

# **SOUTH EAST LINCOLNSHIRE LOCAL PLAN: SPALDING RETAIL PAPER (March 2017)**

## **1.0 THE SOUTH EAST LINCOLNSHIRE TOWN CENTRE AND RETAIL CAPACITY STUDY, 2013**

- 1.1 The South East Lincolnshire Town Centre and Retail Capacity Study, 2013 (the Retail Study) identifies that there is a current need in Spalding for 1,594 sqm of comparison goods floor space, and a need for 10,810 sqm of comparison goods floor space in Spalding by 2031 (the end date of the Retail Study). This means that land could be allocated in the new Local Plan to accommodate 10,810sqm of floor space. This could be on one site or, several smaller sites.
- 1.2 It is expected that a subsequent study will update the Retail Study and provide guidance to inform the need in the latter part of the plan period. A partial Local Plan review may be required to address any changes.
- 1.3 Comparison goods are taken to include non-food and drink items such as clothing, shoes, furniture, household appliances, books and stationery, jewellery and other personal effects. Consumers tend to buy these goods less frequently and so usually compare prices, features and quality of an item before buying.
- 1.4 The Retail Study suggested three potential development areas in Spalding town centre for additional floor space:
- **Chapel Lane:** is fully occupied and operates well as a mixed-use area, with no capacity for additional floor space;
  - **Red Lion Street:** has been developed as Boston College, and incorporates three small units capable of accommodating retail or other town centre uses. There is no capacity for additional floor space;
  - **Gore Lane/Drapers Place:** is currently used as a surface car park and there are currently no plans to change its use. The site is small-scale (0.16ha) and may not be able to accommodate a unit of sufficient size to meet business needs. Access is likely to be difficult for the type of traffic movements associated with this type of development.
- 1.5 It is therefore considered that none of the sites identified in the Retail Study are now capable of accommodating 10,810sqm of comparison goods floor space (or any part) in this plan period.

## **2.0 NATIONAL POLICY**

- 2.1 The National Planning Policy Framework, 2012 states that a Local Plan should:
- allocate a range of suitable sites to meet the scale and type of retail development needed in town centres. It is important that needs for retail are met in full and are not compromised by limited site availability. An

assessment of the need to expand town centres to ensure a sufficient supply of suitable sites should be undertaken;

- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;

### **3.0 POTENTIAL RETAIL SITES IN SPALDING SETTLEMENT BOUNDARY**

- 3.1 Spalding Town Centre boundary is drawn tightly. The Spalding Retail Paper (July 2016) identifies that there are no sites available to meet the immediate identified comparison floorspace need within, or adjacent to Spalding town centre, or within the Spalding settlement boundary. Section 4 responds to representations made in relation to several sites considered previously, and provides responses relating to new sites submitted during the Preferred Sites consultation (July-August 2016).
- 3.2 Using the sequential approach identified in 2.1 above, fourteen sites have been assessed for their suitability for retail development. Consideration was also given to each site's availability for retail use, and the likelihood of that site being able to meet the immediate comparison floorspace need (up to 2026), as well as the identified longer term need to 2031.
- 3.3 The Spalding Retail Paper (July 2016) was taken to the South East Lincolnshire Joint Strategic Planning Committee (JSPC) (24 June 2016). SHR004 was the only site identified by the Retail Paper that was considered available to meet the immediate need and had the potential to be delivered in the short term, although the Paper recognised that the site is within an out-of-settlement location. It considered that exceptionally this could be considered appropriate subject to:
1. submission of a planning application, accompanied by a retail impact assessment (to ensure that the need proposed by the applicants reflects the requirement at the time the planning application is submitted to ensure that there would be no adverse impact upon the vitality and viability of Spalding town centre);
  2. delivery of a high quality design and landscaping scheme demonstrating that the site can be well-integrated with the neighbouring uses and the wider landscape;
  3. provision of enhanced accessibility links with the Spalding built-up area and the town centre.
- 3.4 However, the JSPC resolved that SHR004 was not appropriate for comparison goods development; the preferred approach was to issue a call for retail sites during

the public consultation in July-August 2016 to establish whether any, more sequentially preferable sites, were available for this use.

- 3.5 The Spalding Retail Paper (July 2016) also identifies that 'after 2031 (informed by an up-to-date Retail Study), it is envisaged that some additional capacity for comparison goods floor space could be delivered to the west of Winfrey Avenue, as an extension to Spalding town centre'. Members were supportive of the approach taken to this location, and recognised the justification for the approach taken. Section 4 provides additional commentary on this view.

#### 4.0 SPALDING RETAIL SITE OPTIONS

4.1 **Comments received:** The following comments were made on site ***SHR001: (Land to the west of Winfrey Avenue, Spalding)***:

1. the Holland Market and Winfrey Avenue Retail Parks (the retail units either side of Winfrey Avenue except for Sainsbury's) forms a major part of Spalding town centre and employs a great number of people;
2. the owners confirm an intention to invest further in the retail park to strengthen its role within the centre and to enhance the retail offer within the town;
3. the owners identify that the Local Plan must be compliant with the NPPF particularly paragraphs 23-27. The extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres should be clearly defined and a range of suitable sites to meet the scale and type of retail development needed in town centres should be identified. It is important that needs for retail, are met in full and are not compromised by limited site availability. An assessment of the need to expand town centres to ensure a sufficient supply of suitable sites should be undertaken. A sequential approach to site selection should be undertaken; appropriate edge of centre sites that are well connected to the town centre should be allocated where suitable and viable town centre sites are not available. Only if suitable sites are not available should out-of-centre sites be considered;
4. SHR001 is the only edge-of-centre site that was assessed by the Spalding Retail Paper (July 2016); the JSPC considered it suitable in retail terms, but did not consider it available within the plan period. However, Paragraph 3.2 states that discussions have taken place with the parties involved;
5. the Spalding Retail Paper (July 2016) identifies that the requirement to relocate the bus station and to secure agreement for development from multiple owners (Anglian Water, the Environment Agency and SHDC) means that SHR001 is unlikely to be available until later in the plan period. However, the owners consider with policy support, this site could be suitable and capable of delivering retail development within the plan period as part of a comprehensive scheme for the expansion of the town centre;
6. SHR001 benefits from connectivity between the retail park and the town centre as a result of and the high level of linked trips generated.

#### 4.2 **Responses to the above comments:**

1. It is accepted that Holland Market and Winfrey Avenue Retail Parks are an important part of Spalding town centre and are an important local employer;
2. The owners' intention to invest in the Retail Parks to enhance the retail offer is welcome;
3. The Local Plan will be consistent with national planning policy, unless local evidence can justify an alternative robust approach. The town centre and primary shopping area boundaries for Spalding are identified on the Policies Map and reflect the South East Lincolnshire Town Centres and Retail Capacity Study (December 2013). This paper sets out a comprehensive sequential approach to site selection, following the approach set out in the NPPF;
4. It is accepted that the Spalding Retail Paper identified:
  - one edge-of-centre site (SHR001): this was the only site known to the LPA to be available for retail development;
  - 'the site is unlikely to be available until later in the plan period' because it is known that the site is within three ownerships, and none of those parties have agreed land disposal or have confirmed that their land is available. Therefore, the land cannot be considered 'available'. But the Retail Paper recognised that should this matter be resolved, the site could be capable of accommodating additional retail growth from 2031 onwards. Therefore, it is not accepted that the JSPC considered the site to be unavailable in the plan period. It is accepted that discussions have taken place between the owners and the Council relating to proposals for the site, although this does not mean a site is available; these discussions are considered to be high-level and have not resulted in a planning application being submitted;
5. no evidence has been submitted to confirm the land is available for retail development and the timeframe for its availability. Development of the site involves the re-location of a bus station and a water tower which is likely to involve re-provision and site clearance. This indicates that the site will not be available until the medium term. However, provision will be made in the policy for additional floorspace to be provided in the town centre/edge of centre later in the plan period;
6. SHR001 is adjacent to the town centre and is in close proximity to the Spalding Primary Shopping Area, therefore it is acknowledged that the site could benefit from linked trips to the town centre as well as to Holland Market and Winfrey Avenue Retail Parks;

#### 4.3 **Conclusions on site SHR001** – It is considered that site SHR001 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site with five positive/very positive (green) impacts being recorded relating to accessibility, education, landscape character, soil, air and water quality and employment opportunities, but a further

five (blue) impacts could be delivered by securing appropriate mitigation to help meet future employees and residents' needs, such as protecting amenity;

- with no evidence to show that all the landowners have/intend to dispose of their land, and no evidence to show that provision has been made to re-locate the bus station and the water tower the site cannot be considered to be available. However, it is recognised that should ownership and infrastructure issues be resolved that the site could be an appropriate location for retail development in the medium-long term. Consequently, provision will be made in the policy to support retail provision in a town centre/edge of centre location after 2026.

