

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

Post_title: 02 & 08: Spalding and Pinchbeck

ID1: 38 **comment_author:** Longstaffs

comment_content:

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and would like to support the inclusion of the site Mon 019, as being one of the preferred Housing sites in Spalding.

It is considered that the site could be suitable for a smaller less dense form of development, and being located where it is, it could allow development by possibly smaller developers.

Being located off the A151, with its bus route to Spalding and Bourne, which assists from an accessibility point of view, it is within close range of the services of Spalding.

Overall, on behalf of our clients, we very much support the identification of site Mon 019, as a 'Preferred housing site' on the SELLP Inset Map for Spalding.

Officer Comment:

The support for Site Mon019 is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, this site is no longer required to meet the need. This decision has been informed by flood-risk considerations following an update of the Strategic Flood Risk Assessment for South Holland District and a review of the proposed funding arrangements for the SWRR.

Officer Recommendation:

Site Mon019 is not required for allocation in the Publication version of the Local Plan.

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ID1: 39 comment_author: Longstaffs

comment content:

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and would like to support the inclusion of the site Pin 040, as being one of the preferred Housing sites in Spalding. It is understood that the site is being considered suitable and forms part of the Spalding Urban Extension. (Pin 045) However, we wish to highlight that our clients land which fronts Market Way, has always be considered to be part of property in Pinchbeck, as it was originally the paddock which was occupied with the house on the North east side. We would like to propose that it retain its independence as a stand alone site. It would seem unreasonable for the site to be unavailable to smaller developers until such time as the masterplan for the whole SUE is complete. Overall, on behalf of our clients, we very much support the identification of site Pin 040, as a 'Preferred housing site' on the SELLP Inset Map for Spalding, and hope you can take the above comments relating to the site, as an independent site, on board.

Officer Comment:

The support for Site Pin040 is noted, but for reason of helping to deliver the first phase of the Northern section of the SWRR, it must form part of an enlarged Site Pin045.

Officer Recommendation:

Site Pin040 forms part of an enlarged Site Pin045 for allocation in the Publication version of the Local Plan.

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ID1:	40	comment_author:	Longstaffs	
comment_content:	<p>We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and would like to support the inclusion of the site Pin 016, as being one of the preferred Housing sites in Spalding. It is understood that the site is being considered suitable and forms part of the Spalding Urban Extension. Overall, on behalf of our clients, we very much support the identification of site Pin 016 (as being part of Pin 045), as a 'Preferred housing site' on the SELLP Inset Map for Spalding.</p>			
	<p>Officer Comment:</p> <p>The support for Site Pin016 as part of an enlarged Site Pin045 is noted</p>			
	<p>Officer Recommendation:</p> <p>Site Pin016 forms part of an enlarged Site Pin045 for allocation in the Publication version of the Local Plan.</p>			
ID1:	41	comment_author:	Longstaffs	
comment_content:	<p>We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Spalding, to a level of 5,880, for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the town with its range of services and facilities, which need supporting by new housing for households and families.</p>			
	<p>Officer Comment:</p> <p>The support for an increase in the Spalding housing requirement is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, the figure has now been reduced to 5,255 dwellings.</p>			
	<p>Officer Recommendation:</p> <p>The revised housing requirement for Spalding is 5,255 dwellings.</p>			

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ID1: 42 comment_author: Longstaffs

comment content:

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and would like to support the inclusion of the site Mon 017, as being one of the preferred Housing sites in Spalding. It is considered that the site could be suitable for a smaller less dense form of development, and being located where it is, it could possibly allow for development by smaller developers. Being located off the A151, with its bus route to Spalding and Bourne, which assists from an accessibility point of view, it is within close range of the services of Spalding. Overall, on behalf of our clients, we very much support the identification of site Mon 017, as a 'Preferred housing site' on the SELLP Inset Map for Spalding.

Officer Comment:

The support for Site Mon017 is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, this site is no longer required to meet the need. This decision has been informed by flood-risk considerations following an update of the Strategic Flood Risk Assessment for South Holland District and a review of the proposed funding arrangements for the SWRR.

Officer Recommendation:

Site Mon017 is not required for allocation in the Publication version of the Local Plan.

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ID1: 43 comment_author: Longstaffs

comment_content:

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and would like to support the inclusion of the sites Mon 004/014/015, as being some of the preferred Housing sites in Spalding. It is considered that the sites could be suitable for a smaller less dense form of development, and being located where they are, they could allow development by possibly smaller developers. Being located off the A151, with its bus route to Spalding and Bourne, which assists from an accessibility point of view, it is within close range of the services of Spalding. Overall, on behalf of our clients, we very much support the identification of sites Mon 004/014/015, as 'Preferred housing sites' on the SELLP Inset Map for Spalding.

Officer Comment:

The support for Sites Mon004/014/015 is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, these sites are no longer required to meet the need. This decision has been informed by flood-risk considerations following an update of the Strategic Flood Risk Assessment for South Holland District and a review of the proposed funding arrangements for the SWRR.

Officer Recommendation:

Sites Mon004/014/015 are not required for allocation in the Publication version of the Local Plan.

ID1: 44 comment_author: Longstaffs

comment_content:

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and would like to support the inclusion of the site Stm 004, as being one of the preferred sites in Spalding. It is close to sites previously designated as Housing commitment, and fills the form of development of the frontage in this location. Additionally, existing good highway links make the site accessible to the town and onwards via A16. Overall, on behalf of our clients, we very much support the identification of site Stm 004, as a 'Preferred housing site' on the SELLP Inset Map for Spalding. A Planning Application for residential development has been submitted to the Local Planning Authority for the site.

Officer Comment:

The support for Site Stm004 is noted.

Officer Recommendation:

Site Stm004 is allocated in the Publication version of the Local Plan.

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ID1: 45 comment_author: Mr Barry Humphrey

comment content:

Primary Objections:

1. There is no doubt the proposals within this Local Plan will have a devastating effect on the village of Pinchbeck to the effect that it will lose its identity and become a suburb of Spalding. Even the planning analysis/assessment given in Pin 001, 045, 020 and 040 by planners expresses concerns about:
 - a. The devastating total loss of the green belt between the two communities.
 - b. The effect of having the railway line run right through the centre of the proposed development.
 - c. Using up vital Grade 1 agricultural land greatly needed for the welfare and economy of the nation, and
 - d. Land contamination issues etc.

I would also point out that the current plans do not actually show a clear green belt between the two settlements - only what appear to be hedgerows or possible lines of trees with a very strange small oval shape in the middle? Therefore any 'proposed' green belt separating Spalding and Pinchbeck is currently very vague and, given the amount of housing being proposed, looks extremely difficult to achieve.

2. Why are we continuing to build on what is possibly the largest flood plain in England (Category RED according to the Environment Agency)? I did not detect or see any mention of concerns about flooding in the SE

Officer Comment:

1. It is accepted that the current proposals, to all intents and purposes, involve the loss of a clear 'countryside' break between Spalding and Pinchbeck. However, it should be noted that in strict planning terms, a designated 'Green Belt' between the two settlements does not - and has never - existed. The need to develop the majority of the 'gap' between Spalding and Pinchbeck results from priority being given by the Joint Strategic Planning Committee to development which will assist the delivery of the Northern section of the Spalding Western Relief Road (SWRR). The close proximity of a railway is not seen as a significant impediment to development given good design and layout. Given the predominance of high-quality agricultural land around Spalding and the great majority of South Holland District, the loss of Grade 1 land is an inevitable consequence of seeking to meet the need for housing in the locality. Any land-contamination issues will be addressed appropriately if and where they arise.
2. In preparing a Local Plan, the Government requires sufficient housing land to be identified to meet the identified needs. Whilst it is accepted that flood risk is a major concern in South East Lincolnshire, development land is generally promoted in those parts of established settlements where the risk of flooding is less severe.
3. The Government requires the planning system to ensure that new physical and community infrastructure is provided to meet the needs generated by new housing and other developments.
4. It should be noted that the proposed SWRR is strongly supported by the Local Highway Authority, and its funding arrangements will eventually require

Officer Recommendation:

No change is made to the emerging proposals to develop land between Spalding and Pinchbeck for housing.

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Lincs Local Plan yet by continuing to build northwards towards Pinchbeck, it puts even more new housing stock within the reaches of high risk areas such as the Vernatts Drain, the River Glenn in Pinchbeck and probably the loss of drainage ditches/dykes currently in abundance in the proposed development area.

significant new housing developments to the west of Spalding as well as to the north of it.

3. Why are developers being forced into funding hundreds of thousands of pounds to provide roads and infrastructure? This only serves as an additional tax on home purchases as these costs are not actually borne by the developers themselves but are passed on to prospective home buyers - this all coming at a time when most people but specifically the young, cannot afford to get on the housing ladder - even low cost starter homes!

Detailed Concerns:

1. Expanding Spalding northwards towards Pinchbeck will bring far greater problems than expanding southwards and/or westwards to the main Spalding bypass and A151 Bourne Road. For example the proposed houses north of the Vernatts Drain are on the wrong side of the river away from all the secondary schools, doctors, dentists and town centre facilities meaning the additional traffic direction will be north/south which as we know is the location of existing traffic congestion particularly at peak times in and out of town and the proposals will compound the issue further. The proposed northern link road or bypass extending from Enterprise Way in a westerly direction towards the A151 Bourne Road will not alleviate traffic into or from town when travellers are connected to this new urban sprawl. My main concern here is - why is very little housing expansion going on to

the the south and west of Spalding where easy access to the current bypass and routes out to Peterborough, Stamford and Bourne are more accessible? It would make better sense to develop this area further to gain the 'Peterborough effect' with regard to commuting and attracting business into the area, particularly after the recent upgrade of the A16, rather than gobble up distinctive and characterful villages such as Pinchbeck to the north with all the associated problems, as outlined in Objection 1 above.

2. I understand that building on the A151 broad corridor to the south and west of Spalding has not been favoured or does not seem to be recommended possible because the land concerned has not been promoted by developers, only willing land owners. Such favouritism is totally unjustified and ALL options should be rigorously pursued given the current planning concerns and issues surrounding developing north of the Vernatts Drain.

Personal Recommendations:

1. The proposed 4000+ houses identified in the SE Lincs Local Plan should be built on the land surrounding the A151 Bourne Road, delivering this section of the Relief road through developer funding. This seems the most logical area as it will connect to the planned Relief Road in the south and on to the A16, allowing traffic to flow more freely rather than the current plan of developing northwards bringing about severe traffic congestion for north/south traffic. It will also open up the 'Peterborough effect' bringing more easier commuting and attracting business to the 'easy access' area following the recent upgrade of the A16 southwards.

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2. Allocate some sustainable 'in fill' building land in Pinchbeck adjacent to the village development boundary. For example Pin 02, 08, 19, 34 and 53 would make good preferred housing sites without too much impact on the village or indeed vital traffic flow north/south to/from Spalding.

I would be grateful if you would please acknowledge receipt of these objections/comments.

ID1:	46	comment_author:	Councillor Francis Biggadike	
comment_content:	I am opposed to any more out-of-town retail for Spalding.	Officer Comment:	The NPPF identifies that a sequential approach to site selection for retail and main town centre uses should be promoted (town centre, edge of centre then sites that are well connected to the town centre). It adds that Local Plans should 'set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres.' The Local Plan should promote an approach consistent with national policy.	Officer Recommendation: No change required.
ID1:	47	comment_author:	Councillor Francis Biggadike	
comment_content:	As a regular user of public transport, would like to see improvements to public safety at the Spalding Bus Station. Upon leaving the bus, we have to dodge cars to reach a footpath. Any serious accident would almost certainly lead to a claim against the Council for its neglect to care for the safety of the public in this area.	Officer Comment:	This is not a Local Plan issue.	Officer Recommendation: No change to the Local Plan

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ID1: 48 comment_author: Mr James Johnson

comment content:

I see the south east quadrant has been removed, areas stm 005, 015, 017, 016 and 018.

This area which has been put forward, and has the potential to deliver. In discussions with planners, flood risk and access has been put as the reasons for its removal. However a recent independent FRA proved that development was possible in that area. As for access being in close proximity to the existing Spalding bypass to Peterborough and Boston and less than a mile to the town centre access is significantly better than at Pode Hole, without causing greatly increased congestion on existing roads. There is no need for expensive infrastructure, and is more sustainable than some of the areas included in the preferred options.

Officer Comment:

These sites have not been taken forward for the reasons previously stated in the Preferred Sites for Development consultation exercise. Also, if allocated, they would not be in a position to contribute to the funding of the SWRR.

Officer Recommendation:

These sites are not to be promoted as allocations in the Publication version of the Local Plan.

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ID1: 49 comment_author: Mrs Jacqui Woods

comment content:

I note that there are 237 actual applications on the housing register and that you should be considering building 426 new dwellings per annum of which 284 should be deemed affordable housing. I am aware that this local plan is a long term plan - for the next 20 years or so - but I find it difficult to reconcile the need to build 4,800 houses in this area alone when there are currently just 237 on the housing list. It appears to be a big overkill to me- unless there is an expectation of a greater need i.e. a larger employment base in the area.

D s the council therefore know something that we don't about the future of Spalding and Pinchbeck?

I am still concerned; as are many other local residents that the green buffer at Market Way between Spalding and Pinchbeck is not going to be large enough to provide a distinct separation. I know that the plan was merely indicative but I implore you as planners to be aware of the need to maintain the separation between the two areas Pinchbeck is a separate village and community in its own right and is not a suburb of Spalding, lovely though that market town is.

I am also still concerned about the traffic along Spalding Road both during all the lengthy building work and on completion of all the proposed houses -I still believe there are too many to disgorge onto a single main road when that main road already becomes very busy at peak times and when the railway crossings are closed. Also I understand that the train numbers may increase, further exacerbating the traffic problems.

I am aware that all local authorities have to provide new dwellings in the coming years but my concern is

Officer Comment:

On the issue of housing needs to be met. This is objectively assessed by independent consultants applying recognised methodologies. Acknowledged it is difficult for the lay person to relate to developemnt needed over a 20 year period but records of housing completions over such longer periods (e.g. 1976-2011) show that the development needs are comparable. It should be emphasized that the housing needs have not been derived from past development rates but from population and household projections

Officer Recommendation:

No change to the Local Plan is recommended in respect of the objectively assessed housing need.

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for increased unnecessary conurbations with poor infrastructure and loss of green areas in this beautiful and rural county. You must consider and take account of the fears and wishes of the people that you represent both those here and now and those to come in future years.

Finally, I enclose a copy of the e-mail I sent to John Hayes MP which was forwarded to your Chief Executive, in case that has not become part of my observations on this Local Plan.

I naturally wish this letter to become part of the consultation on the Local Plan.

Dear Mr Hayes

I have some grave concerns about the above local plan and would like to share them with you and ask for your opinions and considerations.

I moved to Pinchbeck 2 years ago from the valleys of South Wales and my husband and I love it here.

It is largely rural - especially compared to the heavily populated valleys - and peaceful.

Pinchbeck is a delightful village with a great community spirit which we have embraced.

And that is one of the main objections to this plan - Pinchbeck is a village. It is NOT a suburb of Spalding lovely though that market town is.

It seems that one of the tenets of the plan is to build an enormous number of houses north of Vematt's Drain up to the edge of the boundary of Pinchbeck, effectively joining the village and the town together. This is completely unacceptable in my view - and in the

view of everyone that I have spoken to about this.

I am aware that housing is a priority in this country and that this county has a large amount of land that the planners are viewing with glee and rubbing their hands together!

But how much of a priority is it to build up to 40,000 (can that be right?) houses in Spalding?

Could you please tell me the numbers on the current council housing list?

As I have previously mentioned I lived in South Wales before moving here. I lived there for 40 years and I worked as a fraud officer for much of that time for the Department of Works and Pensions. (I was also a magistrate in Caerphilly for 14years).

I did a great deal of work amongst the large council estates in the valleys - large sprawling rabbit warrens with often one road in and out (very similar to that mooted north of Vematt's Drain).

I can name three estates off the top of my head - Gumos in Merthyr Tydfil, Penrhys in the Rhondda and Lansbury Park in Caerphilly - at least one of these won an award for design but don't be fooled by that they were much too large with poor infrastructure, poor streetlighting, vandalism and impossible to police as the roads were badly designed with only one escape route.

Also, the so-called 'accessible' housing meant that the areas were largely no-go areas as the people that were housed in the estates were those that nobody else wanted.

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Now, I know that everybody deserves a roof over their heads - indeed one of our pet charities is a homeless one - but I am just outlining some dangers of large estates. I have a lot of experience with such estates.

And, just a thought, will the numbers of houses be required in the light of Brexit?

I have already made comments about the plan to the council and of course I am aware of the second round of consultation which I will be attending.

I am very concerned that the South Holland Plan in lots of ways will compromise the intrinsic loveliness of this most glorious part of the county.

Please Mr Hayes, make the council aware of the concerns of us all and ask them to act on them.

Thank you.

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ID1: 50 comment_author: Mr N Davies

comment content:

Pin045 and Pin024:

Although sensible and easily developed; if commuting from here to Stamford/Peterborough you will need to negotiate existing road layout which is inadequate. Access to the town centre is similarly hampered by inadequate road provision/management.

Priority should be put into some road improvement to the town centre, possibly by a bridge over the railway at Winsover road and associated demolition and redevelopment to create a more high rise commercial district to provide an easy link to the old centre as well as providing the quantity and quality of retail to serve the additional population.

The SWRR really needed to start at the A1175 with a new roundabout to alleviate traffic flow problems. You should think about really stretching the budget to put this road in.

Officer Comment:

It is accepted that, pending the completion of the SWRR, housing development on Sites Pin024 and Pin045 will have to utilise the existing road network in Spalding with its attendant issues. Accordingly, the emerging Local Plan contains proposals to fund traffic-management improvements in Spalding via financial contributions from developers of housing sites in the area.

The emerging Local Plan contains proposals relating to the provision of additional retail space identified in the latest retail capacity study.

It should be noted that the current junction of the A1173 and A1175 has not been shown to be problematic by recent traffic modelling; however, this situation could change in the long term following completion of the SWRR.

Officer Recommendation:

Proposed Policy 30: Delivering the Spalding Transport Strategy is approved.

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ID1: 51 comment_author: Mr Andy Bowser

comment content:

I am a resident of Spalding and work in Pinchbeck.

I have number of concerns relating to the latest July 2016 version of the plan:

- 1) The plan to create the 1000 house cul-de-sac north of the Vernatts River will be the largest cul-de-sac in Europe, and is exactly the opposite of sustainable development.
- 2) The 2000 cars that will flood on to Spalding Road every morning will create such bad traffic I will not be able to drive to work anymore on this already congested road.
- 3) This part of the plan is so unsustainable it leaves the Council wide open to legal challenges when the plan goes to review, in particular as the voice of Pinchbeck residents (via the Parish Council) has been repeatedly ignored in the rounds of consultation. The cost of the challenge will be paid by us tax payers so please do not take this unnecessary risk with public money.
- 4) Please do the right thing and build the houses at Spalding Common or Monks House Lane so the traffic can flow to the south via the section of the relief road that is under construction.

Simply put building houses at Pin 24 and Pin 45 is crazy as it will lead to traffic stand still. Please build the houses where the traffic can flow.

Officer Comment:

It is accepted that, pending the completion of the SWRR, housing development on Sites Pin024 and Pin045 will have to utilise the existing road network in Spalding with its attendant issues. Accordingly, the emerging Local Plan contains proposals to fund traffic-management improvements in Spalding via financial contributions from developers of housing sites in the area. Moreover, emerging Policy 12: Vernatts Sustainable Urban Extension imposes a limit on the number of dwellings (currently 874) that could be built in this development without extending the SWRR round to the proposed junction of it with the A151.

Officer Recommendation:

Proposed Policy 12: Vernatts Sustainable Urban Extension and Policy 30: Delivering the Spalding Transport Strategy in the Draft Publication version of the Local Plan are approved.

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ID1:

52

comment_author:

Mr A Steele, Mrs D Chandler-Steel

comment_content:

We the undersigned are sending our comments to you concerning the proposed plans as viewed at Pinchbeck Library.

We currently live on Wardentree Lane, Pinchbeck, Spalding. Our purpose of moving to Spalding, Lincolnshire was to get away from traffic, pollution, busy roads and to escape the hustle and bustle of an overgrown town.

We feel with the proposed development, we will now go back to a place which will create pollution, dust, excessive noise and destroy the wildlife that we have pleasure of seeing at this present time.

Since moving here just over two years ago Wardentree Lane has become a gateway for speed merchants, litter louts, drivers that show no sign of environmental issues, e.g.; deafening radios blaring while waiting at traffic lights at any time of the day or night.

With the oncoming of new haulage companies occupying premises at the top of Wardentree Lane we are blighted by extremely large HGV which cause pollution, e.g.: diesel fumes, and large amounts of dust.

With more proposed housing we feel this would only exasperate our problem. We all ready have great difficulties in entering and vacating our driveway, this has been mentioned to the highways department by telephone and was told when the new traffic lights had been installed they may be able to do some different road markings. STILL WAITING!

Officer Comment:

The level of housing proposed in the Pinchbeck/Spalding area is necessary in order to assist in meeting the proven identified need for additional dwellings in South Holland District. The proposed number of dwellings in this area is in recognition of the availability of wide variety of services, facilities and employment opportunities in and around Spalding which will enable residents to access them without requiring significant travel.

Officer Recommendation:

Proposed Policy 12: Vernatts Sustainable Urban Extension and Policy 30: Delivering the Spalding Transport Strategy in the Draft Publication version of the Local Plan are approved.

With the venture of new housing, when most properties have one or two vehicles my concerns are that the roads are just not capable of coping with extra traffic. We seem not to be able to cope with what we have at present.

Local press and TV state categorically that Lincolnshire has the worse rate for road accidents, many fatal. Do we really want to become an even worse statistic.

When we moved as all ready stated just over two years ago we were looking forward to a village location that cared about what went on in the vicinity, we would like to add we had no knowledge of The Anaerobic Digestion Plant as this we believe will also be nearly on our doorstep, however we now know our comments on this will have to be forwarded on to Lincolnshire County Council.

The undersigned are Mr A Steele, Mrs D Chandler-Steele, Mr & Mrs A J Chandler.

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ID1: 53 comment_author: Mr Andrew Darley

comment content:

As one of the most important aspects of the plan will be to secure a complete relief road would it not be more sensible to put more preferred housing North of the Vernatts between R2 and R3?

The worst thing that can happen is that the road stops at R1 if your proposed development between Pinchbeck and Spalding g s ahead as congestion will become even worse.

I feel it is paramount that the road between Pinchbeck and R3 is completed during this phase otherwise it may not happen!

Officer Comment:

Proposed Policy 12: Vernatts Sustainable Urban Extension does identify significant housing development which will be accessed by roundabouts R2 and R3 and help to fund the construction of the SWRR all the way round to the A151, and thereby serve to relieve pressure on the proposed Spalding Road junction via R1.

Officer Recommendation:

Proposed Policy 12: Vernatts Sustainable Urban Extension and Policy 30: Delivering the Spalding Transport Strategy in the Draft Publication version of the Local Plan are approved.

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ID1: 54 comment_author: Matrix Planning Ltd.

comment content:

OBJECTION TO THE OMISSION OF SITE TO REAR OF BRIDGE HOUSE, NR. LUCKS BRIDGE, SPALDING COMMON .

