Comments

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

Comment ID 160
Response Date 12/02/20 10:19
Consultation Point Policy TCE2 Proposals for a Medium Sized Foodstore (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?
Policy TCE2

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.

Proposals for a medium size food store serving the Rothwell and Desborough catchment should also be required to undertake a retail impact assessment. This is because the evidence base that underpins the identified need for such a food store can no longer be considered reliable. Indeed, the retail study supporting the JCS was published in October 2014 and relied upon household surveys undertaken in 2010/11 – since this time, convenience goods shopping patterns, like comparison goods patterns, have changed significantly.

In the absence of an update to the retail capacity study, further qualitative justification is required. There is also a need to consider changes to convenience goods provision in the catchment since the household survey was conducted (the fact that Rushden Lakes does not meet local daily needs is insufficient in this regard).

Proposed Actions/Changes

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

In the absence of an update to the retail capacity study, further qualitative justification is required. There is also a need to consider changes to convenience goods provision in the catchment since the household survey was conducted (the fact that Rushden Lakes does not meet local daily needs is insufficient in this regard).

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?