

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	234	Respondent Number:	2081	Comment Author:	Mr S Walton	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:		I can confirm our support for inclusion of the area identified in Purple below LO007 for employment use, in Long Sutton. [Map provided by email]	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:	LO007								
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input type="checkbox"/>						
		Consistent with national policy	<input type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	241	Respondent Number:	1552	Comment Author:	Mr D.W. Green	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	7	Map Number:		Wha009: Please note that this area should be reserved for possible future Industrial Development as already advised.	The SELAA identifies that 'there is no direct access to the site. A new access would need to be provided; Abbot's Gardens or St Mary's Gardens (to the south and north) are residential cul-de-sacs and would be unacceptable, the new access would need to come through the existing Whaplode Industrial Estate or site to the north of Cobgate.' Additionally the site bounds residential properties which could be affected by noise, odour and light. Therefore this site should not be allocated for employment use. No new evidence has been provided to alter this view.		No change to the Local Plan is required.		
Site Allocation Number:	Wha009								
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input checked="" type="checkbox"/>						
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input type="checkbox"/>						
		Consistent with national policy	<input type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	329	Respondent Number:	2320	Comment Author:	ID Planning	Client	UBS Triton Property Fund	Web Link	
-----------------	-----	--------------------	------	-----------------	-------------	--------	--------------------------	----------	--

Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
-------------------	--	---------------	--	-----------------	------------------	-------------------------

Policy Number:	8	Map Number:	
Site Allocation Number:			

Do you consider that this part of the Local Plan is

Legally Compliant	<input checked="" type="checkbox"/>
Sound	<input type="checkbox"/>
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>

Do you consider that the Local Plan is unsound because it is not:

Positively Prepared	<input type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>
Consistent with national policy	<input type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

A modification to the Plan would address the concern outlined earlier. This could be achieved by making clear that although A3, A4 and Class C1 uses are in principle permitted on this site to reflect the existing outline planning permission, such uses should not dominate the overall mix of uses across the site. They should remain ancillary.

We would propose the following amendment (red font) to the second paragraph in Policy 8 as follows:

Main Employment Areas Mixed Use developments, which incorporate main employment uses together with other identified appropriate employment-generating uses, will be supported in Mixed Use Areas identified. However, non Class B employment generating uses should not dominate such areas and still retain an ancillary function to the overall Class B employment function of the area.

The above amendment would ensure that non Class B uses do not dominate sites such as Lincs Gateway in the plan.

Participate in Examination:

Why wish to participate

It is considered necessary to appear at the oral Hearings in order to provide input to the local plan Examination process so that points made above can be considered in the context of any other representations put to the Inspector in dealing with this particular matter.

These representations are submitted on behalf of UBS Triton Property Fund, owners of Springfields Outlet and Festival Gardens in Spalding. In representing the interests of Springfields and in the absence of sequentially preferable sites, our client has sought to assist the Council in meeting the need identified in the December 2013 Town Centre and Retail Capacity Study for additional comparison floorspace in Spalding. Policy 8 deals with improving South East Lincolnshire's Employment Land Portfolio and identifies employment sites in the Local Plan.

The text of the policy confirms that on some sites mixed-use developments, which incorporate main employment uses together with other identified appropriate employment-generating uses, will be supported in Mixed-Use Areas identified.

The Table in Policy 8 then lists out the employment allocations with an indication in Column 4 as to how much Class B employment provision (ha) is anticipated to be provided by a particular site whilst the final column sets out the range of uses which would be regarded as acceptable on that employment site.

This is of particular relevance when dealing with mixed use sites and non Class B employment generating uses. Site Reference SP002 (SP014 on Proposals Map) relates to Lincs Gateway and identifies the site as measuring 18.1 hectares of which 3.7 hectares is anticipated to be Class B uses.

The final column identifies B1, A3, A4, C1 as appropriate uses on the site.

The inference from Policy 8 as currently drafted and the range of uses that are considered suitable is that over 14 hectares of land on employment Site Allocation SP002 (indicated above as SP014) could be used for A3 (restaurants & cafes), A4 (public houses) or C1 (hotels).

