Corby Borough Council  
Planning Policy  
Deene House  
New Post Office Square  
Corby  
NN17 1GD  

5th September 2019

Dear Sir / Madam  

Part 2 Local Plan for Corby: Publication Draft (Pre-Submission) (Regulation 19 Consultation)  
Representations on behalf of Peel Investments Properties Ltd

We write on behalf of Peel Investments Properties Ltd (‘Peel’) in response to the ‘Part 2 Local Plan for Corby: Publication Draft (Pre-Submission) Consultation’. Peel is the long-standing developer and owner of Corby Retail Park.

These representations address concerns with the emerging plan, particularly where it relates to town centre uses and employment land. The representations should be read alongside those submitted on Peel’s behalf to the Emerging Draft Options Plan consultation in 2018.

In summary, Peel consider the emerging Local Plan is unnecessarily restrictive in its approach to town centre uses outside the town centre when there is a clear need for such development to meet local need. They also consider the draft employment policy should be more flexible in allowing complementary ancillary uses (such as retail and leisure uses) in employment areas.

As such, Peel consider the plan to be unsound as it is not positively prepared, justified nor consistent with national policy. However, the issues raised are no so fundamental they cannot be addressed through minor policy changes. Peel do not therefore object for objections sake, rather they seek to ensure policies, particularly relating to the retail park, are made sound.

Peel wish to continue to be involved in the Local Plan preparation so it remains effective and deliverable and can meet the needs of Corby’s growing population. To this end they request an opportunity to participate in the Local Plan hearing sessions.

Retail park context  

Peel’s previous representations evidenced that Corby Retail Park is an existing and established retail location which meets retail needs in Corby (as a borough) and has a ‘complementary’ role to the town centre by providing a local alternative to retail parks outside the Borough.
The retail market continues to change at pace, as landlords and tenants strive to react to customer demands. Crucially, the market is changing from a single offer destination (i.e. only containing retail uses) to a mixed offer which includes a range of retail and non-retail (leisure). Corby is no different and, as such, a diverse retail and leisure offer is important if the borough (and town centre) is to retain customer expenditure and existing retailers and prevent expenditure and employment being lost to competing destinations elsewhere.

The retail park is ideally located to create and enhance the potential for sustainable growth. Previous representations identified that housing and employment growth locations are intrinsically linked and depend on additional services (including retail and leisure) within a suitable distance. The retail park is close to existing and emerging housing and employment growth and provides complementary facilities which contribute to the success of the area.

**Existing policy summary**

**National policy**

The National Planning Policy Framework (‘NPPF’) advocates a ‘plan led’ approach where Local Plans should, amongst other key objectives, ‘... meet the area’s objectively assessed needs...’ and that these needs are not exclusively limited to housing and employment land.

Turning to retail and town centre uses this means allocating ‘a range of suitable sites in town centres to meet the scale and type of development likely to be needed’ and where necessary identifying sites outside of the town centre where such sites are justified.

**Existing local policy**

Strategic policies for Corby are contained in the North Northamptonshire Joint Core Strategy (‘NNJCS’) (2016) which in Policy 12 sets the requirement for 12,500sqm net additional retail floorspace in Corby which should be first directed to the town centre.

This is a clear and unequivocal adopted local plan need for additional retail floorspace. This ‘town centre’ need should not be confused with other additional and location specific need generated by major development such as urban extensions (e.g. Corby West ‘SUE’) which require a quantum of retail floorspace to create sustainable new communities.

Therefore, it is critical that a proactive plan led approach identifies sites which can meet the 12,500sqm net additional retail need, in Corby as a borough, over the plan period. The relevance of this requirement is considered below.

**Local Plan Part 2 evidence base**

The Local Plan Part 2 carries forward the adopted NNJCS requirement to increase the net comparison floorspace of Corby town centre by 12,500sqm net. This 12,500sqm need is then used to inform the emerging plan evidence base.

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1 National Planning Policy Framework (2019) – paragraph 16
2 National Planning Policy Framework (2019) – paragraph 35(a)
4 North Northamptonshire Joint Core Strategy (2016) – Policy 12[c]
The Council has prepared a Town Centres & Town Centre Uses Background Paper (2019) which analyses matters identified in the Emerging Draft (Regulation 18) consultation (2018) and responds to consultee comments on the 2018 consultation.

Section 2 of the paper reviews the retail hierarchy and advises, with reference to previous Peel representations, that policy changes are not required as the retail park does not function as a traditional centre and town centre use development should be directed to Corby town centre5. It also advises there is no requirement to revise the approach as the town centre operators and those promoting the SUE support the current draft policies.