Site owner: Wilson.

Full report sent by email with site plans.

1. Although the site is within the 'open countryside', it is part of an existing built up area, and is adjacent to the planned urban extension to Spalding (the Holland Park extension commitment). It has again been excluded from the revised development boundary for Spalding.

2. Within Spalding itself, it was argued in the Inquiry to the 2006 Local Plan (yes that far back) that the small number of large allocations will result in too much new development being under the control of a limited number of developers. Diversity of ownership will ensure that implementation is not beholden to a few landowners, whilst still securing a comprehensiveness of approach.

3. The proposed site could have formed part of the sustainable urban extension to assist in providing much needed community infrastructure and affordable housing for the town. This permission has now been granted. The present site could still assist with the planned expansion of Spalding by, say, improving local footpaths. Although the site may be seen as an annexe to the urban extension the area needs to be planned as a whole to ensure its coherent development. Indeed the southern entrance to the town appears to have been planned with very little 'presence', and the site

Officer Comment:

This site has not been taken forward for the reasons previously stated in the Preferred Sites for Development consultation exercise.

Officer Recommendation:

Site Stm002 is not required for allocation in the Publication version of the Local Plan.

could assist in helping to create a 'southern gateway' of more substance than presently planned.

4. Certainty is offered that that the land in question will come forward, so that the necessary infrastructure can be properly planned and implemented in a logical and economic manner.

5. The identification of the land at both is desirable as an integral part of promoting sustainable and properly planned urban extensions.

6. The present consultation identifies that the site has less access to local facilities, shops and services than other sites; and as being one of the least sequentially preferable sites in terms of flood risk in Spalding. This conclusion does not stand up to scrutiny “ the site is as close to the centre of Spalding as the housing commitment opposite (the Holland Park extension), is on a bus route, and flood risk can be managed with increase in site levels.

It is again requested that the site is included inside the revised development boundary for Spalding.

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ID1: 55 comment_author: Longstaffs

comment content:

Pin019, Land at Surfleet Road, Pinchbeck

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and would like to support the inclusion of the site Pin 019, as being one of the preferred Housing sites in Pinchbeck.

It is understood that the site is being considered suitable to be taken forward as a Preferred Housing site for the village, with three positive (green) impacts recorded relating to housing delivery, accessibility and landscape character although a further seven (blue) impacts could deliver positive impacts by securing meaningful infrastructure to meet the needs of future residents such as open space and school places. We agree and support these findings.

The Highways Authority identified that 'the site has a large enough opening onto Surfleet Road to be able to provide a safe and suitable access for residential development, commenting that a frontage footway to Oldham Drive would be required,' and therefore it appears that it a satisfactory, straightforward transport solution could be provided to this site. This is also agreed and accepted by our client.

The site is within Flood Zone 3a, and the flood hazard in 2115 is classified as 'no hazard', and the flood depth in 2115 is classified as 'no hazard', and as such the site is one of the most sequentially preferable sites in Pinchbeck.

We concur with the comments in the SHLAA indicates that 'opening-up costs are likely to be low', and that the site is ready and available for development, and therefore able to contribute to the Council's five year

Officer Comment:

Support for Pin019 as a Preferred Housing Site is welcome. Confirmation that the information contained within the SHLAA and SA is correct is noted. Confirmation of the site's availability is also welcome.

Officer Recommendation:

Pin019 is one of the more suitable housing sites in Pinchbeck and should be taken forward as a Preferred Option Housing Allocation.

supply of available housing.

We fully support the allocation at this location, and being within 650m of the village is a logical and appropriate location for residential development.

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ID1: 56 comment_author: Longstaffs

comment content:

Pin021, Land south of Flaxmill Lane/Church Street, Pinchbeck

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and write to request reconsideration of the preferred housing sites for Pinchbeck, and to support the inclusion of the site Pin 021, as being one of the preferred Housing sites in Pinchbeck.

It is understood that the site is not being considered suitable as a Preferred housing site, however we note that the Sustainability Appraisal scores for the site, are four positive (green) impacts being recorded relating to housing delivery, access to local shops and services, accessibility and landscape character, and only one negative (orange) impact relating to soil, air and water quality. We do not understand what that negative impact can represent.

We note that the consultation report states that the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1.0m', and has been stated as being one of the least sequentially preferable sites in Pinchbeck. However, we have been asked to advise that in our client's 65 year knowledge of the site, it has never flooded, or had standing water on the land. Additionally, we re-iterate the benefits of this site above others selected as more suitable:

1. The site is within 330m of the village centre
2. The site is a small field with development to two

Officer Comment:

The SA identifies that the negative impact identified for air, water and soil quality mainly relates to the loss of 1.53ha of Grade 1 agricultural land. Pin021 is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1.0m' one of the least sequentially preferable sites in terms of flood risk in Pinchbeck. The updated SFRA informs the sequential approach to site selection in terms of flood risk; the aim is to steer new development to areas with the lowest probability of flooding. Based on modelling the SFRA considers the degree of probability that land will flood in the future, rather than how often it has flooded in the past. National planning policy states that the Local Plan must take this into account when selecting sites for development. It is accepted that the site is within 330m of the village and has no bad neighbours. The SHLAA confirms that Pin021 'is suitable for residential development but some alteration/re-prioritisation of the existing roads may be required' so it appears that a satisfactory access can be achieved although this may not be as straightforward as for some other sites. There is no formal public right of way adjacent to the site, but an informal path may exist to aid movement. It is accepted that there are bus stops on Pinchbeck Road. The site is in use as a garden centre which is not considered to be a main employment use (it is classified as sui generis). The Employment Technical Paper (January 2016) concludes that the site should not be allocated for employment use. The existing retail use is ancillary to the garden centre and therefore the main use of the site, and most of the products are sold in the village shops and other nearby town centres. Therefore the loss of the site to residential use is not considered to

Officer Recommendation:

Pin021 is not one of the more suitable housing sites in Pinchbeck and should not be taken forward as a Preferred Option Housing Allocation. Pin019 and Pin065 are some of the more suitable housing sites in Pinchbeck and should be taken forward as Preferred Option Housing Allocations.

sides, three if counting the development opposite the site, on Church Street. There are no bad neighbour uses.

3. The site is accessible from Church Street, Flaxmill Lane, and Crossgate Lane. Access onto Crossgate Lane, being sufficient and suitable to accommodate development of the site Pin 021, and being well served by the existing and improved access junction onto Church Street (B1356).

4. The public footpath running along the western boundary of the site is a defined footway link to the village, which could serve as an alternative to using the Church Street footpaths.

5. The site is located within 100m of a main bus stop - route Spalding to Boston, (on Church Street).

Furthermore, we consider the selection of the site Pin 065, now selected as a 'Preferred site for Housing', would involve the loss of a main employment use and service /retail facility for the village. Additionally, that site is located some 800m from the village centre, and it does not provide or form a logical infill to the pattern of residential development of the village. It would also involve crossing Surfleet Road to access the village services via footways. Please take these three comments about Site Pin 065, as objections to that site being taken forward as a Preferred housing site.

have adverse economic impacts. It is accepted that the site is 800m from the village centre but should Pin019 be taken forward as an allocation, Pin065 would form an appropriate pattern of development, forming a logical extension to the village with Herdgate Lane (bounding Pin065 to the north) providing a definitive boundary to Pinchbeck. It is accepted that there is no footway on the east side of Surfleet Road, although enhanced pedestrian access could be secured through the development of the site. This would be a matter for a planning application.

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ID1:

57

comment_author:

Robert Doughty Consultancy

comment_content:

On behalf of Michelle Edwards and Mark Scotney

Pin057:

There appears to be no coherent method of realising the SWRR within the plan period, if at all.

In the meantime, allocations are being put towards the provision of the route along R1, R2 and possibly R3 with no real evidence as to whether this route will ever make it across the Vernatts drain.

Pin057 has not been put forward as a potential housing site due to the lack of access to community facilities impact on landscape character and soil, air and water quality.

We would make the point that these criticisms could be levelled at virtually any Greenfield site across the two districts due in the main to the flat landscape. That would certainly be true of the two allocations that will supposedly see the delivery of R1 and R2 and that would see the coalescence of both Spalding and Pinchbeck.

Pin057 remains part of a group of land interests that could see the delivery of the SWRR without resulting in the coalescence of the two settlements.

Officer Comment:

The allocation of land 'resulting in the coalescence of the two settlements' is regarded as an inevitable consequence of securing the funding and delivery of the first phase of the Northern section of the SWRR (i.e. the roundabout junction with the Spalding Road).

Officer Recommendation:

Site Pin057 is not required for allocation in the Publication version of the Local Plan.

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ID1:

58

comment_author:

Robert Doughty Consultancy

comment_content:

Pinchbeck (general)

Continued support for Pinchbeck as a Main Service Centre, however, the lack of proposed allocations and an overreliance on the proximity to Spalding would seem to effectively undermine the position in the settlement hierarchy.

There appears to be no coherent policy for the delivery of the SWRR within the local plan period. Two large allocations in Pinchbeck are indicated as delivering a road that stops north of the Vernatts Drain. There is no indicated mechanism for the delivery of the road in its entirety and therefore the question arises as to why allocate two large areas of land in Pinchbeck to deliver a road that doesn't go anywhere in response to a highway problem in Spalding.

Leading on from this, on the basis that Pin027 was not chosen because of the impact on the character of the area and Listed Buildings, why allocate land to deliver a road that will result in the coalescence of the two settlements of Spalding and Pinchbeck.

Pinchbeck Pin027

The 2016 SHLAA discounted the site on the basis that development of the site for between 115 and 172 units would have a detrimental impact on the Pinchbeck Conservation Area and the Listed Buildings. There is no evidence that our representation of February 2016 has been considered.

Officer Comment:

The scale of housing growth proposed for Pinchbeck took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. The level of housing growth proposed for Pinchbeck, 240 dwellings over the plan period, is not an insignificant amount of growth and is appropriate for a Main Service Centre that is sixth in the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015). The level of housing promoted recognises the services and facilities Pinchbeck provides and should help sustain those in the future. Pin027 assessed in the SHLAA was that submitted for 5.7 ha. No evidence was submitted to indicate that only part of the site could be available for development. The SHDC Conservation Officer identifies that 'the northern site in particular is a highly sensitive site with regard to its impact on the setting of the listed church and conservation area. Any design proposal would need to be landscape-led; addressing the wider setting of the heritage assets is by no means straight forward. A very low density of development may work but this would need to be proven in respect of the setting considerations. This would require a combined analysis of the setting of a number of heritage assets; the church, the conservation area and the listed dwellings. From this initial assessment it would then be evident as to whether or not development could be successfully accommodated on the site'. The plan submitted does not address this requirement, and therefore it appears that addressing

Officer Recommendation:

Pin027 is not one of the more suitable housing sites in Pinchbeck and should not be taken forward as a Preferred Option Housing Allocation.

heritage concerns will not be straightforward.

However, the site is capable of accommodating a much smaller number of units (our representation indicated 16) which would not have the impact suggested in the SHLAA.

The site has the potential to provide up to 16 dwellings set in expansive curtilages on the periphery of the settlement and could assist in delivering a form of low density, high quality homes not seen anywhere else in draft local plan.

Early consultation with Pinchbeck Parish Council on such a proposal resulted in their support and the letter confirming this is appended to this representation.

Studies carried out on the site indicate that there are no technical reasons why the site could not be developed.

Pinchbeck Parish Council letter -

Re: Proposed Residential Development - Land to North and South Otway House, Pinchbeck

Following our recent telephone conversation and exchange of emails, we would wish to take this opportunity to update regarding the proposals that you submitted for the development of land to the north and south of Otway House, Spalding Road, Pinchbeck.

Your plans together with drawings 776-4-MPo1 and 776-4-MPo1-2 have been presented to the Pinchbeck Parish Council and all of the members" present unanimously lent their support to this project. We

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therefore look forward to receiving the plans for our comments of support from the Planning Department of South Holland District Council.

If we can be of any further assistance, then please do not hesitate to contact us.

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ID1: 59 comment_author: Lincolnshire Wildlife Trust

comment content:

A number of the sites identified as preferred sites for housing or for employment are adjacent to sites designated for their nature conservation interest:

Pin024, Pin045, Mon004, Mon014, Mon016, Mon018, Mon019, Mon022, Mon077 (preferred housing sites) - adjacent to Vernatt's Drain Local Wildlife Site (LWS)

SPOO1 (Proposed Main Employment Area) - adjacent to Blue Gowt Drain, West Marsh Road LWS, Vernatt's Drain LWS, Vernatt's Nature Reserve LWS and Local Nature Reserve, and Spalding Cemetery LWS

SPO14 (Proposed restricted use site) - adjacent to Vernatt's Drain Local Wildlife Site (LWS)

It is important that existing and candidate designated sites of nature conservation interest are protected and enhanced. Sites of nature conservation interest and other areas of natural greenspace should be buffered, extended and linked across the landscape to enable species and habitats to adapt to climate change. This would need to be taken into account in the design and development of the above sites should they be allocated for housing or employment in the Local Plan.

There appear to be a couple of errors on this map. Cowbit Wash Site of Special Scientific Interest has been incorrectly identified on the map as National Nature Reserve. This needs correcting.

Additionally, Arnold's Meadow nature reserve has been

Officer Comment:

The SELAA and the Sustainability Appraisal identifies a range of nationally protected nature sites lie within or adjoin SP001. It concludes that 'Mitigation may be required to offset any potential harm identified but this will depend on implementation and the outcome of site-specific ecological assessments'. So it is accepted that biodiversity should be taken into account in the design process for relevant sites within the Wardentree Lane area. The ELTP will be amended to reflect the representations made.

The map will be corrected.

Officer Recommendation:

Ensure consistency between SELAA and SA in relation to biodiversity.

SP001 Wardentree Lane is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Main Employment Allocation.

SP037 Spalding Power Station and SP038 Spalding Power Station B are some of the more suitable employment sites in South Holland and should be taken forward as Preferred Option Restricted Use Allocations.

A minor change to the map is required.

identified as recreational open space in addition to its designation as a Local Wildlife Site. As a Lincolnshire Wildlife Trust nature reserve we do not feel it is appropriate to categorise the site as recreational open space and we would therefore request that this site is shown only as a LWS.

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ID1: 60 comment_author: Remway Design

comment content:

Please find detailed below our objection to the exclusion of STM002 from Spalding Development Boundary.

The site was classed as suitable for development within the SHLAA under ref STM002 with the explanation:

'The site is in scale with the 5720 dwellings which the emerging Local Plan seeks to be developed in Spalding.

ENVIRONMENTAL IMPACTS - It will not have adverse impacts on natural, built or historic assets.

INFRASTRUCTURE - It will not lead to the loss of existing infrastructure, such as open space, green infrastructure or community facilities.

LOCATION - It is not as accessible to Spalding's existing services and facilities as other sites and is not located within/adjacent Spalding's existing built up area (defined settlement limit);

SITE CHARACTERISTICS - The site is in a row of frontage dwellings with depth development further to the north. Planning permission also exists for 2,250 dwellings to the west of the B1172, which also crosses the railway line. This will change the character of the area and this site, along with adjoining sites become more appropriate to round off Spalding in this location.

TRANSPORT - Services and facilities are not accessible by foot and bicycles have to share road space, which may discourage their use. There are bus stops on the B1172. However, the development of the 2,250 dwellings to the west may change the situation and provide new accessible services and facilities. The opening looks to be large enough for only a private

Officer Comment:

The support for Site Pin002 is noted.

Officer Recommendation:

Site Pin002 is allocated in the Publication version of the Local Plan.

carriageway. The frontage road has no footway.

Consequently the site is considered suitable for a housing site.'

We confirm that the opening to the site is suitable for an adopted road and the footpath will be linked to the existing footpath on Spalding common.

The site is immediately available for development and flood risk issues can be easily overcome within the design stage with a suitable Flood Risk Assessment similar to all new developments within the district.

This site is part of the built up area of Spalding and is even more so with the approval of 2250 dwellings to the east. The site is as close to the town centre of Spalding as the urban expansion already approved.

The arguments against the site not being suitable can be deemed as being unlawful with the approval of the urban expansion opposite and not to include this site will lead the applicant seeking legal advice against the handling of the assessment and the exclusion of the site.

There is no logical explanation for the settlement boundary not including this site. The boundary as it stands includes all land up to the edge of Spalding Common / Spalding bypass but frontage only until Fantail Close. There is no lawful explanation as to why this boundary doesn't extend south along its planned path to include this site.

Within Spalding itself, it has already been argued in the Inquiry to the 2006 Local Plan that the small number of

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large allocations will result in too much new development being under the control of a limited number of developers. Diversity of ownership will ensure that implementation is not beholden to a few landowners, whilst still securing a comprehensiveness of approach. This conclusion is still relevant.

This site should be treated as acceptable under the same grounds as the development to the east and formally request the site being included within the settlement boundary of Spalding.

Failure to include this site will lead to the applicant seeking legal advice against its exclusion.

ID1:	61	comment_author:	Heather Berridge
comment_content:	Looking at the plans very quickly it appears that the land between Pinchbeck and Spalding is going to be used for housing development - off Two Plank Lane. Can we not keep this area rural? Two Plank Lane is currently the boundary of Spalding, and if it is to be developed Pinchbeck and Spalding will be joined. So where will Pinchbeck start and Spalding finish? Two Plank Lane is a beautiful country lane which then leads out into the wonderful countryside, which is readily accessible to everybody on that end of Spalding. Why blight it with housing? There are not very many country lanes left near Spalding which is growing faster than Topsy.	Officer Comment:	The allocation of land for housing development either side of Two Plank Lane (to the north of the proposed Northern section of the SWRR) is regarded as an inevitable consequence of securing the funding and delivery of the Northern section of the SWRR. However, the 'master planning' of the Vernatts Sustainable Urban Extension will have regard to the need to provide significant open space for recreation to serve local demand.
		Officer Recommendation:	No change is made to the emerging proposals to develop land between Spalding and Pinchbeck for housing.

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ID1: 62 comment_author: Longstaffs

comment content:

Stm 006, Land at Spalding Common

We write on behalf of our above named clients. We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and write to request reconsideration of the preferred housing sites for Spalding, and to support the inclusion of the site Stm 006, as being one of the preferred Housing sites for Spalding.

It is understood that the site is not being considered suitable as a Preferred housing site, however we note that the sustainability scores for the site are two positive (green) impacts being recorded for housing delivery and landscape character, but two negative (orange) impacts recorded relating to access to community facilities and soil, air and water quality.

It is stated that Site Stm006 is in close proximity to Stm012, the Holland Park housing commitment, but the Highways Authority identifies that 'services and facilities are not accessible by foot, and bicycles have to share road space, which may discourage their use.'

It is also stated 'there are bus stops on the B1172 and it would be feasible to access this site from a new access on Spalding Common, and although access by sustainable transport is not as good as some sites, it appears that access to public and highways infrastructure can be satisfactorily achieved'.

Officer Comment:

The comments relating to the similarity of circumstances between Site Stm006 and Site Stm004 are noted, but the crucial determining factor in this case is the risk of greater flood depth that applies to Site Stm006.

Officer Recommendation:

Site Stm006 is not required for allocation in the Publication version of the Local Plan.

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We wish to correct the mistake made by the Highways Authority about footpaths, and attach a copy Image shot showing the existing footpath running immediately adjacent to the site on the east of the B1172 (sent by email). The mistake has possibly been made as there is no footpath on the west side of the B1172, (the opposite side of the road to the subject site).

Furthermore, the site is stated to be within Flood Zone 3a. However we note from the Environment Agency Map for Planning - Rivers and Sea, attached, that the site is shown as being partly in Flood Zone 2, as well as Flood Zone 3. Is it therefore likely that the site flood level is more likely to be similar to site 'Stm 004' adjacent - with the same hazard depth as that site?

Lastly, we note that the immediately adjacent site Stm 004, has been selected as a Preferred site. That site has been considered favourable with the sustainability scores including two positive (green) impacts being recorded for housing delivery and landscape character, but a further eight (blue) impacts could deliver positive impacts as a result of the delivery of the site which could secure meaningful infrastructure to meet the needs of future residents such as open space and school places.

We wish to propose that site Stm 006 is equally worthy of receiving the eight (blue) impacts, as is immediately adjacent.

Finally we wish to re-iterate the benefits of the subject site which is equally as suitable as site Stm 004:

1. The site completes fill of the enclave of development at the start of the proposed southern expansion of residential development to Spalding.

2. There are no bad neighbour uses.
 3. The site is accessible from B1172, and has a straight wide section of frontage without visibility or highways issues.
 4. Public footpaths run along the B1172 to the services, shops and school in Spalding.
 5. The site is located within 300m of a main bus stop - route Spalding to Market Deeping/Peterborough.
-

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ID1: 63 comment_author: Longstaffs

comment content:

Pin 015, Land south of Milestone Lane, Pinchbeck -

We write on behalf of our above named clients. We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and write to request reconsideration of the preferred housing sites for Pinchbeck, and to support the inclusion of the site Pin 015, as being one of the preferred Housing sites in Pinchbeck.

It is understood that the site is not being considered suitable as a Preferred housing site, however we note that the SHLAA scores for the site, are all positive with the exception that Highways have commented that 'the roads around this part of Pinchbeck are narrow and the county highways department do not consider many plots are appropriate and thereby do not support this proposal.'

We have since spoken to County Highways, and a Transport Report has been carried out by Consultants. It has been confirmed that access is suitable to provide for

residential development of the site, through the existing farmyard, as opposed to creating a new access onto Milestone Lane, or Crossgate Lane.

Additionally, we re-iterate the benefits of this site above others selected as more suitable:

1. The site is an undeveloped 'enclave' in the heart of the village, surrounded by residential development.

Officer Comment:

In August 2016, the Highways Authority confirms that plans have been submitted to access this site through the farmyard, and identifies that 'with additional footway provision, the proposal may be acceptable in highway terms'. The issues raised are not disputed by the SHLAA. Pin065 is in use as a garden centre which is not considered to be a main employment use (it is classified as sui generis). The Employment Technical Paper (January 2016) concludes that the site should not be allocated for employment use. The existing retail use is ancillary to the garden centre and therefore the main use of the site, and most of the products are sold in the village shops and other nearby town centres. The loss of the site to residential use is not considered to have adverse economic impacts. It is accepted that Pin065 is 800m from the village centre but should Pin019 be taken forward as an allocation, Pin065 would form an appropriate pattern of development, forming a logical extension to the village with Herdgate Lane (bounding Pin065 to the north) providing a definitive boundary to Pinchbeck. It is accepted that there is no footway on the east side of Surfleet Road, although enhanced pedestrian access could be secured through the development of the site. This would be a matter for a planning application.

Officer Recommendation:

Pin015 is not one of the more suitable housing sites in Pinchbeck and it should not be taken forward as a Preferred Option Housing Allocation. Pin065 is one of the more suitable housing sites in Pinchbeck and should be taken forward as a Preferred Option Housing Allocation.

2. There are no bad neighbour uses.
3. The site is accessible from Milestone Lane, but with also footpath access to Crossgate.
4. Public footpaths run along the B1356 to the village services, shops and school.
5. The site is located within 300m of a main bus stop - route Spalding to Boston, (on Spalding Road).