The earlier part of Policy 8 makes clear that for other main employment areas, any non B Class development will only be supported where an applicant can show that the use is ancillary to the effective functioning of the main employment area.

We consider that to effectively allow for potentially 14 hectares of land for either A3, A4 or C1 uses on a site located some distance from the settlement boundary of Spalding is significantly more than would be expected on what should be a largely employment based location. In our view the allowance of such a high potential quantum of A3, A4 and C1 uses in this location would not provide for sustainable development and is not

18.1ha refers to the total site area (the Existing and Proposed Mixed Use Employment Area). In practice, the majority of the Existing Employment Area has full planning permission and is under construction. Therefore 13.8ha is available to the market for a mix of uses (the Proposed Mixed Use Employment Area). However the SELAA assumes that 20% of the Proposed Site would be taken with infrastructure such as roads, car parking, SuDS and landscaping to create a business park setting. In practice it is expected that approx 11ha would be available for a mix of uses, of which Policy 8 suggests approx. 3.7ha would be available for B Class development - meaning that 7.3ha would be available for the other consented uses identified by Policy 8: B1, B2, B8, A3, A4, C1 (and not B1, A3, A4, C1). The intention of Policy 8 is to support the development of Mixed Use Areas which are mostly consented or have masterplans being prepared and not to encourage additional non B-development in these locations (over and above that consented).

Change Policy 8 to: Consented Mixed-use developments which incorporate main employment uses together with other identified appropriate employment-generating uses, will be supported in Mixed-Use Areas identified #. Any new non B-development will only be supported where the applicant can show that it is ancillary to the effective functioning of the Mixed-Use Area.

Change to paragraph 4.1.7: Therefore, in order to protect the town centres and to promote sustainable development, any non B-development within these allocations should be ancillary to the main employment function of the site.

Further consideration of this matter will be necessary as part of the Examination.

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

justified.
Either the area devoted to Class B uses should be increased and the policy make clear that other uses should be ancillary or the scale of the overall allocation should be reduced significantly.
In this way the level of non Class B uses would not then accommodate over 14 hectares of land. This seems somewhat in excess of what would reasonably be required for such uses in this location.
The outline planning permission (H16-0009-14) for site SP014 included the proposed allocation and land to the south, shown on the Publication Proposals Map (see extract above) as an existing mixed use employment area'.
The submitted Design & Access Statement (page 8) supporting the outline application included a schedule of floorspace and reference is made to the inclusion of a hotel and pub/restaurant. The D&A comments that these uses are complementary to the main use of the site for employment purposes.
Furthermore, the Development Framework Plan for the outline planning permission shows the hotel, pub/restaurant, petrol filling station all located on land outside allocation SP002 and on the southern portion of land shown on the Publication Proposals Map as an Existing Mixed Use Employment Site.
Recent local press releases indicated that development is progressing for those complementary uses with Premier Inn the hotel operator and Brewers Fayre the pub/restaurant.
This suggests that a significant proportion of land within SP002 is likely to include for A3, A4, C1 uses.
As currently drafted, the Publication Local Plan includes for up to around 14 hectares of land for non Class 8 employment uses at Lincs Gateway, which appears excessive and beyond reasonable requirements for this location.
Against this background we consider that the allocation of 14 hectares on site SP014 which could accommodate Class A3, Class A4 and Class C1 uses is not justified or effective. On this basis we find the plan unsound.

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	341	Respondent Number:	1412	Comment Author:	Mr C S Massey	Client		Web Link	
Paragraph Number:	4.1	Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	8	Map Number:	1	Part of the de-allocated site (formerly BO005 - now BO006) immediately to the south of the southern boundary of Pilgrim Frozen Foods has already been developed under Planning Application B/17/0014.	A small car park extension on the southern boundary of the Pilgrim Foods site has been completed since the Local Plan was published. The boundary of BO006 should be amended to reflect this development.	Minor modification - Further consideration of this matter will be necessary as part of the Examination.			
Site Allocation Number:	BO006 (B)								
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input type="checkbox"/>	Positively Prepared	<input checked="" type="checkbox"/>						
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input type="checkbox"/>	Effective	<input checked="" type="checkbox"/>						
		Consistent with national policy	<input type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	As published, the plan is inaccurate. BO006 excludes the de-allocated area formerly BO005 and this title has been given to another site (Redstone). This is deliberately misleading making the plan as written unfit for purpose.								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	To provide supporting evidence and expert witnesses to support previous objections made which remain unaddressed, along with current errors evidenced in the draft plan as it stands.								
					Amend Inset Map 1: Amend boundary of BO006 to reflect the consented B/17/0014. Amend Policy 8 to: Main Employment Areas BO006 - amend gross site area to 89.7ha to incorporate additional land.				