4.4 **Comments received:** The following comments were made on site **SHR002 (Former Welland Hospital, Holbeach Road, Spalding):**

1. This site is considered for retail development in the Spalding Retail Paper (July 2016) but dismissed on residential amenity grounds. This is unsound, and not justified in line with the evidence provided through the SA;
2. SHR002 is an out-of-centre site in retail terms, located 1.2km from the town centre. The Retail Paper describes the site as 'accessible to the town centre by foot, bicycle and public transport'. It is the closest and most accessible out-of-centre site to the town centre considered. It is the most sustainable of the sites assessed in the Retail Paper; and substantially more sustainable than SHR004 which is a preferred site for retail development, unless other planning considerations indicate otherwise;
3. the SA scores the site with more positive impacts than any other site, including SHR004, the preferred site. The SA also identifies four of the remaining five impacts as positive with appropriate mitigation. Only flood risk scores poorly: the site is located within Flood Zone 3a – as are all the sites assessed in Spalding - it would therefore be difficult to identify a sequentially preferable site in flood risk terms. Retail uses are a less vulnerable use and retail development should not be dismissed on this site on flood risk grounds. The Retail Paper is inconsistent when it comes to assessing the sites on flood risk grounds;
4. a new out-of-centre site would result in a significant lost opportunity for Spalding. The location of retail floorspace in an out-of-centre location would limit any potential for new retail floorspace to be provided in the town centre as the commercial attraction of doing so would be significantly diminished;

4.5 **Responses to the above comments:**

1. The Spalding Retail Paper (July 2016) identifies that retail development at SHR002 would 'be out of character with the surrounding uses, and, it is considered would generate adverse impacts upon the amenity of existing residents'. Therefore it is not considered that the site was dismissed solely on amenity grounds. The SA recognises that retail development could generate noise and air pollution which could have an adverse impact upon residents' health and well-being, to be minimised through mitigation. These issues do not affect all the other potential retail sites to the same extent;
2. It is accepted that of the out-of-centre sites considered by the Retail Paper (July 2016), SHR002 is the closest to the town centre, although in terms of

accessibility there are other out-of-centre sites (such as SHR003) that the Retail Paper considers to be equally as accessible. It is accepted that the SA rates SHR002 more positively than the other out-of-centre sites considered at that time, although the SA is only one part of the evidence base that informs site selection. It should be noted that SHR004 was discounted as the preferred site by the JSPC, so was not taken forward;

3. The assessment of the SA is not disputed, however reference to SHR004 as the preferred site is; it was discounted as the preferred site by the JSPC, so was not taken forward. The SA scores SHR002 as negative for flood risk. While it is correct that all the potential retail sites are within Flood Zone 3a, it has been agreed with the Environment Agency that 'although the NPPF (para 101) says that *'the aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding'* because large areas of Spalding are at the same probability of flooding (i.e. land having a 1 in 100 annual probability of river flooding, or a 1 in 200 annual probability of sea (tidal) flooding) to identify sequentially preferable sites in terms of flood risk for the emerging Local Plan and during the planning application process, [we] agreed with the Local Planning Authority that the more refined information from the SFRA maps (i.e. the hazard maps) should be used, which show not only the probability of flooding but also the consequences of flooding'. The South East Lincolnshire Strategic Flood Risk Assessment (SFRA) provides the basis for applying this test. This shows that SHR002 is within Flood Zone 3a, with a flood hazard of 'danger for most', and a flood depth of '>1.5m'. Whether or not the Sequential Test can be passed depends upon the suitability of other sites available within the locality. In this instance, it appears that there are other more suitable sites in Spalding that have a lower level of flood risk meaning that the Sequential Test cannot be passed. Although retail uses are less vulnerable in flood risk terms, the aim of the NPPF is to steer new development to areas with the lowest probability of flooding. So in sequential flood risk terms there are sites available, at a lower risk of flooding which can accommodate the retail development and which could be taken forward;
4. retail sites can only be identified in locations that are suitable, available and deliverable. While a town centres first approach is considered to be preferable, if sequentially preferable sites are not suitable or available then alternative sites may be considered as long as an impact assessment can demonstrate that there will be no adverse impacts upon Spalding town centre;

4.6 **Conclusions on site SHR002** – It is considered that site SHR002 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site well with six positive (green) impacts being recorded relating to accessibility, inclusive communities, education, landscape character, soil, air and water quality and employment opportunities, and a further four (blue) impacts could be delivered by securing appropriate mitigation to help meet future employees and residents' needs, such as protecting amenity;
- the Highways Authority states that 'a high quality junction would be required to the A151 so that access is both safe and to not interfere unacceptably with the free flow of traffic in and out of Spalding.' It appears that a suitable access could be secured, although it may not be as straightforward as for other sites;

- although the site is within Spalding settlement boundary, the site lies within a predominantly residential area, and it is considered that the development of comparison goods units would lead to an unacceptable impact upon the character of the area and the amenity of existing residents;
- it is considered that there are more suitable sites available in sequentially preferable locations or established retail destinations that would enable shoppers to compare prices, features and quality of goods before buying, and which will also enable linked trips, thereby promoting a more sustainable form of shopping within the town, which this site does not;
- the NPPF requires development to be steered to areas with the lowest probability of flooding, and this site is the least sequentially preferable in terms of flood risk of the potential retail sites, so should not be taken forward.

4.7 **Comments received:** The following comments were made on site ***SHR003 (Land to the west of Spalding Road)***:

1. This site has been discounted due to the impact on the amenity of existing and future residents, so are unlikely to be suitable for allocation for retail purposes;
2. There is no reason why retail development should not be acceptable in a residential area. There are numerous examples of retail development being located close to residential development such as in town centre and edge of centre locations. The key issue in design terms is to ensure that the amenity of residents is safeguarded by providing appropriate separation distances and buffering from servicing areas and by avoiding overlooking of private spaces. This can be ensured through a masterplan;
3. The location of retail can be considered alongside the design of the new junction with Spalding Road and the route of the Spalding Western Relief Road (SWRR). The Local Plan is not proposing any detailed design at this stage but setting the principles which will then guide the subsequent design work. There is no conflict that could not be avoided by a suitably flexible policy approach;
4. There is no reason why the roundabout should take so long to deliver. The developers control the land necessary to allow for the delivery of the new junction and the first part of the SWRR. Following allocation of the site in the Local Plan, anticipate discussions can be advanced swiftly regarding delivery in the short term and not in 2024;
5. Retail development could provide a better financial return than housing so could generate a higher level of funding for the required road. This would improve the viability of the development overall;
6. A retail assessment confirms that this site is suitable for retail development;

4.8 **Responses to the above comments:**

1. It is accepted that the Spalding Retail Paper (July 2016) identifies that 'the site is opposite Wardentree Lane Employment Area and is expected to be to the north of a new 5 arm roundabout at the entrance to the Vernatt's Sustainable Urban Extension. The location is expected to accommodate at least 4,000 dwellings (over the next two plan periods) and development in this location

should help promote a quality residential environment and attract residents to the area. It is considered that retail development of this type and scale will be out of character with the future vision for this area and may detract from amenity of future residents’;

2. Although retail and residential may co-exist in town centre or edge of centre locations, these are by nature sequentially preferable locations in retail terms, and are therefore locations where retail and town centre uses can be promoted. However site SHR003 is an out-of-centre site, located at the gateway to a primarily residential sustainable urban extension. The land is required to help deliver the 5 year housing land supply for Spalding, and the development of a comparison goods unit(s) is contrary to that aim (as well as the principles of the sequential test);
3. The Highways Authority identifies that the location of the roundabout is fixed, and unless evidence is submitted giving weight to an alternative approach, so is the road line identified on the Policies Map. As the detailed design of the roundabout has not been agreed, neither has the land take. Therefore it would be premature to allocate land for a retail development until the detailed road design has been agreed;
4. The Local Plan is in year 6 (2016), the detailed design and specification for the roundabout has yet to be agreed, a masterplan and planning application has yet to be submitted, and a delivery and funding package has yet to be established. Access to SHR003 cannot be achieved until the roundabout is in place; it is therefore reasonable to assume that development on this site is not likely to be available to meet the immediate retail need;
5. Anecdotal evidence from local agents indicate that retail development may not generate a significantly higher financial return than residential development. However, even if this were the case, this is not on its own sufficient to justify allocating retail development in an out-of-centre location;
6. The developers retail assessment indicates that SHR003 is suitable for retail development;

