

Comments

Site Specific Part 2 Local Plan - Main Modifications Consultation (19/03/21 to 30/04/21)

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Please use a separate form for each representation.

Which Main Modification, change to the Policies Map or section of the Sustainability Appraisal Report Addendum or Habitat Regulations Assessment Addendum does your comment relate to?

MM18 & MM19

Please use a separate form for each representation.

Representation

We write on behalf of our client, Hanwood Park LLP ('HPL'), the master developer and principal promoter of the Kettering East Sustainable Urban Extension (SUE), now more commonly referred to as Hanwood Park.

HPL is concerned that the policy and its supporting text, as amended, will require the delivery of the proposed District Centre at Hanwood Park to be underpinned by sequential and impact assessments. This is contrary to the amendment made by MM13, which clarifies that the Hanwood Park District Centre is included within the Kettering retail hierarchy and will be for "local, day to day needs of residents of the SUE". This wording proposed within MM13 is consistent with the exception of Policy 12g of the Joint Core Strategy (JCS), despite the policy only referring to 'local centres'. Furthermore, Policy 12f of the JCS allows for Part 2 Local Plans to identify additional development opportunities, where these do not undermine the focus of retail development at the town centres of the Growth Towns. The extant outline planning permission for Hanwood Park (and the new outline planning application) do not undermine the focus of retail development at Kettering Town Centre.

Therefore, HPL considers that proposals for the District Centre at Hanwood Park should not require a sequential test or impact assessment. It is not justified to require such assessments for such a long established and committed development. Clearly, the Council accepts that the Hanwood Park District Centre is part of the Retail Hierarchy (MM13) and MM20 accepts that the Local Centres within Hanwood Park should be protected. Furthermore, the NPPF states that a sequential test should be applied to planning applications for main town centre uses which are "neither in an existing centre nor in accordance with an up-to-date plan" (para. 86). Additionally, the Glossary within the NPPF (Annex 2) states that "references to town centres or centres apply to city centres, town centres, district centres and local centres ...". The District Centre is clearly a "centre" in the terms of the NPPF, such that the proposed modification is not consistent with the NPPF, nor is it justified or effective.

Do you wish to be notified?

When the Inspector's Report is published?