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	384	Respondent Number:	2821	Comment Author:	Amec Foster Wheeler	Client	Duchy of Lancaster	Web Link	
-----------------	-----	--------------------	------	-----------------	---------------------	--------	--------------------	----------	--

Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
-------------------	--	---------------	--	-----------------	------------------	-------------------------

Policy Number:	8	Map Number:	4	Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler) is instructed by the Duchy of Lancaster to submit representations to the above consultation, in respect of their land at Park Farm, Donington. Land at Park Farm is currently allocated within the South Holland District Local Plan (2006) under Policy EC1(6) for employment development. However, the site has not been taken forward as an allocation in the emerging South East Lincolnshire Local Plan (Local Plan), as identified on Inset Map 4. Amec Foster Wheeler objected to this omission in the Local Plan Preferred Sites consultation in August 2016, and maintains its objection for the following reasons. Land at Park Farm was included as an employment allocation in the South Holland Local Plan. Therefore, it was considered at this time to be suitable for employment development, and it is considered that the site remains suitable. The Employment Land Review concludes that this is a good quality employment site suitable for a range of mainly industrial uses. Amec Foster Wheeler agrees with this view and that there are no physical or technical reasons preventing the sites development. The assessment indicated that there had been little developer interest, although this was largely due to a prolonged period of economic recession unprecedented in recent times. Whilst this was correct at the time it is not currently the case, and the Officer's comments to the Local Plan Preferred Sites consultation indicating that although the site had been allocated, no development had taken place and the site had not been marketed for employment development are incorrect. Outline planning permission (ref. H04-1082-16) was granted for B1c/82/BB uses on approximately 2ha of the site on 17 January 2017, see attached Site Location Plan. This application was submitted due to local interest to occupy the site, as detailed in the Planning Statement, and negotiations are currently taking place with a local employer for occupation of the first phase for their agricultural / horticultural business. Paragraph 22 of the National Planning Policy Framework advises that planning policies should avoid the long-term protection of employment sites if there is no reasonable prospect of the site coming forward for that purpose. In light of the negotiations currently taking place in relation to occupying the site, there is a very reasonable prospect that the site will be developed for employment uses. Therefore, the site should be retained as an employment allocation in the emerging Local Plan. Inset	The Employment Land Technical Paper Update 2017 (which updates the Employment Land Review) identifies that 'the NPPF states that local authorities should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The ELTP informed by the SELAA identifies several allocations with significant barriers that would constrain future delivery of viable economic development and/or would not meet the needs of the Plan Area's growth sectors.' The Main Employment Area designation in Policy 8 promotes those sites that are best able to meet the needs of the Plan Area's growth sectors and the general employment market. Consequently the Park Farm site was de-allocated because the SELAA identifies that 'the site has proved unattractive to the general employment market (the planning permission is outline and is for the re-location of an existing business rather than being attractive to new business) so it is not considered that demand exists for a strategic employment allocation in this location. The outline permission is only for part of the site rather than its entirety indicating that demand may not exist for employment use on the scale of that currently allocated'. However, the site and any future development would be covered by Policy 8 'Other Employment Sites' which supports the re-use of previously developed land and the conversion of other buildings to employment use, including the agricultural related buildings on site. Additionally it supports the development of employment use subject to several criteria being met which should help fulfill the future aspirations for the site. The Settlement Boundaries Background Paper 2016 identifies that the purpose of settlement boundaries is to define where particular Local Plan policies apply. In effect, they are defining where the Countryside policy (which covers most of the Local Plan area) ends and where other policies relating to the Sub Regional Centres, Main Service Centres and Minor Service Centres start. Consequently a settlement boundary is not intended to include all buildings within the vicinity of a settlement. In many cases the boundary is defined by a strong physical feature on the ground, in this case the A52. Therefore it is appropriate that the site remains outside the settlement boundary.	No change to the Local Plan is required.
Site Allocation Number:						

Do you consider that this part of the Local Plan is

Legally Compliant

Sound

Prepared in accordance with Duty to Cooperate

Do you consider that the Local Plan is unsound because it is not:

Positively Prepared

Justified

Effective

Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

The site should be retained as an employment allocation in the emerging Local Plan.

