

Post_title: 6.0 Policy Context

ID1: 832 **comment_author:** Jacqui Woods

comment_content:

Retail is exceptionally good in the Spalding and surrounding areas. Spalding is a market town with a Town Manager. It has a vibrant 2 day a week market that is popular with everybody of all cultures. This must be preserved. It has many independent retailers and relatively few of the big boys . It has 2 large department stores - 1 of which is a local family owned and run store - that are vital to the town. Independent retailers should be given greater incentives to stay and retain the atmosphere of the town. In conclusion, take great care with this local plan and its implementation. The area of South Holland is unique and charming and needs to be preserved as such. Of course, new housing and transport is an on-going requirement and this is a long-term plan. But you have much to potentially destroy if care is not taken at all stages.

Officer Comment:

The Local Plan recognises the importance of Spalding as a retail centre by identifying the town centre as a Sub-Regional Centre, at the top of the retail hierarchy. The town centre boundary, the primary shopping area and primary shopping frontage has been carefully defined to protect and enhance the role of Spalding town centre in the long term. The Local Plan refers to the role of the weekly and specialist markets, and supports their ongoing operation and development.

Officer Recommendation:

No change required.

ID1:

833

comment_author:

Spalding and District Civic Society

comment content:

6.0.1 Strongly agree especially 'foster civic pride [and] promote local identity'²
Policy 22 Typo Should alphabetical labelling of sections continue throughout the policy?
B (District and Local Centres): strongly support the criteria, especially 1,3,6 and 9.
Out of Centre Development: too permissive? There is little here to prevent out-of-town superstores (on a bus route, however infrequent the service), or the creeping expansion of, say, a garden centre well beyond horticultural goods.

Officer Comment:

Support for 6.0.1 and Policy 22 criteria B1, 3, 6 and 9 is welcome. Alphabetical labelling only refers to the retail hierarchy therefore it should not continue through the policy. The approach to out of centre development is consistent with national policy. Advertisements are covered by Policy 27 Design of New Development. All relevant advertisements will still require advertisement consent, as set out by national legislation and policy.

Officer Recommendation:

No change required.

Post_title:

6.1 Retail Hierarchy

ID1:

834

comment_author:

Pedals - Spalding's Cycle Action Gr

comment content:

Policy 22 New retail development should have good cycling links to neighbouring areas as well as links "within the rest of the centre". New retail development should also include cycle storage for its staff and cycle parking for customers. We suggest including these new paragraphs in the list of expectations, and that paragraphs 4 - 9 are renumbered accordingly: "4. are well located in relation to existing and proposed cycling routes into the centre, and include connections with those routes; 5. incorporate cycle parking for customers and cycle storage for staff,""We support item 3 under the heading "Out of centre development"

Officer Comment:

Point 1 will be added to Policy 22. Cycle parking for retail development is covered by Policy 32 and set out in the parking standards in Appendix 5. Support for section 3 out of centre development is noted.

Officer Recommendation:

Add point 1 to Policy 22. No other changes required.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1:

835

comment_author:

Country Landowners Association

comment content:

In Policy 22: Retail Hierarchy we feel that further clarity is required regarding the paragraph on farm retail and selling of goods produced in the locality. If a shop is to remain viable then this cannot be drawn too tightly and should arguably include goods sourced from the wider Eastern region.

Officer Comment:

It is important that the amount and extent of out of centre development is managed carefully to protect the vitality and viability of town centres. Therefore it is appropriate that when development is permitted outside a defined retail area that in some circumstances the range of goods may be restricted by planning condition or legal agreement.

Officer Recommendation:

No change required.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1: 836 comment_author: Geoffrey Collins & Co

comment content:

This was submitted by email with a subject line "Policy 6 Urban Town Centres and Accessible Shops", which it is assumed refers to Chapter 6, which relates to retail. Long Sutton is described in the current Local Plan as a Retail District Centre with Sutton Bridge, Crowland and Donington classified as Retail Local Centres. In the draft Local Plan Long Sutton becomes a Local Centre alongside Donington, Crowland, Sutton Bridge and Kirton plus three new Local Centres proposed for Urban Extensions (i.e. neighbourhood shopping and business centres). Comment Why be concerned about this new classification? Why spend time considering an issue where a reasonable response might be so what? It is just possible that more public resources will now be directed to Boston, Spalding and Holbeach, as compared to the third tier Local Centres e.g. Grants for shop front enhancements, grants for street scene improvements, etc. etc. We do not have the resources within the limited response period to compare like for like, but the following is representative. Long Sutton Town Centre offers a more enjoyable shopping experience than Holbeach Town Centre and the other proposed Local Centres. Proof, just walk up and down the respective shopping streets. Long Sutton has facilities not available in Holbeach including an optician, a wool shop, a saddlery and tack shop, a delicatessen, a travel agency, a TV and electrical shop, a bakery and proper street market on a Friday. Not available in Long Sutton but available in Holbeach is a furniture store, a eastern European food shop, a launderette, accountants and fishing tackle shop. Long Sutton currently has no empty shops. We request Long Sutton is rescheduled as a second-tier District Centre, rather

Officer Comment:

The NPPF requires LPAs 'to define a network and hierarchy of centres that is resilient to anticipated future economic changes' in a Local Plan. Defining a network, and the extent of the town centres and the primary shopping areas within them, based on a clear definition of primary and secondary frontages in designated centres, enables the Local Plan to set policies that make clear which uses will be permitted in such locations. It also enables developers and the community to be aware of where edge of centre is. All of these issues are important when assessing planning applications for retail and main town centre uses. A District Centre performs an important role and function by providing access to a wide range of retail and related services to serve the needs of the town and the immediate hinterland, while a Local Centre contain a smaller range of shops and services which support the daily needs of a smaller catchment area. Long Sutton is smaller shopping centre (66 units) when compared to Holbeach (90 units) and therefore has a smaller amount of comparison and convenience shops. Holbeach also has more known high street brands and town centre uses within its town centre. It is therefore appropriate that long Sutton is a Local Centre.