However, the local plan evidence base does not fully consider the nuanced approach suggested in Peel’s previous comments; i.e. that the retail park is included within the retail hierarchy, not that the retail park is given the same standing as a town centre. By adopting Peel’s suggested approach, the retail park would be placed above other out of centre retail locations, thus enabling the Council to first focus new town centre use facilities to existing ‘traditional’ centres, then to the retail park and only finally to other out of centre sites where no other locations are available or suitable.

This would also mean the retail park can properly support the sustainable growth of major residential and employment locations in Corby. The plan included in our 2018 representations shows the clear linkages between the Peel Centre (Corby) and existing and planned growth.

Such an approach has been recently taken forward by Hyndburn Council, whereby the Peel Centre (Whitebirk) is an identified retail location4 in the adopted Hyndburn Development Management Policies Plan. The emerging Hyndburn Site Allocations Plan7 then allocates the Peel Centre a retail and mixed use site because of; interconnectivity between the retail park and existing and planned nearby housing and employment growth, and the need for complementary services (including retail and non-retail uses) in the area.

Peel consider Hyndburn’s approach to be a sound proactive means of and properly responding to changing demand, whilst ensuring existing town centres are rightfully protected. It further ensures that the retail park has a role in protecting against sporadic and opportunistic retail development in solus locations which bring no benefits in terms of linked trips with similar uses or connectivity with growth locations. It is therefore entirely consistent with, supportive of and complementary to the overarching development plan strategy.

The Background Paper then considers retail impact thresholds and responds to comments submitted to the 2018 Consultation. Peel’s position on the threshold is unchanged, and the threshold should be increased to 2,000sqm for certain development at the retail park.

**Assessment of Retail Network and Hierarchy (March 2019)**

In the context of the existing and proposed retail hierarchy in Corby, the ‘Assessment of Retail Network and Hierarchy’ Paper considers the role of the retail park. Tellingly, it recognises the

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5 Corby Town Centres & Town Centre Uses Background Paper – Paragraphs 2.4 and 2.5
6 Hyndburn Development Management Plan – Policy DM3
7 Hyndburn Site Allocations Plan [Regulation 18] Consultation (2019) – Site 88
loss of trade to Rushden Lakes. This is evidence of a clear risk of far less sustainable travel patterns and certainly a loss of trade from Corby as a whole.

Notwithstanding this, there is an additional need to identify sites capable of accommodating expected retail needs (i.e. the 12,500sqm requirement set out in the NNJCS). However, neither the hierarchy paper nor the emerging Local Plan identify how the retail hierarchy (and Corby town centre in particular) can accommodate this need. In the context of the NPPF, which requires councils to meet objectively assessed needs, this is a fundamental issue to address.

It therefore follows that efforts should be made to address current and future needs, including identifying additional sites and opportunities. Identifying the retail park within the hierarchy is a sound approach to meeting local need whilst addressing the need to protect against the loss of expenditure to other locations outside Corby. The reality would be that if a pro-active approach is not taken, by making sound use of the retail park as a key part of the hierarchy, then there will be increased risk of trade indeed being lost to locations such as Rushden Lakes which is a detriment to the Corby as a whole.

**Emerging Local Plan Part 2 Policies**

We now comment on specific emerging policies, in the context of the position as set out above where relevant to the retail and site context, evidence base and existing planning policy.

**Proposals Map**

The retail park is within a wider key employment area to the east of Corby which includes a mix of industrial estates, major single employment sites and business parks.

The retail park contributes to the mix of uses in the employment area and therefore Peel do not object to the principle of including the retail park in the employment allocation. However, the relevant employment policies must recognise the role of the retail park, then identify it (after the town centre) as a location which is to be preferred to other out of centre locations for additional retail and other supporting uses such as food and drink, and then identify the retail park on the proposals map.

**Policy 9 – Employment Uses in Established Industrial Estates**

Peel welcome that Policy 9 allows for ‘Ancillary services and facilities...’ in existing employment areas. However, although the accompanying list of potential ancillary uses is not exhaustive, it should be widened to specifically refer to retail uses in recognition of the need for complementary retail facilities within and alongside a wider employment use.

That way suitable ancillary supporting uses can come forward in accordance with wider policy aspirations for development.