4.9 **Conclusions on site SHR003** – It is considered that site SHR003 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site with three positive (green) impacts being recorded relating to accessibility, education and employment opportunities, but a further six (blue) impacts could be delivered by securing appropriate mitigation to help meet future employees and residents’ needs, such as improving accessibility to facilities and protecting amenity;
- it is considered that there are more suitable sites available in sequentially preferable locations or established retail destinations that would enable shoppers to compare prices, features and quality of goods before buying, and which will also enable linked trips, thereby promoting a more sustainable form of shopping within the town, which this site does not;



4.10 **Comments received:** The following comments were made on site **SHR004 (Land to the south-west of Cowbit Road):**

1. the provision of retail floorspace in an out-of-settlement location is contrary to the NPPF which requires a town centre first approach; out-of-settlement sites are at the bottom of the retail hierarchy, below town centre, edge-of-centre and out-of-centre sites. SHR004 is in an out-of-settlement location approximately 3km from the town centre boundary. Significant retail development on sites located outside the settlement boundary should be resisted in the strongest terms;
2. the Spalding Retail Paper (July 2016) states that the sites have the potential to be accessible to the town by foot and bicycle. But improvements would not overcome the significant accessibility issues of the site; access to the town centre by foot would take at least 45 minutes, preventing any realistic opportunity for linked trips facilitating the growth of the town centre. For the town centre to benefit from any linked trips, the site would need to be located within 800 metres;
3. it is highly likely that Spalding Town Centre would incur significant adverse impacts should all, or even a substantial part of the required retail floorspace be provided at SHR004 as high levels of trade draw could be diverted to the site from existing centres. This would have significant impacts on existing retailers leading to higher levels of vacancies and have a detrimental impact on the vitality and viability of the centres. Significant retail floorspace at these sites could also undermine their employment allocations;
4. an alternative, out-of- centre site would result in a significant lost opportunity for Spalding. The location of retail floor-space in an out-of-centre location would limit any potential for new retail floor-space to be provided in the town centre as the commercial attraction of doing so would be significantly diminished;
5. the Lincs Gateway has great potential as a location for comparison retail, which requires good visibility and a prominent location in order to be successful, which is recognised to some extent in the Spalding Retail Paper. These proposals should not compromise the high quality landscaped environment proposed for the business park, or dilute the original vision for the project, which led to the grant of planning permission;
6. the developers are keen to provide a mixed-use development at Lincs Gateway to meet the Local Plan's objectives, and the needs of Spalding over the Plan period;
7. confirm that national retailers have shown interest in the Lincs Gateway, and a preference for this location over any other in the town. Discussions have shown that these retailers would not favour alternative locations within Spalding, and they would be unlikely to locate in Spalding if the Lincs Gateway site were not available;
8. welcome the recognition in the Retail Paper that land should be allocated to accommodate 10,810 sq m of comparison retail floor space. It is important that the Local Plan should identify sites to deliver the required retail development, as this type of development can take time to come to fruition. Delaying this decision would risk failing to meet the need for retail within the Plan period. The failure to meet the projected need for retail could have serious implications for Spalding as a retail centre. Where retail demand is unmet, shopping habits can

change and become fixed, with people seeking the services they require elsewhere, for instance in Peterborough. The Local Plan should therefore proactively plan for the provision of retail, to avoid a delay in provision. New retail areas must also be planned with the intention that they would be pleasant places to spend time, so as to allow them to be successful in attracting shoppers. A high quality environment is important, as is the presence of ancillary uses such as A3 and A5 food and drink establishments;

9. a retail needs assessment considers the potential which the Lincs Gateway holds as a location for retail development. The site would be suitable for this development for the same reasons that it would be suitable for a business park, due to its gateway location;
10. retail development should be carefully planned to ensure that there would be sufficient floor space within the site to create a viable development. The Retail Paper suggests that SHR004 could provide 14,000 sq m of retail floor space. This is not the case, this estimate fail to take account of the need for other land-hungry elements, such as car parking, access roads, landscaping and drainage. This means that it would not be possible to promote only the remaining area of SHR004 for retail development;
11. agree that the scale of retail development should be limited, and tested so as to ensure that it would not have an unacceptable adverse impact on Spalding town centre;
12. A Masterplan would be submitted to ensure that it would sit comfortably alongside the business park and residential development;
13. the planning permission for the business park does not require any funding to be provided for the footpath. An investigation of the issue at the time of the application revealed that the cost of upgrading the footpath would be substantial, due to the need to reconstruct the bank, and the cost of these works was estimated at £200,000, putting it beyond the Highway Authority's budget. However, this cost could be met by retail and residential development, along with the additional construction of a dedicated cycle lane;
14. The provision of a mix of uses within the site would also greatly improve the prospects of a bus service being extended to serve the site, and provide an improved connection with the town centre. The uses proposed would provide a strong demand for a bus service throughout the whole of the day and up to 7 days a week;

#### 4.11 **Responses to the above comments:**

1. It is accepted that out-of-settlement sites are the lowest tier in the retail hierarchy identified by national policy. The NPPF states that if sites cannot be identified in accordance with the town centres first approach the Local Plan should set policies for meeting the identified needs in other accessible locations that are well-connected to the town centre; the Spalding Retail Paper (July 2016) identified that site SHR004 could be suitable provided that three criteria could be met (which if the site was taken forward would be included in a policy), including the provision of enhanced accessibility links with the Spalding built-up area and the town centre. However, SHR004 was discounted by the JSPC, so will not be taken forward;
2. It is accepted that SHR004 is approximately a 45 minute walk from the town centre. Although improvements to foot and cycle paths could enhance accessibility it is accepted that opportunities for linked trips with town centre services are more limited from this location;

3. An impact assessment would be required with a planning application to ensure that an out-of-centre development does not have a significant adverse impact on the town centre. The planning permission for SHR004 is for a B Class led scheme (including employment generating development, but not retail). The owners representations indicate that only a small part of SHR004 is expected to accommodate B Class development, with a mix of uses proposed for the remainder of the site, so it is not considered that retail use could undermine this part of the wider site (the rest of the consented site is SHR005);
4. retail allocations can only be identified in locations that are suitable, available and deliverable. While a town centres first approach is considered to be preferable if sequentially preferable sites are not suitable or available then alternative sites may be considered as long as an impact assessment can demonstrate that there will be no adverse impacts upon Spalding town centre. This paper indicates that no sites are available in the town centre or edge of centre capable of accommodating the immediate identified need so alternative locations should be considered. This approach would not prevent development coming forward on small-scale sites should demand exist;
5. it is accepted that SHR004 is a prominent, visible site, however this equally applies to the provision of a business park (which the site has planning permission for). Although the planning permission is for a mix of uses, the justification for an out-of-centre development was for a prestige employment-led business park environment including complementary hotel, conference and function centre, petrol filling station etc. Large scale comparison retail units would be contrary to the original vision for the project (and for which planning permission was granted);
6. SHR004 and SHR005 as permitted would deliver a mixed-use which would help deliver the Local Plan's objectives, and the employment needs of the Plan area over the plan period;
7. The owners confirmation that discussions have taken place with national retailers is noted, although no evidence has been submitted to support the view that these retailers would not locate elsewhere in the town should alternative sites become available;
8. The Local Plan is proactively planning for retail development and is expected to allocate site(s) to address the identified retail needs. A site for retail development would be expected to deliver a high quality environment to create an attractive space for shoppers and visitors. However, this would be a matter for the planning application. The desire for, and level of, ancillary uses will be a matter for the Local Plan policy (and the subsequent planning application);
9. It is accepted that the owners retail assessment identifies that SHR004 is suitable for retail development;
10. It is accepted that an allocated retail site should accommodate the retail units, appropriate access, car parking, servicing and landscaping. As the owners state the SHR004 has insufficient land available to accommodate such uses then SHR004 is no longer considered available for retail use;
11. National policy requires that a sequential and impact assessment be undertaken for any retail development (over an identified threshold) outside the primary shopping area to ensure that there are no adverse impacts generated from a scheme upon town centres;

12. The provision of a masterplan for this site is welcome;
13. It is accepted that the planning permission for the business park does not require a footpath link. However, as SHR004 is an out-of-settlement site accessibility would need to be improved by sustainable transport for the location to be more suitable and to promote linked trips with the town centre. Site SHR004 is unsuitable for residential development, which the owners identify is needed to help fund the foot/cyclepath improvements necessary to enhance accessibility to the site for retail use. Therefore the site is considered to be unsuitable with regards to accessibility;
14. An extended bus service to this site would be welcome, however there is no evidence to suggest that public transport providers are willing to undertake an extension, or that there is funding available to support the extension;

