**Comments**

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

<table>
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<th>Comment ID</th>
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<tr>
<td>Response Date</td>
<td>12/02/20 09:29</td>
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<tr>
<td>Consultation Point</td>
<td>Employment Allocations (View)</td>
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**Representation**

Please use a separate form for each representation.

**Which part of the Publication Plan does your representation relate to?**

Section 5 - Employment Allocations

**Tests of Soundness**

Do you consider the Local Plan is sound in terms of being:

| Justified | No |
| Effective | No |
| Positively prepared | No |
| Consistent with National Policy | No |

**Legal and Procedural requirements**

Do you consider the Local Plan has been prepared in line with legal procedural requirements?  
Yes

**Duty to Cooperate**

Do you consider the Local Plan to be compliant with the Duty to Cooperate?  
Yes

**Reasons**

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.
No additional employment allocations for Kettering are stipulated in the SSP2. Notwithstanding this, the North Northamptonshire Joint Core Strategy 2011-2031 (JCS), in addition to the Council relying on the housing numbers of this site, relies on the provision of employment parcels at Hanwood Park to justify employment floorspace and thereby ensure sustainable development across Kettering. Policy 23 of the JCS specifies a job creation target of 8,100 for Kettering Borough in the period 2011-2031, the scale and mix of which will be supported by the committed SUEs, including Hanwood Park.

The Employment Land Review and Allocation Background Paper (as referred to in Paragraph 5.21) projects a total of 42,400 sqm of floorspace to be provided at the Kettering East SUE within the plan period up to 2031, yet the KBC SSP2 fails to make explicit how this will be achieved. There is no adequate or effective policy to safeguard the employment supply at the Kettering East SUE.

Proposed Actions/Changes

Please explain what changes or actions are needed to make the Local Plan legally compliant.

Therefore, as indicated above, a Hanwood Park site-specific policy for Hanwood Park is essential to support the development of on-site employment, and to achieve the JCS target. Therefore, in order for the Plan to be effective and ‘sound’, our client considers that a site-specific allocation and policy should be included within the Plan and referred to within Section 5 of the SSP2.

Attendance at the examincations hearings

If you are seeking to change the Plan, would you like to attend the examination hearings? 

Yes

If Yes, please outline the reason(s) why, below.

The land owned and controlled by Hanwood Park LLP (‘HPL’) comprises a significant proportion of Hanwood Park, formerly known as East Kettering Sustainable Urban Extension (‘SUE’). The site is shown in Figure 16 of the North Northamptonshire Joint Core Strategy 2011-2031 as a “Committed Principle Sustainable Urban Extension”. As principal promoter/ master developer of such an important large scale site within Kettering Borough Council’s administrative area, HPL consider it is essential that they are present and able to participate at any Examination hearing session(s) – if deemed necessary – in order to assist the Inspector by responding to any queries that may arise from the consultation, further representations on the Plan and supporting the soundness of the Plan.

Notifications

Do you wish to be notified?  

. When the Plan is submitted for independent examination?  

. When the Inspector’s Report is published?  

. When the document is adopted?