Officer Recommendation:

No change required.

the proposed third-tier Local Centre ranking.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1:

837

comment_author: Indigo Planning

comment content:

While we support the proposed retail hierarchy for main town centre uses, we do not support the proposed impact assessment thresholds, or the proposed Primary Shopping Area for Spalding. Draft Policy 22 currently requires that all new or additional retail, leisure and office floorspace is subject to an impact assessment where it is: 500sqm or more outside of Boston town Primary Shopping Area, or 250sqm or more outside the Primary Shopping Area of Spalding and the District and Local Centres. This impact threshold is unduly low and significantly below the impact threshold in the NPPF. We understand that this has been amended following the preferred options consultation in which it was proposed for a threshold of 2500sqm for Boston and Spalding Town Centres and 500sqm for the other centres. Sainsburys would therefore recommend an increase in the thresholds proposed for Retail Impact Assessments given as currently worded small scale retail development would need to satisfy the impact test even though such development is only likely to have a small turnover and will therefore not impact on existing centres. Spalding Primary Shopping Area Sainsburys request that the Primary Shopping Area is expanded to include their existing store at Sheep Market, given the important role it plays within the town centre. The South East Lincolnshire Town Centre and Retail Capacity Study (December 2013) identifies the importance of the contribution of the Sainsbury s store and neighbouring retail parks (Holland Market and Winfrey Avenue) to the town centre s overall offer. The draft PSA boundary is currently tightly drawn along Chapel Lane with the existing town centre 70m from the existing Sainsbury s

Officer Comment:

Support for the retail hierarchy is welcome. The impact assessment thresholds are identified by the South East Lincolnshire Town Centres and Retail Capacity Study. The threshold of 250sqm reflects the size and function of Spalding town centre. This threshold will help protect the town centre from medium and large scale out-of-centre food stores and other shops which could have significant impacts. In addition, the overall quantity of retail floorspace in Spalding town centre (and the other town centres), and the scale of individual retail units typically found in these centres, mean that a development of 2,500 sq m (around 25,000 sq ft) as identified by the NPPF would potentially represent both a significant proportion of the total and a very large unit in the local context. Such a development would therefore have the potential to significantly affect the sustainability of shopping patterns in the area. In view of this, there is a need for retail developments of more than 250 sqm to be assessed for their impact. The Primary Shopping Area follows the NPPF definitions and is an 'area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage)'. These have been defined by the SEL Town Centres and Retail Capacity Study 2013. Sainsburys and Holland Market are considered by that study to be edge of centre, are not contiguous with the primary shopping frontage and therefore should not be included in the primary shopping area.

Officer Recommendation:

No change required.

store. The store however, includes good pedestrian and cycle links to the rest of the town centre, providing linked shopping trips. Furthermore, the store is the key anchor convenience store within the town centre and should be recognised by its inclusion within an extended PSA.

ID1: 838 comment_author: ID Planning

comment content:

We act for the owners of the Springfields Outlet Shopping Centre in Spalding (UBS Triton) and have been instructed by them to submit representations in relation to the draft local plan (SELLP).

Summary

In summary our representations seek recognition of the important role which the Springfields Outlet Centre and associated uses provide in the local economy providing a leisure and retail based tourist destination, which attracts visitors to Spalding.

For reasons set out below we also consider the existing outlet centre and surrounding land should be included within the settlement boundary O1 Spalding. The ring road (A16) provides a logical boundary to the settlement with the outlet centre, Festival Gardens, exhibition centre and nursery to the north all within this area.

We also consider the local plan should make more direct reference to the Springfields Outlet Centre in Chapter 6 of the local plan dealing with 'Vibrant Town Centre and Accessible Shops and Services'. We set out below suggested text for inclusion in the draft plan.

Background and Context

The Springfields Outlet Centre overall site includes the factory outlet centre, Festival Gardens, garden centre, car parks and the exhibition / conference centre. Immediately north are employment uses and the Nursery. The site incorporates an area of approximately 15.5

hectares located in the north west quadrant of the A16/A151 roundabout in the eastern part of Spalding. The history of the wider centre dates back to 1966 with the opening of Springfield Gardens. The gardens were

Officer Comment:

The purpose of settlement boundaries is to define where particular Local Plan policies apply. In effect, they are defining where the Countryside policy (which covers the majority of the Local Plan area) ends and where other policies relating to Sub-Regional Centres, Main Service Centres, Minor Service Centres and Other Service Centres and Settlements start. Consequently, a settlement boundary is not intended to include all the buildings within the immediate vicinity of the settlement. This means that a settlement boundary does not necessarily include all the dwellings and other developments that may be locally regarded as part of a given settlement; and this is often because there is a discernible open gap between the main body of the settlement and an outlying property. In this case that is the Coronation Channel to the west. Although the Low Fulney area is within the settlement boundary its built form has a different character to the Springfields site, which has a character similar to nearby neighbourhoods in Spalding. It is acknowledged that Springfields plays an important role in the local and sub-regional economy, in terms of visitor numbers and job creation and that this is not adequately reflected in the Local Plan. However it is proposed to add a new policy relating to the visitor economy, within which the importance of Springfields would be identified and to designate the site on the Policies Map. Although the site would remain outside the settlement boundary, this approach would provide a positive framework within which the site can operate in the long term. Reference will continue to be made to Springfields within the supporting text of Policy 22, albeit to reinforce its role as an out of town retail park.

Officer Recommendation:

SHR010 Springfields Retail Outlet and Exhibition Centre should be identified on the Policies Map. Add new visitor economy policy to the Local Plan.

successful during the 1960's, 70's and 80's. By the early 1990's the continued viability of Springfield Gardens was in doubt with visitor numbers dropping from a previous peak of 125,000 per annum to only around 20,000 per year. The spiral of decline led to potential closure if future investment was not secured. The end result would have been the loss of support to important local festivals including the Flower Parade as well as closure of the gardens, resulting in the loss of part of the history of the town.