**Policy 10 – Non Employment Uses (non-B) in Established Industrial Estates**

As we have identified above, the draft Proposals Map shows the retail park to be within a wider employment allocation. As detailed below, Peel do not necessarily object to this allocation, but it is important that employment land policies are positively framed to enable further growth at the park. As already identified above, the retail park should also be specifically identified on the proposals map.
Although Peel do not object to Policy 10, the wording should be revised. This would involve adding a further criterion (criterion (e)) which allows non-B Class employment uses in an employment area where the site in question is already in a non-employment use. That way existing non-B Class employment uses in employment areas, such as the retail park, can continue to be used for complementary and supportive uses as envisaged in Policy 9. That way the role of the retail park can be recognised and supported, and unnecessary policy burdens can be avoided.

Policy 19 – Network and Hierarchy of Centres

Hierarchy of centres

Given evidence within these representations, the previous Regulation 18 representations and the council’s own evidence base, Corby Retail Park should be included in the retail hierarchy.

The current draft policy 19 (and accompanying Policy 24), whereby centres in the hierarchy cannot meet full retail needs and the retail park is not identified in the hierarchy, risks speculative unplanned development in other out of centre locations. Clearly, sporadic and unplanned retail development would be of a detriment to the town.

Three town centre development sites are identified in Policy 24, yet the policy does not identify a scale or quantum of retail development which could be accommodated in order to meet the identified need for an additional 12,500sqm net floorspace in Corby. Moreover, two of these sites are likely to result in a net reduction in retail space.

Corby Retail Park serves an important function within the retail market by providing floorspace for retailer business models which cannot readily locate to the town centre, and locally by providing locally accessible retail park facilities. Indeed, the town centre has continued to flourish notwithstanding further development at the retail park.

Including the retail park within the hierarchy, as a designated centre or ‘Commercial Centre’ and the thus next sequentially preferable location to the town centre, will enable the future managed approach to retail and associated uses in this location and support sustainable development aspirations. This is a preferable alternative to speculative applications.

Retail impact threshold

Peel strongly object to the proposed local retail impact threshold of 400sqm. Our previous comments on the Regulation 18 draft (Policy 23 as it was then) remain relevant to the revised Policy 19. The local plan evidence base conclusions that centres in Corby are well performing®, as such there is no justification for a low floorspace threshold. Not least, such a low threshold places an unnecessary burden on small scale proposals which could meet localised need.

A more pragmatic and sound approach, if the council has concerns with speculative retail development, would be to encourage growth at existing retail locations (such as the retail park) by increasing the threshold (to 2,000sqm) for mezzanine and goods controls applications at the retail park but retaining a lower 400sqm threshold elsewhere.

® Corby Town Centres & Town Centre Uses Background Paper – Paragraphs 2.4 and 2.5
Summary

These representations are submitted on behalf of Peel Investments Properties Ltd regarding relevant policies within the ‘Publication Draft (Pre-Submission)’ Corby Local Plan Part 2.

Peel consider the strategy for delivering new retail development should be revised to ensure full retail needs (as identified in the NNJCS) can be met in the Corby urban area, as the town centre is unable to fully meet these needs. The current draft plan fails to meet these needs.

Corby Retail Park is an existing retail location, close to existing and proposed employment and housing growth, which can accommodate some of this unmet retail need. Development at the retail park presents a clear opportunity to promote the most sustainable patterns of development (for example, the promotion of linked trips) by grouping supporting uses in a broad area, rather than in a sporadic way on individual smaller opportunity sites.

In this regard, employment policies should also be updated to encourage ancillary retail uses within and close to existing employment areas.

Peel object to the proposed locally set lower retail impact threshold of 400sqm (compared with the nationally set threshold of 2,500sqm) in Draft Policy 19.

Therefore, the Local Plan Part 2 should be updated to:

1. Recognise Corby Retail Park’s important complementary role to the wider employment area (Draft Policies 9 and 10)
2. Identify the retail park within the retail hierarchy (Policy 19) so it is placed above other out of centre sites (albeit accepting it is not at the same ‘level’ as the town centre);
3. Recognise the specific separate need for retail warehousing which should be directed to the retail park in the first instance (Policy 19); and
4. Revise impact thresholds to increase the threshold in floorspace terms (for example to 2,000sqm) for applications at the retail park

In Peel’s view, these changes will ensure the emerging Local Plan can be positively framed to encourage growth in the town centre whilst ensuring retail needs, which cannot be fully met in the centre, are directed to the retail park rather than sporadic unplanned locations.

We trust the above comments will considered accordingly. But if there are any queries then please do not hesitate to contact me.

Yours sincerely,

For and on behalf of NJL Consulting