Furthermore, we consider the selection of the site Pin 065, now selected as a 'Preferred site for Housing', would involve the loss of a main employment use and service /retail facility for the village. Additionally, that site is located some 800m from the village centre, and it d s not provide or form a logical infill to the pattern of residential development of the village. It would also involve crossing Surfleet Road to access the village services via footways. Please take these three comments about Site Pin 065, as objections to that site being taken forward as a Preferred housing site.

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ID1: 64 comment_author: Indigo Planning

comment content:

We write on behalf of , the owners of Holland Market and Winfrey Avenue Retail Parks, Spalding to make representations to the South East Lincolnshire Draft Local Plan - Preferred Sites for Development (July 2016) consultation.

SREF is a major investor in Spalding, having acquired the Holland Market and Winfrey Avenue Retail Parks in November 2013. This includes all the retail units either side of Winfrey Avenue except for the Sainsbury's store. The asset forms a major part of Spalding town centre and employs a great number of people. SREF takes its role as a major stakeholder in Spalding town centre very seriously and is committed to assisting the development of a successful and vibrant local economy.

SREF intends to invest further in the retail park to strengthen its role within the centre and to enhance the retail offer within the town. These representations are made against this context and should be read alongside our previous representations (submitted in February 2016) which focused on the draft policies of the emerging Local Plan relating to the town centre and the need to protect and enhance the retail offer.

National Planning Policy Framework (NPPF) (March 2012)

Paragraphs 23-27 of the NPPF set out the requirements for ensuring the vitality of town centres. The Framework states that planning policies should be positive. Promote competitive town centre environments and set out policies for managing the

Officer Comment:

It is accepted that Holland Market and Winfrey Avenue Retail Parks are an important part of Spalding town centre and are an important employer. The owners' intention to invest in the Retail Parks to enhance the retail offer is welcome. 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). It is understood that initial discussions have taken place between the owners and the Council relating to proposals for the site, although these have not resulted in a planning application being submitted. The Spalding Retail Paper (July 2016) identifies that 'the site is unlikely to be available until later in the plan period. However, the site could be capable of accommodating additional growth from 2031 onwards. Consequently this site could be suitable as an extension to the town centre towards the end of the plan period (2031-2036).' 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. It is considered appropriate that this site was identified in the long term as a potential extension to the town centre. The intention, should the site be taken forward, is that policies would provide support for the extension. The JSPC considered sites SHR004, SHR005, SHR006, SHR007 and SHR008 as potential retail

Officer Recommendation:

At this stage insufficient evidence has been submitted relating to the availability of the sites to the east and west of Winfrey Avenue. This means that neither site can be considered to be available to meet the immediate need for comparison goods floorspace. Given the complexities associated with each site, and the expected lead-in time for this scale of development, based on the evidence provided it is considered unlikely that the sites will be available before 2026. However Policy 22: Additional Retail Provision will be amended to direct any retail floorspace required to town centre or edge of centre locations post 2026. SHR002 former Welland Hospital, SHR003 land to the west of Spalding Road, SHR004 land to the south-west of Cowbit Road, SHR005 land to the north east of Cowbit Road, SHR006 land to the south of Holbeach Road, SHR007 land to the north of Holbeach Road, SHR008 land to the north of the A16, SHR009 east of Winfrey Avenue and SHR001 west of Winfrey Avenue are not some of the more suitable retail sites in Spalding and should not be taken forward as a Preferred Option Retail Allocation.

growth of centres over the plan period.

The NPPF advises that in drawing up Local Plans, local authorities should:

- Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- Define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;
- Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites; and
- 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.

The NPPF also states that local planning authorities should require applications for main town centre uses to be located in town centres, then in edge-of-centre locations and only if suitable sites are not available should out-of-centre sites be considered.

South East Lincolnshire Draft Local Plan - Preferred Sites for Development (July 2016)

We note that, along with the proposed allocations for

sites, and were subsequently discounted from the site selection process. SHR002 and SHR003 were also discounted for the reasons stated by the objector. It is accepted that the majority of the alternative site is adjacent to the town centre with only 0.02ha being within the town centre boundary. It is accepted that the existing retail parks are within the town centre and in close proximity to the Spalding Primary Shopping Area, have good accessibility by a range of transport and generate the potential for linked trips from visitors. It is appears (subject to a detailed assessment), that the site has the capacity to accommodate the comparison floorspace need to 2021, and potentially that identified up to 2031. The potential for flexibility in the design of the floorspace is welcome, but this would also be true of any other potential site. However the site is occupied by the Sir Halley Stewart Playing Field, which accommodates Spalding United (a small stand and clubhouse/changing facilities). The playing field and club buildings do not have unlimited public access, and is primarily available for Spalding United, but there is managed community access and the club does perform a wider role in promoting teams at various levels including the first team as well as juniors and ladies, thereby supporting the health and well-being of many Spalding residents. The loss of playing fields is not supported unless one of three tests set out in national policy apply. In this case, any new development would have to ensure that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. It is common for there to be a requirement for a playing field to be re-provided and be operational before development is able to commence. No evidence to demonstrate that an alternative site has been found or that re-location package has been agreed has been

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new housing, the purpose of this latest consultation is to seek suggestions from landowner and developer interests on the suitability of sites within or on the edge of Spalding town centre, available to meet the identified capacity for new comparison goods floorspace equating to 10,810sqm by 2031.

We also note that, to date, the Joint Strategic Planning Committee (JSPC) has not been able to accept any of the sites put forward for such development and has asked that the availability of further sites be explored.

Sites considered to date

The Spalding Retail Paper (July 2016) states at paragraph 3.1 that there are no suitable and available sites capable of accommodating all, or part of, the retail floorspace requirement within the town centre boundary.

In addition, the document states at paragraph 3.4 that there are no suitable and available sites located in edge-of-centre locations. In reaching this conclusion, the JSPC considered one edge-of-centre site, namely land to the west of Winfrey Avenue.

Land to the West of Winfrey Avenue, Spalding (SHROO1)

This is the only edge-of-centre site that was assessed as part of the Spalding Retail Paper (July 2016) and whilst the JSPC considered it suitable in retail terms, they did not believe that it was available within the plan period.

The Retail Paper states at paragraph 3.3 that the requirement to relocate the bus station and to secure

submitted. The field is held in trust for the benefit of Spalding residents. The developers state that all matters relating to the charitable status of the site were addressed previously and a similar agreement could be secured in this case. No evidence to demonstrate this has been submitted. As this land is not considered to be available to meet the existing identified need in the short term it is not accepted that this site would bring about the earlier delivery of SHROO1. The town centre boundary follows the recommendations of the Town Centre and Retail Capacity Study 2013, however as the draft Policies Map indicates; should an edge of centre site be considered appropriate for future retail use the town centre boundary would be extended to accommodate that site(s). The NPPF defines Primary Shopping Areas as 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 current PSA is therefore consistent with this approach and reflects the specialist recommendations of the Town Centre and Retail Capacity Study 2013.

agreement for development from multiple owners (namely, Anglian Water, the Environment Agency and South Holland District Council) means that the site is unlikely to be available until later in the plan period. However, the council states at paragraph 3.2 that discussions have taken place with the parties involved.

Despite the council's view that the site is unlikely to be available due to the reasons outlined above, we believe that with policy support through the Local Plan, 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 adjacent to Holland Market Retail Park. This is explored in further detail in the 'Alternative Site' section below.

The JSPC also considered seven out-of-centre and out-of-settlement sites as outlined in the retail paper. None of which have been considered to be acceptable. We summarise the sites considered to date below.

Land to the south-west of Cowbit Road (SHR004) and
Land to the north-east of Cowbit Road (SHRO05) - Lincs Gateway Site

These adjacent sites are 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. Out- of-settlement sites are at the bottom of the retail hierarchy, below town centre, edge-of-centre and out-of-centre sites.

Whilst the Spalding Retail Paper (July 2016) states that the sites have the potential to be accessible to the

town by foot and bicycle. We do not consider that any improvements would overcome the significant accessibility issues of the sites. In particular, 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. We consider that for the town centre to benefit from any linked trips, the site would need to be located within 800 metres. Given that these sites are located at almost four times that distance there would be no benefit to the town centre if retail floorspace was provided in this location.

The provision of retail floorspace in an out-of-settlement location such as this is entirely inconsistent with, and contrary to the NPPF which requires a town centre first approach.

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 in this location 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. Further. Provision of significant levels of retail floorspace at these sites could also undermine their employment allocations.

Given that there is a suitable alternative site in a sequentially preferable location at Holland Market Retail Park (see below) we do not consider that these sites are suitable retail allocations and should not be considered for allocation for retail uses.

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In addition to site references SHROO4 and SHR005 outlined above, the council has also considered sites located outside the settlement boundary at:

- Land to the south of Holbeach Road (SHROO6) and Land to the north of Holbeach Road (SHROO7); and
- Land to the north of A16, Spalding (SHROO8).

These sites are located outside of the settlement boundary, where significant retail development should be strongly resisted.

The council has also previously identified the following edge-of-centre sites

- Former Welland Hospital, Holbeach Road, Spalding (SHROO2); and
- Land to the west of Spalding Road (SHR003).

However, given that the council, and subsequently the JSPC have both discounted these sites due to the impact on the amenity of existing and future residents, they are unlikely to be suitable for allocation for retail purposes.

Summary

As outlined above, the eight sites identified in the Spalding Retail Paper (July 2016) have all been discounted by the JPSC to be unsuitable (and in the case of site reference SHROO1, unavailable) to meet the immediate identified need for retail floorspace.

The council is therefore accepting submissions which

identify alternative sites which could accommodate all or a proportion of the retail floorspace required in Spalding up to 2031. We consider that there is a suitable alternative site in a sequentially preferable location at Holland Market Retail Park (see below) and do not consider that any of the out-of-centre and out-of-settlement sites identified in the Retail Paper are suitable locations for retail development and should not be considered for allocation for retail uses.

As outlined below, we demonstrate that there is a significant opportunity to meet the identified need for retail floorspace within and adjacent to the town centre boundary in accordance with the NPPF's approach to allocate retail development on the most sequentially preferable sites.

The edge-of-centre option

The edge-of-centre option that SREF wishes to put forward as a preferred site for retail development comprises the Holland Market and Winfrey Avenue Retail Parks including land to the north (Sir Halley Stewart playing field and the land west of Winfrey Avenue identified on the submitted Existing Site Plan Ref: 9986-16 to allow the expansion of the existing retail park. (provided by email)

The existing retail park is well established and has an important role in the town's retail provision. 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 Park is 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 park, as an existing retail destination, makes an important contribution to the town centre's overall offer. In particular, 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.

In addition, the retail parks are perfectly located in terms of accessibility by sustainable modes of transport which is unrivalled in Spalding. The bus station is located on Winfrey Avenue immediately to the north and adjacent to the existing retail park and Spalding railway station is located a short distance to the west.

The immediately adjacent sites to the north of the existing retail park are the most suitable sites in Spalding for further retail development. As confirmed by the Spalding Retail Paper (July 2016), there are no other suitable or available sites within the primary shopping area. Furthermore, the sites are directly adjacent to the current town centre boundary and, in policy terms, they are the most sequentially preferable sites capable of accommodating the identified retail capacity. Given that they are adjacent to the existing Primary Shopping Area and well served by public transport they are also the most sustainable.

We have enclosed proposed site plans (Proposed Site Plan Phase 1 Ref: 9986-13 and Proposed Site Plan Ref: 9986-14) (plans provided by email) which demonstrate how a suitable site could be developed to meet the identified need. The first phase proposes a new terrace of retail units and a separate unit alongside comprising

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a total of 6,271 sqm (67,500sqft) of new retail floor-space alongside a drive-thru restaurant and pod unit (providing public conveniences).

In terms of retail capacity, the South East Lincolnshire Town Centre and Retail Capacity Study (Dec 2013) identified a capacity of 10,810sqm up to 2031, however, a significant proportion of that (8,291sqm) is not required to come forward before 2026 - ie for the next decade. Within the first phase of development, the proposed scheme could meet and exceed the capacity requirement of 2,508sqm up to 2021. Furthermore, the proposal would also secure a significant proportion of the 2026 requirement in the best and most suitable location for additional retail growth. As a result, we do not consider that there is any reason for the JSPC to identify other sites.

Phase 2 of the scheme proposes a further 4,877sqm (52,500sqft) on land to the west of Winfrey Avenue. When combined with Phase 1, this would provide a total floor-space of 10,800sqm (116,250sqft).

This effectively 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 the most suitable site that is very well connected to the town centre and primary shopping area. Insofar as retail planning is not a precise matter and more or less floorspace might ultimately prove to be needed, considerable flexibility is available by virtue of the potential for additional mezzanine floorspace (ie they could amount to less than the 50% assumed above or more, up to almost a further 100%).

The potential scheme also offers the opportunity to enhance the links between the retail parks and the Primary Shopping Area through public realm pedestrianisation improvements and potential remodelling of units backing onto Swan Street.

In addition, there is flexibility in terms of the potential for the B&Q unit to be redeveloped at the end of its current lease and to yield more floorspace at mezzanine level.

Sir Halley Stewart Playing Field

The Sir Halley Stewart playing field is the subject of a declaration of trust requiring it to be used for the benefit of the inhabitants of Spalding. However, 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.

In reality, 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 extremely limited. In re-providing sports/recreation facilities elsewhere in Spalding, the true intentions of Sir Halley Stewart could be realised by ensuring that these are genuinely accessible for public use.

Land to the West of Winfrey Avenue (SHR001)

The Spalding Retail Paper (July 2016) assessed the land to the West of Winfrey Avenue and the JSPC considered that the site was suitable for retail development as a

result of it being adjacent to the town centre boundary; consistent with the character of the area and the existing retail park; and accessible. The committee concluded, however, that the requirement to relocate the bus station and secure agreement from multiple owners meant that the site was unlikely to be available within the plan period and was only likely to be capable of accommodating additional growth from 2031 onwards.

Despite this conclusion, we believe that allowing Phase 1 of the proposed SREF scheme to come forward would encourage earlier delivery of the water tower site. The development of Phase 1 could enable the relocation of the bus station and would encourage further retail development to be delivered once land ownership issues have been resolved.

Additional benefits

The provision of additional retail development at the site would result in a number of benefits for Spalding, local residents and stakeholders. Importantly, it would increase activity and footfall in the Winfrey Avenue and Swan Street areas. Given the site's proximity, this would not only strengthen the town centre but it would facilitate its future growth in attracting new and competing retailers.

The scheme would also result in the relocation and improvement of the bus station to a more appropriate and accessible location (ie to the north of Swan Street), closer to the town centre and primary shopping area. Furthermore, significant public realm improvements would be secured as part of the scheme, further enhancing connections with the town centre. As part of these public realm enhancements, it may also be

possible to pedestrianise the southern part of Winfrey Avenue to again encourage more linked trips with the town centre and this should be fully explored as part of a comprehensive masterplan for the site should the council decide to allocate it for retail use.

SREF is keen to work with the JSPC and officers to ensure major investment in the town centre takes place, resulting in the delivery of substantial benefits to Spalding as a whole.

We consider that should the council choose to allocate an alternative, out-of- centre site, this 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.

Measures to secure future retail provision

As outlined in our previous representations to the draft local plan (dated 19 February 2016), there are several measures that the JSPC can take to create a more favourable policy position and secure future retail provision in Spalding.

In summary, these measures are:

Extension of Spalding Town Centre boundary

The expansion of Spalding Town Centre boundary 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 and assisting meeting the identified retail

needs of Spalding. This would be in compliance with the NPPF which 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 accommodate retail needs.

Expansion of Spalding Primary Shopping Area

The primary shopping area should also 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).

Any retail impact on the retail park 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.

By including the existing floorspace within the primary shopping area, the council will ensure that it is afforded the highest level of policy protection.

We trust that these representations will be fully considered by the JSPC and taken into account when progressing the Local Plan.

We would welcome the opportunity to meet with officers to discuss how SREF and the council can work together to deliver significant benefits to the town centre and to Spalding.

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ID1:	65	comment_author:	Mrs Wendy Atha
comment_content:	Officer Comment:	Officer Recommendation:	
SITE Pin045 1. There is a gas main at the side of 111 Spalding Road, Pinchbeck. Is this safe to put a road in there? 2. For such a large development where are all the jobs for these people? not everyone is retired! 3. How is the infrastructure (dr, dentist, etc.) going to cope? Doctors don't seem to want to come to this area. 4. What are these underhand activities? At least be upfront and above-board. 5. Will Pinchbeck and Spalding remain separate?	1. The existence of the gas main is acknowledged and it will be taken into account in planning the route of the SWRR. 2. The houses are required to meet existing households, many of which will already have jobs. 3. The Local Planning Authority will be seeking financial contributions to improve the infrastructure required to meet the needs of the additional population generated by the additional housing. 4. There is no knowledge of 'underhand activities'. 5. It is accepted that the current proposals, to all intents and purposes, will involve the loss of a clear 'countryside' break between Spalding and Pinchbeck.	No change is made to the emerging proposals to develop land between Spalding and Pinchbeck for housing.	

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ID1:

66

comment_author: A Aluzzi

comment_content:

PIN 45/24/011/050/025

I believe that phase 1 and of the Pinchbeck development will begin as soon as the 5 point roundabout at the junction of Spalding road and Enterprise Way is completed. Traffic is already heavy on Spalding road at peak times and often gridlocked. Although the traffic lights at the junctions of Spalding road with Wygate road and West Ell Avenue have been updated they do not cope with present traffic needs. Cars turning right from Enterprise Way into Morrisons supermarket create a build up of traffic on the roundabout , if Spalding bypass is closed for any reason i.e an accident , then traffic is redirected through Wardentree Lane to Spalding Road causing gridlock. Building approximately 800 houses with the development of Pin 45/24/011/028/050 and no additional road infrastructure is ridiculous . There will be no movement of traffic in the area.

Looking at the overall plan of the area ,a development with access directly onto the A16 would be more sensible ,aiding commuting out of the area. Pin 45 and Pin 24 must be the most expensive option taking into account the cost of providing river and railroad crossings.

The railroad carries heavy goods trains over a 24 hour period ,to build a development with this traffic running through its centre will surely impact on the quality of life of the residents

I thought that residential planning decisions took into account the quality of life of the residents.

Officer Comment:

The current traffic problems along the Spalding Road are acknowledged and, accordingly, the emerging Local Plan now contains proposals to secure financial contributions from developers of housing sites in the Spalding and Pinchbeck areas to fund traffic-management improvements in these

areas. There are issues arising from focussing a Spalding development strategy on sites to the east of Spalding: firstly, the risk of flooding tends to be far more severe on the eastern side of the town; and secondly, a number of current transport issues in the town would be best addressed by the provision of the SWRR, the funding of which is greatly dependent on the proposed housing developments that will be directly served by it.

Officer Recommendation:

Proposed Policy 12: Vernatts Sustainable Urban Extension and Policy 30: Delivering the Spalding Transport Strategy in the Draft Publication version of the Local Plan are approved.

In my opinion this development and SWRR appears to be based on satisfying developers and land owners , rather than the good of the community .

Is there any guarantee that on completion of Pin 45/24 that the developers will be bound to complete the relief road ?

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ID1: 67 comment_author: Graham Warren Ltd

comment content:

Spalding:

Broadgate has major land interests in Spalding including planning permission for 2,250 dwellings at Holland Park. A component of this development is the first leg of the Spalding Western Relief Road (WRR).

Broadgate's representations to the January/February consultation on the Plan welcomed the proposed level of development at Spalding and this is still the case. The Draft Plan contemplates that further development will fund future stages of the WRR and a safeguarding corridor is proposed in the Plan to this effect (Policy 31).

In that each phase of the WRR is to be provided in association with the commensurate phase of development, the Plan will need to provide a co-ordinated approach to ensure that the road is built to accommodate the increase in traffic associated with new development which needs to be properly assimilated onto the highway network. The site assessments for Spalding and particularly that for Pin 024, confirm that the SWRR will not be completed during the Plan period, ie before 2036. It is also made clear that the Highway Authority is unlikely to fund it, so it will need to be development led'.

The Plan will need to provide a clear programme of development for the delivery of housing in Spalding. When considering issues in respect of Pin 024/059 under paragraph 5.58, sub paragraph 9 states that the delivery of the WRR will only be viable through housing

Officer Comment:

Since it has been decided not to pursue a Community Infrastructure Levy (CIL) for any part of South Holland District, it is proposed that the developers of the sustainable urban extensions in Spalding will contribute to the funding of the SWRR and that developers of other housing sites with a capacity of 11 or more dwellings will contribute to the funding of other improvements to transport management in the area set out in the Spalding Transport Strategy. Having regard to this approach and other considerations, a number of 'Mon' sites lying to the west of the proposed SWRR 'Safeguarding Corridor' have been withdrawn from further consideration in the emerging Local Plan. The continued promotion of sites Mon005 and Mon008 is considered essential if the Local Plan proposals for Spalding are to 'deliver a wide choice of high quality homes' as required by the Government's NPPF, and the criticisms of site Mon005 are not accepted. Whilst these sites will not be expected to contribute to the funding of the SWRR, they will - as previously indicated - be expected to contribute to the funding of other important improvements to transport management in the town.

Officer Recommendation:

Proposed Policy 12: Vernatts Sustainable Urban Extension and Policy 30: Delivering the Spalding Transport Strategy in the Draft Publication version of the Local Plan are approved.

development and that housing will be permitted in phases to reflect the level of development required to deliver sufficient funding to ensure that the developer can deliver each phase of the road. Broadgate supports this approach but only on the basis that all housing sites the subject of new planning permissions in Spalding from now on, are required to make a rooftop contribution to the WRR. This can be justified because all new development will clearly impact on traffic in the town.

The Plan needs to be clear about the number of specific sites and number of dwellings that will contribute to each phase of development. Between them sites Mon 001, 004, 005, 008, 014, 015, 016, 017, 019 and 022 represent a substantial area of land held in a number of different ownerships. These sites clearly cannot be developed on a piecemeal basis if the stated objectives of providing the WRR are to be achieved. The same approach also applies to Pin 045.

Collectively the sites north of Bourne Road relate to one another. However, site Mon 005 in particular, is a random and isolated location for development that would appear sporadic and consolidate the ribbon development to the west. It has no natural western boundary. This would lead to a development that would be out of character and harmful to the immediate landscape and the wider landscape setting of the town. There are better located sites within the corridor of the WRR that can be developed comprehensively on a properly planned basis. Mon 005 if developed would be inimical to good planning and should be removed as a preferred housing site.

Given multiple land ownership alone (there could also

be access issues with the smaller sites), the level of uncertainty of the above Mon sites coming forward on a properly planned basis and crucially, ensuring the provision of the appropriate stage of the WRR, is considerable. Without the timely and phased provision of the WRR there is a danger that existing development already permitted and progressing, such as Wygate Park, will suffer because of the lack of proper highway infrastructure. Traffic generated from the proposed secondary school site adjacent to Mon 008 without the proper highway infrastructure in place is unacceptable.

The WRR and its proper phasing is essential for the level of development proposed for Spalding. However, the Plan has a fundamental problem because of the disparate nature and distribution of the preferred housing sites proposed for the town. To fund the WRR, properly phase its construction and importantly provide the land for its provision, it is preferable to have land to be allocated for housing that includes its route and for that part of the route to be a component part of and serve the development permitted.