Support for revitalising the Springfields Gardens complex was provided by the then adopted South Holland Local Plan (1998) which recognised the show gardens as historically a visitor attraction of national interest, which had experienced significant decline. The supporting text of the plan encouraged the regeneration of Springfields.

Proposals to breathe new life into the centre were approved by the Secretary of State for the Environment in February 2001 including a factory outlet centre, information centre, calé/restaurants and other associated uses. Further proposed investment was granted planning permission in 2006 to provide additional factory outlet units, a travel lodge hotel improvements to the gardens and public art including sculptures.

The role of Springfields was acknowledged by the 2006 adopted South Holland Local Plan (paragraph 2.7) highlighting that during the period of investment in the Springfields Retail Outlet Centre, Spalding Town Centre had strengthened, suggesting beneficial spin off for the town centre. The 2006 adopted local plan also highlighted the tourism sector was of increasing significance and importance to the District and would play an important role in economic prosperity (paragraph 2.8).

Improvements and investment in the centre over time reflects its role as an important tourist attraction in Spalding attracting significant numbers of visitors each year from a wide area. Today, Springfields provides a range of leisure orientated uses including the factory outlet centre, Festival Gardens, exhibition centre and events arena, miniature railway and land train, crazy golf and playbarn and seasonal water taxi taking visitors into the historic centre of Spalding.

With an annual footfall of over 2.3 million it represents a major tourist destination drawing visitors from areas beyond Kings Lynn to the east, Peterborough to the south, Stamford & Grantham to the west and Skegness to the north. Providing around 500 jobs in total at Springfields is an important source of employment in the town and therefore makes a significant contribution to the local economy.

Draft South East Lincolnshire Local Plan 2011-2036

The draft plan has been published for public consultation. For reasons set out below we object to the draft Local Plan on the basis that:

1. The Springfields Centre and associated uses are not located within the defined settlement boundary for Spalding; and
2. No recognition is given in the local plan to the important role which the Springfields complex provides to the local economy and in particular to the visitor economy.

Settlement Boundary of Spalding

The draft Local Plan Proposals Map (Inset Map No 2, Pinchbeck & Spalding) includes a 'Settlement Boundary' which cross refers to draft Policies 12, 19, 20 and 21. Spatial Policy 2 is also of relevance. The settlement boundary in the vicinity of Springfields follows the western bank of the River Welland crossing the A151 to the south west of the complex. The settlement

boundary does not include Springfields. However, north of the A151 Fulney Hall is included within the settlement boundary but not the permitted restaurant (A3) immediately next to Fulney Hall or the NFU offices. South of the A151 and east of the River Welland the proposed settlement boundary includes an area of land currently in employment use, allocated on the draft Proposals Map as a 'Specific Occupier Site' (draft Policy 8), and housing west of Fulney Lane and east of the river, along with the tyre fitting depot fronting the A151. Despite inclusion of a number of uses south of the A151 and between the River Welland and the A16 within the settlement boundary (and Fulney Hall north of the A151), there is no recognition of Springfields and associated uses as an existing occupied site and one which logically falls within the settlement boundary for Spalding. As with Fulney Hall it lies north of the A151.

Draft Spatial Policy 2 identifies areas where development is to be directed including the sub regional centres of Boston and Spalding. The policy states that within the settlement boundaries of these two towns development will be permitted that supports their roles as sub-regional centres. Clearly, any proposals would be subject to other policies of the local plan and relevant material considerations including national planning policy. In our view the Springfields complex performs an important function attracting visitors to Spalding and therefore supports the role of the town as a sub-regional centre. Outside defined 'Settlement Boundaries' draft Policy 2 confirms that the rest of the local plan area is designated as Countryside where development is more restricted in policy terms. Given the role provided by the Springfields complex

supporting the sub-regional centre of Spalding, on this basis alone the centre should be included in the settlement boundary of the town.

The evidence base for the Draft Local Plan includes a background paper entitled 'Settlement Boundaries Background Paper'. This sets out the rationale for the identification of settlement boundaries.

Paragraph 3.4 identifies that: "...a settlement boundary is not intended to include all the buildings within the immediate vicinity of the settlement. This means that a settlement boundary does not necessarily include all the dwellings and other developments that may be locally regarded as part of a given settlement; and this is often because there is a discernible open gap between the main body of the settlement and an outlying property". (our underlining)

Springfields, including associated uses, is a substantial complex and there is no discernible open gap between the main body of Spalding and the Springfields centre. In our view it clearly forms part of the overall settlement with the A16 Ring Road forming a physical and logical

boundary between the town and countryside beyond. When considering the 2006 planning application (H16/0401/06) for improvements to the centre and in recommending approval, the officer's report to Committee concluded that although Springfields was 'technically' located in open countryside outside the defined settlement limits of Spalding:

"...it is clearly a significant existing facility and

visually appears to form part of the physical fabric of the town

bounded to the east by the A16". (our underlining) The officer's view is supported by what is on the ground

with the strong urban character of this entrance to Spalding including existing development north and south of the A151 between the Fliver Welland and the A16. However, only the uses south of the A151 and Fulney Hall north of the A151 are included in the settlement boundary. The urban character of the area between the river and the A16 and nature of uses within this area supports its inclusion within the settlement boundary.

The officer's comments on the 2006 phase 2 application continued by highlighting that the proposed expansion of the centre in 2006 would be located on brownfield land and that it would be very difficult to argue that the development would have any adverse impact on landscape character. The Settlement Boundaries Background Paper highlights that each settlement boundary has been defined having regard to a number of guidelines as follows:

“a) The settlement boundary encloses the main built up area (or areas, in the case of a few settlements) of the town or village.