Participate in Examination:

Why wish to participate

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Map 4 shows the Park Farm site as being outside of the settlement boundary. As indicated above, planning permission has been granted on part of the site. As such, it is considered that the previous allocation should be included within the settlement boundary, or as a very minimum, the approved application site should be included. Amec Foster Wheeler objects to the exclusion of the site from within the settlement boundary, and suggests that it is entirely appropriate for the boundary to be amended to include the site due to its previous allocation and recent consent for employment development. In conclusion, Amec Foster Wheeler on behalf of the Duchy of Lancaster wishes to confirm its objection to the omission of Land at Park Farm as an employment allocation from the Local Plan. It is maintained that the site is entirely suitable for employment uses, and that due to the current occupier interest it will come forward for development, contributing to the range and type of sites available within the District. It is, therefore, considered that the site should be reinstated as an employment allocations.

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	417	Respondent Number:	2794	Comment Author:	3D Planning Ltd	Client	Cook Engineering	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:			Officer Recommendation:	
Policy Number:	8	Map Number:	4	<p>The site is in a relatively isolated location in business terms and the current owners are struggling to maintain it in business use and it is used at a very low level as a secondary base for storage associated with the main business. The buildings on site are not suitable for modern B2 or B8 business use and it is not viable on a site of this size / location to upgrade them as the values are not there. The relatively isolated location is not attractive for B1 office use which in sequential terms the LPA would seek to direct to a larger town centre. The site is a long established B2 and B8 site in a predominantly residential area, it is a non-conforming use that has the potential to adversely impact on residential amenity. It is clear that if the site were to be used to its capacity a B8 use in accordance with its permission then it would cause significant impacts to the residential amenity of the surrounding residential properties as a non-conforming use. It is noted that the permission and particularly conditions 2 and 3 significantly restrict the commercial viability of the existing use and buildings and as such that the current owner only uses it as a satellite store facility rather than a main operation site. It is noted that the reason for the imposition of conditions 2, 3 and 4 are to protect residential amenities and indeed C2 specifically refers to protect the amenities of this residential area. The owner of the site is of the view that the site is too restricted in terms of constraints to operate in a viable and commercial manner utilise it for a B8 use it is clear that current working requirements for a B8 would require hours of operation to enable at least 0600-2300 usage. Clearly this is not possible in this residential location. It is clear that a B2 use could not be located on site due to the conflict with amenity and that it is not a suitable or attractive site for B1 offices or commercial operation. Therefore it is not considered practical to retain the industrial use on site. Process In terms of process it is not clear what investigations the LPA actually carried out in relation to the identification of sites under Established Employment sites policy. It appears likely that it simply compiled a list of existing B class sites, however this is not a strategic assessment of ongoing suitability and is simply a description of what is. It is not clear that an assessment of the sites to meet ongoing and changing business needs has been addressed. Many of the sites in the smaller settlements are in reality not suited to modern business needs in terms of transportation and communication and are not likely to</p>	<p>DO010 is a small scale site within the settlement boundary of Donington, a Main Service Centre. The site has changed occupiers in the last 5 years indicating that the site was suitable for ongoing employment use. Therefore, DO010 was identified as an Established Employment Site. However, in order for the designation to be meaningful there needs to be some degree of certainty that the site will remain in employment use over the plan period. The LPA are aware that planning permission for residential use on part of the site has been refused and the owners intentions for the future use of the site are unclear. This indicates that the site may not be available for employment use in the long term. As the site is 0.27ha the loss of employment land would generate little adverse impact upon the economy. Therefore the site should no longer be protected for employment use.</p> <p>Change Inset Map 4 to: Remove the notation of DO010.</p> <p>Change Policy 8 to: Under Established Employment Sites delete row DO010</p>			<p>Further consideration of this matter will be necessary as part of the Examination.</p>	
Site Allocation Number:	DO010	Map Number:	4						
<p>Do you consider that this part of the Local Plan is</p> <p>Legally Compliant <input checked="" type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p>Do you consider that the Local Plan is unsound because it is not:</p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input checked="" type="checkbox"/></p> <p>Consistent with national policy <input type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	Remove land at Quadring Road Donington from the Established Employment sites identified under Policy 8.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