Problems have occurred in both Boston and South Holland where developers have not had the financial gearing to provide the infrastructure that is needed for the development of a site. In Holbeach, Long Sutton and Boston, growth has been slow because of the inability of developers/landowners to invest in infrastructure in advance of development. These centres are important in the mix of locations designated for development and careful consideration needs to be given to the issue of delivery so as to ensure the Plan achieves its growth objectives. This is

particularly pertinent to the future development of Spalding, a regional growth centre.

Lack of these essential development funds can lead to stop start development and sites being mothballed, exacerbating the current lack of a five year supply of deliverable housing land which afflicts both authorities. These problems could also prejudice the timing of the WRR.

Broadgate has invested to date £4m on infrastructure to accommodate the current development off Broadway, limited to 500 dwellings and is dealing with the re-alignment of the WRR through Holland Park. The company has funds to continue investment of this magnitude for future development sites in Spalding. It is only this continuing level of commitment that will ensure that housing development brings with it future phases of the WRR on a properly planned basis. With this in mind Broadgate is firmly of the opinion that land north of Vernatts Drain and currently shown as safeguarded, should be allocated for development in the Plan period.

Certainty by way of a specific allocation is necessary to commit to the overall levels of investment required to secure the WRR and in particular underwrite the costs involved in crossing the railway so as to extend the WRR to the north.

The Mon sites referred to above should be earmarked for development beyond the Plan period and only come forward before then if the land north of Vernatts Drain and other allocated sites do not come forward.

This current consultation is solely concerned with site

issues and not policies in the Plan. However the council must guard against the eventuality of small sites in multiple ownership and physically divorced from the WRR not coming forward and contributing to its timely provision.

Because of the issues involved, Broadgate would be pleased to discuss the provision of a policy that results in a practical approach to development in Spalding and that meets the objectives of the Draft Plan in respect of the WRR. The outcome of these discussions can then be presented in the Submission Draft Plan that will include policies that result in a workable properly planned solution to housing provision and in particular construction of the WRR potentially in the Plan period.

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ID1:

68

comment_author:

Robert Doughty Consultancy

comment_content:

Pin053:

The development of Pin053 has the support of the Parish Council and can be developed with little impact on the character of the area. The site is already developed with a variety of permanent and semi-permanent horticultural buildings and hardstanding, the redevelopment of which would have less impact on the character of the area than those greenfield allocations now being pursued as part of the draft local plan. The site hugs the railway line and the village edge and it is difficult to see how a conclusion that there will be a detrimental impact on the character of the area is valid.

Technical studies commissioned by the landowner show that the site is capable of being developed without detrimental impact on issues of acknowledged importance.

Consultation with Network Rail has concluded that there is no objection in principle to the proposed allocation.

The development of the site would allow for the provision of affordable housing to satisfy the requirement for such housing in the settlement. It is doubtful whether those allocations that have been put forward to fund the SWRR will be able to provide affordable housing to proposed policy requirements on viability grounds.

The site is within walking distance of the village centre

Officer Comment:

This site has not been taken forward for the reasons previously stated in the Preferred Sites for Development consultation exercise.

Officer Recommendation:

Site Pin053 is not required for allocation in the Publication version of the Local Plan.

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and its amenities and closer on foot than the two allocations to the north of the village. The route through the village is also along quiet estate roads rather than along the main road through the village, which then has to be crossed to access all the services and amenities which generally lie to the west.

ID1:	69	comment_author:	Councillor James Avery		
comment_content:	<p>I have serious reservations about the practicalities of a scheme that will deliver 600+ houses, over a period of time, infilled between Pinchbeck and Spalding, without the inclusion of a South Western relief road. The suggestion is that development will make the necessary funds available to provide this relief road, but I fail to see how 600 properties will provide such funds within this 20 year timeframe.</p> <p>As developments materialise in locations R1 and R2, this will have the effect of gradually increasing traffic flow that has no option other than to head for a roundabout at the current junction with Enterprise Way. Over the next 20 years this will add 1200 vehicles (minimum) per day heading for this junction, and this is no reflection of how many actual vehicle movements per day may occur.</p> <p>There is no suggestion on my part that locations R1 and R2 are unsuitable for development, but, such development must include appropriate transport infrastructure. The current scheme, without the South Western Relief road, is wholly unsuitable for this location.</p>	Officer Comment:	<p>The funding of the complete route of the SWRR will be primarily achieved through developer contributions relating to a number of sites (involving 1000's of houses) located round the northern and western edges of Spalding, the development of which will extend well beyond the period of the emerging Local Plan. It is accepted that, pending the completion of the SWRR, housing development on Sites Pin024 and Pin045 will have to utilise the existing road network in Spalding with its attendant issues. Accordingly, the emerging Local Plan contains proposals to fund traffic-management improvements in Spalding via financial contributions from developers of housing sites in the area. Moreover, emerging Policy 12: Vernatts Sustainable Urban Extension imposes a limit on the number of dwellings (currently 874) that could be built in this development without extending the SWRR round to the proposed junction of it with the A151.</p>	Officer Recommendation:	<p>Proposed Policy 12: Vernatts Sustainable Urban Extension and Policy 30: Delivering the Spalding Transport Strategy in the Draft Publication version of the Local Plan are approved.</p>

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ID1:

70

comment_author:

Spalding & District Civic Society

comment_content:

Preferred Sites

This matter cannot be separated from the SWRR, as both the number and location of the houses proposed have, we believe, been dictated - and distorted? - to a large extent by the need to find developer money to fund the road. The result is a plan that proposes the loss of valuable A1 agricultural land to developments that sprawl beyond natural boundary constraints, the virtual amalgamation of Spalding and Pinchbeck, the neglect of brownfield sites, and the increasing congestion of a centre already under severe pressure. Gridlock there will drive businesses, shoppers and visitors away. We cannot support the development north of the Vernatt's joining up Spalding and Pinchbeck (the proposed green gap is a fig-leaf), nor beyond Monk's House Lane. therefore, we propose a moratorium on any development north of the Vernatt's and beyond Monks House Lane until all possible lobbying avenues have been exhausted. After the brownfield sites, the smaller sites close to existing development should be phased for early housing development.

Officer Comment:

The allocation of land for housing development either side of Two Plank Lane (to the north of the proposed Northern section of the SWRR) is regarded as an inevitable consequence of securing the funding and delivery of the Northern section of the SWRR. (In this regard, please see previous comments from Broadgate Homes Ltd and the response to it.) However, the 'master planning' of the Vernatts Sustainable Urban Extension will have regard to the need to provide significant open space for recreation to serve local demand. Whilst the emerging Local Plan gives encouragement to the redevelopment of brownfield sites in Spalding for housing purposes, there are insufficient brownfield sites in the town to meet its significant needs.

Officer Recommendation:

Proposed Policy 12: Vernatts Sustainable Urban Extension and Policy 30: Delivering the Spalding Transport Strategy in the Draft Publication version of the Local Plan are approved.

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ID1: 71 comment_author: ID Planning

comment content:

1.0 Introduction

1.1 We act on behalf of the owners of the Springfields Outlet Centre in Spalding and have been instructed by them to submit representations in relation to the 'Preferred Sites for Development' public consultation event.

1.2 The representations are made against the background of representations submitted in February 2016 and the Council's 'Call for Retail Sites' to meet future retail development needs in the Borough.

1.3 Our representations support the meeting of the identified 'retail need' at the Springfields Outlet Site as a sustainable, suitable and available site. This document also sets out consequent amendments required to the Local Plan as it progresses to Publication stage.

2.0 Background

[Summary - Sets out history of the Springfields complex and outlines its role in the economy, including an appendices with a map showing where VIP membership card holders live. Also lists what future enhancements are anticipated.]

3.0 Strategic Context

[Summary - Representation sets out a number of strategies and plans considered of relevance to the Springfields complex - Greater Lincolnshire Destination Management Plan 2013-2020; Greater Lincolnshire LEP

Officer Comment:

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. It is acknowledged that expansion of Springfields would enhance the retail and visitor offer, helping to attract more visitors to the town with potential spin-offs. 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. Investment in the Exhibition and Conference Centre would be welcome, particularly as this provides an opportunity to enhance the year round visitor offer. It is accepted that the retail need would use brownfield land which has the capacity to accommodate the identified retail need. Maximising the use of brownfield land is consistent with national and Local Plan policy. It is accepted that SHR010 is not of high environmental value. Springfields is an important visitor attraction in South Holland, but also within the Greater Lincolnshire economy. It also provides 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. A new retail destination would not have this benefit and could lead to less sustainable shopping patterns. The owners Transport Appraisal shows that the site has good walking access to the surrounding residential

Officer Recommendation:

Based on the evidence provided it is considered that land at Springfields is available to meet identified needs in the short term. As such Policy 22 will be amended to allocate 5400sqm (net) comparison goods floorspace, in two phases, in this location by 2026. To protect the town centre and to promote the vitality and viability of Spalding town centre non A1 uses will be restricted to those that are ancillary to the effective functioning of the retail allocation. A masterplan will also be required for the site. SHR010 Springfields is one of the more suitable retail sites in Spalding and should be taken forward as a Preferred Option Retail Allocation.

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

Strategic Economic Plan (2014); Review of Tourism in Lincolnshire (May 2016); and South Holland District Council Corporate Plan 2015-19.

4.0 South East Lincolnshire Retail Need and Call for Sites

[Summary of 4.1-4.12 - Sets out the findings of the Retail Paper (July 2016) which includes the current and future need for comparison goods floorspace in Spalding. Representation states that the approach taken in the Retail Paper is in line with the NPPF. Outlines why a 'Call for Retail Sites' was issued during the consultation.]

4.13 For reasons set out in the following section we consider that the Springfields Outlet Centre general location is a suitable and available location at which to meet the identified retail need for future comparison goods floorspace.

4.14 The Springfields Outlet Centre and Festival Gardens location has not previously been considered by the Council as a site to meet the 'retail need'.

5.0 Preferred Sites Consultation

5.1 The Preferred Sites Consultation includes a 'Call for Retail Sites'. We consider the Springfields Outlet Centre and associated Exhibition Centre / Festival Gardens site (Springfields Centre) provides an appropriate location to meet the identified 'retail need' set out in the Local Plan's evidence base.

Achieving Sustainable Development

5.2 The purpose of the planning system is to contribute to the achievement of sustainable development

areas, and good off carriageway cycling access to the town and some of the nearby villages, such as Weston which is accepted. The owners submission relating to public transport access is accepted, and it is considered that the site has good public transport access to Spalding town centre, the Spalding urban area and other town centres. 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, this would be a matter for a planning application and potentially a s106 legal agreement. It is acknowledged that the site is well-screened from the A16 by a landscape bund, and by incorporating new development within the site would not lead to any adverse visual impacts on the landscape or townscape. The intention to use a high quality design for any new development is welcome, and should be in keeping with, but potentially enhance the townscape. Confirmation of the site's availability is welcome. Support from the Horticultural Society in relation to the expansion of the Events and Conference Centre is welcome. The findings of the owners SA are noted. A SA will be undertaken for the site as part of the Local Plan process. 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 that those retailers would not locate in Spalding. It is recognised that identifying a retail site at an established retail destination should help diversify the town's retail offer making it more attractive to visitors. Investment could potentially encourage greater use of the town centre and the other facilities Spalding has to offer. The owners are proposing a phased approach to development: 2,508m² by 2021 to deliver the identified retail, and then in Phase 2 2892m² by 2026 to help address need in the latter part of the plan

(paragraph 6, NPPF). The NPPF identifies three dimensions to sustainable development including:

- An economic role
- A social role
- An environmental role

5.3 It is considered that expansion of the Springfields centre to accommodate the identified retail need to 2031 would achieve all the above three dimensions to sustainable development in the following manner:

Economic Role

o It is considered the quantum of retail need identified could be accommodate within the Springfields Centre complex thus ensuring sufficient land of the right type is available in the right place to support growth.

O 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.

O Inclusion of comparison goods floorspace would generate new employment opportunities in Spalding. The existing centre provides around 500 jobs.

O Accommodating the retail need in this location could generate a substantial number of new employment opportunities with national retailers providing real career progression prospects and full training programmes.

O A significant number of the new jobs would suit local residents with hours of work able to fit around availability.

O New employment will provide spin off benefits through increased spend in the local economy.

O Once open the expanded centre will need increased support services ranging from

period. However this would leave an amount of floorspace which could either be taken up at Springfields or should a more sequentially preferable site could forward in accordance with the town centres first approach, an alternative could be promoted. This approach also provides sufficient flexibility should the identified need change in the longer term. 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. Agree 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 upon. Should SHR010 be taken forward as a retail allocation, the boundary will encompass the properties identified by the owners. How Springfields Shopping and Festival gardens are taken forward is a matter for subsequent versions of the Local Plan. Should SHR010 be taken forward as a retail allocation, Policy 24 will be amended to reflect the allocation of land. 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.

suppliers to the food and beverage outlets to cleaning services. A wide variety of opportunities could come forward in the wider supply chain.

O Employment would be created through the construction phase.

O Expansion of Springfields would also facilitate further investment in the Horticultural Society's Exhibition and Conference centre. This would secure a high quality facility providing conferences / exhibitions and making an increasing contribution to the visitor economy in line with strategic tourism initiatives.

• Social Role

o Provision of new employment opportunities would lead to gainful employment with national retailers offering prospects of career progression for a wide range of people at different levels.

O This would provide new jobs and for those currently not able to find gainful employment an opportunity to make a contribution to the local economy and improvement in quality of life.

Environmental Role

o The accommodation of the retail need would use existing developed land and consequently would not require additional land outside the built up area of Spalding.

O Reuse of existing urban land would be in keeping with the NPPF's core planning principles including the desire to encourage the effective use of land by reusing land that has been previously developed (brownfield land) 2

O The existing site is not of high environmental value.

O As described below allocation of land for comparison retail in this location would provide new development in an accessible location and one where people can

walk / cycle or access by bus.

O Expansion of an existing retail location which currently attracts a substantial number of visitors would provide the opportunity for one trip to serve more than one purpose.

5.4 Against this background we consider the merits of the Springfields location to accommodate the future retail need with sustainability as an important principle.

Sustainable Location

General Location Attributes

5.5 The preceding sections set out the importance of the Springfields Centre location as part of the visitor economy in Spalding attracting visitors from an extensive area as demonstrated by VIP members (see Appendix 1).

5.6 Springfields attracts around 2.3 million visits per annum, a large number of which are visitors that would otherwise not visit the town.

5.7 The Springfields Centre is an established retail destination for local residents and those living in the wider sub-region.

5.8 Springfields is therefore already attracting shopping trips to the town and 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.

5.9 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.

5.10 If a completely new retail destination was established in Spalding to accommodate the identified comparison goods floorspace need, this would create more retail trips split between an additional location leading to a greater spread of trips and less sustainable shopping patterns.

5.11 Attracting more visitors to Springfields would also provide potentially greater linkages between the complex and the town centre by sustainable modes of transport and increase spin off benefits.

Accessibility by Choice of Transport Mode

5.12 An allocation in the Local Plan to facilitate further comparison goods retail development at Springfields would secure that investment in a sustainable location which is accessible by a choice of transport mode.

5.13 Included in Appendix 2 is a Transport Appraisal [Transport Appraisal provided by email] prepared by Sandersons. This addresses the location of the site in the context of access by a choice of means of transport.

5.14 The Sandersons' note 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.

5.15 Cycle provision on the adjoining road network includes off carriageway cycle lanes with an extensive cycle catchment able to access the centre. The emerging Local Plan Proposals Map (Policy 31) identifies a cycle route along Holbeach Road to the front of Springfields linking westwards to the town

centre.

5.16 The Springfields location is within 5 km cycling distance of the wider Town and Spalding and some nearby villages.

5.17 Bus services currently run past the site with stops on the A151 around 500m/450m walking distance of the centre. This includes the 505 service which provides three buses an hour linking Spalding, Holbeach, Long Sutton and Kings Lynn. The X12 service provides a longer distance service during summer months.

5.18 There is also a bus stop on Camel Gate approximately 50 metres walk from the main Springfields shopping area with a shelter / seating and it is used by the 505 and X12 bus services travelling southbound. Regular bus services therefore serve the site.

5.19 Sustainable linkages are currently provided between Springfields and Spalding town centre. Expansion of Springfields would, however, provide an opportunity to further enhance such linkages through a range of potential measures that would also serve the tourist economy.

5.20 Measures that could be considered as part of an overall package of investment include:

- Measures to further enhance accessibility by bus
- Improvements to the water taxi service
- Cycleway improvements linking to the town centre

- Provision of a cycle hire scheme for visitors enabling them to cycle to the town centre and other tourist

attractions in Spalding

Help to fund plans the Horticultural Society have for a new pedestrian/cycle route along the River Welland

Creation of a tourist trail linking Ascoughee, Springfields and the town centre

5.21 In light of the above we consider the Springfields Centre to be in a sustainable location accessible by a choice of transport mode and one which has established links to surrounding residential and employment areas, as well as Spalding town centre.

5.22 On this basis we consider there is clear support for Springfields to meet the future retail needs of the town.

General Design Considerations

5.23 The Springfields Centre is located towards the eastern edge of Spalding. For reasons set out in Section 6.0, we consider the centre should be included within the settlement boundary of the town.

5.24 Springfields and associated uses provide a substantial complex forming part of the urban area of Spalding. South of the centre and on the opposite side of Holbeach Road is a tyre changing facility with a major employment use further south off Fulney Lane North. On the opposite side of Fulney Lane North are a number of residential properties.

5.25 West of Springfields and on the opposite side of Coronation Channel are further residential areas within walking distance of the centre. To the north is an existing employment use with a further road linking west towards other residential areas.

5.26 The wider complex is located within an urban setting. It lies immediately west of the A16 Ring Road. When previously granting permission for an earlier extension to the Outlet Centre, the officer's report to Committee (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.

5.27 The frontage site of the Springfields complex to the A151 Holbeach Road is currently occupied by the NFU office block. To the rear of that is car parking before the more modern Travelodge and outlet centre with Festival Gardens between the centre and the A16.

5.28 An existing soft landscape bund removes any visibility of the built complex from the A16 as you pass the site north or south bound.

5.29 In urban design terms, Springfields is screened from views as you approach the town from the east by existing development (Tyre Depot and NFU building) and soft landscaping.

5.30 We include in Appendix 3 a concept masterplan [masterplan provided by email] showing in broad terms the area where expansion of the existing centre could take place.

5.31 What is clear is that unlike some of the other retail sites assessed in the Council's Retail Paper (July 2016), the proposed expansion area is screened from surrounding areas by existing development and soft landscaping.

5.32 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.

5.33 Further expansion of the centre adopting a modern high quality design would be in keeping with the existing character of the area and unlike other sites previously considered by the Council would not be highly visible on the main approaches into Spalding.

5.34 Future development would incorporate a high quality modern design reflecting the current broad approach to the centre to provide an attractive shopping environment.

Suitability and Availability

5.35 Having regard to the above we consider the Springfields site to be suitable to accommodate the Council's identified future retail need to 2031. It is also available.

5.36 Support for expansion of Springfields is provided by the Horticultural Society with consequent benefits arising in relation to potential expansion of the Conference & Exhibition Centre.

5.37 We include in Appendix 4 a letter [letter provided by email] from the Horticultural Society supporting future expansion at Springfields to meet retail needs in Spalding.

5.38 On this basis we can confirm the site is 'available' for future expansion. We include in Appendix 3 a concept Masterplan which shows an area for potential expansion north of the existing outlet centre.

5.39 It is considered this general area could

accommodate the identified retail need (10,810 m2 net comparison goods) in a sustainable location and assist in meeting the District's retail needs in full.

5.40 We consider the site to be a 'suitable' location to accommodate the retail need and one which will lead to a wide variety of benefits related to both investment in the local economy but also investment in an important tourist destination serving Lincolnshire and beyond.

5.41 The Springfields site is 'suitable' and 'available' for expansion to accommodate the identified future retail needs in full.

Sustainability Appraisal of Springfields

5.42 The Council's Retail Paper (2016) sets out a summary of the merits of different potential sites in and around the Spalding area with an assessment of each site against the Sustainability Appraisal objectives.

5.43 We include our assessment of the Springfields location against those objectives in Appendix 5.

5.44 Our analysis demonstrates how the Springfields location generally performs well against the particular criteria identified. In our view the location performs well or would have a positive effect (Green) against the following criteria:

Improve health and well-being - the Springfields site does not immediately adjoin existing residential uses although they 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. Furthermore the site is accessible by choice of transport mode which would be further enhanced.

Make efficient use of South East Lincolnshire's transport infrastructure - 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.

To promote strong, secure, socially inclusive and 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 of the internal and external environment maximising natural surveillance and creating a safe and accessible environment for all.

To improve education, training and lifelong learning - 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.

ï€ To protect the quality and character of landscape and townscape and seek opportunities for enhancement - Expansion of Springfields 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 therefore protect the existing quality and character of the landscape/townscape in the local area whilst also providing opportunities of enhancement through investment in new landscaping. The design of any additional development would be in keeping with the existing modern approach.

To protect and improve the quality of soil, air and water resources by encouraging their sustainable and efficient use - whilst expansion of the retail use on the site would inevitably have some effect on air quality, the scope exists to enhance existing access by a choice of transport mode providing more sustainable means for residents to access the site. The expansion area forms part of the wider complex and would therefore use existing developed land (brownfield) within the general

ï€ To promote business growth and create high quality employment opportunities within a sustainable and diverse economy - Delivery of around 10,810 m2 net of comparison goods floorspace at the Springfields complex 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 programmes could also be made available by national retail organisations providing new skills for local people. The site has 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 shopping facilities on the site. It would also enable delivery lorries to access the site a short distance from the A16 (T) without travelling through the urban area.

5.45 When measured against other Sustainability Appraisal objectives, the effects could be positive or negative depending upon mitigation measures (Blue), or there could be a minor effect / no clear link (Blank) or a proposal could have a negative effect (Red).

5.46 In the context of the expansion of Springfields, we consider there would be no adverse impacts (Blank) in relation to the protection and enhancement of green infrastructure, biodiversity and geodiversity. Expansion to meet the retail need would be accommodated within the existing site and would not therefore impact surrounding areas.

5.47 There would also be no adverse impact on South East Lincolnshire's urban and rural historic and built environment. Grade II Listed Fulney Hall is located at the entrance to Springfields from the A151. This designated heritage asset is situated in an existing built environment with more modern designs in the immediate vicinity. Expansion of Springfields would be accommodated on land to the north of the main Outlet Centre, away from Fulney Hall.

5.48 Mitigation could be included to ensure no negative impact on the objective to encourage the sustainable use of land and waste management (Blue). Accommodating the retail need in a location which would reuse existing land and therefore would help encourage the sustainable use of land.

5.49 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 in the management of waste. Most

national retailers have policies in place to deal with waste in the most sustainable manner they are able.

5.50 In relation to the objective to reduce greenhouse gas emissions (Objective 12), the proposed expansion would be in a location which is accessible by a choice of transport mode. Therefore, whilst there could be some negative effects, the proposed investment in further improvements to access by non car modes, would also help ensure more positive impacts overall from implementation (Blue).

5.51 Having regard to other 'Sustainability Objectives', the only objective where there could be a negative effect is in the context of seeking to reduce the risk of fluvial flood hazard to people, property and land. The site is located in Flood Zone 3 on the Environment Agency's flood map.