(b) The settlement boundary also encloses:

(i) Areas of amenity and / or recreational open space, the appearance and character and/or use of which is worth of protection; and

(ii) Sites with planning permission for development situated on the edge of the main built-up area.

(c) In general settlement boundaries have been defined using discernible features on the ground (e.g. A road-line or drainage ditch), most of which will be mapped. It should be noted that land-ownership boundaries do not necessarily form a good definition for where a specific approach to planning policy for development should apply. “

Visually and physically Springfields forms part of the

settlement of Spalding. This was recognised by the case officer dealing with the expansion plans for the centre in 2006. Further development is also located north of the main Springfield site, including the nursery and other employment uses. Land south of the A151, including employment, residential and other employment generating uses are included in the settlement boundary. Further land north of the A151 should logically also fall within the settlement boundary. Springfields forms part of the urban area of Spalding and should be included within the settlement boundary. The A16 ring road provides a physical boundary to the east, between the existing complex and what could be regarded as open countryside. We consider the A16 should provide the line of the settlement boundary and not the River Welland.

The Springfield site itself is clearly not 'open countryside'. Neither does the situation arise where there is a clear gap between the edge of the built up area of Spalding and the complex, as highlighted in the Settlement Boundaries Background Paper.

In light of the above we consider that Springfields and the area of land bounded by the A16 Ring Road to the east, the edge of built development to the north, the A151 to the south and the River Welland to the west should be included in the settlement boundary for Spalding. We enclose an extract from the draft Local Plan Proposals Map showing the proposed extension of the settlement boundary edged in red.

Recognition of the Important Role provided by Springfields

We consider the draft local plan provides an opportunity to recognise the important role Springfields plays in the local economy including its importance as a tourist destination attracting visitors to

Spalding that otherwise would not visit the town. This should be included in the supporting text of the local plan in Chapter 6 (Vibrant Town Centres and Accessible Shops and Services) with the inclusion of a new paragraph 6.1.9 as follows:

“In addition to defined town centres, the out of centre Springfields complex in Spalding provides an important tourist destination in the local plan area, including Festival Gardens, other visitor attractions and a tourist information facility together with shopping facilities.

The comp/ex makes a valuable contribution to the local economy in terms of providing complementary shopping to other locations and attracting visitors to the town. “

We consider the Springfields complex has much to offer and provides an important facility with a much wider draw than Spalding and its immediate surrounding rural area. This attraction brings people to Spalding and recognition should be given to the function it performs and its value to the local area. The draft Local Plan makes no reference to these benefits and excludes it from the defined settlement boundary for Spalding.

The draft Local Plan should be amended to:

1. Include Springfields and surrounding land within the settlement boundary of Spalding; and
2. Include specific recognition to the role it provides serving the town of Spalding with its extensive catchment area, attracting visitors to the town.

If you feel it would assist to meet to discuss our representations, we would be willing to do so. If you have any queries, or require clarification on any point, please do not hesitate to contact me.

ID1:

847

comment_author: Chestnut Homes

comment content:

The identified retail hierarchy within this policy seems logical and provides a good starting point for managing the proposed development of any future retail sites within the area. There is recognition that retail impact assessments will be required to ensure that the effect of any such developments are not too detrimental on the existing town centres, which is a sound planning policy to adopt. We are however concerned that the threshold for triggering such impact assessments is very low compared to the National Policy requirement. There is a recognition within paragraph 6.1.12 that local centres will be provided in the strategic urban extensions and we would suggest this should include the Q2 Quadrant development within the accompanying text as this will be viewed as an integral part of the proposed Q2 development. Further consideration could be given within this policy as to how mixed-use developments should be considered in light of this hierarchy.

Officer Comment:

Support for the retail hierarchy is welcome. The impact assessment thresholds are identified by the South East Lincolnshire Town Centres and Retail Capacity Study. The threshold of 250sqm reflects the size and function of Spalding town centre. This threshold will help protect the town centre from medium and large scale out-of-centre food stores and other shops which could have significant impacts. In addition, the overall quantity of retail floorspace in Spalding town centre (and the other town centres), and the scale of individual retail units typically found in these centres, mean that a development of 2,500 sq m (around 25,000 sq ft) as identified by the NPPF would potentially represent both a significant proportion of the total and a very large unit in the local context. Such a development would therefore have the potential to significantly affect the sustainability of shopping patterns in the area. In view of this, there is a need for retail developments of more than 250 sqm to be assessed for their impact. Support for a Local Centre at Q2: The Quadrant is noted. The reference to A1 development as part of mixed-use development in employment areas was a typo. However it will be made clear that mixed-use development should be in conformity with Policy 22, and the national approach to protecting the vitality and viability of town centres.

Officer Recommendation:

Add reference to a Local Centre at Q2: The Quadrant to Policy 22.

ID1:

848

comment_author: Indigo Planning

comment content:

We support draft Policy 22 in its identification of a retail hierarchy which outlines a locational focus for the development of town centre uses in Boston and Spalding town centres. We support the aim of Policy 22 in that the town centres of Boston and Spalding should be the locational focus for the development of town centre uses including retail, food and drink outlets, financial and professional services and other leisure and tourist related uses (Use Classes A1-A5, B1, D1 and D2). We acknowledge the proposed lower threshold of 250 sqm (gross) for retail impact assessments outside the primary shopping area and the district and local centres in Spalding. Although this threshold is substantially lower than the threshold of 2,500 sqm threshold set by the NPPF, we consider that a lower threshold is justified in this instance and the town centre of Spalding is afforded a high level of protection against out of centre retail floorspace from coming forward. Spalding Town Centre boundary The draft Local Plan states that town centre boundaries define the areas within which the majority of retail development and other main town centre uses are concentrated, and where additional provision should go over the Local Plan period, to ensure that their role in providing a range of local shops and services is safeguarded and enhanced. It also states that Boston and Spalding town centres will be the focus for the majority of new main town centre uses over the Local Plan period, particularly for comparison goods floor space (see Policy 24). We consider that this approach is appropriate. However, the NPPF requires local planning authorities to undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites in order to