4.12 **Conclusions on site SHR004** – It is considered that site SHR004 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site with three positive (green) impacts being recorded relating to inclusive communities, education and employment opportunities but four negative (orange) relating to health and well being, accessibility, landscape character and soil, air and water quality;
- the site lies outside the Spalding settlement boundary, and is about 3km from Spalding town centre so is an out-of-settlement location;
- although some of the infrastructure to open-up this site has been delivered, the planning permission for the site would need to be re-negotiated to accommodate retail use. Although this could provide an opportunity to enhance accessibility to Spalding by foot, bike and public transport, the owners have indicated that this would only be possible with residential development being provided in this location. This is not being promoted by the Local Plan, therefore the site is not considered suitable;
- the owners state that there is insufficient land available within SHR004 to accommodate retail development therefore the site cannot be considered available;
- This site lies within a prominent gateway location; JSPC consider that the provision of retail development would adversely impact upon the prestige business park development consented for this site, and may discourage businesses from locating there;

4.13 **Comments received** - The following comments were made on site **SHR005 (Land to the north-east of Cowbit Road, Spalding)**:

1. the provision of retail floorspace in an out-of-settlement location is contrary to the NPPF which requires a town centre first approach; out-of-settlement sites are at the bottom of the retail hierarchy, below town centre, edge-of-centre and out-of-centre sites. SHR005 is in an out-of-settlement location approximately 3km from the town centre boundary. Significant retail development on sites

located outside the settlement boundary should be resisted in the strongest terms;

2. the Spalding Retail Paper (July 2016) states that the sites have the potential to be accessible to the town by foot and bicycle. But improvements would not overcome the significant accessibility issues of the site; access to the town centre by foot would take at least 45 minutes, preventing any realistic opportunity for linked trips facilitating the growth of the town centre. For the town centre to benefit from any linked trips, the site would need to be located within 800 metres;
3. it is highly likely that Spalding Town Centre would incur significant adverse impacts should all, or even a substantial part of the required retail floorspace be provided at SHR004 as high levels of trade draw could be diverted to the site from existing centres. This would have significant impacts on existing retailers leading to higher levels of vacancies and have a detrimental impact on the vitality and viability of the centres. Significant retail floorspace at these sites could also undermine their employment allocations;
4. an alternative, out-of- centre site would result in a significant lost opportunity for Spalding. The location of retail floor-space in an out-of-centre location would limit any potential for new retail floor-space to be provided in the town centre as the commercial attraction of doing so would be significantly diminished;
5. the Lincs Gateway has great potential as a location for comparison retail, which requires good visibility and a prominent location in order to be successful, which is recognised to some extent in the Spalding Retail Paper. These proposals should not compromise the high quality landscaped environment proposed for the business park, or dilute the original vision for the project, which led to the grant of planning permission;
6. the developers are keen to provide a mixed-use development at Lincs Gateway to meet the Local Plan's objectives, and the needs of Spalding over the Plan period;
7. confirm that national retailers have shown interest in the Lincs Gateway, and a preference for this location over any other in the town. Discussions have shown that these retailers would not favour alternative locations within Spalding, and they would be unlikely to locate in Spalding if the Lincs Gateway site were not available;
8. The site is identified as SP014 on the Proposals Map, but this reference does not correspond to any reference in the consultation documents - it would be helpful to have an explanation of what this reference means as the Proposals Map and discursive evidence base have the potential to confuse. Assume that the Councils are still considering how best to address Lincs Gateway in the new Local Plan;
9. welcome the recognition in the Retail Paper that land should be allocated to accommodate 10,810 sq m of comparison retail floor space. It is important that the Local Plan should identify sites to deliver the required retail development, as this type of development can take time to come to fruition. Delaying this decision would risk failing to meet the need for retail within the Plan period. The failure to meet the projected need for retail could have serious implications for Spalding as a retail centre. Where retail demand is unmet, shopping habits can change and become fixed, with people seeking the services they require elsewhere, for instance in Peterborough. The Local Plan should therefore

proactively plan for the provision of retail, to avoid a delay in provision. New retail areas must also be planned with the intention that they would be pleasant places to spend time, so as to allow them to be successful in attracting shoppers. A high quality environment is important, as is the presence of ancillary uses such as A3 and A5 food and drink establishments;

10. a retail needs assessment considers the potential which the Lincs Gateway holds as a location for retail development. The site would be suitable for this development for the same reasons that it would be suitable for a business park, due to its gateway location;
11. agree that the scale of retail development should be limited, and tested so as to ensure that it would not have an unacceptable adverse impact on Spalding town centre;
12. retail development should be carefully planned to ensure that there would be sufficient floor space within the site to create a viable development. The Retail Paper suggests that SHR005 could provide 30,373 sq m of retail floor space. This is not the case, this estimate fail to take account of the need for other land-hungry elements, such as car parking, access roads, landscaping and drainage. Around 10,000 sq m of retail floor space is more likely to be accommodated on the northern part of the site. As suggested the amount of retail development there should be controlled by a criteria-based policy. This would allow the amount and type of development to be carefully controlled;
13. A Masterplan would be submitted to ensure that it would sit comfortably alongside the business park and residential development;
14. the planning permission for the business park does not require any funding to be provided for the footpath. An investigation of the issue at the time of the application revealed that the cost of upgrading the footpath would be substantial, due to the need to reconstruct the bank, and the cost of these works was estimated at £200,000, putting it beyond the Highway Authority's budget. However, this cost could be met by retail and residential development, along with the additional construction of a dedicated cycle lane;
15. The provision of a mix of uses within the site would also greatly improve the prospects of a bus service being extended to serve the site, and provide an improved connection with the town centre. The uses proposed would provide a strong demand for a bus service throughout the whole of the day and up to 7 days a week;

#### 4.14 **Responses to the above comments:**

1. It is accepted that out-of-settlement sites are the lowest tier in the retail hierarchy identified by national policy. The NPPF states that if sites cannot be identified in accordance with the town centres first approach the Local Plan should set policies for meeting the identified needs in other accessible locations that are well connected to the town centre. However the Spalding Retail Paper (July 2016) discounted the site, so it will not be taken forward;
2. It is accepted that SHR005 is approximately a 45 minute walk from the town centre. Although improvements to foot and cycle paths could enhance accessibility it is accepted that opportunities for linked trips with town centre services are more limited from this location;
3. An impact assessment would be required with a planning application to ensure that an out-of-centre development does not have a significant adverse impact on the town centre. The planning permission for SHR005 is for a B Class led scheme (including employment generating development, but not retail). Even though, the owners representations indicate that only a small part of SHR005 is

expected to accommodate B Class development (with a mix of uses being considered for the remainder), it is considered that alternative uses would undermine the ability of the site to accommodate the consented employment scheme;

4. retail allocations can only be identified in locations that are suitable, available and deliverable. While a town centres first approach is considered to be preferable if sequentially preferable sites are not suitable or available then alternative sites may be considered as long as an impact assessment can demonstrate that there will be no adverse impacts upon Spalding town centre. This paper indicates that no sites are available in the town centre or edge of centre capable of accommodating the immediate identified need so alternative locations should be considered. This approach would not prevent development coming forward on small-scale sites should demand exist;
5. it is accepted that SHR004 is a prominent, visible site, however this equally applies to the provision of a business park (which the site has planning permission for). Although the planning permission is for a mix of uses, the justification for an out-of-centre development was for a prestige employment-led business park environment including complementary hotel, conference and function centre, petrol filling station etc. Large scale comparison retail units would be contrary to the original vision for the project (and for which planning permission was granted);
6. SHR004 and SHR005 as permitted would deliver a mixed-use which would help deliver the Local Plan's objectives, and the employment needs of the Plan area over the plan period;
7. The owners confirmation that discussions have taken place with national retailers is noted, although no evidence has been submitted to support the view that these retailers would not locate elsewhere in the town should alternative sites become available;
8. The references on the Policies Map should be consistent with the appropriate Local Plan policy and evidence base. This matter will be addressed in future versions of the Local Plan. The Local Plan is clear about the designation of the Lincs Gateway: it had been intended to take SHR005 (and SHR004) forward for the consented uses, but after taking account of the owners representations in January and August 2016 (which indicated a need for alternative uses on site and less B Class development than is permitted), it is considered that the scale of the employment land at SHR005 should be reduced;
9. The Local Plan is proactively planning for retail development and is expected to allocate site(s) to address the identified retail needs. A site for retail development would be expected to deliver a high quality environment to create an attractive space for shoppers and visitors. However, this would be a matter for the planning application. The desire for, and level of, ancillary uses will be a matter for the Local Plan policy (and the subsequent planning application);
10. It is accepted that the owners retail assessment identifies that SHR004 is suitable for retail development;
11. National policy requires that a sequential and impact assessment be undertaken for any retail development (over an identified threshold) outside the

primary shopping area to ensure that there are no adverse impacts generated from a scheme upon town centres;