5.52 The Springfields complex is shown as being in Flood Zone 3 on the Environment Agency flood map and in a location where flood defences are in place. The proposed expansion of Springfields would be accommodated on land within the complex and would not therefore expand the general extent of the overall area. Flood risk issues would be taken into account as part of any future expansion proposals. At this early stage the expansion could have a positive or negative affect which could be mitigated as necessary (Blue).

5.53 Overall, we consider further investment in the Springfields Centre's location would provide an overall positive effect when assessed against the various Sustainability Appraisal objectives.

Other Benefits

5.54 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.

5.55 This would help 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.

5.56 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, providing something different to Springfields.

5.57 What is clear is that meeting the retail need in this location would enable new retailers to be attracted to the town in a location which is already an established retail destination.

5.58 Expansion of Springfields in the manner set out above would help secure Spalding as an premier tourist destination all year around. For example, attractions such as 'Winter Wonderland' would draw people to the town in the lead up to Christmas.

Phasing

5.59 A phased approach would be taken to future development on the site to meet the identified retail need.

Phase 1 could include up to around 7,500 m2 net comparison goods floorspace to 2020;

Phase 2 would be likely to come forward post 2020.

6.0 Proposed Amendments to Local Plan

Summary

6.1 Having regard to the preceding sections we consider Springfields to represent a sustainable, suitable and available site to meet the Council's future retail needs.

6.2 As a result of the above, we consider land at Springfields should be allocated for comparison goods floorspace as part of the overall complex.

6.3 Representations were made as part of the consultation exercise in early 2016. Those representations sought:

1. Recognition of the important role Springfields has to play in the local economy and provision of Outlet shopping facilities;
2. Inclusion of Springfields within the Settlement Boundary given the nature of the local context and its effective inclusion in the urban area of Spalding.

6.4 We note that in publishing the latest 'Preferred Sites' consultation, the Council have identified the Springfields complex as an 'Outlet Centre' on the Proposals Map to which Policy 22 applies. This recognises that Springfields forms one element of the retail hierarchy in the district (Policy 22).

6.5 We support the recognition given to the role of Springfields as part of the retail hierarchy, however, having regard to the 'Retail Call for Sites' to meet future comparison goods floorspace needs, we consider the centre should be identified for such growth.

6.6 Against this background and taking other matters

into account our representations seek the following:

1. Allocation of Springfields for future comparison goods floorspace to meet the identified retail need;
2. Inclusion of the Springfields complex in the Settlement Boundary for Spalding;
3. Amendments to Policy 22 to reflect the inclusion of Springfields in the retail hierarchy;
4. Amendments to Policy 24 to reflect the allocation of land at Springfields to meet future comparison goods floorspace need; and
5. Amendments to Policy 7 to remove the ability for up to 20% of the area devoted to a business park to potentially be utilised for retail development (Class A1).

Allocation of Springfields to meet future comparison goods floorspace needs - Site Specific Allocation

6.7 Springfields provides an important tourist attraction serving Lincolnshire and beyond. The Outlet offer provides a range of retail and associated uses, along with Festival Gardens and the Exhibition / Conference centre that makes an important contribution to the local economy.

6.8 Springfields currently attracts shoppers from a wide area. The proposed allocation of land at Springfields to meet the identified comparison goods floorspace need would expand an existing retail destination.

6.9 It would provide the opportunity to attract retailers to Spalding that would not otherwise locate in the town thus complementing the town centre offer.

6.10 Against this background we consider the proposed supporting text set out below and proposed Policy

SRA01 should be incorporated into the Publication Local Plan.

Supporting Text and Policy for Inclusion in Local Plan

SPRINGFIELDS SHOPPING AND FESTIVAL GARDENS

The Springfields outlet shopping centre and Festival Gardens complex has become one of the most popular visitor attractions in south east Lincolnshire. Attracting over 2.3 million visitors each year it provides an important local employer as well as providing a Factory Outlet shopping offer which attracts people to Spalding from an extensive surrounding area. The complex includes Outlet Shopping and Garden Centre, Festival Gardens, the adjoining Events & Conference Centre run by the Spalding Horticultural Society and associated cafes/restaurants for those visiting the centre. Together, the complex provides an important tourist destination and contributor to the local economy. The Council are required to make provision through the Local Plan for future development needs. The retail capacity assessment forming part of the Local Plan's evidence base identifies the need for an additional 10,810 m2 net of comparison shopping in Spalding to the period 2031.

Following an assessment of the suitability and availability of a number of sites to meet the identified need, the Springfields centre is considered to provide an appropriate established retail destination for future expansion to accommodate the retail need. The Council therefore support the expansion of Springfields to meet future retail needs for Spalding.

Springfields has been made the subject of a site specific allocation to facilitate development of up to 10,810 m2 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. In addition to the retail element it is recognised that 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. To control such elements Policy SRA01 therefore permits A3, A4 or A5 uses provided it can be demonstrated they would be ancillary to the main function of the Springfields complex as a leisure/shopping destination.

Policy SRA01 (Spalding Retail Allocation 01)

Proposals for new comparison goods floorspace up to 10,810 m² net within the area designated as 'Springfields Shopping & Festival Gardens' on the Proposals Map will be permitted provided that:

- a) No more than 7,500 m² net as a first phase is occupied before January 2020; and
- b) Additional floorspace for food and drink uses (A3, A4 & A5) will be supported provided it can be demonstrated that such uses are ancillary to the primary leisure/shopping function of Springfields complex

Development proposals for further investment to improve the Events and Conference Centre will be supported.

6.11 Should officers wish to discuss the above proposed wording, including the phasing of any future development and the proportion of the overall retail need that could be met at Springfields, our clients would be willing to meet with officers to discuss matters further.

6.12 The area to be allocated as part of the Springfields Shopping and Festival Gardens site should include that

area designated on the July 2016 Spalding Inset Map No 2 as an Outlet Centre but should also include Fulney Hall and the existing dental practice building to the rear.

6.13 These two properties, along with the NFU office building all form part of the wider complex and built up area associated with Springfields and should be incorporated within the overall allocated site.

Inclusion of Springfields within the Settlement Boundary of Spalding

6.14 As highlighted above whilst we support the principle of the identification of Springfields Outlet on the Proposals Map in the latest draft consultation document (subject to the proposed allocation above), we consider Springfields should be included within the settlement boundary of Spalding.

6.15 The settlement boundary in the vicinity of Springfields follows the western bank of Coronation Channel 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.

6.16 South of the A151 and east of Coronation Channel 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 along with the tyre fitting depot fronting the A151.

6.17 Given inclusion of a number of uses south of the

A151 between Coronation Channel and the A16 within the settlement boundary (and Fulney Hall north of the A151), we consider that Springfields and associated uses would logically fall within the settlement boundary for Spalding.

6.18 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.

6.19 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.

6.20 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 states 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)

6.21 Springfields and associated uses is a substantial

complex. 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.

6.22 When considering an application in 2006 (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)

6.23 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 Coronation Channel 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.

6.24 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 boundary d s not necessarily form a good definition for where a specific approach to planning policy for development should apply.”

6.25 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.

6.26 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 Coronation Channel.

6.27 The Springfield site itself is clearly not ‘open countryside’. Neither d s 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.

6.28 In light of the above we consider that Springfields should be included in the settlement boundary for Spalding. This would include that area included on the July 2016 Proposals Map as ‘Outlet Centre’ and additional land comprising the dental practice south west of the main shopping area in the complex. Fulney Hall is already within the settlement boundary.

Amendments to Policy 22 to reflect the inclusion of Springfields in the retail hierarchy

6.29 Policy 22 defines the ‘Retail Hierarchy’ and considerations to apply to out of centre proposals for main town centre uses as well as retail impact

assessment thresholds.

6.30 The published Proposals Map as part of the 'Preferred Sites Consultation' includes a designation for Springfields as 'Outlet Centre' with a cross reference to Policy 22 on the Spalding housing sites map.

6.31 Whilst we clearly support the allocation and cross reference to Policy 22 as the centre forming part of the retail hierarchy, we have commented above on the extent of the area to be designated and inclusion of Springfields within the settlement boundary for Spalding

6.32 In order to reflect the inclusion of Springfields in the retail hierarchy (Policy 22) we would suggest the following 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 SRA01 having regard to other relevant policies in the Local Plan.

Amendments to Policy 24 to reflect the allocation of land at Springfields to meet the future comparison goods floorspace need

6.33 Policy 24 deals with 'Additional Retail Provision' with 'A' addressing comparison goods floorspace. This should be amended to reflect the proposed allocation of land at Springfields to accommodate up to 10,810 m2 net comparison goods floorspace.

6.34 We propose the following amendment to Policy 24. Replace the existing paragraph A with the text below:

A. Comparison Goods Floorspace

Up to 28,014 sqm (net) of additional comparison goods

floorspace is expected to be needed within Boston and Spalding by 2031. New provision in Spalding should be in accordance with Policy SRA01. New provision in Boston should be consistent with the centre's scale, function and physical capacity to integrate extensions Amendments to Policy 7 to remove the ability for up to 20% of the area devoted to a business park to potentially be utilised for retail development (Class A1) 6.35 Policy 7 deals with improving south east Lincolnshire's employment land portfolio. Employment land is to be managed to meet the needs of south east Lincolnshire by a variety of means including ensuring a sufficient supply, range and choice of quality, accessible employment sites.

6.36 Part 3 of the policy seeks to provide opportunities for mixed use development within Use Classes B1, B2 and B8 and complementary employment generating uses within Use Classes A1, A2, A3, A4, A5, C1, D1 or sui generis, so long as their proportion only covers up to 20% of the gross site area at a number of named locations.

6.37 As the policy does not specify a limit on one of the particular uses in the draft policy, for example, Class A1 retail, it is possible that as worded the policy would allow up to 20% of the gross site area of the 5 named locations (3 in Spalding) to be developed for open Class A1 retail use (i.e. Convenience or comparison).

6.38 This would clearly lead to provision of a substantial quantum of retail floorspace in the SHM1, SHM2 and SHM3 locations.

6.39 In our view the flexibility included in Policy 7 should be removed in relation to the potential for the various locations referred to in Part 3 to include A1-A5, C1 and D1 or sui generis. Proposals for town centre uses would be considered against other relevant policies in the Local Plan.

6.40 In addition we would suggest removal of the phrase 'mixed-use' as this implies a range of more traditional employment uses (B1, B2 and B8) and other uses such as residential.

6.41 Against this background we suggest Part 3 of Policy 7 be amended to state as follows:

3. Providing opportunities for a mix of employment uses within Use Classes B1, B2 and B8 in the following locations:

BOM1 Endeavour Park, Boston

BOM2 Distribution Park, Kirton

SHM1 Holbeach Technology Campus, Holbeach

SHM2 Spalding Business Park, Wardentree Lane

SHM3 Lincs Gateway, Spalding

7.0 Conclusions

7.1 Springfields Outlet Centre and associated uses attracts around 2.3 million visitors to Spalding each year. It is one of the key tourist destinations in the County attracting visitors from a wide area.

7.2 It is an established tourist destination providing an outlet offer with the Festival Gardens and other associated retail leisure uses. Ongoing investment at Springfields over the past year and during the 2016-2017 period amounts to more than £3 million including a new Winter Wonderland.

7.3 The complex makes a significant contribution to the local economy providing around 500 employment opportunities and wider spin off benefits to the local supply chain for the centre.

7.4 Springfields is accessible by a choice of transport mode enabling visitors to arrive by bus, car, cycling or on foot from surrounding areas. It currently attracts visitors for a variety of trips including leisure shopping.

7.5 For reasons set out in this document we consider it provides a sustainable, suitable and available location to meet the District's future retail needs in the context

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of additional comparison goods floorspace.

7.6 Against this background our representations seek:

1. Allocation of Springfields for future comparison goods floorspace to meet the identified retail need;
2. Inclusion of the Springfields complex in the Settlement Boundary for Spalding;
3. Amendments to Policy 22 to reflect the inclusion of Springfields in the retail hierarchy;
4. Amendments to Policy 24 to reflect the allocation of land at Springfields to meet future comparison goods floorspace need; and
5. Amendments to Policy 7 to remove the ability for up to 20% of the area of a business park to potentially be utilised for retail development (Class A1).

ID1:	72	comment_author:	Lincolnshire County Council	
comment_content:	Mon022 - The County Council support the allocation as landowner and land will be put to the market in due course.	Officer Comment:	The support for Site Mon022 is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, this site is no longer required to meet the need. This decision has been informed by flood-risk considerations following an update of the Strategic Flood Risk Assessment for South Holland District and a review of the proposed funding arrangements for the SWRR.	Officer Recommendation:
				Site Mon0022 is not required for allocation in the Publication version of the Local Plan.

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ID1: 73 comment_author: Pinchbeck Parish Council

comment content:

Primary objections to the local plan:

- A. The proposal of a Cul-De-Sac north of the Vernatts connecting 1000 houses to Spalding Road is unsustainable development.
- B. Pinchbeck Parish Council's well communicated policy of maintaining the last bits of green space between Pinchbeck and Spalding have been ignored with the vast majority of the land to be built on between the two settlements.
- C. The size of the Relief Road Safeguarding Corridor is unjustifiably large, meaning the housing development is forced to the area where it is not wanted or logical.

Detailed concerns:

- 1) The proposed 1000 house Cul-De-Sac is unsustainable development, and will be the creation of the largest Cul-De-Sac in Europe (the current record is at Foley Road in Newent), creating issues for all who access the development, in particular emergency services.
- 2) The Cul-De-Sac leads on to Spalding Road which is already heavily congested at peak times making it even more unsustainable, and damaging existing householders ability to use the road network unhindered by the traffic the new development will create.
- 3) The 1000 houses north of the Vernatts are on the opposite side of the river from the Proposed Education Facility, doctors and town centre meaning the predominant traffic direction will be south, which is the location of the existing congestion, compounding the issue.

Officer Comment:

- A. The proposed Vernatts Sustainable Urban Extension is considered to be sustainable given the large need for housing that has to be met in Spalding.
- B., 4), 5) and 6): The allocation of land resulting in the virtual coalescence of the two settlements is regarded as an inevitable consequence of priority being given by the Joint Strategic Planning Committee to securing the funding and delivery of the first phase of the Northern section of the SWRR (i.e. the roundabout junction with the Spalding Road.
- C. The size of the Safeguarding Corridor is a sensible precaution given no design work on the Central section of the SWRR has been undertaken to date.
- 1), 2) and 3): It is accepted that, pending the completion of the SWRR, housing development on Sites Pin024 and Pin045 will have to utilise the existing road network in Spalding with its attendant issues. Accordingly, the emerging Local Plan contains proposals to fund traffic-management improvements in Spalding via financial contributions from developers of housing sites in the area. Moreover, emerging Policy 12: Vernatts Sustainable Urban Extension imposes a limit on the number of dwellings (currently 1026) that could be built in this development without extending the SWRR round to the proposed junction of it with the A151.
- 7) The Safeguarding Corridor cannot be reduced in size pending the completion of route-design work by the Local Highway Authority.
- 8) The emerging Local Plan already contains proposals for housing development in the Spalding Common area, which are accessed off the B1172.

Officer Recommendation:

Proposed Policy 12: Vernatts Sustainable Urban Extension and Policy 30: Delivering the Spalding Transport Strategy in the Draft Publication version of the Local Plan are approved.

- 4) Pinchbeck Parish Council's long standing policy of maintaining the all of the remaining open land between Market Way and the Vernatts River has been ignored with Pin 45 connecting the two settlements.
- 5) This will create a conurbation that will adversely affect the residential amenity of the residents of Pinchbeck, and change the nature of the village from rural to urban sprawl.
- 6) The suggestion of some green patches between the Vernatts and Market Way whilst the majority of the land is built on d s not address this concern.
- 7) The above issues easily could be resolved by further reducing the size of the Safeguarding Corridor (as the latest iteration of the plan has in part done), placing the 1000 houses at Spalding Common next to existing large scale development.
- 8) The viable option of building at Spalding Common can still deliver a section of the Relief Road, meaning this will meet with Lincolnshire County Council's strategic objective to deliver a Relief Road for Spalding with developer funding.

Recommended changes:

- A) Reduce the unjustifiably large land take for the Relief Road Safeguarding Corridor.
- B) Build the 1000 houses at Spalding Common, delivering this section of the Relief Road through developer funding. This is logical as it will connect to the planned Relief Road in the south and on to the A16, allowing traffic to flow.
- C) Build the northern section of the Relief Road later.

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ID1: 74 comment_author: Longstaffs

comment content:

Stm 005/015/016/017/018, Land east of Cowbit Road - Spalding - Spalding South East Quadrant

We write on behalf of our above named clients. We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and write to request reconsideration of the preferred housing sites for Spalding, and to support the inclusion of the sites Stm 005/015/016/017/018, as being preferred Housing sites for Spalding.

It is understood that the site(s) is not being considered suitable as Preferred housing site(s), and we note the Comments and Responses in the Housing Paper for Spalding.

We have considered these and set out below further comments:

1 We attach herewith a formal Flood Risk Assessment carried out on the site [flood risk assessment provided by email]. In conclusion this report shows 'that the proposed development for the construction of either residential dwellings or commercial facilities or even both has been demonstrated to be located in an area which the defence crest heights are greater than the 1 in 1000 year flood level.'

2 From an agricultural land quality classification, the land at Cowbit Road is of a

Officer Comment:

1: Following an update of the Strategic Flood Risk Assessment for South Holland District, it has been confirmed that the sites in question remain less preferable in respect of the sequential test. 2: Notwithstanding their specific soil characteristics, the sites in question come under the Government's definition of 'best and most versatile agricultural land'.3 and 4: It appears that satisfactory access arrangements could be achieved, but this would be subject to confirming the precise extent of land deemed acceptable for development.

5: It is not proposed that the SWRR has a junction with the A16.

Officer Recommendation:

Sites Stm005/015/016/017/018 are not required for allocation in the Publication version of the Local Plan.

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lesser grade silt to the land on the north and west of Spalding. We understand National Planning policy states that the best agricultural land should not be selected for development.

3 Access appears to have been considered by Highways only from the location of Cowbit Road. We wish to highlight that the combined site d s have access from Spalding Drove, and Burr Lane, and particularly at the south east corner, the Burr Lane junction, to its spur onto the A16 bypass.

4 Footpath and Bicycle route concerns have been noted. We would propose that new and additional footpaths could be located around the periphery but within the site, if insufficient existing highway width is available. Footpaths do presently exist on Cowbit Road.

4 Our clients have noted that where the proposed SWRR is to join the A16 at the north end, will result in it having to pass through the existing Primary Employment/ Industrial estate areas of Spalding (Enterprise Way and Wardentree Lane). These locations are already heavily served by traffic operating in and out of the industrial area, and additional traffic created from new dwellings in the area to the north west of Spalding, passing through this area to link to the A16 heading north or south, can only create congestion issues for this area. If land is developed in the South East quadrant,

resulting traffic would not need to travel though the Primary Industrial area of the town to access the existing Road infrastructure.

In summary, our clients consider that the development of the South East Quadrant d s not rely on extensive and expensive infrastructure improvements, and will not add to the congestion in the town's Industrial areas.

Additionally, we re-iterate the benefits of this combines site above others selected as more suitable:

1. The site is within walking distance of the Town centre, primary and secondary schools, and all via existing Footpath access.
2. The site is developed on two sides, three if counting the existing development to the north of the Coronation Channel. There are no bad neighbour uses.
3. The site is accessible from Cowbit Road, Clay Lake and Burr Lane. Access onto the A16 is available via the Burr Lane 'spur'
5. The site is located within 50m of a main bus stop.

The primary case for this site being selected as a preferred site, is its immediate deliverability. Other sites that are proposed as 'Preferred sites' are not likely to be delivered within a short or even medium term, and many of those other sites are dependent on the creation of major road infrastructure, including the proposed SWRR.

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ID1: 75 comment_author: Longstaffs

comment content:

Employment Site - Moortoft Lane/Wardentree Lane, Pinchbeck

We write on behalf of our above named client.

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and would like to support the inclusion of our client's site as being a proposed 'Main Employment Area' site for Spalding.

The site forms a logical infill to the cluster pattern of Industrial/Commercial development in this location.

Officer Comment:

It is accepted that the vacant site on Moortoft Lane/Wardentree Lane would form an infill plot within the wider Wardentree Lane area.

Officer Recommendation:

SP001 Wardentree Lane is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Main Employment Allocation.

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ID1: 76 comment_author: Longstaffs

comment content:

Mon 013 Land at Horsesh Road

We write on behalf of our above named client.

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016). We note that our client's site is not proposed as a 'Preferred' housing site, however, there is a large swathe of land marked up as a 'safeguarding corridor' for the proposed SWRR, and this covers a good part of our clients land.

At this stage, we wish to ask that consideration should be given to a more sensible demarcation of the SWRR route, as presently, the sterilisation effect of this broad corridor, impacts on our client to a great extent. It is effectively 'Planning Blight'. The wide corridor, leaves for poor residual planning and the consequence of that under these proposals is that there is little or no land that is allocated for residential development, that could contribute towards the road cost, thereby being self defeating.

We are aware that Lincolnshire County Council carried out a scoping report some time ago, and would it not be possible to use the findings from this report, to define a narrower corridor for the SWRR. The further west the route, the more land that is then available for development, and therefore the greater the contributions that could be made.

Officer Comment:

The extensive safeguarding corridor remains necessary pending the completion of SWRR route-design work by the Local Highway Authority. It is not considered that there is planning-blight issue at present.

Officer Recommendation:

Site Mon013 is not required for allocation in the Publication version of the Local Plan.

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ID1: 77 comment_author: Longstaffs

comment content:

Mon 008/016, Land off Monks House Lane/Bourne Road, Spalding

We write on behalf of our above named clients.

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and would like to support the inclusion of sites Mon 008 and Mon 016, as being some of the 'Preferred Housing sites' in Spalding.

It is understood that they are being considered suitable to be taken forward as Preferred Housing sites, and that there is an anticipated area for Educational facilities and well as an area of the site to be protected as a 'corridor' for the SWRR.

Our client would be pleased to engage in discussions with Planners and the various Education departments to explore the fine detail of the proposals, to aid the delivery of housing and infrastructure to meet the needs of future residents such as open space and school places.

We fully support the allocation at this location

Officer Comment:

The support for Sites Mon008/016 is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, Site Mon016 is no longer required to meet the need. This decision has been informed by flood-risk considerations following an update of the Strategic Flood Risk Assessment for South Holland District and a review of the proposed funding arrangements for the SWRR.

Officer Recommendation:

Site Mon016 is not required for allocation in the Publication version of the Local Plan.

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ID1:

78

comment_author:

David Lock Associates Limited

comment_content:

I object to the proposed preferred sites for development that have been identified. This response reinforces earlier comments made in February 2016 and follows the submission of our landholding off Burr Lane in the Call for Sites.

Officer Comment:

Following an update of the Strategic Flood Risk Assessment for South Holland District, it has been confirmed that the site in question - and adjoining sites to the north of Burr Lane - remain less preferable in respect of the sequential test.

Officer Recommendation:

Site Stm009 is not required for allocation in the Publication version of the Local Plan.

