

Appendix 2g – Town Centres

Comment	KBC Response
<p>12. Policy TEC3. Town centres are changing and trying to maintain too large an area dilutes the offer and creates a sprawling site which will be unattractive. Far better to concentrate the retail offer into a smaller site and encourage residential development closer to the centre.</p>	<p>Your comments are noted.</p>
<p>393. Question 3. We would like to draw your attention to the Green Infrastructure (GI) corridors established in North Northamptonshire. These are mapped out on page 106 of the North Northamptonshire Joint Core Strategy (NNJCS) 2011 – 2031, and strategically underpin Kettering Part 2 Local Plan. The NNJCS indicates that Desborough town centre is part of the Jurassic Way Sub-Regional GI Corridor, and that Rothwell town centre is within the Sywell Reservoir to Broughton local GI corridor. Therefore, any development within these GI bands will be expected to protect green space by maintaining and enhancing its current GI status.</p> <p>Tailby Meadow Local Nature Reserve is situated to the South East of Desborough, and we would consider the associated land along the River Ise as an important GI asset, which is functionally linked to the River Ise and Meadows SSSI. Natural England advises that this GI corridor is unfavourable for development, and that protection of the Nene and Ise Valleys is underpinned by Policy 20 of the NNJCS. In addition, Local Wildlife Sites such as Tailby Meadow Local Nature Reserve are protected under paragraphs 170a and 174b of the revised NPPF.</p> <p>More specifically, the River Ise is the best example in the county of a lowland river on clay, fed by base-rich water. The channel displays a variety of semi-natural features increasingly</p>	<p>Your comments will be taken into account when considering allocations in the area, including the identification of a site for a medium sized supermarket.</p>

Appendix 2g – Town Centres

<p>uncommon in areas of intensive agriculture. In addition, the River Ise is part of the Nene Valley Nature Improvement Area, connecting the River Ise to the wider river and wetland network.</p> <p>We have previously advised that the River Ise and Meadows SSSI would be highly sensitive to any increased sediment load that could occur from construction. Although we are aware that Land south of Desborough (DE/210 draft housing allocation KET/2016/0044) has already been permitted, should any similarly situated development proceed we would advise that it must be accompanied by a suitably worded condition requiring a Construction Environmental Management Plan (CEMP). This is to ensure measures to prevent sediment pollution in the River Ise are detailed and then delivered.</p> <p>The River Ise and Meadows should be considered as containing a habitat of principal importance (Lowland Meadow) under Section 41 of the Natural Environment and Rural Communities Act (2006). The site is recognised as containing MG4 Alopecurus pratensis - Sanguisorba officinalis grassland. This is a scarce habitat with less than 1500ha remaining in the whole of England and is restricted to river floodplains which have been traditionally managed. Due to the presence of MG4 grassland, Tailby Meadow Local Nature Reserve should be considered of at least county level importance, and therefore the site and surrounding area should be avoided for development and measures adopted to avoid impacts from recreational pressure.</p>	
<p>112. Question 3. We need another supermarket in Desborough as we only have co-op. It should be on the outskirts of the town though as there isn't anywhere in the town centre big enough.</p>	<p>Your comment is noted. However, in accordance with the National Planning Policy Framework, location of a supermarket will follow a sequential test, prioritising town centre locations first, before considering edge of town centre and then other accessible locations that are well connected.</p>

