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22 August 2018

Dear Elaine

SOUTH EAST LINCOLNSHIRE LOCAL PLAN 2011-2036: PROPOSED MAIN MODIFICATIONS (2018)

We write on behalf of Schroders UK Real Estate Fund (SREF), the owners of Holland Market and Winfrey Avenue Retail Parks, Spalding to make representations to the South East Lincolnshire Local Plan 2011-2036: Main Modifications Schedule. SREF has engaged with the South East Lincolnshire Local Plan preparation at every stage including participation at the examination hearings in 2017.

SREF is a major investor in Spalding, having acquired the Holland Market and Winfrey Avenue Retail Parks in November 2013. The two retail parks include all the retail units either side of Winfrey Avenue except for the Sainsbury's store. They form a major part of Spalding town centre and employ a significant 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 parks to strengthen their role within the centre and to enhance the retail offer within the town. These representations are made against this background and should be read alongside our previous representations and hearing statements, 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 in accordance with the principles and policies of the NPPF.

In line with our previous comments and suggestions made at the examination hearing sessions, our representations focus on the following policies:

- **Former Policy 21: The Retail Hierarchy (renumbered as 24);**
- New policy titled: 25 Ensuring Viable Town Centres;
- Former Policy 22: Primary Shopping Frontages (renumbered as 26); and

- Former Policy 23: Additional Retail Provision (renumbered as 27).

Former Policy 21: The Retail Hierarchy (renumbered as 24)

We support the proposed amendments to the new Policy 24 which offer further support for enhancement of the vitality and viability of Boston and Spalding town centres.

However, as noted at the examination hearing sessions, we consider that the future vitality and viability of Spalding town centre would benefit from the alteration of the town centre boundary to extend the designated town centre to include land to the north of the Holland Market and Winfrey Avenue Retail Parks. It could be extended to include land between the retail park and King's Road, thereby allowing for the further expansion of the town centre and assisting in meeting the identified retail needs of Spalding.

Such an alteration to the boundary of the designated town centre would be in compliance with the NPPF (July 2018), which requires local planning authorities to undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites to accommodate retail needs (paragraph 85-part d).

New policy titled: 25 Ensuring Viable Town Centres

The introduction of Policy 25 as an enabling policy to support and encourage the evolution of Boston and Spalding town centres is supported. Its aim is to ensure that the town centres remain the focus and priority for opportunities for retail, entertainment, commerce and activity.

We particularly support the reference in the policy to:

- Supporting the redevelopment of land within the town centre boundary that can provide for retail and other town centre uses in accordance with the sequential test; and
- Enhancing the public realm through improvements to public spaces, accessibility and signage.

We also welcome the Council's commitment to develop partnership working to ensure the vitality and viability of the Boston and Spalding town centres.

Whilst the commitment to undertake a review of the town centres and the Retail Capacity Study to review retail capacity, town centre boundaries and primary shopping frontages is welcomed, this should have been undertaken to inform the emerging Local Plan. The need for the Council to now identify retail sites outside of defined centres, which is in direct conflict with the NPPF, is a direct result of the failure to properly assess the retail capacity, potential for town centre expansion and ultimately the identification of potential retail sites in the town centre and on edge-of-centre sites through an up-to-date retail study.

We do not consider that the approach taken in proposed Policy 27 (see below) provides the certainty and flexibility needed to deliver the required retail floorspace in Spalding during the plan period.

The lack of suitable allocations that seek to address the full retail needs of Spalding will almost inevitably lead to other less suitable sites coming forward to address the shortfall in retail floorspace. This may lead to sequentially less preferable sites coming forward through the planning application process.

In the absence of any suitable allocations or commitments, a case could be made to justify out-of-centre schemes as the impact assessment would only need to consider existing floorspace within defined centres, retail commitments, and allocations. In the absence of suitable allocations, the opportunity for out-of-centre schemes to come forward will increase.

Any delays in delivering the allocated floorspace at Springfield Shopping Centre before 2026 will only exacerbate the issue and could expose the town centre retail provision to greater pressure and impact from competing out-of-centre schemes.

The Council should adopt a more positive approach to planning for new retail development within Spalding by allocating sufficient sites in suitable locations to meet the full retail needs of the town and to provide the certainty required for key stakeholders such as SREF to commit the further investment in the town centre.

For these reasons, we do not consider it appropriate to only commit to 'commence' a retail study update within one year of adoption. This does not commit the Council to concluding the Retail Study in a timely manner. Given the current approach to identifying retail sites which is in direct conflict with the NPPF, we consider that the policy wording should require the Council to '**complete**' an update to the Retail Study **within one year of adoption**.

