Comments

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

Comment ID 158
Response Date 12/02/20 10:12
Consultation Point 6 Town Centres (View)
Status Processed
Submission Type Email
Version 0.2

Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
   Paragraph 6.3

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.
We would reiterate our previous representation dated 31 July 2018 (Comment ID: 163) that the evidence base underpinning JCS is now out of date; not least because in the intervening period, Rushden Lakes has come forward with further improvements planned (see pending East Northants Application Ref: 19/01092/FUL). There have also been substantial changes to shopping habits and retailer requirements nationally. The retail study supporting the JCS was published in October 2014 and relied upon household surveys undertaken in 2010/11.

In light of this, there is a question mark over the reliability of the evidence base underpinning the adopted JCS comparison goods retail floorspace capacity figures for Kettering and therefore whether it is appropriate to refer these at Para 6.3 (although we do support the fact that such retail development will be directed to the Town Centre).

**Proposed Actions/Changes**

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

So as not to delay the adoption of the SSP2, we request that this Paragraph be amended to acknowledge that there is an urgent need to revisit retail floorspace capacity figures and to commit to doing so in the near future (ideally as part of the review of the Kettering Town Centre Area Action Plan).

**Attendance at the examinations hearings**

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

Yes

**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?