Appendix 2g – Town Centres

<p>113. TCE6 2 and 4. You said that Development should protect and enhance local services and facilities which meet a local need, and guard against their loss.</p> <p>The Library is shutting in Desborough in September and will cause real problems for people who haven't got transport to get to another Library. The children use it and so do some people for company, and using it to get bus passes from the Council desk. I have heard that KBC won't help them keep it open which is disgusting.</p>	<p>Public Libraries are funded and run by Northamptonshire County Council. Where libraries have been considered for closure, NCC invited interested parties to submit an expression of interest to demonstrate how they may take over those libraries. The SSP Part 2 Local Plan can theoretically make recommendations to safeguard sites for a particular community use, however, if there is no operator to provide the service, then the site could remain dormant and potentially result in harm to the appearance and safety of the local area. The issue of which public libraries will remain open and which libraries will close remains on going, and further work will be recommended to identify the current position of this facility and determine whether there is any scope to safeguard the library site for a community use.</p>
<p>131; 137. Page 46 Policy TCE5. In principle we strongly support the idea of protecting the local services in the Hawthorn Road area as they are a focal point for our community and allow the community to meet day-to-day needs within the local area We envisage growing this focus in the Plan period.</p> <p>However we believe that Argyll Street should be included in TCE5. This reflects the fact that Argyll Street contains as many services as Hawthorn Road.</p> <p>We also request consideration be given to protecting waiting and loading to service these facilities should there be any changes to the current parking arrangements</p> <p>It would be most helpful to produce a map of the protected areas.</p> <p>With these modifications, we consider that this policy will be</p>	<p>Comment concerning the protection of services/facilities at Hawthorn Road is noted. Waiting/loading areas may be able to be protected where their loss is associated with development requiring express planning permission, and is likely to give rise to adverse impact on highway safety. Where proposals are submitted which could have an impact on highway safety, Northamptonshire Highways Authority will be consulted for advice, so that the proposal can be fully assessed and a decision made through the planning process. The NNJCS currently addresses highway safety issues satisfactorily, and further policy is not required. Further work will be undertaken to investigate the facilities available on Argyll Street and whether they should be included in the Pre-submission Part 2 Local Plan and associated map (see below). A map to accompany Policy TCE6 and defines the extent of protected local services/facilities will be included in the Pre-submission Part 2 Local Plan.</p>

Appendix 2g – Town Centres

<p>consistent with paragraph 70 (third bullet) of the National Planning Policy Framework, which states that planning policies and decisions should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.</p>	
<p>138. Page 46. Policy TCE5. In principle we strongly support the idea of protecting the local services in the Hawthorn Road area as they are a focal point for our community. The local residents do not have to travel to shop</p> <p>However we believe that Argyll Street should be included in TCE5. Argyll Street contains as more services as Hawthorn Road. The boundary should be Broadway and Roundhill Road</p> <p>We also request consideration be given to protecting waiting and loading to service these facilities should there be any changes to the current parking arrangements. The shops need spaces for people to park for 30 minutes whilst they do their shopping.</p> <p>It would be useful to produce a map of the protected areas.</p>	<p>Comment concerning the protection of services/facilities at Hawthorn Road is noted. Waiting/loading areas may be able to be protected where their loss is associated within development requiring express planning permission, and is likely to give rise to adverse impact on highway safety. Where proposals are submitted which could have an impact on highway safety, Northamptonshire Highways Authority will be consulted for advice, so that the proposal can be fully assessed and a decision made through the planning process. The NNJCS currently addresses highway safety issues satisfactorily, and further policy is not required. Further work will be undertaken to investigate the facilities available on Argyll Street, Broadway and Roundhill Road and whether they should be included in the Pre-submission Part 2 Local Plan and associated map (see below).</p> <p>A map to accompany Policy TCE6 and defines the extent of protected local services/facilities will be included in the Pre-submission Part 2 Local Plan.</p>
<p>163. Question 3. The evidence base underpinning NNJCS Policy 12 is now approaching 4 years old. In the intervening period there has been substantial change to retail patterns and requirements nationally and of course more locally through the delivery of Rushden Lakes and the significant intensification of</p>	<p>The need for a medium sized food store responds to a strategically identified need set out within the Joint Core Strategy. The retail offer provided through Rushden Lakes does not meet local daily needs, but rather, a wider retail offer comprising convenience and comparison goods retail. It is</p>

Appendix 2g – Town Centres

<p>that scheme through numerous s73 and s96 applications alongside the most recent June 2018 application to substantially extend the retail park. In light of this significant shift in retailing, there is a need to revisit the evidence base underpinning Policy 12 of the NNJCS before a decision can be made as to whether there is in fact capacity / need to provide an additional foodstore at Desborough or Rothwell.</p>	<p>considered that Rushden Lakes will not have an impact on the medium sized food store need referred to within the draft SSP2 Local Plan.</p>
<p>164; 165. Policy TCE4. We have concerns with the wording of this policy. While we do understand the need to create new local centres in sustainable urban extensions (where there are no close by existing facilities that could realistically provide for this need), the policy must include a definition of the extent of a local centre to ensure that the development provided is in fact "small-scale".</p> <p>To ensure that any proposed Local Centre does not undermine the vitality and viability of designated town centres, it will be appropriate and necessary to define the parameters of a Local Centre within the emerging Part 2 Local Plan.</p> <p>The NPPF does not include a definition of local centres, nor does the accompanying Planning Practice Guidance. However, Planning Policy Statement 4: Planning for Sustainable Economic Growth (which was superseded by the NPPF) did contain the following definition at Annex B:</p> <p><i>“Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural</i></p>	<p>Your comments are noted. A definition of what constitutes a 'Local Centre' will be considered, although this will need to be carefully worded to ensure that it plans positively. The proposed definition is helpful, although the use of floor space thresholds introduces constraints which are not necessarily appropriate. The reference to 'a defined town centre' is noted.</p>