12. It is acknowledged that the owners state the floorspace would be around 10,000sqm which would be appropriate should the site be in a sequentially preferable, sustainable location;
13. The provision of a masterplan for this site is welcome;
14. It is accepted that the planning permission for the business park does not require a footpath link. However, as SHR005 is an out-of-centre site accessibility would need to be improved by sustainable transport for the location to be more suitable and to promote linked trips with the town centre. Site SHR004 is unsuitable for residential development, which the owners identify is needed to help fund the foot/cyclepath improvements necessary to enhance accessibility to the site for retail use. Therefore the site is considered to be unsuitable with regards to accessibility;
15. An extended bus service to this site would be welcome, however there is no evidence to suggest that public transport providers are willing to undertake an extension, or that there is funding available to support the extension;

4.15 **Conclusions on site SHR005** - It is considered that site SHR005 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site with three positive (green) impacts being recorded relating to inclusive communities, education and employment opportunities but four negative (orange) impacts relating to health and well-being, accessibility, landscape character and air, water and soil quality;
- SHR005 is an out of settlement site so is not considered to be in a sequentially preferable location in retail terms;
- The provision of 10,000sqm of retail development in this gateway location would undermine the consented employment scheme and may discourage prestige businesses from locating in the area. It would also contribute to a succession of town centre uses in an out of settlement location, rather than the creation of a well-conceived scheme;

4.16 **Comments received** - The following comments were made on site ***SHR006 (Land to the south of Holbeach Road, Spalding)***:

1. the provision of retail floorspace in an out-of-settlement location is contrary to the NPPF which requires a town centre first approach; out-of-settlement sites are at the bottom of the retail hierarchy, below town centre, edge-of-centre and out-of-centre sites. Significant retail development on sites located outside the settlement boundary should be resisted in the strongest terms;
2. an alternative, out-of- centre site would result in a significant lost opportunity for Spalding. The location of retail floor-space in an out-of-centre location would limit any potential for new retail floor-space to be provided in the town centre as the commercial attraction of doing so would be significantly diminished;



4.17 **Responses to the above comments:**

1. It is accepted that out-of-settlement sites are the lowest tier in the retail hierarchy identified by national policy. The NPPF states that if sites cannot be identified in accordance with the town centres first approach the Local Plan should set policies for meeting the identified needs in other accessible locations that are well connected to the town centre; as such the Spalding Retail Paper (July 2016) identified that site SHR006 would be unsuitable for retail development, and was discounted;
2. retail allocations can only be identified in locations that are suitable, available and deliverable. While a town centres first approach is considered to be preferable, if sequentially preferable sites are not suitable or available then alternative sites may be considered as long as an impact assessment can demonstrate that there will be no adverse impacts upon Spalding town centre. This paper indicates that no sites are available in the town centre to accommodate the required floorspace. However this would not prevent smaller scale development coming forward on small-scale sites should demand exist;

4.18 **Conclusions on site SHR006** - It is considered that site SHR006 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site with three positive (green) impacts being recorded relating to inclusive communities, education and employment opportunities but four negative (orange) impacts relating to health and well-being, accessibility, landscape character and soil, air and water quality;
- SHR006 is an out of settlement site so is not considered to be in a sequentially preferable location in retail terms;
- The Highways Authority have identified that it is not possible to provide a safe access to this site for the use proposed;
- The capacity of the site would also significantly exceed the need identified for Spalding for this plan period. This would have an adverse impact upon the vitality and viability of Spalding town centre, and upon other town centres within South Holland;

4.19 **Comments received** - The following comments were made on site ***SHR007*** (***Land to the north of Holbeach Road, Spalding***):

1. the provision of retail floorspace in an out-of-settlement location is contrary to the NPPF which requires a town centre first approach; out-of-settlement sites are at the bottom of the retail hierarchy, below town centre, edge-of-centre and out-of-centre sites. Significant retail development on sites located outside the settlement boundary should be resisted in the strongest terms;
2. an alternative, out-of- centre site would result in a significant lost opportunity for Spalding. The location of retail floor-space in an out-of-centre location would limit any potential for new retail floor-space to be provided in the town centre as the commercial attraction of doing so would be significantly diminished;

#### 4.20 **Responses to the above comments:**

1. It is accepted that out-of-settlement sites are the lowest tier in the retail hierarchy identified by national policy. The NPPF states that if sites cannot be identified in accordance with the town centres first approach the Local Plan should set policies for meeting the identified needs in other accessible locations that are well connected to the town centre; as such the Spalding Retail Paper (July 2016) identified that site SHR007 would be unsuitable for retail development, and was discounted;
2. retail allocations can only be identified in locations that are suitable, available and deliverable. While a town centres first approach is considered to be preferable, if sequentially preferable sites are not suitable or available then alternative sites may be considered as long as an impact assessment can demonstrate that there will be no adverse impacts upon Spalding town centre. This paper indicates that no sites are available in the town centre to accommodate the required floorspace. However this would not prevent smaller scale development coming forward on small-scale sites should demand exist;

#### 4.21 **Conclusions on site SHR007** - It is considered that site SHR007 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site with three positive (green) impacts being recorded relating to inclusive communities, education and employment opportunities but four negative (orange) impacts relating to health and well-being, accessibility, landscape character and soil, air and water quality;
- SHR007 is an out of settlement site so is not considered to be in a sequentially preferable location in retail terms;
- The Highways Authority have identified that it is not possible to provide a safe access to this site for the use proposed;
- The capacity of the site would also significantly exceed the need identified for Spalding for this plan period. This would have an adverse impact upon the vitality and viability of Spalding town centre, and upon other town centres within South Holland;

#### 4.22 **Comments received** - The following comments were made on site ***SHR008*** (***Land to the north of the A16, Spalding***):

1. These sites are located outside of the settlement boundary, where significant retail development should be strongly resisted;
2. an alternative, out-of- centre site would result in a significant lost opportunity for Spalding. The location of retail floor-space in an out-of-centre location would limit any potential for new retail floor-space to be provided in the town centre as the commercial attraction of doing so would be significantly diminished;

#### 4.23 **Responses to the above comments:**

1. It is accepted that out-of-settlement sites are the lowest tier in the retail hierarchy identified by national policy. The NPPF states that if sites cannot be identified in accordance with the town centres first approach the Local Plan should set policies for meeting the identified needs in other accessible locations that are well connected to the town centre; as such the Spalding Retail Paper (July 2016) identified that site SHR008 would be unsuitable for retail development, and was discounted;
2. retail allocations can only be identified in locations that are suitable, available and deliverable. While a town centres first approach is considered to be preferable, if sequentially preferable sites are not suitable or available then alternative sites may be considered as long as an impact assessment can demonstrate that there will be no adverse impacts upon Spalding town centre. This paper indicates that no sites are available in the town centre to accommodate the required floorspace. However this would not prevent smaller scale development coming forward on small-scale sites should demand exist;

4.24 **Conclusions on site SHR008** - It is considered that site SHR008 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site with only two positive (green) impacts being recorded relating to education and employment opportunities but five negative (orange) impacts relating to health and well-being, accessibility, biodiversity, landscape character and soil, air and water quality;
- SHR008 is an out of settlement site so is not considered to be in a sequentially preferable location in retail terms;
- Significant adverse impacts have been identified relating to landscape character and the natural environment;
- Although it is technically feasible to provide a highways access this is likely to be less straightforward than for other sites and the cost could adversely impact upon the deliverability of a scheme;

## 5.0 NEW SITES

5.1 The following new sites were put forward for consideration as Potential Retail Sites:

5.2 **Comment received:** The following site was promoted at ***SHR009 (land to the east of Winfrey Avenue, Spalding)***.

1. the existing retail parks are well established and play an important role in the town's retail provision. The South East Lincolnshire Town Centre and Retail Capacity Study (December 2013), identifies that the Holland Market and Winfrey Avenue Retail Park is responsible for 67% of the total convenience turnover of Spalding town centre. The breakdown of comparison goods floorspace in the town centre is not provided, but the retail park, an existing retail destination, makes an important contribution to the town centre's overall offer. The retail park is well connected to the primary shopping area and makes a major contribution to footfall in the town, with the primary shopping

area significantly benefitting from linked trips undertaken by visitors to the retail park;