Officer Comment:

Support for the retail hierarchy and the locational focus of Policy 22 is welcome. Support for the lower impact assessment threshold is welcome. An assessment has been undertaken to identify suitable sites to accommodate Spalding's retail needs. The Town Centres and Retail Capacity Study 2013 identifies that there is a need for up to 10,810sqm of floorspace for comparison goods, but that convenience goods needs can be accommodated in small scale units within new Local Centre or to provide for underserved areas. The Retail Paper 2016 identifies that the land to the north of Holland Market and Winfrey Avenue Retail Parks is not available, and therefore not deliverable. However the Additional Retail Provision policy will be amended to ensure that post 2026 any retail need will be directed to town centre or edge of centre locations which would include this site. Therefore it is not appropriate for the town centre boundary to be extended. The Primary Shopping Area follows the NPPF definitions and is an 'area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage)'. These have been defined by the SEL Town Centres and Retail Capacity Study 2013. Sainsburys and Holland Market are considered by that study to be edge of centre, are not contiguous with the primary shopping frontage and therefore should not be included in the primary shopping area.

Officer Recommendation:

Add reference to post 2026 comparison retail need being located in Spalding town centre or edge of centre locations.

accommodate its retail needs. To this end, we consider that the town centre boundary for Spalding should be extended to the north of the Holland Market and Winfrey Avenue Retail Parks to include land between the retail parks and King s Road in order to allow for the further expansion of the town centre and to assist in meeting the identified retail needs of Spalding.

Spalding Primary Shopping Area The primary shopping area should be expanded to include both the Holland Market and Winfrey Road Retail Parks, which perform an important role within Spalding town centre and are a key generator of footfall there. This is evident from the South East Lincolnshire Town Centre and Retail Capacity Study (December 2013), which identifies that the Holland Market and Winfrey Avenue Retail Parks are responsible for 67% of the total convenience turnover of Spalding town centre. Although the breakdown of comparison goods floorspace in the town centre is not provided, the retail parks make an important contribution to the town centre s overall offer. The parks also provide the majority of the town centre s car parking provision (which is free of charge). Any retail impact on the retail parks as a result of out of centre schemes will ultimately impact on the success of the Primary Shopping Area given the connectivity between the two and the high level of linked trips generated. Given the role that the retail parks play in the success of the town centre, it is vital that they are afforded the highest level of policy protection through the extension of the primary shopping area to include the existing floorspace. This would ensure that any out of centre retail development over the threshold of 250sqm would need to consider the impact on the existing floorspace on the retail parks.

ID1:

849

comment_author: Spalding and District Civic Society

comment content:

6.1.13 Strongly support.

Policy 23 and 6.2.8 We warmly welcome the new concept of 'dead frontages' (breaks in A1 frontage). We urge that it is extended to cover the whole of Primary Shopping Areas and not just Primary Shopping Frontages. Just as devastating in creating "dead frontages" is the increasing number of shops blanking-out their windows with vinyl film (see Appendix). The practice kills footfall just as surely as a run of non-retail businesses. It is therefore vital, we urge, to include in the policy some such provision as: 'The blanking-out of shop windows by vinyl film or other means, by the rear of display cabinets or by bricking up will not be permitted'.

Crucial Omission An advertising policy either in this chapter or Chapter 7. One only has to look at photographs of Victorian and Edwardian town centres to see the devastating effect of uncontrolled advertising. Similarly for 1930s giant hoardings both now re-entering by the back door via vinyl film Policy 29 is not nearly strong enough. Will signs and advertising still require an application for Advertising Consent?

Officer Comment:

Support for Option b is welcome. Support for Policy 23 and the primary shopping frontages are welcome. The Town Centres and Retail Capacity Study 2013 identifies the primary shopping frontages as broadly relating to that of the existing Primary Shopping Area but excludes some properties in Sheep Market and extends the designation south along Market Place to reflect the current retail uses. This approach is consistent with the NPPF which identifies primary shopping frontages as including a high proportion of retail uses which may include food, drinks, clothing and household goods. The vinyls referred to are in general placed on the inside of windows – the planning system has no control over the use of the vinyls added within a building. Similarly, placing of cabinets inside units is not a planning matter. Bricking up of windows may be a planning issue but this will be assessed on a site by site basis. Advertisements are covered by Policy 27 Design of New Development. All relevant advertisements will still require advertisement consent, as set out by national legislation and policy.

Officer Recommendation:

No change required.

ID1:

850

comment_author:

Springfields Horticultural Society L

comment content:

the owner and operator of Springfields Festival Gardens, and also Springfields (Enterprises) Ltd. The charity s commercial business, Springfields Events & Conference Centre: The Trustees of the Society consider the draft local plan provides an opportunity to recognise the important role Springfields Festival Gardens and Springfields Events & Conference Centre plays as a combined visitor and community facility in the local economy including its importance as a tourist destination attracting visitors to Spalding that otherwise would not visit the town. This should be included in the supporting text of the local plan in Chapter 6 (Vibrant Town Centres and Accessible Shops and Services) with the inclusion of a new paragraph 6.1.9 as follows: "In addition to defined town centres, the out-of-centre Springfields Outlet Shopping & Festival Gardens, and the adjoining Springfields Events & Conference Centre together provide an important tourist destination in the local plan area. The complex makes a valuable contribution to the local economy in terms of providing complementary shopping to other locations and attracting visitors to the town as well as providing the local community with a considerable social and economic benefit." The Society s Trustees consider the Springfields Festival Gardens and the Events & Conference Centre, combined with the Outlet Shopping Centre have much to offer and provide an important facility with a much wider draw than Spalding and its immediate surrounding rural area. This attraction brings people to Spalding and recognition should be given to the function if performs and its value to the local area. The draft Local Plan makes no reference to these benefits and excludes it from the

Officer Comment:

It is acknowledged that Springfields Festival Gardens and Springfields Events & Conference Centre play an important role as a visitor and community destination. However it is not considered that the supporting text for Chapter 6 is the correct location for the text.