Overarching Growth Strategy

It is clear that the proposed preferred sites continue to focus growth to the west of Spalding. Whilst the infrastructure improvements in the form of a relief road are understood, there continues to be a lack of recognition for the existing capacity on the highway infrastructure to the south of the town. In this location there are immediate connections onto the strategic highway network - A16 which provides key onward connections to Peterborough and Boston and has recently received substantial investment through its realignment. Given the extent, value and capacity of infrastructure on this southern side of the town, it is logical that growth should be direction to this general location to avoid increased congestion associated with 'through' traffic movements within the town centre to reach the strategic highway network.

This area of Spalding is an excellent growth location. A significantly important commercial development has recently been approved adjacent to the A16 which provides employment opportunities and now represents a logical edge to the settlement of Spalding.

The land to this side of the town benefits from the flood defences and is unconstrained. Its development would help counterbalance the growth to

the west of the town.

Site Assessment

In terms of the Sustainability Appraisal of sites we provide the following comments:

Site STM009

This site is referenced at greenfield. The site is currently a nursery which is now lacking in commercial viability. This is a brownfield site and the Government agenda continues to focus development on previously developed land. This site would constitute such on a brownfield register. This site should be prioritised above greenfield development.

The site receives a more negative response in terms of its flood risk than other 'preferred' sites affected by flood zone 3a.

Our understanding from the SFRA is that when taking into account the flood defences (the 'residual flood extent' map, SRFA 2010, shown below) the site is not affected by zone 3a, unlike other 'preferred sites' (e.g. STM004). This site should receive the same, if not better, assessment that the 'preferred sites' that are affected by flood risk and this should not be seen as a constraint to the selection of this site.

In any case the EA have commented in response to allocations in flood risk areas stating the mitigation that would be required - demonstrating that development in such areas is achievable and that this is not viewed as a constraint in terms of the SA

assessment for other sites.

There is record of the site containing 'filled land' however, the site currently holds an existing dwelling and any future development could be designed in such a way to avoid such a constraint. This would not impede delivery.

The site does not hold or is affected by any landscape or ecological designations, unlike other 'preferred sites'. For instance STM004 and STM010 are affected by the Wash SSSI (as shown on the extract from the MAGIC map below [map provided by email]) and its impact area. As such STM009 should receive a more favourable rating in terms of environmental constraints.

Furthermore, the accessibility of the site in terms of transport connections and proximity to local facilities is very similar to that of STM004 and STM010. It is not considered that it should be rated any differently in this respect and actually benefits from a range of amenities in close proximity - Little London, Matmore Gate and Spalding town centre is in easy walking and cycling distance.

Growth in this location would help provide the most logical definitive edge to the town and would 'round off' the urban area. It is in close proximity to a number of service centres (as mentioned above Little London, Clay Lake / Matmore Gate and the town centre) and has efficient access to a range of facilities. This would avoid pushing growth further afield on the western side of Spalding, away from the strategic highway network.

It is essential that there is a balanced approach to

growth in Spalding, including sites to the south of the town - a location that has seen minimal growth in recent years yet has the infrastructure capacity to accommodate it.

We request that Site STM 009 is reconsidered and reassessed in light of the above. It provides a sustainable, brownfield site that is capable of accommodating a number of units to contribute toward the Local Plan housing requirements. In particular it is considered that there is not a robust evidence base to support the allocation of other sites above STM009.

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ID1:

79

comment_author: Robert Doughty Consultancy

comment_content:

We support the proposal to allocate PIN25 as a proposed allocation Pinchbeck - PIN 25 and support the analysis set out in paragraph 5.61 of the consultation (Land off Spalding document. As a former employment site within the settlement Road, Pinchbeck) curtilage the redevelopment of the site for housing purposes would meet the criteria of sustainable development. We note, however, that paragraph 5.60 of the consultation document states that no comments were made regarding this site in the January 2016 consultation.

We did provide comments on the failure to include PIN25 as a housing allocation under policy 12 in response to the January 2016 consultation. The current consultation document Housing Paper Pinchbeck (July 2016) fails to address these comments, and despite the positive recommendation there is a real concern that our comments have not been taken fully into account. It appears, therefore, that comments submitted to a previous consultation have not been taken into account and been given due consideration. This is a procedural failure and if it is a common phenomenon, could result in the plan being found unsound. This is obviously an unwelcome possibility and, as such, we should be grateful if our client's previous comments, which are repeated in full below, could be given due consideration at this time. We would ask that our previous comments are given due consideration in response to the current consultation.

Our previous comments specifically relating site PIN25 are copied below for ease of reference.

Officer Comment:

The comments made in respect of Site Pin025 are noted and have been taken into account. Unfortunately, the 'January 2016' response relating to this site was addressed in the Spalding Housing Paper.


Officer Recommendation:

Site Pin025 is allocated in the Publication version of the Local Plan.

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Comments on Policy 7

Our client's land (PINO25) should be included in the list of allocations. We note that the SHLAA concludes that the site is considered suitable for housing; an analysis that we support, although the conclusion has not been carried through to the draft Inset Map but included within the settlement boundary.

As a redundant employment site on the Spalding Road, near the proposed junction with the proposed Spalding West Relief Road, the site is clearly in one of the most sustainable brownfield locations in the town. The redevelopment of this former business site will improve the amenity of this part of the South Holland, which with the Enterprise Park to the east and the proposed Urban Extension to the west, is clearly one of the most prominent development areas in the district. The site is also surrounded by existing or approved development on all sides as PIN11 benefits from an extant planning permission. 

ID1:	80	comment_author:	Spalding & District Civic Society
comment_content:	Officer Comment:	Officer Recommendation:	
The following existing recreational open spaces are still unmarked as such:- a. Pinchbeck Road - the playing field immediately behind the Garth School; b. Pinchbeck Road - the large playing field alongside the above to the north (ex-Geest's? ex-Sugar Beet Factory?); c. Spalding Common - the Community Centre's playing field on the east side of the B1172 They should be coloured green.	a. The Garth School will be added to the mapping system. b. The large field to the north of the Garth School has not been added as it was shown as a housing site in the 1998 SHDC Local plan, following which some residential development was undertaken at the front, and public access to it was stopped. Possibly as a consequence it was not shown as open space in the 2007 SHDC local plan. C. This site is no longer accessible.	Update the mapping to show The Garth School playing field.	

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ID1:

81

comment_author:

Robert Doughty Consultancy

comment_content:

We maintain our support to the designation of land at Wardentree as Proposed Main Employment and Existing Employment Areas. Our client's land parcels at Elsom's Way and Wardentree Lane) Lane are subject to extant planning permissions H14-O709-14 and H14-0121-09. These sites are available for development and are a significant part of South East Lincolnshire's Employment Land Portfolio in Spalding.

We also note and welcome the positive response to our comments to amend the Inset Map and Policy 7 to include appropriate reference numbers for each employment allocation made to the January 2016 consultation.

Officer Comment:

Confirmation that land at permitted land at Elsom's Way and at Wardentree Lane are available is welcome. It is accepted that these sites will make a substantial contribution to the employment land portfolio for the Local Plan area.

Officer Recommendation:

SP001 Wardentree Lane is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Main Employment Allocation.

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ID1:

82

comment_author: Spalding & District Civic Society

comment_content:

The Town Centre Boundary does not make sense. The newly included Water Tower and Police Station are twice as far from the central point (the Market Place) as the Magistrates' Court and the Broad Street car park. These latter two may well develop into some form of retail use during the life of the Plan.

The Primary Shopping Area omits Station Street, New Road and the third side of the Sheepmarket. Why? All have concentrations of A1 retail units. Likewise, it is difficult to understand why the Sheepmarket, the east side of Broad Street (to Herring Lane) and the other side of Bridge Street are not included in the Primary Shopping Frontages.

We therefore propose that you should: redraw the Town Centre Boundary to include the Magistrates' Court and straight along Double Street to Herring Lane; and redraw the Primary Shopping Area and Primary Shopping Frontages as set out above.

Officer Comment:

The NPPF identifies that a town centre should include the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. Main town centre uses include retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). The water tower has been included as part of a potential extension to the town centre, so if taken forward would be re-developed. It is therefore appropriate that the magistrates court and the Broad Lane car park is excluded. There are no plans to develop either for retail or any other town centre use, and should a proposal come forward these would be edge of centre sites so subject to other policy considerations, be appropriate for town centre uses. The NPPF defines a primary shopping area as 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). The third side of Sheepmarket and Station Street are separate from the primary shopping frontage, and although New Road contains some retail units, these are part of a broken frontage with the majority being non A1 units, so do not constitute the focus of the retail area. Primary shopping frontages have been identified by the Town Centre and Retail Capacity Study 2013

Officer Recommendation:

No change required.

(based on the national definition) 'primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods' (so units within an A1 use). Defining frontages should also take into account prime rental levels and pedestrian flows to reinforce a compact, well defined retail area with a quality, 'active street frontage', contributing towards a lively street scene. Frontages that provide for more diversity of uses such as restaurants, betting shops, leisure activities and second hand or charity stores, such as Sheepmarket, New Road and Station Street are not considered to be primary frontages. Frontages are usually terminated by a definite break, such as a road, service yard, footpath or the defined break between shopping areas, which would also exclude part of Sheepmarket and Station Street. Outside the primary shopping frontages, but with primary shopping area and the town centre, the full range of town centre uses, as defined by the NPPF, would be permitted, subject to a series of further tests. It is considered unnecessary to identify these frontages and therefore secondary shopping frontages will not be defined.

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ID1:

83

comment_author:

Spalding & District Civic Society

comment_content:

Spalding has barely half the Recreational Green Space needed for a town of its size. Yet the Plan makes not the slightest attempt to address the deficit. (Even its chosen database appears to look no further than formal sports pitches, sports centres and village halls, ignoring the need for public green spaces for informal leisure and exercise.) Possible sites exist - Designate the following as Recreational Green Spaces: the former Gas Works site (now decontaminated). A once -in-a-lifetime opportunity within the built-up area to tackle the green space deficit, a space potentially linkable to the Castle Field to create an open park-like amenity benefitting the town's status as a sub-regional centre; the north end of Cowbit Wash as an informal park-like area. (Can never be built on, as key part of flood defence works).

Officer Comment:

Developers only need to provide openspace to cater for the needs of the development. Therefore, providing land to tackle underprovision will have to be paid for by other means. The north end of Cowbit Wash maybe the most affordable of the suggested sites. The former gas works is likely to be expensive owing to the investment that has been undertaken to clean the site and it being located within Spalding, where built development would be appropriate in principle.

Officer Recommendation:

No change to the mapping is required.

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ID1:

84

comment_author: Spalding & District Civic Society

comment_content:

Spalding has half-a-dozen derelict brownfield sites, some of them prominent, all crying out for housing development. Despite government pressure to use such sites, the Plan simply ignores them -to concentrate on finding greenfield locations to develop into large estates. (Why are brownfield sites previously earmarked as Housing Commitments or Potential Housing Sites now left blank?)

We were told that no brownfield sites had "come forward" or "been proposed by owners". If their development for housing depends on this, then we're not being offered a plan, merely a freezing of the status quo.

Nor is it any answer to say that the new plan will be periodically reviewed. Without preferred uses being specified, such sites are at the whim of developers and landlords, whose piecemeal proposals, however undesirable, cannot be refused on planning grounds. (Cf. the overbearing frontage and wasteful over-provision of parking space of the former Leverton's site in Westlode Street or the monstrous barracks of a 'care home' proposed for the Bull and Monkey site.)

To leave the various key brownfield sites in the town blank is the negation of planning and a failure on the Plan's own terms -to "guide development and the use of land ... up to 31 March 2036" by "identifying those areas of land that need to be developed for new houses ..." (para 1.1.2 of the Public Consultation on Preferred Sites for Development).

Officer Comment:

All of the sites listed are within the Settlement Boundary for Spalding and therefore could be developed in principle.

Four of the sites have been submitted to the SHLAA. All of them are considered to be developable and three of them have had planning permission, although now lapsed. Allocating them will not aid their development.

Five sites have not been submitted to the SHLAA and therefore cannot be assumed to be available and as a consequence cannot be allocated.

Officer Recommendation:

No change to the approach is required.

Therefore, the Plan should; declare a Brownfield First Policy; restore to status of Potential Housing Site or designate as Preferred Housing Site the former Jewsons (Roman Bank), the former Sorting Office (Crescent), St John's Road site, Willow Walk site; and designate as Potential or Preferred Housing Sites the former Welland Hospital (Roman Bank), the former Bettinsons's Garage (Holbeach Road), the former Swimming Pool site (Pinchbeck Road), the former Auction Hall site (north of Sainsbury's roundabout, the Bull and Monkey (Churchgate), and the site between Crescent and Market Place derelict for over 50 years. This last site and the Sorting Office site also have retail potential.

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ID1:

85

comment_author:

Spalding & District Civic Society

comment_content:

As envisaged at present, the South Western Relief Road makes no sense. It would be like constructing highways up to both sides of the Humber and then not building the bridge. The central section is not scheduled within the 20 years' lifetime of the new Plan, and by no means certain after that.

Meanwhile, the through-traffic that would have avoided the centre on a fully-built road will still be coming into the centre, where it will add to the congestion now made many times worse by the extra traffic disgorged onto Winsover Road and Pinchbeck Road from the large housing developments needed to pay for the two unconnected bits of the road - the congestion further exacerbated by the increased level-crossing down-times. If ever there was a recipe for total gridlock in the town centre, this is it. And the Plan offers no solution.

The situation is patently, destructively, absurd. It's difficult to blame the planners, though. It is a direct result of the government's doctrinaire demand that infrastructure should be funded by the developer. If the SWRR was to be funded by central government, as it ought to be, then there could be a proper planning consideration of both the number and location of houses Spalding can sensibly accommodate. As it is, both are skewed by the need to make developers pay for the road. What might well be thought of as natural restraints to expansion, such as the Vernatt's and Monks House Lane, are to be over-ridden by sprawl.

The destructive absurdity of the situation has been

Officer Comment:

It is acknowledged that delivery of the SWRR will take place over a longer time period than the current Local Plan. In considering how the phases of the SWRR are delivered in this plan period will be subject to master planning and highway design work and the exact outcomes of this work are not known at present.

Officer Recommendation:

No change to the draft Local Plan are recommended

apparent for some time, but we are not aware of any serious lobbying of central government by councillors or officers. It was not until the then SHDC leader and others sat down with the then Transport Secretary (Kenneth Clarke), at a meeting arranged by the constituency MP, that our A16 bypass got onto the Transport Department's list. there needs to be an intense and persistent lobbying campaign of central government at the highest level to fund the SWRR.

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ID1: 96 comment_author: Longstaffs

comment content:

Mon 005 Land at Horsesh Road



We write on behalf of our above named client.

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016). We note that a part of our client's site is included in the list of Preferred housing sites. We further note there is a large swathe of land marked up as a 'safeguarding corridor' for the proposed SWRR, and this covers some of our clients land.

At this stage, we wish to ask that consideration should be given to a more sensible demarcation of the SWRR route, as presently, the sterilisation effect of this broad corridor, impacts on our client to a great extent. It is effectively 'Planning Blight'. The wide corridor, leaves for poor residual planning and the consequence of that under these proposals is that there is little or no land that is allocated for residential development, that could contribute towards the road cost, thereby being self defeating.

We are aware that Lincolnshire County Council carried out a scoping report some time ago, and would it not be possible to use the findings from this report, to define a narrower corridor for the SWRR. The further west the route, the more land that is then available for development, and therefore the greater the contributions that could be made.

In summary, on behalf of our client, we are pleased

Officer Comment:

The extensive safeguarding corridor remains necessary pending the completion of SWRR route-design work by the Local Highway Authority. It is not considered that there is planning-blight issue at present.

Officer Recommendation:

Site Mon005, as identified in the Preferred Sites for Development document, is allocated in the Publication version of the Local Plan.

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that there has been an allocation of some of the site Mon 005 for development, but look forward to receiving further details of the SWRR route.

ID1:	97	comment_author:	Mr R Stringer
comment content:	Officer Comment:		Officer Recommendation:
The development of the roundabout to allow access onto Spalding Road from new development without the continuation initially of the SWRR is surely unacceptable. Who knows what the timescale would be of the completion.		Site Mon005, as identified in the Preferred Sites for Development document, is allocated in the Publication version of the Local Plan.	Proposed Policy 12: Vernatts Sustainable Urban Extension and Policy 30: Delivering the Spalding Transport Strategy in the Draft Publication version of the Local Plan are approved.
If access is also to be given on to Market Way, it will require a major upgrade of that road way. It is inadequate even now for the present traffic, and a potential death trap for pedestrians and cyclists.			
To say there is a Doctors surgery in Pinchbeck is a gross exaggeration			
If the number of houses is allowed, Pinchbeck and Spalding will effectively be joined and become one. A very detrimental step.			
The railway line is becoming increasingly used by heavy goods traffic and not just during the day, during the night. This is not conducive to the quality of life to the proposed new inhabitants			

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ID1: 98 comment_author: Environment Agency

comment content:

PINCHBECK -

We initially had a concern regarding the increase in the number of housing allocations from 190 to 240 dwellings without the updated SFRA information being available. However, the draft SFRA outputs show that none of the allocations will be subject to flood depths greater than 0.5m, and mitigation of the residual risk should, therefore, be possible. These comments are subject to the caveat that the draft SFRA outputs have not yet been ratified.

SPALDING (Mon004; Mon014; Mon015; Mon016; Mon017; Mon018; Mon019; Mon022; Stm004; Stm010; Stm028)-

Please note that the comments made below are based on the updated hazard mapping for the South East Lincolnshire Strategic Flood Risk Assessment. Where the breach analysis has been updated since 2010, these maps have not yet been agreed and these comments should not be taken as definitive, they are based on draft outputs and may be subject to change. The hazard mapping appears to have altered significantly for this area and therefore we have low confidence in the flood risk text supporting these allocations. However, we recommend that you use this data to review your Sequential Test evidence for the site allocations.

Draft outputs show that the following sites lie within an area classified as 'Danger for All' or 'Danger for Most' in the Strategic Flood Risk Assessment with predicted flood depths varying. Sites where predicted flood

Officer Comment:

The Environment Agency's support for the Preferred Sites is welcome (the updated SFRA confirms the EA's initial comments).

Officer Recommendation:

No change required to site selection. Further work will be undertaken with the promoters of allocations to ensure that mitigation can be delivered as part of a viable scheme.

depths are shown to be between 1-2m (even where such flood depths are only expected in some parts of the site) are as follows: Mon014; Mon015; Mon016; Mon018; Stm010; Stm028. It is important that the site promoter acknowledges the level, and additional costs, of flood mitigation that will be required to make the dwellings safe (i.e. confirms that the NPPF Exception Test can be passed, through built in resistance measures to mitigate against the appropriate breach scenario with allowances for climate change for the lifetime of the development). Confirmation that the sites will still be viable, and therefore deliverable, when these additional costs are taken into account should be sought from landowners/developers. Such mitigation can also impact on the final design of the houses, i.e. raising the height due to finished floor level requirements and sometimes needing to be 3 storey with no ground floor habitable rooms - such requirements often fall into conflict with other planning policies and you need to be confident that sites can incorporate the required mitigation, and still be acceptable on other planning grounds.

The remaining sites (Mon001; Mon004; Mon017; Mon019; Mon022; Stm004) could also be subject to depths of up to 1m, which is still significant.

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ID1: 99 comment_author: Origin Design Studio

comment content:

Pin045 -

On behalf of our client, the landowner, we would like to lodge an OBJECTION to the designation of a piece of land contained within parcel Pin045 within the revised local plan.

Officer Comment:

The site is a field to the north of a Listed Farm House and Farm Yard.

The site is designated as Proposed Green Infrastructure. The Highways Authority identifies that 'access off Pinchbeck Road into this site is considered difficult due to the impact the horizontal alignment of the road on providing adequate junction visibility and the conflict a junction might have with the existing Hospital junction. It would not be recommended to have a junction so close to the proposed new 5 arm roundabout to the north'. Further consideration has been given in relation to the provision of housing on this site through alternative access arrangements; the Highways Authority identifies that to access the site from the proposed 5 arm roundabout would require 'an extra arm off this roundabout, the roundabout would have to be significantly larger than the current 5 arm arrangement. A larger circumference of the roundabout is also likely to cause conflict with the required levels/distances needed to allow for the bridge over the railway.'

Officer Recommendation:

No change to the approach is required.

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ID1:	100	comment_author:	Sport England	
comment_content:	Sport England do not wish to make comments on any specific settlement or site number as, having reviewed the various policy and inset maps, the preferred allocations do not appear to involve playing field land. It is noted that the safeguarding route for the Spalding Western Relief Road may impact on playing field land. Should this be the case, any impact on playing field land would need to be addressed in line with NPPF Paragraph 74, in working up any more detailed plans.			
	Officer Comment:	Comments noted.		
	Officer Recommendation:	No change to the emerging Local Plan.		
ID1:	101	comment_author:	Anglian Water	
comment_content:	Spalding - A number of the proposed housing allocations in this area are expected to require improvements to the existing water supply and/or foul sewerage network to enable development to come forward on these sites. Please refer to the enclosed spreadsheet [received via email] for detailed comments relating to these sites. Pinchbeck - All of the proposed housing allocations in this area are expected to require improvements to the existing water supply and foul sewerage networks to enable development to come forward on these sites. Please refer to the enclosed spreadsheet [received via email] for detailed comments relating to these sites.			
	Officer Comment:	The Local Plan will have to demonstrate how arising water and sewerage infrastructure needs will be met, and these matters will be dealt with in later versions of the document and the Infrastructure Delivery Plan that will accompany it. The site specific matters identified by Anglian Water will help inform the site selection process and the anticipated delivery rate for preferred sites.		
	Officer Recommendation:	No change required to site selection. Further work will be undertaken in the IDP to ensure Anglian Water's concerns are identified.		

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ID1: 102 comment_author: Historic England

comment_content:

The Spalding housing allocation information contains a typographical error since it states that the collective site Pin045 is not taken forward in the comment, response, conclusion part of the paper but at the end of the paper it is cited as being a preferred option.

Officer Comment:

Comments noted.

Officer Recommendation:

Correct Housing Paper for Spalding accordingly.

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ID1: 103 comment_author: Nathaniel Lichfield Partners

comment content:

On behalf of United Lincolnshire Hospitals NHS Trust -
SHR002: Former Welland Hospital Site, Holbeach Road -

This site is considered for retail development in the Spalding Retail Paper (July 2016) but dismissed on residential amenity grounds. We consider the dismissal of the site for retail purposes is unsound, and not justified in line with the evidence provided through the associated sustainability appraisal.

The National Planning Policy Framework (NPPF) explicitly states that in plan making, Local Planning Authorities need to allocate a range of sites to meet their retail needs in full (para. 23). If sufficient town centre or edge of centre sites cannot be identified, other accessible locations that are well connected to the town centre should be considered (own emphasis).

The Retail Paper concludes that there are no suitable available sites within or on the edge of Spalding town centre. Accordingly, preference should be given to sites which are accessible and well connected to the town centre in line with the NPPF guidance (para. 23).

SHR002 is an out of centre site in retail terms, located 1.2 km 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 in the Retail Paper.