2. the retail parks are well-located in terms of accessibility by sustainable modes of transport; the bus station is located on Winfrey Avenue to the north and adjacent to the existing retail park and Spalding railway station is located a short distance to the west;
3. the sites adjacent to the north of the existing retail parks are the most suitable sites in Spalding for further retail development. They are adjacent to the town centre boundary and are the most sequentially preferable sites capable of accommodating the identified retail capacity and are adjacent to the Primary Shopping Area;
4. the first phase (to the north of B and Q) proposes a new terrace of retail units and a separate unit comprising a total of 6,271 sqm (67,500sqft) of new retail floor-space alongside a drive-thru restaurant and pod unit (providing public conveniences). 10,810sqm of floorspace is identified up to 2031, but a significant proportion (8,291sqm) is not required to come forward before 2026. The first phase of development could meet and exceed the capacity requirement of 2,508sqm up to 2021 and would also secure a significant proportion of the 2026 requirement in the best and most suitable location for additional retail growth. Phase 2 of the scheme (SHR001) proposes a further 4,877sqm (52.500sqft). When combined with Phase 1, this would provide a total floor-space of 10,800sqm (116.250sqft). This matches the identified retail capacity at 2031 and demonstrates that all of the identified retail capacity for comparison goods floorspace within the plan period can be accommodated on a site that is well connected to the town centre and primary shopping area;
5. retail planning is not a precise matter and more or less floorspace might prove to be needed; flexibility is available by virtue of the potential for additional mezzanine floorspace (i.e. it could amount to less than the 50% assumed above or more, up to almost a further 100%);
6. SHR009 involves the development of the Sir Halley Stewart Playing Field. This is the subject of a declaration of trust requiring it to be used for the benefit of the inhabitants of Spalding. The playing field has been almost solely used by Spalding United Football Club since its establishment in 1921 and its access by the public is limited. In re-providing sports/recreation facilities elsewhere in Spalding, the intentions of Sir Halley Stewart could be realised by ensuring that these are genuinely accessible for public use. All of the matters related to the charitable status of the site were addressed by the previous scheme for a supermarket on the site and a similar agreement could be reached to secure the re-provision of sports facilities elsewhere;
7. the promotion of SHR009 would encourage earlier delivery of SHR001. The development of SHR009 could enable the relocation of the bus station and would encourage further retail development to be delivered once land ownership issues have been resolved;
8. additional retail development in this location would increase activity and footfall in the Winfrey Avenue and Swan Street areas which would strengthen

the town centre and facilitate its future growth in attracting new and competing retailers; it would result in the relocation and improvement of the bus station to a more appropriate and accessible location (i.e. to the north of Swan Street), closer to the town centre and primary shopping area; significant public realm improvements would be secured as part of the scheme, enhancing connections with the town centre e.g. it may be possible to pedestrianise the southern part of Winfrey Avenue to encourage more linked trips with the town centre and potential remodelling of units backing onto Swan Street. The B&Q unit could also be redeveloped at the end of its current lease to yield more floorspace at mezzanine level;

9. a comprehensive masterplan would be prepared for the site should it be allocated for retail use;
10. to be consistent with the NPPF, Spalding Town Centre boundary should be expanded to the north of the Holland Market and Winfrey Avenue Retail Parks to include land between the retail park and King's Road allowing for the further expansion of the town centre to help meet the identified retail needs of Spalding;
11. The primary shopping area should be expanded to include the Holland Market Retail Park, which performs an important role given that it is responsible for 67% of the total convenience turnover of Spalding town centre (and a significant contributor to comparison goods turnover) and is a key generator of footfall. The parks also provide the majority of the town centre's car parking provision (which is free of charge). Including the existing floorspace within the primary shopping area will ensure that it is afforded the highest level of policy protection.

### 5.3 **Response to the above comments**

1. it is accepted that the existing retail parks are well-established and have an important role to play in the town centre economy, particularly in terms of providing an attractive retail offer. It is also acknowledged that the retail parks are responsible for a significant part of the convenience goods turnover in the town centre. The existing retail parks are within the town centre boundary and are within 50m of the Primary Shopping Area. Site SHR009 adjoins the town centre boundary. Therefore opportunities exist for shoppers to benefit from linked trips between the three destinations;
2. Spalding Bus Station adjoins the northern boundary of the Retail Parks and Spalding Railway Station is 115m to the west. Therefore it is accepted that the site has good access by sustainable transport;
3. It is accepted that SHR009 is an edge of centre site, and although the site is not adjacent to the Primary Shopping Area, it is therefore in a sequentially preferable location in terms of retail provision;
4. The developers masterplan identifies retail units capable of accommodating the immediate need for comparison goods floorspace, as well as capacity for additional floorspace post 2026, including land within Phase 2 (SHR001) which would address the comparison goods floorspace requirement to 2031;

5. It is agreed that retail planning is not a precise matter and that the amount of retail floorspace required over the plan period may change, particularly in the medium-long term. The flexibility built-in by the scheme is noted;
6. The development of SHR009 would involve the redevelopment of the Sir Halley Stewart playing field, used by Spalding United. It is agreed that there is a requirement for the space to be used for the benefit of Spalding residents. Although the site does not have unlimited public access, there is managed community access and the club does perform a wider role in promoting teams at various levels including the first team, juniors and ladies, thereby supporting the health and well-being of many Spalding residents. Securing similar or enhanced public use would be a matter for a planning application. However, the loss of playing fields is not supported unless one of three tests set out in national policy apply. In this case, the loss resulting from the proposed development would need to be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. While discussions have been held relating to the charitable status of the site previously these have never been formally addressed and such matters can take time to resolve. No evidence has been submitted indicating that the promoters of the scheme own SHR009, the trustees are supportive of the scheme, or that replacement playing field land has been secured. Without such evidence the land cannot be considered available for retail use to meet the immediate need for comparison goods floorspace;
7. It appears that it may take several years for SHR009 to come to fruition so it is not accepted that this would bring about the earlier delivery of SHR001 or that it would bring about the re-location of the bus station. The Highways Authority identifies that the relocation of the bus station would have to take place before SHR001 could be developed, and no evidence has been submitted to demonstrate that a site has been secured or that plans are underway for its relocation, neither has evidence been submitted to show that all landowners are positively engaged in the process;
8. the benefits of additional retail development in this location are acknowledged;
9. the developers intention to prepare a masterplan for SHR009 should it be allocated is welcome;
10. should SHR009 be allocated for retail use the town centre boundary would be expanded to include the site;
11. Primary shopping areas are defined in the NPPF as 'defined areas where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage)'. The South East Lincolnshire Town Centres and Retail Capacity Study (2013) does not define a secondary shopping frontage, so the extent of the PSA is drawn where the transition from the highest concentrations of retail (in the primary shopping frontage) meets areas where retail development is still concentrated albeit with a lower number of units in retail use. This includes the Station Street/New Road/Swan Street area which separates the Retail Parks from the Primary Shopping Area. Therefore,

Holland Market Retail Park is considered to fall within the town centre boundary and not the PSA, but still would have an appropriate level of protection to enable its ongoing successful operation.

5.4 **Conclusions on site SHR009** - It is considered that site SHR009 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site with four positive/very positive (green) impacts being recorded relating to accessibility, education and training, landscape character and employment opportunities, but a further five (blue) impacts could be delivered by securing appropriate mitigation to help meet future employees and residents' needs, such as protecting amenity;
- SHR009 is an edge-of-centre site within 165m of the Primary Shopping Area, in a highly accessible location;
- SHR009 is currently a playing field occupied by a football club; the development of this site would therefore lead to the loss of a playing field, and although the developers identify that it would be possible to relocate the facility, no evidence has been submitted to show how this would be undertaken or the timescale for the re-location;
- Although SHR009 is physically able to accommodate the immediate need for comparison goods floorspace, it cannot be considered available as the Sir Halley Stewart Playing Field is not within the promoters ownership. No evidence has been provided by the trustees of the land to indicate willingness to dispose of the site for retail use;
- Given the current lack of availability and the presence of the playing field, the site cannot be considered able to provide comparison goods floorspace in the short-medium term. However, it is recognised that should ownership and infrastructure issues be resolved that the site could be an appropriate location for retail development in the medium-long term. Consequently, provision will be made in the policy to support retail provision in a town centre/edge of centre location after 2026.

5.5 **Comment received:** The following site was promoted at **SHR010 (land at Springfields Retail Outlet and Exhibition Centre, Spalding)**.