Appendix 2g – Town Centres

areas, large villages may perform the role of a local centre.”

Whilst PPS4 is no longer technically in force, the make-up of local centres nationally has not changed substantially as the retail and leisure industry evolves. This is because the nature of local centres is one of meeting top-up needs or access to smaller scale services leaving larger civic, retailing, leisure and service functions to higher order centres as defined by the Local Plan. The above definition therefore provides a helpful starting point for determining the form and nature of a local centre within Sustainable Urban Extensions.

Our recommendation would be that local centres are defined as follows:

“The uses of a local centre will typically include a small supermarket below 280 Sqm (A1 Use Class), a limited range of other small shops / services A1-A5 (each below 100 Sqm and up to 500 Sqm of total floorspace) and community facilities (D1/D2 uses, each unit below 200 Sqm per unit and up to 500 Sqm of total floorspace). The services could include a surgery, post office, hair dresser and / or nursery. The total floorspace of the local centre should not exceed 1,280 Sqm. All floorspace figures relate to Gross Internal Area. Proposals for the amalgamation of units which breach the above unit thresholds or for the introduction of additional floorspace through mezzanine floors which breaches the total floorspace for the local centre will need to be assessed against the sequential and impact test as defined by the NPPF (this policy overrides the 2,500 Sqm threshold for impact assessment as set by the NPPF)”.

Appendix 2g – Town Centres

<p>In addition to the above, the reference to 'within the town centre' should be replaced by 'within a defined town centre'.</p>	
<p>166. Policy TCE5. The current statement that no impact assessment would be required below the threshold should be removed. The Council should be able to request an assessment if they consider it necessary e.g. cumulative effects. At present, this wording will encourage the submission of applications just below the identified threshold. It is also not clear what would happen in terms of requesting an impact assessment where a proposal for retail, leisure or office uses is brought forward outside of the 4 named centres i.e. adjacent to another centre in the hierarchy - could a proposal up to 2,500 sqm be pursued in such locations without the need for an impact assessment? Clearly that would not be appropriate and the wording of the policy should be changed to avoid such unintended consequences.</p> <p>In addition, there needs to be a provision for triggering impact assessment in new local centres. Please refer to our submission to Policy TCE4 in this respect. Accordingly, any development above the defined thresholds in the definition of 'Local Centre' that we propose for TCE4 should trigger the automatic requirement for applying the sequential test and impact test.</p>	<p>Your comments are noted. The comment about removing the final sentence to leave it to the Council's discretion regarding whether an impact assessment is required will be considered where the floorspace of proposals falls below the minimum limit. Regarding the second part of your comment, the four named towns are the only towns located within the borough, with all the other settlements within Kettering Borough being villages. The respective locally set impact assessment thresholds would apply outside of the respective town centre but within the respective settlement boundaries. Outside of these areas, the nationally set impact assessment threshold applies (2500m²). Main town centre use proposals in open countryside or within village settlement boundaries would need to be justified through a sequential test and demonstrate compliance with the settlement hierarchy, and it is unlikely that town centre uses in such locations would be proposed due to conflict with the Development Plan . As a result, the council does not consider it necessary to apply a 5th locally set threshold to serve villages and open countryside.</p>
<p>408. Policy TCE3. Criteria 'i' is welcomed.</p>	<p>Your comment is noted.</p>
<p>240. Section 6 - 6.8 - Policy TCE1. This policy states it will give priority to town centre sites - so WHY has the Lawrence site been discounted as a possible site for the medium sized food store?</p>	<p>The Lawrence's site is subject to legal restrictions which prevent a supermarket retail use from being established on this site.</p>
<p>242. Policy TCE3. Residential developments in town centre do not result in loss of use.... again - WHY is the Lawrence site</p>	<p>Residential development within core retail areas can have an adverse impact in terms of diluting the concentration of town</p>