contribute significantly to the wider economy as the plan intends and to this extent, this aspect of the plan is not based on sound strategic planning. Outcome It is acknowledged that the LPA need to maintain and encourage employment as a cornerstone of the local economy, however the assessment of existing employment sites seems somewhat cursory and does not consider if the sites are appropriate for B class uses going forward, or if they could be better used for an alternative strategic use, such as housing with a new industrial allocation in a preferable location being made to secure viability throughout the plan period.

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	422	Respondent Number:	1843	Comment Author:	Neil Kempster	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:			Officer Recommendation:	
Policy Number:	8	Map Number:	1	<p>We support the wide variety of employment land sites identified in the Local Plan to provide a range of opportunities to attract inward investment. Flexibility is a key consideration with the need for proposed sites, such as that identified at Q2, to evolve over time, through a proper Master Planning exercise and to be able to respond to changing economic market conditions. To aid such flexibility we would suggest the Employment provision (of 2.5 Ha) is seen as a minimum size with the potential for this to be considerably higher. We would also suggest that the Employment Classes are extended to include A1 and A5 uses, B2, C1 and D1/D2 uses, as well as sui generis uses, Q2 is proposed as a major mixed use development, assisting the delivery of the new Boston distributor road through the development of a major new Sustainable Urban extension. As such a wide variety of uses could be envisaged and it is important that the relevant Local plan policies do not constrain how the project evolves.</p>	<p>The 2.5ha identified refers to the amount of B Class employment development only. Any other employment uses on site would be additional. Give the aspirations for this urban extension it is appropriate for the Employment Classes to be extended to accommodate B2 and C1. However, A1, A5, D1 and D2 are town centre uses and should be directed to the town centre first. However all of these uses could be acceptable in this location provided they are ancillary to the effective functioning of the B Class development. Sui generis could cover a wide range of different uses, many of which should be directed to a town centre first. However, to reflect the aspirations for the site and to provide greater certainty for the developer and the LPA moving forward, a marina and related development will be identified as an appropriate Employment Class.</p> <p>Change Policy 8 to:</p> <p>Consented Mixed-use developments which incorporate main employment uses together with other identified appropriate employment-generating uses, will be supported in Mixed-Use Areas identified #. Any new non B-development wil only be supported where the applicant can show that it is ancillary to the effective functioning of the Mixed-Use Area.</p> <p>Change Policy 8 to:</p> <p>Change BO035 to BO008 for consistency</p> <p>Change Policy 8, BO008 to: Employment Class: B1, B2, A2, A3, A4, C1 and marina and marina related development</p> <p>Change paragraph 4.1.6 to: Change BO014 to BO008 for consistency</p> <p>Change last sentence of paragraph 4.1.6 to: The location of the employment development at BO008 will be agreed through a masterplan for the site. The site is expected to be a major mixed-use scheme, incorporating uses to help deliver a range of economic objectives over the Local Plan period. This could include a marina and related development as well as more traditional B Class development and employment generating uses.</p>			<p>Further consideration of this matter will be necessary as part of the Examination.</p>	
Site Allocation Number:	Sou 006								
<p>Do you consider that this part of the Local Plan is</p> <p>Legally Compliant <input checked="" type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p>Do you consider that the Local Plan is unsound because it is not:</p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input type="checkbox"/></p> <p>Effective <input checked="" type="checkbox"/></p> <p>Consistent with national policy <input type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	Inclusion of the amendments suggested in para Q4								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	As promoter of this large mixed use development we would welcome inclusion on any debate surrounding relevant policies for such mixed use developments								