1. The Springfields Outlet Centre and Festival Gardens has not previously been considered as a site to meet the 'retail need' but could accommodate the quantum of retail need identified ensuring sufficient land of the right type is available in the right place to support growth;
2. Expansion of Springfields and associated facilities would improve an important visitor attraction in Spalding, attracting more visitors to the town with potential consequent spin-off benefits;
3. Inclusion of comparison goods floorspace would generate new employment opportunities in Spalding. The existing centre provides around 500 jobs. A significant number of new jobs with national retailers offering prospects of career progression for a wide range of people at different levels and would suit local residents with hours of work able to fit around availability. New employment will provide spin-off benefits through increased spend in the

local economy; needing increased support services ranging from suppliers to the food and beverage outlets to cleaning services and in the wider supply chain; and through the construction phase;

4. Expansion of Springfields would also facilitate further investment in the Horticultural Society's Exhibition and Conference centre; providing an increasing contribution to the visitor economy in line with strategic tourism initiatives;
5. The retail need would use existing developed land (to the north of the existing outlet centre which could accommodate the identified retail need (10,810 m<sup>2</sup> net comparison goods) and would not require additional land outside the built up area of Spalding. This would be in keeping with the NPPF;
6. The existing site is not of high environmental value;
7. Springfields attracts around 2.3 million visits per annum, a large number of which are visitors that would otherwise not visit the town. Springfields is also an established retail destination for local residents and those living in the wider sub-region attracting shopping trips to the town. The addition of further retail in this location would mean that those already travelling to Springfields would be able to benefit from the wider choice and retail offer that could be provided. This would enable an existing shopping trip to be used for the purchase of other goods at the same time in the same location thus providing more sustainable shopping patterns. If a new retail destination was established in Spalding, this would create more retail trips split between an additional location leading to a greater spread of trips and less sustainable shopping patterns;
8. A Transport Appraisal demonstrates the site is within easy walking distance of residential areas to the south and west. Pedestrian linkages are available via well established and convenient routes linking to surrounding areas. Cycle provision on the adjoining road network includes off carriageway cycle lanes with an extensive cycle catchment able to access the centre. The Policies Map identifies a cycle route along Holbeach Road to the front of Springfields linking westwards to the town centre within 5 km of the wider Town and Spalding and some nearby villages;
9. Bus stops on the A151 are around 500m of the site, providing three buses an hour linking Spalding, Holbeach, Long Sutton and Kings Lynn, with a longer distance service in the summer. There is also a bus stop on Camel Gate approximately 50m walk from the main Springfields shopping area and is used by two bus services travelling south;
10. Expansion of Springfields would provide an opportunity to enhance sustainable links to the town centre through a range of potential measures that would also serve the tourist economy e.g. measures to enhance bus services; improvements to the water taxi service; cycleway improvements to the town centre; provision of a cycle hire scheme to cycle to the town centre and other tourist attractions in Spalding; contribution to fund plans the Horticultural Society have for a new pedestrian/cycle route along the River Welland; creation of a tourist trail linking Ayscoughes, Springfields and the town centre;
11. The wider complex is located within an urban setting. It lies immediately west of the A16. The Committee Report for an extension to the Outlet Centre (H16/0401/06) concluded the centre visually appeared to form part of the physical fabric of the town bounded by the A16 to the east. The proposed expansion area is screened from surrounding areas by existing development



and soft landscaping so unlike other sites would not be highly visible on the main approaches into Spalding;

12. The existing outlet centre provides an attractive modern form of architecture with use of materials and elevations to provide the appearance of separate shop units. Further expansion of the centre adopting a modern high quality design would be in keeping with the existing character of the area;
13. The owners confirm that the site is available;
14. Support for expansion of Springfields is provided by the Horticultural Society particularly in relation to proposals for further investment to improve the Events and Conference Centre;
15. An SA has been submitted; Springfields would perform well or would have a positive effect against the following criteria:
  - Objective 2: health and well-being - existing residential uses are within walking distance. Whilst there would be some increase in traffic to the centre, the location of the identified retail need adjoining the existing Springfields centre would mean there would be some trips serving more than one purpose. The site is accessible by choice of transport mode which would be further enhanced;
  - Objective 3: transport - Springfields lies within the urban area of Spalding and is accessible by a choice of transport mode. Dedicated cycle routes pass the site connecting to residential areas and beyond to the town centre to the west. Bus stops are within walking distance. Safe routes currently exist for pedestrians and cyclists to access Springfields from the existing road network. For those who wish to travel by car any expansion would utilise existing access points.
  - Objective 4: cohesive communities - Expansion of Springfields would provide new employment opportunities in a location already attracting employment activity. Design of any expansion could have a positive effect on crime by careful layout and design.
  - Objective 5: education - Attracting national brands to Spalding that otherwise would not locate in the town would provide new opportunities for residents to work with national operators and receive appropriate training. It would also offer career progression opportunities with a national and in some cases multi-national company.
  - Objective 8: landscape and townscape – SHR010 could be accommodated to the north of the main complex and would not be visible from the surrounding road network or approaches to the town. It would protect the existing quality and character of the landscape/townscape and provide opportunities of enhancement through new landscaping. The design would be in keeping with the existing modern approach.
  - Objective 9: soil, air and water resources - expansion of the retail use on the site would inevitably have some effect on air quality, scope exists to enhance existing access by a choice of transport mode providing more sustainable means for residents to access the site. SHR010 would use existing developed land (brownfield)
  - Objective 13: employment opportunities - would create new employment opportunities, provide wider spin-off benefits for local businesses in terms of the supply chain to support the centre and make a positive contribution to the local economy. Training by national retailers could provide new skills for local people. There is good access to the strategic road network making it easier for local labour and shoppers who need to use the private car to access the site. It would also enable deliveries to access

the site a short distance from the A16 (T) without travelling through the urban area.

- There would be no adverse impacts in relation to Objectives 6 and 7;
  - Objective 10: land and waste management would depend on implementation- accommodating retail need which would reuse existing land would help encourage the sustainable use of land. Whilst expansion of the complex will inevitably lead to increased waste, measures could be introduced by new retailers to ensure that sustainability principles are adopted. Most national retailers have policies in place to deal with waste in the most sustainable manner they are able.
  - Objective 12: climate change would depend on implementation - the site is accessible by a choice of transport mode. Further improvements to access by non car modes, would also help ensure more positive impacts overall;
  - Objective 11: flood risk depends on implementation - Springfields is within Flood Zone 3 and in a location where flood defences are in place. The development would be accommodated on land within the complex and would not expand the extent of the overall area. Flood risk issues would be taken into account as part of any future expansion proposals. The expansion could have a positive or negative affect which could be mitigated;
16. The allocation of land at Springfields to accommodate the identified future retail comparison goods floorspace need would enable Spalding to attract retailers that otherwise would not locate in the town to an established retail destination, helping to diversify the town's overall retail offer in a manner which would complement existing provision in the town centre whilst making Spalding a more attractive destination for visitors. With further investment to enhance existing linkages to the town centre, those visiting Springfields could be encouraged to also visit the town centre and experience its unique and varied offer;
17. A phased approach would be taken to future development on the site to meet the identified retail need: Phase 1: up to around 2508 m<sup>2</sup> net comparison goods floorspace to 2021, and in terms of Phase 2, the Retail Study identifies an additional requirement of 5,873 sqm net by 2026. The owners suggest that Springfields could accommodate around half of that (i.e. 2,892 sqm net comparison goods) during the period 2021-2026 to help meet that need. This leaves a quantum of floorspace which could be taken up in the period by other developments and also allows some flexibility in the retail capacity predicted;
18. Springfields is identified on the Policies Map as an 'Outlet Centre'. This recognises that Springfields forms one element of the retail hierarchy but consider the centre should be identified for such growth on the Policies Map;
19. The owners have submitted a draft policy for consideration which includes:
- Springfields should be the subject of a site specific allocation to facilitate development of up to 10,810 m<sup>2</sup> net comparison floorspace during part of the plan period to 2031. Any retail expansion beyond that will be subject to retail policy tests set out in Policy 22;
  - the expansion of this location is likely to require additional support facilities including cafes and restaurants. However, such uses should not dominate the overall function or nature of the centre and its offer. Therefore A3, A4 or A5 uses can be provided if it can be demonstrated they would be ancillary to the main function of Springfields;

- No more than 7,500 m2 net as a first phase is occupied before January 2020; and
20. The area to be allocated should include Fulney Hall and the existing dental practice to the rear. These two properties, along with the NFU office building all form part of the wider complex and built up area associated with Springfields;
  21. In Policy 22 the following should be added to the policy after 'B. District and Local Centres':
    - C. Springfields Shopping and Festival Gardens: The Springfields Outlet Centre and associated uses including Festival Gardens and the Events & Conference Centre provide an important tourist destination in Spalding with its associated outlet retail function. Expansion of the centre to meet the identified comparison goods floorspace retail need will be permitted in accordance with Policy x having regard to other relevant policies in the Local Plan.
  22. Policy 24 should be amended to reflect the allocation of land at Springfields to meet the future comparison goods floorspace need
  23. an alternative, out-of- centre site would result in a significant lost opportunity for Spalding. The location of retail floor-space in an out-of-centre location would limit any potential for new retail floor-space to be provided in the town centre as the commercial attraction of doing so would be significantly diminished;