Officer Recommendation:

Add reference to the Springfields Festival Gardens and Springfields Event and Conference Centre to new policy 8 on the Visitor Economy.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

defined settlement boundary for Spalding. The draft Local Plan should, we suggest be amended to include specific recognition to the role it provides serving the town of Spalding with its extensive catchment area, attracting visitors to the town.

ID1:	851	comment_author:	Lincolnshire County Council		
comment_content:	<p>Public Health Comments There are opportunities here to further influence health and social well-being. The role that maintaining well designed thriving retail and town centres has on reducing social isolation, health inequalities, and improving community resilience could be referenced in the opening paragraphs. LCC Public Health team would welcome a discussion about whether it is appropriate to include a requirement to avoid an over concentration of uses that might detract from health and social wellbeing, e.g. hot food takeaways and betting shops. The expectation of new development within retail centres should specifically reference achieving balanced community meeting places with the aim of reducing social isolation. Policy 24 (C) on access to local shops without the need to use a car is particularly supported.</p>	Officer Comment:	<p>Reference to the benefit town centres can have for public health, including for social isolation will be added to the supporting text of Chapter 6. Reference to the negative impacts an over proliferation of hot food takeaways can have on local amenity and town centre activity will be added to the supporting text of the primary shopping frontages policy. Support for Policy 24 c is welcome.</p>	Officer Recommendation:	<p>Add reference to public health benefits of town centres to supporting text.</p>

ID1:

852

comment_author: Waller Planning

comment content:

Retail Impact Assessment The proposal to reduce the thresholds at which a retail impact assessment and sequential test are required, for retail development in Spalding, to only 10% of the national threshold (of 2,500 sq m), is unjustified. Developments of 250 sq m are likely to be relatively common, representing as they do a single large retail unit. This low threshold will place a significant burden on applicants seeking planning permission in the future. More fundamentally, this policy approach suggests that the Councils are opposed to new retail, leisure and office floor space coming forward, and it appears that this is simply intended as a means by which new proposals will be refused. Paragraph 6.1.5 seeks to explain the very restrictive approach proposed by Policy 22, indicating that a higher threshold would make Spalding vulnerable to potential challenges over the Plan period. We believe that the meaning behind this oblique phrase is that a higher threshold would increase the likelihood that retail or other town centre uses could be permitted in locations outside of the town centre, and this may in some way challenge the town centre. As we show below, there is a substantial need for new comparison retail, and this cannot be accommodated within Spalding town centre. In this context, the sequential test should be undertaken by the Local Plan, which can identify new locations to meet the need for retail development. As currently drafted, Policy 22 simply seeks to avoid the question of retail development entirely, an approach which is unlikely to meet the soundness tests of the Local Plan being positively prepared and effective. If appropriate allocations were to be made, then there would be no need for an

Officer Comment:

The impact assessment thresholds are identified by the South East Lincolnshire Town Centres and Retail Capacity Study. The threshold of 250sqm reflects the size and function of Spalding town centre. This threshold will help protect the town centre from medium and large scale out-of-centre food stores and other shops which could have significant impacts. In addition, the overall quantity of retail floorspace in Spalding town centre (and the other town centres), and the scale of individual retail units typically found in these centres, mean that a development of 2,500 sq m (around 25,000 sq ft) as identified by the NPPF would potentially represent both a significant proportion of the total and a very large unit in the local context. Such a development would therefore have the potential to significantly affect the sustainability of shopping patterns in the area. In view of this, there is a need for retail developments of more than 250 sqm to be assessed for their impact. This does not mean that the Council is opposed to new retail development, should an applicant submit an impact assessment that demonstrates a need for that use, and all other planning considerations are acceptable then it would be supported. It is accepted that new comparison goods floorspace cannot be accommodated in Spalding town centre. It is also acknowledged that the Local Plan should identify a new site(s) to help address this need, or set out a criteria based policy within which such applications should be considered. However an impact assessment threshold would still be required to ensure that speculative schemes are assessed in a robust way that does not adversely impact upon the vitality and viability of Spalding town centre, or any other centre. The requirement for the sequential test is set out in

Officer Recommendation:

Undertake an assessment to accommodate the identified comparison goods floorspace requirement for Spalding. Amend Policy 24 accordingly.

excessively restrictive threshold for retail impact assessments and the sequential test. We therefore propose that these thresholds should be raised to bring them close to, or in line with, the national threshold, in order to provide reasonable flexibility in the operation of this policy in the future. The Lack of Capacity in Spalding Town Centre The Councils Retail Study identifies three potential locations for new retail development within Spalding Town Centre. We are aware that none of these locations offer viable opportunities for new development: The identified site between Chapel Lane and Swan Street is a pedestrianised square. It is not of sufficient size to offer the potential for any new development larger than a small shop unit, and its development would remove an attractive square from the town centre, thus leading to a degradation of its built environment; The site on Red Lion Street has now been redeveloped, to form Boston College s Red Lion Quarter building, which accommodates a small amount of convenience retail alongside education, training and office facilities; The site between Draper s Place and Gore Lane suffers from an inadequate highway access, multiple ownerships, a lack of good quality retail frontage, and it is constrained in size; we understand that previous proposals to redevelop this site have been unsuccessful. This demonstrates that none of these sites are likely to deliver new retail development. The only site which may have a possibility of delivering some development is the land between Draper s Place and Gore Lane, and at best this is unlikely to deliver more than a few hundred square metres of retail floorspace. None of these sites are likely to be of sufficient size or attractiveness to meet the needs of national retailers, who require large, regular shaped floor plates, with good prominence and excellent accessibility for both