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	425	Respondent Number:	2825	Comment Author:	Indigo Planning	Client	Diana Properties Ltd	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	8	Map Number:	19	<p>The owner of the former Gardman premises in Moulton: [all images and maps referenced have been provided by email] The former Gardman premises is located to the south of the commercial and historic centre of Moulton, adjacent to High Street (B1357). Immediately north of the site is the Moulton Conservation Area, as well as the Grade I Listed Windmill and two further Grade II Listed properties. The site is roughly 2.6 ha in size, the majority of which is vacant although part of the site is used for overflow storage by Smart Garden Products Ltd. The occupier does not pay a rent to Diana Properties, but they do cover the business rates. The site is formed of a collection of warehouses and workshops with associated service yard, as well as an area of unused brownfield land to the south - see satellite image below. The site is identified as MO001 Inset Map No 19: Moulton and as a Established Employment Site at Policy 8 of the Local Plan (March 2017). Background The site was formerly occupied by Gardman Ltd, a garden products supplier, who utilised the site for storage, packaging and distribution of garden products between August 2000 to August 2012. During that time, operations steadily declined due to the limitations of the site and Gardman transferred its activities to more suitable premises elsewhere within the region. The site eventually became vacant in April 2014. Although the site has a prominent location in Moulton, access into the site is narrow and unsuitable for large HGVs and commercial vehicles. The route into the site is through residential areas and the village centre which can give rise to potential conflict and impact on amenity. Furthermore, the warehouses and workshops were built in the 19705/80s, are of limited quality and no longer meet modern occupational requirements. Upon Gardman Ltd vacating in April 2014, the site was marketed for mixed B1/B2/B8 uses by Barker Storey Matthews (BSM) for a number of years between 2014 to 2016. The marketing exercise comprised site signage and mailshot to the BSM database and interested parties, as well as advertising through the BSM website and office in Peterborough. Although the site was actively marketed for an extended period of time, a long-term occupier was not identified. The site currently serves as temporary overflow storage for a third party, Smart Garden Products Ltd (SGP). The facility is only in use sporadically, at peak times of the year when SGP require surplus storage to supplement their other regional facilities. SGP occupy the premises on licence</p>		<p>MO001 is identified as an Established Employment Site. However, in order for the designation to be meaningful there needs to be some degree of certainty that the site will remain in employment use over the plan period. The site has been actively marketed for several years and appears to be used on a temporary basis only. The owners indicate that the site is also no longer available for employment use in the long term. Therefore the site should no longer be protected for employment use.</p> <p>Change Inset Map 19 to: Remove the notation of MO001.</p> <p>Change Policy 8 to: Under Established Employment Sites delete row MO001</p>		<p>Further consideration of this matter will be necessary as part of the Examination.</p>	
Site Allocation Number:	MO001								
<p>Do you consider that this part of the Local Plan is</p> <p>Legally Compliant <input checked="" type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p>Do you consider that the Local Plan is unsound because it is not:</p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	<p>In order to make the Local Plan sound, the former Gardman site should be designated as a housing allocation through Policy 11. This approach would also help to address the housing shortfall in Moulton and is in accordance with paragraph 47 of the NPPF, which requires local planning authorities to meet their full, objectively assessed needs for housing.</p>								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate									

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

and do not pay rent to Diana Properties Ltd, given that the premises are unsuitable for full occupancy. Considering this, Diana Properties has recently undertaken a further marketing exercise to understand what alternative uses might be suitable. A number of national multiple convenience store retailers have been contacted to determine whether the site is suitable for a small convenience store, as part of a wider mixed use scheme. Unfortunately, responses indicate there are not sufficient housing numbers and emerging housing site allocations within the vicinity of the site to justify a store. Given the lack of demand for commercial uses in Moulton, Diana Properties is now seeking to promote the site for residential development through the emerging South East Lincolnshire Local Plan and intends to submit a planning application for comprehensive redevelopment of the site in due course. National Planning Policy Framework (NPPF) (March 2012) Paragraphs 47 of the NPPF states that local planning authorities should, inter- alia, use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area in order to significantly boost the supply of housing. Paragraph 51 of the NPPF states that local planning authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. The NPPF also states that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities - paragraph 55. South Holland Local Plan 2006 It is instructive to review the evolution of Policy 8 and the designation of the former Gardman site as an EES, in order to understand the origins of and justification for the draft policy designation. Set out at Figure 1 below is an extract from Inset Map 12 of the South Holland Local Plan 2006. The map shows that the site was not designated for employment uses in the previous Local Plan, which remains the relevant development plan for the Borough until the new Local Plan is adopted in due course. In the January consultation version of the South East Lincolnshire Local Plan, only part of the site was identified as a Local Employment Site, as identified by Inset Map No 21, see Figure 2 below. The Local Employment Site designation covered the warehouse buildings within the north-east corner of the site and some associated yard