Officer Comment:

The Spalding Retail Paper (July 2016) identifies that 'retail development on this scale will be out of character with the surrounding uses, and, it is considered would generate adverse impacts upon the amenity of existing residents' so was not identified as a Preferred Retail Site. The Spalding Retail Paper (July 2016) identifies several reasons to explain SHR002 not being identified as a Preferred Retail Site including adverse impacts on residential amenity. A positive approach based on objectively assessed need has been undertaken, consistent with national policy, reasonable alternatives were considered and the approach justified, therefore it is not considered this approach is unsound. The SA recognises that SHR002 'may lead to additional noise and air pollution, green infrastructure could be required in and around the site to minimise any adverse impacts on physical and mental health'. Therefore without green infrastructure the SA suggests amenity issues would be an issue. It is accepted that of the out-of-centre sites available and considered by the Spalding 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 Spalding 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, although the SA is one element of the evidence base that informs site selection. The assessment of the SA is not disputed. The site falls within Flood Zone 3a and is therefore not in a sequentially preferable location in flood risk terms. As such, the SA is correct to identify the impact as negative, however the Spalding Retail Paper is clear that the site has not been discounted on flood risk grounds. Retail

Officer Recommendation:

SHR002 former Welland Hospital is not one of the more suitable retail sites in Spalding and should not be taken forward as a Preferred Option Retail Allocation.

Therefore, preference should be given to retail development on Site SHR002 in sequential terms, unless other planning considerations weigh in the balance against this use/ site. There is no evidence provided to suggest this is the case here.

First, we note the accompanying sustainability appraisal which has been prepared for each site scores the site with six positive green impacts. This is higher than any other site assessed for retail purposes, and is three points higher than the site considered appropriate for retail purposes in this paper (Site SHR004). It is acknowledged in the sustainability appraisal that four of the remaining five impacts could be positive on site SHR002 with appropriate mitigation measures. The only impact which scores poorly is flood risk. The site is located within flood zone 3a, however, this is consistent with all the sites assessed in Spalding (and the vast majority of Spalding settlement boundary) and it would therefore be difficult to identify a sequentially preferable site in flood risk terms to serve the identified Spalding retail need. Retail uses are a less vulnerable use and retail development should not be dismissed on this site on flood risk grounds. In this respect, we note the scoring within the Retail Paper is inconsistent when it comes to assessing the sites on flood risk grounds.

It is therefore very clear that this site forms the most sustainable site for retail development of the eight sites assessed in the Retail Paper; and substantially more sustainable than Site SHR004 which is a preferred site for retail development.

Site SHR002 is not considered appropriate because it is

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.

located in a residential area and retail development is considered to impact negatively on residential amenity. There are numerous examples across the country of retail development sitting successfully alongside residential development. In fact, a large proportion of new retail developments now incorporate an element of residential uses. This conclusion is, therefore, not justified; especially in light of the sustainability appraisal which recognises with appropriate mitigation measures retail development could have a positive impact on sustainable amenity matters. In the absence of accompanying evidence based reports assessing noise, air quality and transport impacts of the development it is premature to dismiss the site on amenity grounds.

The site is a previously developed site, within Spalding's settlement boundary located 1.2 km from the town centre and is an accessible site. In the absence of any suitable sites within or on the edge of Spalding town centre, this site would be appropriate for retail development in line with the sequential test as set out in the National Planning Policy Framework (para. 24), and subject to it being demonstrated that it will not have an adverse impact on the vitality and viability of Spalding town centre (para. 26). The planning balance of developing this brownfield site within the settlement boundary would far outweigh developing a site outside the settlement boundary which is over 3km from the town centre.

We therefore consider this site is appropriate for retail development, subject to compliance with the impact test set out in the NPPF, and ensuring appropriate mitigation measures in place to ensure the development does not significantly impact upon

residential amenity.

Accordingly, we consider the site should be allocated for retail uses (convenience and comparison) in the local plan to meet an element of the forecast retail need for the borough.

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ID1: 104 comment_author: Larkfleet Homes

comment content:

Pin011:

Larkfleet have an interest in this site and the adjacent land having recently gained planning permission for 169 homes on the site.

We welcome this being included within the document as both a 'Preferred Housing Site' and as 'Housing Commitment'. We are also pleased to note that the site appears to be within the settlement limits for Pinchbeck and Spalding. However, the boundary is confusing in this location and needs to be clarified. We also note the comment of the JPU that it 'is one of the more suitable Potential Housing Sites in Spalding'.

However, we note that only part of the site which has approval has been identified on the plan. A significant element of the approved scheme is not identified. The plan needs to be amended to cover the whole site which has planning consent. A site plan of the approved scheme is attached.

Pin0002:

We welcome the sites identification as a 'Preferred Housing Site' and being within the proposed settlement limit for the area. We note the JPU's comments on the site as being 'one of the most suitable Potential Housing Sites in Pinchbeck' and the comment from the Highways Authority that the site's redevelopment

Officer Comment:

Support for the identification of Pin002 as a Preferred Housing Site is welcome. Confirmation that plans are being prepared for the site are noted, as is the provision of open space on site;

Support for inclusion of Pin011 as a Preferred Housing Site and Housing Commitment. However as Pin011 has planning permission the site should only be identified as a Housing Commitment. It should be noted that the site falls within the settlement boundary for Spalding and not Pinchbeck (although the two settlement boundaries adjoin one another). Accept that the site area does not accurately reflect the consented scheme.

Officer Recommendation:

Pin002 is one of the more suitable housing sites in Pinchbeck and should be taken forward as a Preferred Option Housing Allocation.

Pin011 is one of the more suitable housing sites in Spalding and should be taken forward as a Housing Commitment.

for housing is acceptable in
highway terms.

Larkfleet have an interest in the site and have drawn up
a scheme which demonstrates
that the site can deliver 29 homes ranging from 2 to 4
beds and including detached,
semi-detached and terraced properties together with
14% of the site area being set aside
as open space.

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ID1: 105 comment_author: Ashley King Developments

comment content:

CLAY LAKE:

We welcome the recognition in the Councils' employment Paper that Clay Lake is one of the most suitable employment sites in South Lincolnshire, and that it should be taken forward as a main allocation. Ashley King Developments remain committed to delivering a B2 industrial and BB storage / distribution development within the site.

This commitment is illustrated by their investment in constructing a new highway access from the A16, and in the ongoing work being undertaken on the preparation of a planning application. To this end, a number of technical studies have been completed, and discussions have been undertaken with District Council Officers. Discussions are ongoing with specific end users, to ensure that the form of the application will meet their requirements.

As we have previously explained in our representations on the consultation in early 2016, and in our separate representations on the Lincs Gateway site, it is intended that B2 and B8 development should be located at Clay Lake, rather than at Lincs Gateway. The two sites are close to each other by road, and the provision of this development at Clay Lake would serve the needs of end users equally well. The site's proximity to existing successful businesses also makes it the logical location for further development to allow for their extension over time. As the Employment Paper notes, the proposals outlined by the extant planning permission for the southern part of the site also allow

Officer Comment:

Support for the identification of the Lincs Gateway as a high quality employment site is noted. Confirmation that the owners intend to develop a prestige employment site is welcome. Provision of a masterplan for the site is welcome. Although the owners propose to deliver the original high quality business park which led to the granting of planning permission, the consent also included B2 and B8 development on the wider site. While the provision of B2 and B8 use is acceptable at Clay Lake, it is considered that alternative uses at Lincs Gateway, such as retail and residential differ significantly from that consented and may be at odds with a high quality business park setting. The owners desire to work with the Council is welcome, as is the proposal to deliver mixed-use development, although this should be consistent with the planning permission. SP002 is located at the southern gateway to Spalding on the A16, although employment sites next to the A16 to the north of Spalding could be also a gateway location. It is not accepted that this site has better potential than any other to diversify the local economy; the Local Plan has identified a range of preferred sites; several are able to support knowledge-based industries, which are also able to support a more varied workforce. SP002 as permitted should be able to retain and attract a more skilled workforce, although diluting the offer with comparison retail may not have the same effect. It is accepted that the developers have invested in and delivered some of the infrastructure necessary to bring forward SP002, particularly the southern part of the site. The provision of a business park, for start-up, small and medium sized businesses is consistent with the planning permission for the site and is welcome. Providing space

Officer Recommendation:

SP002 Lincs Gateway is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Main Employment Allocation.

SP012 Clay Lake is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Main Employment Allocation.

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for an improved highway access for these businesses, which would have the benefit of taking HGV traffic away from Spalding Drove.

We also welcome the recognition that there should be a more flexible approach to mixed-use development in employment locations, to allow for a more appropriate mix of uses within these sites. At Clay Lake, it is anticipated that there would be demand for A3 and A5 food and drink establishments, with a large number of people working within or visiting the site. The proposals for the site may also include sui generis uses, such as a truck stop, which would not only generate employment, but would also provide a valuable service to the many local businesses which rely on distribution by lorry. A flexible policy approach, which would enable this and other types of supporting and complimentary development, is therefore welcomed.

We also welcome and agree with the assessment in the ELTP that the site is deliverable and that a viable employment development can be expected within the Plan period. However, we do not agree with the comments in that document, that the infrastructure required to enable the site's development implies that it is not likely to come forward in the short term. Ashley King Developments have received firm interest in the site from a number of parties, which has led to the ongoing work on the preparation of a planning application.

In light of this, we request once more that the area of the proposed allocation should be extended to the north, to incorporate the area of land between the existing development at Clay Lake and the Coronation Channel and Childers' South Drove. This land is just as

for clusters to develop is also supported, as is the approach which allows businesses to grow. However it is considered that the position identified by LCC consultants, 2009 has changed. Since then, other sites have been granted planning permission for serviced land for business use in Spalding, at Elsoms Way, Wardentree Lane. The South East Lincolnshire Employment Premises and Land Review (2012) identifies that 'demand for offices is not particularly high in South East Lincolnshire; the local office market is very small, with relatively few enquiries and most demand coming from small businesses and a few medium-sized professional firms and some public sector organisations. Future levels of office demand are considered unlikely to be very different from current levels'. The concept of linking education and research uses within the site is a well-used approach, which could be useful should the conference centre be provided on the southern site. Promoting links with the food and agricultural sector would be supported. It is accepted that promoting a more diverse economy could attract higher skilled, better paid jobs to live in the area, which could include younger people wishing to remain in the area. This approach is promoted by the Local Plan. Enquiries from businesses is welcome, and confirmation that a reserved matters application is being prepared is noted. It is acknowledged for an employment site to be successful ancillary, complementary uses may be required to support the wider needs of the site, and that the 20% limit has been removed. But SP002 has planning permission so any development should be consistent with that consent, which at present does not include D1 use. If such uses are proposed for those parts of the site that require prior written approval, these would have to be justified, and consistent with national and local planning policy. However in all cases these would have

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suitable for employment use as the rest of the site, and we believe that it is appropriate that the Local Plan should identify it as such. There is no strategic planning benefit in omitting this land, and it is contrary to the Council's stated position of over-allocating employment land, to ensure that there is a sufficient buffer to allow for the delivery of the Plan's target. We wish to avoid a situation whereby the Local Plan is progressed in its current form, and Ashley King Developments are then forced to make a planning application for what should be an acceptable form of employment development, which is technically contrary to the emerging Local Plan. Should this be the case, the Local Plan would in fact be actively obstructing the delivery of the development which the document generally supports.

As with our previous representations, we have enclosed Drawing 224/201, which shows our proposed amendment to the Local Plan Proposals Map [drawing provided by email].

YEWS FARM:

This representation relates to the land at Yews Farm, which is also referred to in the current and previous consultation documents as land to the West of Spalding Road, and housing sites Pin045, Pin016, Pin031, Pin020 and Pin040.

We welcome the amendments which have been made to the Proposals Map for the land at Yews Farm, which have removed the area which would have been set aside for only green infrastructure. The incorporation of this area within the 'Preferred Housing Site' designation will allow for a more flexible approach to be taken to the location of housing and associates areas of green

to be ancillary to the primary purpose of the site, B Use employment. In general office development has a higher employment density than B2 or B8 development. However, it is not just the quantity of jobs that is provided by development, the type and mix of jobs is also important. It is accepted that the Lincs Gateway is a prominent, visible site however the Spalding Retail Paper (July 2016) concludes that 'the South East Lincolnshire Joint Strategic Planning Committee, at their meeting of the 24 June 2016, resolved that the preferred site was not appropriate for comparison goods floor space; 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'. No evidence has been submitted to support the view that national retailers would not locate elsewhere in the town should alternative sites become available. The Local Plan is proactively planning for retail development and is expected to identify site(s) to address the identified short term retail need. A site for retail development would be expected to deliver a high quality environment to create an attractive space for shoppers and visitors. The design and the provision of ancillary uses would be a matter for the planning application, consistent with local policy. It is accepted that the owners retail assessment identifies that SHR004 is suitable for retail development. The owners confirmation that the remaining part of the southern site is not available for retail is noted. Any complementary uses, such as those suggested would have to be consistent with the planning permission for the site. Although the owners state that any floorspace on the northern site would be limited to 10,000sqm, they acknowledge that the supporting infrastructure (access, car parking, servicing and landscaping) are land

infrastructure and open space. We also welcome the removal of the 'Countryside' designation from the area proposed for housing, as being a logical change to the Proposals Map.

We believe that extension of the housing site to include all of the land on the Spalding Road frontage is also a sensible decision, and it is one which we supported in our previous representations on the emerging Local Plan. As with the land to the west of the railway, the designation of all of this land as lying within the proposed area for residential development will allow for the whole site to be developed in accordance with a Masterplan-led approach, which can provide a suitable area of green separation between the new development and the southern edge of Pinchbeck.

We noted in our previous representations that it is expected that the new development will ultimately provide the funding for the new Spalding Western Relief Road (SWRR). In this regard, it is particularly welcome that a large area is now proposed for residential development.

Our previous representations proposed that an area at the site's frontage would be suitable for a retail development, to help meet the need identified in the Councils' Town Centre and Retail Capacity Study. We have noted that this proposal is assessed in Councils' Retail Paper, which has been prepared to accompany the current consultation.

This suggests that the site would not be a suitable location for retail development for a number of reasons. These are set out below, alongside our response to each of them.

hungry which would mean that the permitted B use would be significantly reduced. Although it is accepted that a criteria based policy could control the amount of floorspace, it is the location of the retail use on a gateway site that is of concern. It is accepted that the planning permission for the business park does not require a footpath link. The provision of a foot or cycle path is not sufficient justification to promote retail or residential development in this location. 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. It is accepted that the Policies Map references, and those used in the Employment and Retail Papers are inconsistent and therefore unclear. The Employment Paper suggests the northern site would be unsuitable for employment use because the owners submission in January 2016 stated that retail and residential uses were being promoted on site, and the July 2016 submission reinforces that B uses are being promoted as a minor element of the scheme. However the site does have planning permission so is shown on the Policies Map. The provision of a Concept Masterplan is acknowledged.

Support for the identification of the site for employment use is welcome. The owners commitment to delivery of the site is welcome. It is accepted that the junction from the A16 into the site has been delivered. The preparation of a planning application for the site is noted, as are ongoing discussions with Officers and end users. Provision of B use development at Clay Lake is supported, and complements the existing use. The Lincs Gateway is a separate consented scheme, although within the ownership of the same developer. Therefore its future use should be considered separately. Provision

1. Retail development would be out of character with the future vision for this area and may detract from amenity of future residents.

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 centres 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 avoiding any overlooking of private spaces. This can be ensured through an appropriately designed Masterplan.

The Highway Authority suggests that retail development should not be identified in this location until the definitive location of the roundabout and SWRR has been agreed.

Our previous representations sought an acknowledgement on the Proposals Map that this location can accommodate either retail or residential development. The location of either can be considered alongside the design of the new junction with Spalding Road, and the route of the SWRR. The Local Plan is not proposing any detailed design at this stage, but simply setting the principles which will then guide the subsequent design work. We see no conflict that could not be avoided by a suitably flexible policy approach.

In addition, we note once more that it is advisable for the locations of the SWRR and new junction to be labelled as indicative on the Proposals Map. It is clear from the comments in the Retail Paper that the Highway Authority do not yet consider their location to

of a new access would ensure that all businesses on the site benefit from enhanced access to the A16. Clay Lake is not identified as a mixed use site. Therefore any proposals for non B uses are likely to be required to be 'ancillary' to the main use of the site, as such uses should be complementary to, and supporting the main use of B use development. Although the owners state that there has been firm interest from end users and a planning application is being prepared, a similar comment was received, in response to the January 2016 consultation, which indicated that a planning application would be submitted in summer 2016. Unfortunately to date no application has been received. This suggests that delivery of the site may not be as straightforward as has been suggested. Even with the junction in place there will be a period of time needed to open-up the site for development which may mean that businesses are not operational in the short-term. The Employment Paper (July 2016) identifies that the additional site is 'suitable because it is located adjacent to an existing Main Employment Area and land with planning permission for B Uses. The access improvements to be delivered with the permitted land would apply to this site. However the site does not have planning permission and would need significant upfront investment to open up the wider site for development'. As the take-up of employment land in South Holland is still slow, and the development of the site with planning permission has not progressed, it is considered that identifying additional land in this location may lead to an over-supply of land in this location. As such this site will not be designated for employment use in this plan period. However the flexibility built into the Local Plan policy should ensure that should a proposal come forward on this site, and the criteria of the policy are met, that the site could be taken forward.

have been fixed, and it is therefore appropriate that the Local Plan should provide flexibility to ensure that the site can be delivered within the policy framework it creates.

3. The roundabout is not expected to be delivered until 2024, and so the site would provide retail too late in the Plan period.

There is no reason that the roundabout should take so long to deliver. As we have previously said, Ashley King Developments control the necessary land to allow for the delivery of the new junction and the first part of the SWRR. Following the allocation of the site in the Local Plan, we anticipate discussions can be advanced swiftly regarding the delivery of development on this site in the short-term, and certainly not 8 years from now.

4. The provision of comparison goods in this location could undermine the housing and design strategy for this location.

There is no reason to assume that retail development in this location would undermine the delivery of housing or the SWRR. As we have noted above, there are no reasons relating to the design of the road infrastructure or the proximity of housing which would undermine the delivery of the proposed development.

With regard to funding, a retail development could in fact provide a better financial return than housing, and as such it could generate a higher level of funding for the required road infrastructure. This would in turn help to improve the viability of the development as a whole.

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This representation is accompanied by a further statement (Appendix 1 - [provided by email]) by Chase Partners, specialist retail consultants, which confirms their view that this location is suitable for retail development, and that this would not undermine the delivery of the wider site or the SWRR.

We have noted in our separate representations regarding Lincs Gateway that any reduction in housing at Yews Farm could be replaced with new housing at Lincs Gateway. We are therefore confident that the proposed development at Yews Farm is entirely deliverable. We respectfully request that the Council make the following changes to the emerging Local Plan:

- Mark the location of the new junction with Spalding Road and the route of the SWRR as 'indicative' on the Proposals Map key.
- Include a new allocation for retail development on the Yews Farm site, at its frontage with Spalding Road, in accordance with our Drawing 221/401/A, which is enclosed with this representation [provided by email].

LINCS GATEWAY:

We welcome the recognition, both in the previous draft of the Local Plan and this current consultation, that Lincs Gateway provides the potential for a high quality employment site which can bring something new to the area in terms of job creation and diversification of the economy. It was identified in the previous draft of the Local Plan as a Prestige Employment Site, and it remains Ashley King Development's intention that it should fulfil this potential. However, it also has great potential as a location for comparison retail, a fact

which is recognised to some extent in the Council's Retail Paper. Ashley King Developments also remain committed to delivering residential development at Lincs Gateway to meet local housing needs. We consider below the ways in which these uses can be brought forward successfully, through the development of a comprehensive Masterplan for the site.

The revised proposals for Lincs Gateway outlined in these representations are based on the need to ensure a deliverable development. There is no intention that the proposals should in any way 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. Whilst it is intended that some bulky B2 and B8 uses would be displaced to the nearby Clay Lake site, it is still intended to deliver the business park, without any reduction in the number of jobs that were originally envisaged. The provision of retail development would not compromise these objectives, but it would allow the site to fulfil another useful function, in addition.

Ashley King Developments are keen to work with the Council in providing a mixed use development at Lincs Gateway which can help to meet the Local Plan's objectives, and the needs of Spalding and South East Lincolnshire over the Plan period. We also look forward to working with the Councils in their bid to adopt and deliver a sound Local Plan.

Key Principles for Development at Lincs Gateway

Prestige Employment Site Lincs Gateway is unique, due to its position at the 'gateway' to Spalding, on the A16. It is the first part of the town visible to traffic heading

north from Peterborough and east from Stamford and the A1. Its excellent location is what makes it a particularly suitable location for a high quality business park. This site has better potential than any other in the Local Plan area to help diversify the local economy, and attract knowledge-based industries. It could also help to retain and attract talent to the area, and reverse a trend whereby young professionals leave to develop their careers elsewhere.

Comparison Retail - This location would be equally suitable for comparison retail, which also requires good visibility and a prominent location in order to be successful. We have put forward proposals for retail in response to the Council's evidence, which suggests that there is a high level of need for new retail floor space over the next 15 years, but no identified sites to deliver it. We have also noted that the Council's own recent analysis has shown that there are no suitable and available town centre sites, and limited opportunities on the edge of the centre. Lincs Gateway has the potential to play a valuable role as one of the sites which the Council can select as a location for new retail development. We can also confirm that national retailers have shown interest in Lincs Gateway, and a preference for this location over any other in the town.

New Homes “ We believe that there remains a high level of need for housing, above the capacity of the residential sites which the draft Local Plan proposes to allocate. We also believe that Lincs Gateway is a suitable location for residential development, which can co-exist with the other uses within the site, and help to deliver improved transport links and environmental improvements which would be to the benefit of the project as a whole.

Whilst we are now promoting a mixed use development for Lincs Gateway, we can confirm that Ashley King Developments' primary goal for Lincs Gateway remains for it to deliver a high quality business park, with all of the benefits that this would bring to the town and wider area.

Town and wider area.

Nomenclature

We note that the current consultation documents identify the Lincs Gateway site in various slightly different ways. The Proposals Map refers to an 'Existing Mixed Use Employment Site' (southern area) and 'Proposed Mixed Use Employment Site' (northern area). The Council's Employment Paper then identifies the site as a whole, as a 'Proposed Mixed Use Development Site'. The Employment Paper suggests that the site is not suitable for employment use, following the suggestion in our previous representations that it would also be suitable for other uses including retail and residential development. The Council's Retail Paper suggests that the northern part of the site is unsuitable for retail development because it is too large, and there is a concern that it would undermine the delivery of the business park. The site is also identified as SP014 on the Proposals Map, but this reference does not appear to correspond to any reference in the various consultation documents, and it would be helpful to have an explanation of what this new reference is intended to signify.

Read together, the Proposals Map and discursive evidence base therefore have the potential to confuse.

We assume from this that the Councils are still considering how best to address Lincs Gateway in the new Local Plan. We hope in these representations to address the matters which the Employment and Retail Papers suggest need further clarification.

A Prestige Employment Site

As we have noted above, Ashley King Developments remain committed to the delivery of a high quality business park at Lincs Gateway. The previous consultation draft of the Local Plan embraced the site's potential, identifying it as a Prestige Employment Site, and noting that it had been identified because of its 'strategic economic importance, attractiveness to the market, and ability to accommodate business clusters and high-value employment which could stimulate economic growth, diversify the local economy and help reduce unemployment particularly in the area's deprived wards'.