Former Policy 22: Primary Shopping Frontages (renumbered as 26)

Policy 26 states that the vitality and viability of centres in the retail hierarchy will be maintained and enhanced. Proposals for retail use outside the primary shopping areas as identified on the Policies Map, or for other main town centre uses, outside the town centre boundaries and where not provided for under Policy 23, will be required to demonstrate their suitability through a sequential test in line with the National Planning Policy Framework.

We support the emphasis of the policy in terms of the need for retail developments outside of the primary shopping area to provide and satisfy the sequential test as part of any planning application, consistent with the NPPF.

However, the primary shopping area should be expanded to include both the Holland Market and Winfrey Road Retail Parks, which perform an important role within Spalding town centre and are a key generator of footfall there. This is evident from the South-East Lincolnshire Town Centre and Retail Capacity Study (December 2013), which identifies that the Holland Market and Winfrey Avenue Retail Parks account for 67% of the total convenience turnover of Spalding town

centre.

Although a breakdown of comparison goods floorspace in the town centre is not provided, the retail parks make an important contribution to the town centre's overall offer. The parks also provide the majority of the town centre's car parking provision (which is free of charge).

We do not consider that the town centre boundaries and primary shopping frontages in Spalding have been appropriately defined in Policy 26 and on the Proposals Map. Both the town centre and primary shopping area should be extended to include the retail provision at the Holland Market and Winfrey Avenue Retail Parks to ensure that they are given the level of policy protection they require given the important role they play in the success of Spalding town centre.

Former Policy 23: Additional Retail Provision (renumbered as 27)

We consider that the lack of identification of suitable sites within and adjoining Spalding town centre is a direct result of the absence of an up-to-date Retail Study. We also consider that there are sites surrounding the Holland Market and Winfrey Avenue Retail Parks that could be considered for retail use to allow the town centre to expand. However, we recognise the Council's need to identify sites that are available now to meet the retail needs of the Borough in the period up to 2022.

Whilst we disagree that the most suitable site available is the site at Springfield Shopping Centre, we welcome the Council's proposed change to reduce the comparison goods floorspace allocation in this location from 5,400sqm down to 3,700sqm.

We also strongly support the Council's commitment in the policy to direct the remaining comparison goods floorspace need of 7,110sqm to Spalding town centre or in an edge-of-centre location.

This commitment emphasises the need for the Council to expedite the preparation of the Retail Study update and identify potential sites to come forward to meet the retail needs of the Borough beyond 2022 as soon as possible to defend against planning applications from coming forward for new retail floorspace on unsuitable sites in out-of-centre locations.

Next steps

We trust that these representations will be fully considered by the Council 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.



We look forward to confirmation of receipt of these representations but please do not hesitate to contact us if you have any queries.

Yours faithfully



Ben Frodsnam

Cc: Tom Woolven, Schroders



JOINT COMMITTEE RESPONSE FORM

REP: MM20(1)

PMM REF: PMM023

The issue of whether the designated Town Centre boundary for Spalding should be extended to 'include land to the north of the Holland Park and Winfrey Avenue Retail Parks' was thoroughly explored at the Local Plan Examination hearing sessions. The consideration of the issue can be best summarised in the following 'Additional Retail Question 15' asked by the Inspector and the Joint Committee response to it.

'15. As per NPPF paragraph 23, 6th bullet, should consideration be given to expanding the Town Centre to ensure a sufficient supply of suitable sites?

Joint Committee response

The boundary of the Spalding Town Centre as proposed in the 2013 Town Centre and Retail Capacity Study was the subject of review. As a consequence of this review, the boundary in the Submission Version of the Local Plan is now somewhat larger than was originally identified by the retail consultants. Currently, it is not considered that there is any potential for further expansion pending new information coming forward regarding the availability of significant edge-of-centre or out-of-centre sites.'

In conclusion, the Inspector did not ask the Joint Committee to amend the Spalding Town Centre boundary as part of the current preparation of the South East Lincolnshire Local Plan, but, instead, requested:

- the formulation of an additional policy aimed at protecting and enhancing the vitality and viability of Boston and Spalding Town Centres; and
- the commencement of a review of the South East Lincolnshire 'Town Centre and Retail Capacity Study' within one year of the adoption of the Local Plan, and for it to include, inter alia, a review of town-centre boundaries.