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

space to the rear. As illustrated by Figure 3, the whole of the former Gardman site is identified as an EES under Policy 8 - the site is identified as MO001. Clearly, designation of the whole of the former Gardman site for employment uses is a recent policy development that has evolved as the emerging Local Plan has progressed. The whole of the former Gardman site is identified as MO035 in the South East Lincolnshire Strategic Housing Land Availability Assessment (April 2017) (SHLAA). In the supporting text, it is noted that the site is currently empty and is being marketed, that the estate agents have been contacted to suggest it is submitted for inclusion in the SHLAA and until that is received, the site is considered to be unavailable. From this evidence, it appears that the local planning authority's preferred use of the site is in fact residential. The suitability of the site for residential use is discussed further, in relation to Policy 11 below. Policy 8 Improving South East Lincolnshire's Employment Land Portfolio Policy 8 focuses on allocating and safeguarding employment land in order to meet the requirements of the Local Plan. The policy identifies a series of EESs, which are to be protected for new B1, B2 or B8 development and/or redevelopment in Class B1, B2 or B8 use. Furthermore, the policy prohibits substantive change of use to non-B uses in EESs, stating that such development will only be supported where it can be demonstrated that the proposals are ancillary to the effective functioning of the site. Diana Properties does not agree with the designation of the former Gardman site as an EES. The site is located within a predominantly residential Minor Service Centre, not suited to intensive commercial and/or industrial uses. Access to the site is constrained by the entrance off High Street, as well as the nature of the surrounding road network. The existing building stock is dated, of poor quality and no longer meets the expectations of modern occupiers. This is supported by the South East Lincolnshire Local Plan: Employment Land Technical Paper 2016 (ELTP), which notes that the existing building stock is of average quality and the site access is narrow and unsuitable for large HGVs. In summary, the ELTP recommends that 0.4 ha of the site be safeguarded as an Existing Local Employment Site for B1/B2/B8 uses. The South East Lincolnshire Local Plan: Employment Land Technical Paper Update March 2017 (ELTP Update) provides an update on the position relating to the site. It is noted that the site appears to have recently been let, indicating existing demand for employment development in this location. As such, it is recommended that the whole of the site should be

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

safeguarded for employment uses. To clarify the current position, as noted above, the site is predominantly vacant although a small part is occasionally used as overflow storage by SGP. The site is unsuitable for permanent occupation, as demonstrated by the fact SGP do not pay rent for the temporary use. In light of this, it is clear that the site would be more sustainably and suitably put to use in meeting the surplus housing need for Moulton, presently not identified in the South East Lincolnshire Local Plan.

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	511	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link	
-----------------	-----	--------------------	------	-----------------	--------------------------	--------	--	----------	--

Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
-------------------	--	---------------	--	-----------------	------------------	-------------------------

Policy Number:	8	Map Number:	
Site Allocation Number:	SP012		

Do you consider that this part of the Local Plan is

Legally Compliant	<input checked="" type="checkbox"/>
Sound	<input type="checkbox"/>
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>

Do you consider that the Local Plan is unsound because it is not:

Positively Prepared	<input checked="" type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>
Consistent with national policy	<input type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Proposed Amendments to Policy 8 and Proposals Map
 The table within Policy 8 should be amended to allow for ancillary A3 and A5 uses within the Clay Lake site.
 include the following text within the first part of the policy, concerning Main Employment Areas:
 "Uses which do not fall within the 'B' use classes, but which would satisfy the following criteria, will be permitted within Main Employment Areas: o it would be compatible with other B-class employment uses within the wider site; and o it would lead to the generation of a significant level of employment; and / or o it would provide a facility which would be of significant benefit to other local businesses."
 Extend the "Proposed Main Employment Area' designation at Clay Lake to the north, up to Childers South Drive, as shown on our Drawing 224/201.