Ashley King Developments support this recognition, and wish to continue to work with the Council in delivering a prestige employment site, which remains the ultimate focus for Lincs Gateway. We believe that the business park should continue to be identified as a Prestige Employment Site in the new Local Plan.

We outlined in our previous representations the benefits which we believe Lincs Gateway can provide for the local economy, and local people, and we have assumed that it is not necessary to repeat all of what we have previously said here. However, we reiterate that Ashley King Developments is committed to the delivery of a business park at Lincs Gateway, and has

invested over £1 million in the delivery of infrastructure, to bring forward the initial southern part of the site. The site also already has highway access points in place for both its northern and southern areas. The development which has so far taken place on this part of the site has resulted in recognition within the emerging Local Plan that this area is an 'Existing Mixed Use Employment Site'. Irrespective of the separate way in which the emerging Local Plan treats the two parts of the site, we note that both parts benefit from the same current planning permission for business development, and it is intended that business development should be provided on the site, in accordance with this permission.

In addition to the hotel, pub / restaurant and conference / function facility which are being delivered on the southern part of the site, the business park on the northern area would also include serviced office accommodation, designed for small and medium-sized companies. This would include a building or cluster of buildings with meeting rooms and other office and reception facilities which could be used or hired by tenants as required. This would be placed at the heart of the business park, alongside other complementary uses such as a cafe and creche, as noted below. This central part of the business park is hereafter referred to as the Business Centre.

It is envisaged that the Business Centre would be a facility which would cater particularly for small and medium-sized companies, and start-up businesses. It could provide a flexible range of office spaces which could be configured and reconfigured to meet the needs of the end users. It would also be the hub around which other office based business would be developed.

It is well established that encouraging small businesses to start and grow in an area can have significant long-term benefits for the local economy. As businesses grow, they move on to larger premises, and also spawn further businesses. Over time, this can lead to the establishment of a cluster of similar businesses in an area. However, without this type of accommodation, the chances of such a cluster emerging are far more limited.

Following the development of the Business Centre, companies moving to the site would then be able to take on space either within this or other serviced office buildings, or they would be able to purchase a piece of serviced land for the construction of their own bespoke premises, as a design and build project. The lack of serviced land for business use in Spalding, available on a freehold basis, is a longstanding problem which was identified by consultants working for Lincolnshire County Council in 2009. This is an issue which has not been addressed to date, other than in the granting of planning permission for the business park at Lincs Gateway.

It is also envisaged that the northern part of the site will include education and research uses, to be provided through a link with a higher education institution. Dedicated accommodation would be provided for research and development. This is model which has been developed in other successful business parks, which benefit from the close proximity of skilled academics and companies undertaking research, with the potential to share staff and ideas. This might include the commissioning of specialist tasks from academic staff, or joint working on projects. It is also

highly likely to be facilitated by the provision of shared communal facilities and break-out spaces, where people can meet less formally. This leads to the conclusion that there is a clear benefit in combining conference, meeting, research and office facilities within a relatively concentrated area.

As we highlighted in our previous representations, there is the potential for this development to build on the strengths of existing businesses in the area, which specialise particularly in food and agricultural technologies. This may, for instance, lead to the opportunity for co-operative research and development between industry and academic institutions. This approach at Lincs Gateway would be consistent with the concept of clusters of similar types of development, advocated in paragraph 4.1.9 of the supporting text to Policy 7.

The presence of academic institutions, companies undertaking research, and professional companies more generally, can also have a direct influence on local people. The Economic Case prepared by SQW to support the planning application for Lincs Gateway identified that whilst there are good quality local schools in this area, young people aspiring to work in the professions often move away in search of work. This of course has a negative social effect, as it does not help to enable a diverse community. There is a clear benefit in providing the types of jobs and training opportunities locally which these young people require to allow them to stay in the area.

As with the Clay Lake site, Ashley King Developments have received a large number of enquiries from a range

of local, regional and international companies, who are interested in locating their businesses within Lincs Gateway. They have been drawn to the site by the promise of its prominent location and the prestigious style of the proposed development, with its landscaped campus. Proposals are currently being prepared, which will reflect the outcome of these discussions, and a reserved matters application will be prepared to finalise these details and allow construction on site in the near future.

This representation is accompanied by a simple Concept Masterplan [masterplan provided by email], which illustrates the way in which the development could be arranged within the site, with business development alongside retail and residential development. This is discussed further below.

We welcome the Council's recognition that a successful modern business park can accommodate more than simply B-class employment. We have noted that the Council have moved on from their stance in the January consultation, that non-B-class uses should be limited to 20% of the site, and the recent Employment Paper suggests that this issue will be considered further.

We believe that the hotel and pub / restaurant which have been approved on the southern part of the Lincs Gateway site would be valuable supporting elements which would help the business park to be a success, and this is a view which was backed up by SQW's Economic Case in the planning application, and supported by the Council in their grant of planning permission. The Council's recent comments in the Economic Paper, and in the previous Local Plan consultation document⁴, suggest that further uses may

also be acceptable, in order that they can support the business park. These might include development in the D1 use class, such as education or training facilities, or a creche for the children of those employed within the site, or an A3 cafe. Such facilities would be intended to meet the demand generated by the site, and not cater for the wider area.

Whilst the emerging proposals for Lincs Gateway would not see the whole site developed as a business park, the development of office-based employment would still result in the provision of a high number of jobs. The employment density of office-based development is substantially greater than a B2 industrial or B8 storage / distribution uses would allow for, even within a landscaped campus. To illustrate this point, we note that the planning application estimated that over 2,000 jobs could be provided within this site, with a mixed B1, B2 and B8 development. Of these, around 1,500 were expected to come from the office-based development; however, the office-based uses were only expected to accommodate around a third of the developable area within the northern part of the site.

With this in mind, it is clear that if the B2 and B8 uses can be moved to the nearby site of Clay Lake, as we proposed in our previous representations, there is scope for alternative forms of development at Lincs Gateway, provided that they will be complementary to the business park, and the site's gateway location.

Retail Development

We commented in our previous representations that, as the Council's evidence base showed a substantial need for retail development over the next 15 years,

and as no suitable sites had been identified, there was an opportunity for some of this development to be located at Lincs Gateway. We welcome the recognition in the Council's Retail Paper that land should be allocated in the new Local Plan to accommodate the 10,810 sq m of comparison retail floor space which the evidence base suggests is required.

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, as was previously proposed, 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 soon change, with people seeking the services they require elsewhere, for instance in Peterborough. Where these habits change, they can soon become fixed and difficult to change. It is therefore essential that the Local Plan should 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.

This representation is accompanied by a specialist assessment of this issue by Chase & Partners, included at Appendix 1 [provided by email]. Chase & Partners reflect on the need for retail development, and the

implications of the existing evidence supporting the Local Plan.

They also consider the potential which 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. It would provide the visibility which retail operators require, and discussions undertaken with national retailers, on behalf of Ashley King Developments, have shown substantial interest in this location. These discussions have also 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.

It is necessary to provide retail development in a carefully planned way, which will ensure that there would be sufficient floor space within the site to create a viable development. This implies that it would not be possible to promote only the remaining area of the southern part of the site for retail development, as this area would not be sufficiently large to accommodate several major national retailers, as well as the areas of car parking they would require, and the landscaping which is to be integral to the site.

We suggest that remaining space within the southern part of the site, which is not already taken by the hotel, pub / restaurant and petrol filling station, may be suitable for other complementary uses. These might include sui generis uses, such as a car showroom, a A3 café or A5 hot food take-away. They might also include B class employment, such as B1(c) or B2 industrial development, subject to this being suitable close to the hotel. However, it would be more logical

and viable to incorporate new retail outlets together on the northern part of the site.

We have noted the Council's concerns, expressed in the Retail Paper, that the northern part of the Lincs Gateway site would be too large a site for retail development. However, Officers have also provided an answer to this with regard to the smaller, southern part of the site, by proposing that 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.

The comments in the Retail Paper also suggest that the amount of retail development which should be located at Lincs Gateway, or other sites, should be very limited, due to concerns regarding the vitality of the town centre. As noted above, the Local Plan's evidence base identifies the need for 10,810 sq m of new comparison retail floor space in Spalding in the period to 2031. We note that the Retail Paper anticipates that this could be provided on one or several sites, and Lincs Gateway has the potential to deliver all or part of the required retail development. We 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.

We note that the Retail Paper suggested that the southern part of the Lincs Gateway site could provide around 14,000 sq m of retail floor space, and the northern part of the site at least 30,373 sq m. This is simply not the case, and these estimates fail to take account of the need for other land-hungry elements, such as car parking, access roads, landscaping and drainage infrastructure. To give a better explanation of

this point, the Concept Masterplan which accompanies these representations shows around 10,000 sq m of retail floor space, on the northern part of the site.

There is clearly a need for a Masterplanned approach to the delivery of retail development within the site, to ensure that it would sit comfortably alongside the business park and residential development. This is reflected in the Concept Masterplan which accompanies these representations.

Residential Development

We have also previously suggested that Lincs Gateway would be a suitable location for new residential development, in our previous representations in response to the January 2016 consultation. We still believe that this is the case and that housing in this location can make a positive contribution towards making the site more accessible, by delivering improved sustainable travel options, and also provide the opportunity for people to live and work in close proximity.

Housing can be designed in a way which would be complimentary to the site's primary purpose, as a landscaped business park, and it can also sit comfortably alongside retail development. We have noted the Council's comments that retail development may not be suitable in close proximity to housing. We are unsure why this conclusion has been reached, as it is common for residential and retail uses to co-exist in close proximity.

This is particularly the case in town centres, where residential accommodation is typically encouraged above shops, in order to provide activity throughout

the day and evening. However, it is also common with larger retail developments, where the only potential cause of disturbance may relate to servicing areas. With good design, servicing areas can be located so that they are not close to residential development, and so avoid any disturbance.

We believe that there is a high level of need for housing, which the emerging Local Plan would not meet as it is currently drafted. We have previously submitted representations concerning the proposed housing target, which suggest that it is an under-estimate of the actual level of need, based on a long-term continuation of recessionary trends, and we stand by that view. In addition, we have suggested that there is an opportunity for retail, in the form of a supermarket, at the entrance to the Spalding Western Relief Road (see our representation on the Yews Farm site). If this were to be provided, the consequential reduction in housing at that site could be made up at Lincs Gateway.

South East Lincolnshire Local Plan 2011 – 2036

Representations on Behalf of Ashley King

Developments February 2016 Waller Planning

Representations 9th Delivery The provision of housing at Lincs Gateway could also provide further funding for the provision of infrastructure which would benefit the business park. This could include roads, services and drainage infrastructure within the site. It could also include improved pedestrian and cycle links to the town.

In this regard, we note the Council's comments in the Employment Paper, that the business park would be able to fund the provision of an improved footpath connection. Unfortunately, this is not the case. The planning permission for the business park does not require any funding to be provided for the footpath; this was not required by the Highway Authority at the

time of the application, and District Council Officers did not consider that it would be justified. 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.

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.

Concept Masterplan The Concept Masterplan which accompanies these representations is intended to show the way in which the different uses could be located within the site in a way which would provide the ideal environment for each of them. It is based around the following principles.

Business Park

- The business park would be given due prominence, with a highly visible location on the A16 roundabout. It is envisaged that a major new building could be located close to this frontage, to present a positive image. This is likely to be the Business Centre described above, or another major office, should this be required by a specific end user.
- The landscaped environment envisaged by the planning application would be created, making an important contribution to the site's appearance from nearby roads, and also providing the campus style environment previously envisaged within the site.

Retail Development

- The proposed retail development would also benefit from road frontage, which would ensure it would be attractive to major retailers.
- Retail development would also benefit from a landscaped environment, which would help to ensure the development was attractive, and also separate it from surrounding uses.
- Landscaped areas would also allow for the provision of the swales and balancing ponds required to meet surface water drainage requirements, and also to allow for features which can lead to a net increase in biodiversity within the site.
- A broad, landscaped spine road would allow for the different uses within the site to be provided with their own entrances, from a pleasant environment, which would also meet the necessary standards to allow for HGV traffic.

Residential Development

- Housing would be located close to existing housing on Fen End Lane, although with the provision of an open space and landscape buffer to protect the amenity of existing residents.
 - The need for swales and landscape belts provides a convenient opportunity to separate the housing from other uses within the site. However, business and retail development could also be designed to ensure that servicing areas were kept away from housing, and the potential overlooking issues were avoided.
-

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

ID1: 106 comment_author: Mrs F Smith (GLNP)

comment content:

The GLNP highlights that a number of sites identified as preferred sites for housing or employment are adjacent to sites of designated nature conservation value:

2

Spalding & Pinchbeck (Inset Map No 2 and No 8) in 024, Pin045, Mon004, Mon014, Mon016, Mon018, Mon019, Mon022, Mon077 (preferred housing sites) adjacent to Vernatt's Drain LWS

2

SP001 (Proposed Main Employment Area) adjacent to Blue Gowl Drain, West Marsh Road LWS, Vernatt's Drain LWS, Vernatt's Nature Reserve LWS and Local Nature Reserve, and Spalding Cemetery LWS. SP014 (Proposed restricted use site) - adjacent to Vernatt's Drain LWS. Arnold's Meadow is a LWS and identified as recreational open space. This is private land and it would be appropriate to check this designation with the land owner before confirming this designation.

Officer Comment:

The SELAA and the Sustainability Appraisal identifies a range of nationally protected nature sites lie within or adjoin SP001. It concludes that 'Mitigation may be required to offset any potential harm identified but this will depend on implementation and the outcome of site-specific ecological assessments'. So it is accepted that biodiversity should be taken into account in the design process for relevant sites within the Wardentree Lane area.

Officer Recommendation:

Ensure consistency between SELAA and SA in relation to biodiversity. SP001 Wardentree Lane is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Main Employment Allocation.

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ID1:

107

comment_author: Pedals

comment_content:

The Sustainable Urban Extension north of the Vernatt's Drain and west of the B1356

In our response to the January 2016 consultation we pointed out the Pinchbeck importance of being able to cycle safely and conveniently not only within proposed development but also between the development The Sustainable Urban and other destinations.

It is essential that a bridge or bridges which are suitable for cycling west of the B1356 are provided across the upgraded and increasingly-used railway line, to facilitate cycling and to avoid the delays and safety risks at level crossings.

We ask that the Local Plan should state clearly that this development must be designed to "maximise opportunities for walking and cycling within the Sustainable Urban Extension (including a bridge or bridges across the railway), and connecting it with key uses outside the SUE such as employment areas, schools, leisure facilities and shops".

Our response to the January 2016 consultation highlighted the cycle route between Spalding and Pinchbeck which crosses the SUE and the Spalding Western Relief Road. We are pleased that this cycle route has been included in the present map.

We ask that the Local Plan should state clearly that the development of the SUE must "incorporate the existing cycle route which links Pinchbeck and Spalding via Blue Gowt Lane and Two Plank Lane, including

Officer Comment:

It is accepted that provisions relating to the encouragement of safe and convenient walking and cycling should be included in the revised Policy 12: Vernatts Sustainable Urban Extension.

Officer Recommendation:

Proposed Policy 12: Vernatts Sustainable Urban Extension and Policy 30: Delivering the Spalding Transport Strategy in the Draft Publication version of the Local Plan are approved.

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arrangements for the route to remain open for safe use throughout the construction of the development".

Land at Pode Hole, west of Monk's House Lane, north of the A151 and south-east of the Vernatt's Drain

This land is within a convenient cycling distance of Spalding's Town Centre, schools, leisure facilities, and work-places. However, we are very concerned about the current lack of any provision for safer Land at Pode Hole, cycling along the A151 between Pode Hole and the town centre.

The SWRR will pass through the site. There must be safe crossing points to facilitate cycling within the site, linking the homes to the west of the SWRR with the education facilities proposed on the east side, and with destinations in the existing built-up area.

If this land is allocated for development in the Local Plan, we ask that the Plan should state clearly that "the development must incorporate safe cycle routes within the development, especially where they cross the Spalding Western Relief Road, and must deliver significant off-site works to facilitate safer, more convenient cycling between the development and the town centre and other key uses such as employment areas, schools, leisure facilities and shops".

Cycle Route notation

Our response to the January 2016 consultation highlighted our concern about the use of a single notation for "Cycle Routes". This has not been

addressed in the current map. Therefore we repeat it below and request that it is considered seriously. The paragraph and policy numbers refer to the text published in January 2016.

A single notation has been used for "Cycle Routes". This is an oversimplification because it covers a multitude of circumstances eg:

- cycling provision which exists eg dual use and shared use cycle routes and other signed routes, to be protected under Policy 31 C1
- proposed routes included in Policy 31 (see our comments about that policy and some omissions from the map)
- routes in need of improvement (eg the Daffodil Route, see our comment about paragraph 8.0.2)
- "routes" which have been identified by others but for which there is no evidence on the ground of specific cycling provision or signing (eg London Road, Spalding)

We suggest that two notations should be used,

- one for existing routes, to be protected and maintained in accordance with Policy 31 C1. This notation would cover routes which have specific cycling provision on the ground (e.g. shared and dual use paths) and those roads which have no specific cycling provision but which have official signs identifying them as cycling routes; and
- another notation for those proposed routes listed in Policy 31 C2 (including our suggested additions)."

Our comments on Policy 31 included the following:

Policy 31 C2iii: this should state "alongside the Coronation Channel" not along and should be shown on Inset Map 2. We consider that the east bank is

appropriate for dual use by pedestrians and cyclists if suitably surfaced and signed.

Policy 31 C2v, C2vi and C2vii : These should be shown on the appropriate maps.

Policy 31 C2 : We request that the following schemes are included in the list of projects:

- *a New River Cycleway south of Spalding*.

We consulted SHDC and LCC on this proposal in 2015 with a fully-documented report.

- *Holland Road Bridge to High Bridge (west bank of river).* The route southwards from the "Twin Bridges" towards the town centre on the west bank of the river comes to a abrupt halt at the Holland Road Bridge. It is not even possible to cycle on the highway from there to the heart of the town centre because Double Street is one-way north-bound.

- *Wygate Park peripheral road.* Off-road cycling provision is sporadic and should be connected, in a locality where coherent cycling provision is emerging within the developing residential areas.

- *Woolram Wygate / Pinchbeck Road junction to the Johnson Community Hospital and Enterprise Way.* We understand that Lincolnshire County Council is investigating the opportunities for cycling provision on the B1356 connecting the growing residential area in north west Spalding with the employment areas off the B1356.

These projects should be included in the C2 list and shown on the proposals map."

We are pleased that some of our detailed comments on the January 2016 consultation map have resulted in changes to the present map. We are grateful for the short extension of time which we have been granted to check and comment on the accuracy of the present

map.

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

ID1: 108 comment_author: Lincolnshire County Council

comment content:

Regarding the Spalding Western Relief Road the line of Phase 1 at the southern end, the Protected Road Line north of Vernatts Drain and the Safeguarding Corridor between them are all supported. The rationale for how the allocations to support the road could, however, be made clearer.

It is noted that a large part of the urban extension north of Vernatt's Drain, which was a Preferred Housing Site in the previous consultation, is now shown as safeguarded for housing after 2036. This may well be more realistic, taking account of the comments received on that consultation but the area as shown is still not a coherent and defensible area to safeguard for a sustainable urban extension. The apparent extension of Pin045 to take in adjacent sites, as shown on the inset map, is not clearly and simply stated in the text or the trajectory.

Whilst this partly compensates for the phasing of over 4000 dwellings beyond the Local Plan period, much of the rest is provided by the selection of a large number of linked sites along the north side of Bourne Road as far as Pode Hole. This creates a wedge of development both sides of the safeguarding corridor, which sterilises a large area in the middle pending the drawing up of a precise road line.

The proposed education site inside the safeguarding corridor has been discussed with LCC and is strongly supported. As, however, the funding of both a school and the SWRR are dependent on developer contributions, there is potential for a large amount of

Officer Comment:

This matter has been addressed in the preparation of new Policy 30: Spalding Transport Strategy.

The explanation for the increase in size of Site Pin045 is set out in the 'A strategy for the delivery of a further phase of the Spalding Western Relief Road and major housing growth in Spalding' Background Paper.

Following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, the 'Pode Hole sites' situated to the west of the safeguarding corridor are no longer required to meet the need. This decision has been informed by flood-risk considerations following an update of the Strategic Flood Risk Assessment for South Holland District and a review of the proposed funding arrangements for the SWRR.

The intentions regarding Site Mon008 will be clarified on the inset map. No further capacity is specified for this site given the present uncertainty over the precise route of the Central section of the SWRR; whereas there is certainty regarding the capacity of Site Mon 005. Sites Mon013 and Mon020 have not been allocated in order that they can fully contribute to the funding of the Central section of the SWRR in the review of the Local Plan following the identification of its precise route.

Officer Recommendation:

Sites Mon001, Mon004, Mon14, Mon015, Mon016, Mon017, Mon019 and Mon022 are not required for allocation in the Publication version of the Local Plan.

residential development to be built in advance of them, separated by a large gap from Spalding and its other facilities.

The text makes clear that only the eastern part of site Mon008 is a Preferred Site as the rest impinges on the safeguarding corridor. This cannot, however, be clearly interpreted from the Inset Map. Also there is an inconsistent approach between this site, where no further capacity is shown in the trajectory and:

Mon 005 where only a small eastern part is allocated, not drawn up to the edge of the safeguarding corridor, but a further capacity of almost 1000 beyond 2036 is shown in the trajectory, but not on the Inset Map

Mon 020 where the whole site is rejected as impinging on the original safeguarding corridor, even though part of the site remains to the east of the narrower area shown on the Inset Map, which could potentially be allocated. If undeveloped in the long term this site would be left isolated between Mon008 and the potential SUE north of Vernatts Drain.

Mon013 where the same point applies to the eastern part, which no longer impinges on a narrower safeguarding corridor.

In summary, it is not entirely clear from the evidence presented why sites are allocated outside the safeguarding corridor, some of which may not contribute to delivering the SWRR, in preference to sites within it and adjacent to a longer length of the potential route. It is not suggested that the capacity would exactly balance, but the justification of this approach to urban form on the western edge of Spalding should be revisited before allocations are finalised to ensure that the future delivery of the SWRR is not adversely affected.

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ID1: 613 comment_author: ID Planning

comment content:

Additional correspondence received from ID Planning by SHDC's Senior Planning Policy Officer:

"I write further to our conversation and the findings of the Council's Retail Study which you point out identifies capacity for an additional 2,508 sqm net of comparison goods floorspace by 2021 and then as discussed a further 5,873 sqm net during the period 2021 to 2026 to give a total need by 2026 of 8,291 sqm net comparison goods, with the remaining need coming forward to 2031.

Following your email I discussed and agreed with our client the suggestion that a Phase 1 provision amounting to 2,508 sqm net up to 2021 would be acceptable.

In terms of looking forward to a Phase 2, the Retail Study identifies an additional requirement of 5,873 sqm net by 2026. Our client has suggested 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.

Clearly, if Members wish Springfields to provide for more of that 2nd Phase floorspace they would be happy to do so but we can discuss this further following your forthcoming internal discussions."

Officer Comment:

Comments noted.

Officer Recommendation:

Proposed Policy Policy 23: Additional Retail Provision in the Draft Publication version of the Local Plan is approved.