Top 40" employment site; therefore SHOULD be designated an EPA

Site reference (where applicable)	Site Name	Location	Site specific information	Notes
Purpose-built biomass/waste regeneration plant in open countryside. It is a significant business, such that it should be recognised as making a significant contribution to the District's economy.				As a "Top 40" business, the role of Biogen (UK) Ltd as a significant business within the District must be recognised. Therefore it is concluded that the site should be safeguarded as an EPA.
EPA39	Rectory Business Centre/ Albert Road/ Victoria Road	Rushden	Identified through previous evidence gathering (2012-13)	YES - Aspinall Verdi reference ENE14
The Rectory Business Centre and adjacent businesses represent remnants from the former boot and shoe industry				The Rectory Business Centre/ adjacent employment area is situated immediately opposite the town centre. It still hosts a significant range of businesses, but it would require further assessment to establish its appropriateness to be designated an EPA.
EPA40	Ravensden Farm, 265 Bedford Road	Rushden	Identified through previous evidence gathering (2012-13)	NO - Significant haulage/ distribution hub, so SHOULD be designated an EPA
Ravensden Farm was an agricultural diversification scheme, developed along the A6 in the 1990s. It started as a pet food business, with a number of warehouses/ storage buildings developed on the site over the past 20-25 years.				The site is a significant hub of economic activity. It consists of predominantly warehousing, having direct access to the A6/ strategic road network. Permission was recently granted for expansion of one warehouse (447 sq m; 16/01357/FUL), indicating that the site hosts a significant quantum of economic activity.
EPA41	Halden's Parkway	Thrapston	RNOTP Policy 16	NO - Strategic haulage/ distribution hub, so SHOULD be designated an EPA
Halden's Parkway is a long established distribution/ logistics hub, with access to the strategic road network (A14/ A605). Its economic importance is recognised in the current LPP2/ RNOTP (Policy THR4).				As an established warehousing/ distribution hub (direct access to the A14 Trunk Road), Halden's Parkway is recognised as a significant employment area. It has hosted significant new warehouse development within the past 5 years and continues to play an important strategic economic role.
EPA42	Cottingham Way/ Cosy Nook	Thrapston	RNOTP Policy 16	YES - Aspinall Verdi reference ENE13

Site reference (where applicable)	Site Name	Location	Site specific information	Notes
Cottingham Way/ Cosy Nook hosts a range of employment uses/ small businesses (predominantly B2/ sui-generis uses) ; e.g. garage services, building supplies, brewing. It adjoins the current town centre; its current quality, environment and contribution to the local economy would need to be properly assessed.				As a long established employment area, the contribution of the Cottingham Way/ Cosy Nook employment area must be recognised. Nevertheless, the appropriateness of the range of uses (e.g. EA Flood Zone 2) must be considered in order to determine the area's suitability as an EPA.
EPA43	Top Close	Thrapston	RNOTP Policy 16	NO - Significant employment area, so SHOULD be designated an EPA
Top Close is a smaller/ outlying employment area at the edge of the existing Thrapston built up area. It contains a range of established employment uses; most notably Crawford & Tilley sweet factory, which was recently expanded with the movement of a plant from Ireland in 2012 and now employs around 70 people (Northants Telegraph, 12 May 2012).				Top Close enjoys good access to the strategic road network (A605). There are still some parts of the site yet to be developed, although it must be recognised as a significant employment area; suitable to be designated an EPA.