## 5.6 **Response to the above comments**

1. The Springfields Outlet Centre and Festival Gardens has not previously been considered as a potential retail site because the site was not considered to be available. However the owners identification that the site is available and able to accommodate the retail need is noted;
2. It is acknowledged that expansion of Springfields would enhance the retail and visitor offer, helping to attract more visitors to the town;
3. It is accepted that about 500 jobs are provided on site and that expansion of the retail offer would generate additional employment, potentially with national retailers. It is also noted that a range of economic spin-offs could be generated in the local economy and for local businesses;
4. Investment in the Exhibition and Conference Centre would be welcome, particularly as this provides an opportunity to enhance the year round visitor offer;
5. It is accepted that the retail development would use brownfield land. Maximising the use of brownfield land is consistent with national and Local Plan policy;
6. it is accepted that SHR010 is not of high environmental value;
7. The important role Springfields plays as a visitor attraction in the local and regional economy is recognised. It is also acknowledged that the site is an important retail destination for residents and those living within the wider sub-region. It is accepted that additional retail development in this location would enable visitors to have a wider choice, and compare products, as well as making linked trips within the one site;

8. It is accepted that Springfields has good sustainable transport access with Spalding, and good cycle access to nearby villages;
9. It is accepted that the site has good public transport provision; a bus service enters the site, and additional services are within a 500m walk of the site providing access to a regular service to Spalding town centre (and its bus station), the Spalding urban area and other town centres, as well as further afield to Kings Lynn;
10. The owners proposals to enhance sustainable transport links to Spalding town centre and enhance the tourist offer in the area is welcome. Should this site be taken forward enhanced sustainable and public transport links to Spalding town centre would be essential to ensure that opportunities for linked trips are provided for residents and visitors helping to generate spin-off benefits for the local economy. The details would be a matter for a planning application and potentially a s106 legal agreement;
11. It is acknowledged that the site is well-screened from the A16 by a landscape bund. Incorporating new development within the site would not lead to any adverse visual impacts on the landscape or townscape;
12. The intention to use a high quality design for new development is welcome, and should be in keeping with, but potentially enhance the townscape;
13. Confirmation of the site's availability is welcome;
14. Support from the Horticultural Society is welcome;
15. The findings of the owners SA are noted. The JSPC's Sustainability Appraisal scores this site well with five positive (green) impacts being recorded relating to accessibility, education, landscape character, soil, air and water quality and employment opportunities, but a further five (blue) impacts could be delivered by securing appropriate mitigation to help meet future employees and residents' needs, such as protecting amenity;
16. A site in this location might attract new retailers to the town, although no evidence has been submitted to suggest that should this site not come forward those retailers would not locate in Spalding. It is recognised that additional retail development at an established retail destination provides opportunities for comparison shopping and linked trips, as well as diversifying the town's retail offer making it more attractive to visitors. Investment from the scheme to encourage greater use of the town centre and the other facilities Spalding has to offer is welcome;
17. The owners phased approach to development is welcome and would address the immediate need for floorspace. However, it would leave an amount of floorspace which could either be taken up by other developments or a town centre/edge of centre site should those sites become available in the medium term. This approach also provides sufficient flexibility should the identified need change in the longer term;
18. Should SHR010 be taken forward as a retail allocation, it would be identified as such on the Policies Map and would be accompanied by an appropriate policy;
19. It is agreed that any A3, A4 or A5 uses should be ancillary to the main function of the site to ensure the vitality and viability of Spalding town centre

is not adversely impacted. The other points will be given detailed consideration and the outcome reflected in the Local Plan policy;

20. Should SHR010 be taken forward as a retail allocation, the boundary will encompass the properties identified;
21. Consistent with national policy, retail outlets and out of town retail parks do not constitute town centres and will not be allocated a place in the hierarchy;
22. Should SHR010 be taken forward as a retail allocation, Policy 23 will be amended accordingly;
23. retail sites can only be identified in locations that are suitable, available and deliverable. While a town centres first approach is considered to be preferable if sequentially preferable sites are not suitable or available then alternative sites may be considered as long as an impact assessment can demonstrate that there will be no adverse impacts upon Spalding town centre;

5.7 **Conclusions on site SHR010** - It is considered that site SHR010 is the Preferred Retail Sites in Spalding, and that it should be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site well with five positive (green) impacts being recorded relating to accessibility, education, landscape character, soil, air and water quality and employment opportunities, but a further five (blue) impacts could be delivered by securing appropriate mitigation to help meet future employees and residents' needs, such as protecting amenity;
- SHR010 is an edge-of-settlement site, in a highly accessible location;
- SHR010 would involve no loss of infrastructure, is a brownfield site, and would be in keeping with the character of the townscape;
- SHR010 is physically able to accommodate the immediate need for comparison goods floorspace, and the owners confirm the availability of the site, with support from other interested parties such as the Horticultural Society submitted;
- the site is an established retail and visitor destination suitable and available to provide comparison goods floorspace in the short-medium term. A phased approach to delivery has been promoted which will deliver the short term need but will not adversely affect the ability of the town centre to expand in the long term;
- measures to enhance links with the town centre are identified, and should be progressed through a masterplan should this site be allocated;

5.8 **Comment received:** The following site was promoted at ***SHR011 (land to the east of Marsh Road, Spalding)***.

1. The site is available for retail use;

5.9 **Response to the above comments**

1. The owners confirmation that the site is available is welcome;

- 5.10 **Conclusions on site SHR011** - It is considered that site SHR011 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:
- the Sustainability Appraisal scores this site with three positive (green) impacts being recorded relating to communities, education and employment opportunities, but three (negative) impacts relating to health and well-being, accessibility and landscape character;
  - The site has a low profile and is in an out-of-settlement location in a predominantly rural setting, and is unlikely to be attractive to the retail market;
  - The site is currently accessed from Stumps Lane which would not be suitable for vehicular access to a retail development. The site is not accessible by public transport and could be made accessible by foot and bike, although there is no footpath at present;
- 5.11 **Comment received:** The following site was promoted at ***SHR012 (Broad Street Car Park, Spalding)***.
1. The site is adjacent to the town centre and could be redeveloped over the plan period so should be considered for retail use;
- 5.12 **Response to the above comments**
1. The owners intentions for the site are unknown, therefore the site cannot be considered available for retail use;
- 5.13 **Conclusions on site SHR012** - It is considered that site SHR012 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:
- the Sustainability Appraisal scores this site with five positive (green) impacts being recorded relating to accessibility, communities, education, landscape character and air water and soil quality, and five (blue) impacts could be delivered by securing appropriate mitigation to help meet future employees and residents' needs, such as protecting amenity;
  - the site is a small-scale, brownfield, edge of centre site;
  - the site is 0.20ha and may not be of an appropriate size to meet the specifications for retail development, particularly with appropriate servicing and turning space;
  - should the site become available in the long term, this edge of centre site would be in a sequentially preferable location (after town centre locations) to accommodate retail development;
- 5.14 **Comment received:** The following site was promoted at ***SHR013 (land to the north-east of King's Road, Spalding)***:
1. The site is within close proximity to the town centre and could be redeveloped over the plan period so should be considered for retail use;

5.15 **Response to the above comments**

2. The owners intentions for the site are unknown, therefore the site cannot be considered available for retail use;

5.16 **Conclusions on site SHR013** - It is considered that site SHR013 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the Sustainability Appraisal scores this site with five positive (green) impacts being recorded relating to accessibility, communities, education, landscape character and soil, air and water quality, and five (blue) impacts could be delivered by securing appropriate mitigation to help meet future employees and residents' needs, such as protecting amenity;
- the site is a small-scale, edge of centre, brownfield site;
- the site is 0.53ha and may not be of an appropriate size to meet the specifications for comparison goods floorspace, particularly with appropriate servicing and turning space;
- should the site become available in the long term, this edge of centre site would be in a sequentially preferable location (after town centre locations) to accommodate retail development;

5.17 **Comment received:** The following site was promoted at ***SHR014 (Sessions House, The Crescent, Spalding)***.

1. The site is adjacent to the town centre and could be redeveloped over the plan period so should be considered for retail use;

5.18 **Response to the above comments**

2. the site has planning permission for a residential use, therefore the site cannot be considered available for retail use;

5.19 **Conclusions on site SHR014** - It is considered that site SHR014 is not one of the Preferred Retail Sites in Spalding, and that it should not be taken forward as a Retail Allocation:

- the site has planning permission for a residential use therefore it is considered the site will not be available for retail use over the plan period;

## **6.0 RETAIL ALLOCATIONS**

- 6.1 SHR010 will be taken forward as a Retail Allocation for 5,400sqm of comparison goods floorspace to address the needs of Spalding in the short-medium term (to 2026). Local Plan policy will ensure that after 2026 the outstanding requirement for 5,410sqm is directed to town centre/edge of centre locations. This approach ensures that the immediate need is met at an established retail destination, in an accessible location, so that linked trips both on site and with the town centre can be achieved (and should be secured through developer contributions). It also provides promoters of town centre/edge of centre sites the opportunity to address ownership

and infrastructure issues and provide a comprehensive masterplan approach to development of those sites should the demand exist.



# South East Lincolnshire Retail Land Availability Assessment - Spalding (March 2017)

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