Appendix 2g – Town Centres

<p>being planned for purely residential use - surely the mixed use is the best option?</p>	<p>centre uses and hence the focus of the town centre itself. However, increasing town centre populations can also serve to enhance the vitality and viability of town centres. As a result, it is important that town centre housing is placed in the right location in order to achieve these aims.</p>
<p>243. TCE6. The Library should be listed as a service/facility in policy TCE6.</p>	<p>Thank you for your comment. Libraries can be considered a 'community building' which is listed, however for the avoidance of doubt, 'libraries' will be added to the list of examples of services and facilities.</p>
<p>244. TCE4. The Old Dairy site should be further investigated to see if it could provide a large enough site for a medium sized store.</p>	<p>Your comment is noted. The site potential will be assessed and investigated for potential use as a medium sized food store.</p>
<p>256. Section 6.8 & Policy TCE1. This section states that priority will be given to town centre sites so why has the Lawrence site been discounted as a possible site for a medium size store and has now been allocated to housing only development?</p>	<p>The Lawrences site has not been formally allocated as housing site, but as owner of the site Kettering Borough Council has worked up a housing scheme for the site (see July 2018 - executive committee paper).</p>
<p>257. Policy TCE6. Policy TCE6 - Desborough Library needs to be on this list.</p>	<p>Thank you for your comment. Libraries can be considered a 'community building' which is listed, however for the avoidance of doubt 'libraries' will be added to the list of examples of services and facilities.</p>
<p>280. Question 3. Supermarket in Desborough and Rothwell. Both Desborough and Rothwell need more shops. They are both large enough to warrant and sustain a supermarket. Particularly given cuts in public transports, the residents need a local store.</p>	<p>Your comment is noted.</p>
<p>281. TCE6 Protection of Local Services. I welcome and strongly support this. Local areas with shops and amenities such as Hampden Crescent and Hawthorn Road play a crucial role in the community.</p>	<p>Your comment is noted.</p>

Appendix 2g – Town Centres

<p>489. Question 3. Paragraph 6.8 of the SSP2 identifies that there is a need for a medium-sized food store (around 2,000sqm) to serve Rothwell/ Desborough. The NNJCS at the time of writing did not identify any potentially suitable sites.</p> <p>Taylor Wimpey UK Ltd requests that Kettering Borough Council considers the potential of a supermarket alongside residential development could be delivered at RO/205 – Land to the west of Shotwell Mill Lane, Rothwell.</p>	<p>Site RO/205 was discounted through the assessment work undertaken in preparation of the draft SSP2 Local Plan, and the need for a medium sized food store to serve the Rothwell/Desborough area does not justify the residential development of the wider site.</p>
<p>342. Protection of Local Services and Facilities. The Trust welcomes the principle of this policy but suggests some amendments to improve its compatibility with the NPPF and its ability to protect facilities that are valued by local people and important for well-being.</p> <p>Under part 3, we recommend the following alteration:</p> <p>3) the property has been marketed for its current use for a sufficient period of time at a reasonable price and that there has been no interest in the property, and that the existing use is no longer economically viable;</p> <p>The reason for this change is that in financial terms many community and cultural facilities are not 'economically' viable in isolated financial terms as they rely on discounted or peppercorn rents and/or subsidies/funding. They do however have social value, and can also support the wider vibrancy and viability of surroundings.</p> <p>To conform with the NPPF (2018), we also recommend the list</p>	<p>The exclusion of 'economically' from bullet point 3 is noted due to the limitation it imposes on community/cultural facilities which focus on social value. However, it is proposed that instead, the policy reads 'economically or socially', and that supporting text expands this further referring to comments received and facilities no longer being required by the community. This would enable uses to be assessed on two factors. Social value could be measured through evidence received in response to planning applications, such as objections to loss of a valued community use. The inclusion of cultural facilities within the list of services and facilities is noted, however, this description is quite ambiguous and would require further clarification through definition.</p>

Appendix 2g – Town Centres

of services and facilities outlined under part 4 also includes 'cultural facilities'.	
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