national policy. The South East Lincolnshire Town Centres and Retail Capacity Study identifies that the convenience floorspace should be delivered by units of up to 500sqm within new neighbourhoods or underserved areas. SHR004 and SHR005 are both identified as out of centre sites, approx. 3km from Spalding town centre, with little opportunity to enhance accessibility. These sites lie within a prominent gateway location; Members consider that the provision of retail development would adversely impact upon the prestige design expected to be promoted upon this site, and may discourage prestige businesses from locating on the site, a key aspect of justifying employment development in this location at the planning application stage. No evidence has been submitted that national retailers would only locate in Spalding should the Lincs Gateway become available. Planning permission has been granted for mixed-use development on this site which does not include A1 use. The promoter of the site secured planning permission for a business park with industry and distribution as well as other uses. It is not accepted that retail would provide a complementary peaceful atmosphere to offices, but the suggestion that the consented uses may do, undermines delivery of the consented scheme. Provision of a masterplan and delivery of a high quality landscaped scheme is welcome. It is not accepted that delivery of retail in this location would avoid a piecemeal approach to delivery, as it is possible that the retail element could be delivered in advance of other parts of the site. 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. Site SHR003 is an out-of-centre site, located at the gateway of a residential sustainable urban

customers and servicing requirements. It is therefore clear that any retail requirement beyond this level must be accommodated in alternative locations. There are also a lack of alternative sites in edge of centre locations. A number of medium-sized retail units have been built within walking distance of the town centre, but we have been unable to identify any further vacant plots for additional retail development in this area. The Retail Study also does not identify further opportunities for retail development within the centre or edge of centre areas. The Need for New Retail Allocations The Retail Study identifies a need for 10,810 sq m of new comparison retail floorspace and 2,286 sq m of convenience retail in Spalding by 2031. We understand that the convenience retail may be met by developments of up to 500 sq m, to meet local needs. However, the Local Plan makes no provision for the new comparison retail required. Policy 22 is silent on the matter of future provision, and the issue is only raised at paragraph 6.3.8, which is part of the supporting text to Policy 24. This acknowledges that the Local Plan does not address this issue, and commits to a partial review of the Local Plan in order to do so. This approach is neither logical or justified, given that there is an identified need for retail development (quoted in the supporting text for Policy 24), and the Local Plan is currently being prepared. In addition, a failure to plan properly for Spalding's future retail needs will simply lead to stagnation in the town's economy, and the loss of retail spending to competing centres elsewhere. It is therefore clearly not planning positively, as required by the NPPF. The Retail Study indicates that the need for comparison retail in Spalding will be 1,594 sq m by 2016 (now), and that this will rise by a further 1,000 sq m by 2021, and then far more rapidly after that. The Council currently anticipate that the Local Plan will be

extension. The land is required to help deliver the 5 year housing land supply requirement for Spalding, and the development of a comparison goods unit(s) is contrary to that aim. The route for the Spalding Western Relief Road abuts the site to the south. The Highways Authority identifies that the location of the roundabout to the SWRR is fixed, and unless evidence is submitted giving weight to an alternative approach, so is the road line identified on the Policies Map. The detailed specification of the roundabout and the road (including buffers, drainage etc) has yet to be finalised. Therefore it would be premature to allocate land for a retail unit until the specification has been agreed with all partners, through a masterplan. The Local Plan is in year 6, the detailed design and specification for the roundabout has yet to be agreed, a planning application has yet to be submitted, and a delivery and funding agreement 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 commence until 2024 therefore the retail development would not be able to address the immediate comparison need identified in the Local Plan. It is possible that a new convenience goods unit (of up to 500sqm) could be appropriate as part of the development of the sustainable urban extension, but this would have to be part of a Local Centre, its location identified through a masterplan to be agreed with all partners.

adopted in 2017, at which time it will already be out of date with regard to retail development. This will effectively require speculative planning applications to do the job of the Local Plan, in applying the sequential test to new retail proposals. Following this, it is unlikely that a review of the Local Plan could be adopted much before 2021. This implies that the Local Plan will effectively leave a policy vacuum for at least 5 years, possibly longer. It is also worth noting that new retail development will require time to come forward. Sites must be identified, commercial deals arranged, planning permission granted and new buildings constructed, and this process can itself take years. This is a further reason for the Local Plan to be positively prepared, and identify new sites for retail development now, as it will enable these sites to come forward for development as they are required to meet the need identified in the Retail Study. We are also aware from commercial discussions which have taken place in relation to Lincs Gateway that major national retailers are keen to locate in Spalding, but they have been unable to do so due to a lack of available and deliverable sites capable of meeting their requirements. These are high quality retailers who are already located in comparable towns to Spalding, across the country, but have not yet been able to identify a suitable location within Spalding. This has led to interest in Lincs Gateway as a potential location for modern and efficient comparison retail. A large amount of interest has been expressed by major national retailers, who are not currently located in Spalding, and who would only be interested in a premium edge of town location such as Lincs Gateway. We believe that alternative forms of development would be entirely suitable behind the new offices, provided that preserved the peaceful campus-style atmosphere

intended for the business park, and were designed to a suitably high standard, with a similar landscape-led approach to that required for the business park. Such alternative uses would arguably be more appropriate as a backdrop to a peaceful business park than industry or distribution centres. Ashley King Developments envisage an opportunity to create an attractive location for retail, which would accommodate the large floor plates required by retailers, within a landscaped environment of a similar standard to that which would be provided for the business park element of the site. A Masterplan is currently being prepared, which would locate this retail development behind the office-based uses, which would retain their highly visible location at the site's frontage. We believe that Lincs Gateway would be entirely suitable for comparison retail use and ... Is already going to be developed as a high quality business park, with a landscaped setting and prominent location. We have explained in our representation concerning Policy 7 that there is a large area of land available on the site, now that the land-hungry employment uses are to be relocated at Clay Lake. This provides an opportunity for an adjacent retail development, in a high quality and carefully designed environment, that will make a major economic contribution towards the wellbeing of the town and wider area. The alternative would be an unplanned and piecemeal approach, through speculative planning applications. We therefore suggest that Lincs Gateway should be identified as a retail allocation, to meet part of Spalding's future need for comparison retail floorspace. As we have explained in relation to Policy 13, we also believe that the land at Yews Farm, identified as Pin016 and Pin045, is a suitable location for new convenience and comparison retail. This would serve the new housing and existing communities in this

area, whilst the location's good accessibility would make it a suitable location to serve a wider area with comparison retail. We are concerned that Policy 22, as it is drafted, appears to advocate a negative and restrictive approach. It seeks to apply the sequential test to any large shops, and refuses to make allocations for the retail development that the Council's evidence base indicates is required. This appears to be an attempt to restrict retail development, not to positively enable growth. It is an unsound approach, because it fails to plan positively, effectively or in a justified manner, as required by the NPPF (paragraph 182).

Proposed changes to Policy 22 We believe that Policy 22 should be changed in the following ways: It should acknowledge the need for edge of town retail development, to meet Spalding's long-term needs; Land at Lincs Gateway should be identified as a location to meet the need for new comparison retail development, in accordance with our other representations; Land at Yews Farm should be identified as a location for both convenience and comparison retail, in accordance with our other representations; The threshold for retail impact assessments and the application of the sequential test for town centre uses should be raised up to the national level, of 2,500 sq m.

Post_title: 6.2 Primary Shopping Frontages

ID1: 853 comment_author: Mr John Stuart Birkett

comment content:

With 'Primary Shopping Frontages' surely the point is to promote a high proportion of retail uses “ not to promote a mix of uses. If this policy is not changed an application to provide 100% retail in a primary shopping frontage could be opposed on the grounds that it d s not include a mixture of uses. It may well be acceptable to have a mix of uses, with retail predominating; but the possibility of 100% retail should not be ruled out. There appears to be nothing in this part of the policy to prevent large businesses being developed on transport routes, but otherwise far from centres of population. The policy therefore needs to contain another criterion to limit such development to sites within or adjacent to Boston and Spalding and possible some of the other larger settlements, in the event that a town centre cannot be found.

Officer Comment:

The NPPF defines primary shopping frontages as those areas 'likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods'. This suggests that other uses will be appropriate in order to promote a competitive town centre environment. However the policy is clear that ground floor A1 uses in the Primary Shopping Frontage should be retained for retail use, with alternative uses only being supported where the criteria of the policy are met. The retail hierarchy policy manages out of centre development consistent with national policy.

Officer Recommendation:

No change required.

Post_title: **6.3 Additional Retail Provision**

ID1: 854 comment_author: Mr John Stuart Birkett

comment content:

It is difficult to see how parts A and B will relate to future development control decisions. Should the inference be that any comparison goods shopping in excess of the stated square footage will be refused? It seems unlikely. With regard to convenience goods shopping, there is no mention of the qualitative consideration. There is a deficiency at the quality end of the convenience offer in Boston. In the (admittedly unlikely) event of an application by Waitrose for a substantial supermarket in the centre of Boston, this policy, as drafted, would seem to preclude such a proposal “ which would be unfortunate.

Officer Comment:

Policy 24 sets out the requirement for additional retail floorspace as evidenced by the Town Centre and Retail Capacity Study 2013. It is correct to assume that any floorspace proposed in excess of that stated is not considered to be part of the need, and would therefore have an adverse impact upon the vitality and viability of the town centres so would not be supported, unless evidence submitted indicated that the needs had changed. The Local Plan cannot influence the type of retailer that locates in the Plan Area. Retailers submit applications where there is considered to be a need for their product/brand; should a supermarket chain that is not found within the Plan Area intend to promote a site then each case would be judged on its merits, and it would be for the developer to demonstrate that a need existed or had changed since the Local Plan was adopted. It should be noted that the retail need extends to 2031, so it is feasible that post 2031 additional need could be required for convenience as well as comparison floorspace.

Officer Recommendation:

No change required.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1: 855 comment_author: Chestnut Homes

comment_content:

We note the stated convenience and comparison goods floor space requirements to 2031. In particular there is very low requirements for additional convenience store within the Boston area and we would support this approach, giving existing provision which has policy objectives as part of the Q1 development to deliver overriding community benefits as part of the enabling development on this site.

Officer Comment:

Support for the approach to convenience floorspace is noted, as is the indication that a convenience store would be part of the Q1 scheme.

Officer Recommendation:

No change required.

ID1: 856 comment_author: Mike Harrison

comment_content:

Those businesses and shops that do survive in Spalding are very resilient and more competition is not required.

Officer Comment:

The Town Centre and Retail Capacity Study 2013 provides the evidence for the retail policies. This robust study shows that there is an identified need for additional comparison and convenience floorspace to 2031. The NPPF is clear that where a need is identified that a suitable site(s) should be allocated to meet the scale and type of retail needed in town centres.

Officer Recommendation:

No change required.

ID1: 857 comment_author: Waller Planning

comment content:

Further to our comments on Policy 22, we reiterate in relation to Policy 24 that there is no significant capacity for new retail development in Spalding town centre, or on the edge of the centre, and there is a pressing need for new sites to be identified on the edge of the town. The proposed approach, of refusing to identify new allocations, and leaving this matter to a future review of the Local Plan (as stated in paragraph 6.3.8 of the supporting text) is simply a failure to plan positively or effectively, and so it is unsound. Please see our representations on Policy 22 for full details in this regard.

Officer Comment:

The Spalding Retail Papers acknowledge that there are no suitable, available and deliverable sites in Spalding town centre or at the edge of the centre. The NPPF is clear that where a need is identified that a suitable site(s) should be allocated to meet the scale and type of retail needed in town centres. However this does not mean that there is a pressing need for new sites in out of town locations (which the site being promoted is).

Officer Recommendation:

Amend Additional Retail Provision to incorporate allocation(s) for comparison goods floorspace.