Participate in Examination:

Why wish to participate

Because the issues raised in this representation would be best explained to the Inspector in the format of a round-table discussion.

We welcome and support the identification of Clay Lake (Site SP012) in Policy 8, as a Main Employment Area. Clay Lake is a well established employment area, and now has a new connection to the strategic highway network, constructed by Ashley King Developments, which enables the delivery of the wider site. This is a deliverable site which is currently the subject of substantial interest from local and international businesses. Work is ongoing on the preparation of proposals for new development, primarily in the B2 general industrial and B8 storage/distribution use classes. The site is in an ideal location, close to the Sub-Regional Centre of Spalding, with good visibility from and access to the strategic road network, and without any limitation placed on it due to proximity to sensitive receptors, such as residential development.

Delivery
 As the Employment Land Technical Paper (ELTP) highlights, Clay Lake is well located to deliver employment in what is already an established area for B-class development, with a number of existing businesses already present. The site could potentially enable the expansion of existing businesses, or the relocation of businesses from existing facilities to new bespoke premises. The site's location and visibility have proven to be a significant draw in discussions between Ashley King Developments and various potential end users. The site also now benefits from a connection to the A16, which is purpose-built to serve a major new development. This access would provide sufficient capacity to allow both for the site's development, and for vehicular movements to be diverted from Spalding Drove through the site to the A16.

Technical work has been undertaken to design new access roads and drainage features within the site, and with regard to matters such as ecology, archaeology and the potential for ground contamination. This has established that there are no constraints to the delivery of new employment development within the site. This work has in turn fed into the design of a Masterplan, which is currently being refined in discussions with end-users.

Ashley King Developments are committed to the delivery of a B2 industrial and B8 storage / distribution development within the site. This commitment is illustrated by the considerable investment they have already made in the construction of a new highway access from the A16, and in the ongoing work being

Policy 8 does not identify Clay Lake as a Mixed Use Area but solely as a Main Employment Area. It identifies the appropriate mix of uses as B1, B2, B8. Policy 8 also states that 'any non-B development will only be supported where the applicant can show that it is ancillary to the effective functioning of the Main Employment Area.' This would support ancillary A3 and A5 uses as well as sui generis. The SELAA identifies that development of the land to the north of Clay Lake (SP029) is reliant on the development of Clay Lake to the south. Clay Lake is identified as a strategic employment site with the potential to provide for a mix of B class employment development over the plan period. But, given the relatively slow take-up of employment land on Clay Lake to date (following an outline planning permission over five years ago and no subsequent reserved matters application) particularly if opening-up costs are not prohibitive, it is considered that the extension to the site should not be allocated until a reasonable level of employment development has taken place at Clay Lake. This would ensure the site is developed comprehensively with appropriate supporting infrastructure.

No change to the Local Plan is required.

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

undertaken on the preparation of a planning application.

We have noted that the ELTP identifies Clay Lake as an example of a site which has significant up-front infrastructure costs, which could delay its delivery. The technical work undertaken to date has shown that these costs are not prohibitive, subject to there being an end-user identified. Given the interest shown by the market, Ashley King Developments expect the site to be delivered in the next few years, within the early to mid-part of the plan period. Their view, based on discussions with these end users, is consistent with the Council's own findings, reflected at paragraph 3.29 of the ELTP, that there has been a recent upturn in activity in relation to employment land, which may signal an increase in demand for the upcoming plan period.

Benefits

The site's development would bring a number of benefits to the local economy. Clay Lake is identified in the ELTP as a site which has the potential to make a valuable contribution to the provision of new jobs in the area, and it is identified as a prestige employment site in the draft Local Plan. We support this view of the site, and we believe that its strategically advantageous location, high visibility, and the potential to accommodate a high quality, modern development, make it one of the brightest employment land prospects in South-East Lincolnshire.

The delivery of this site can help to stimulate the local economy. In addition to providing suitable and high-tech premises for leading local businesses, it is also envisaged that it may be possible to encourage new businesses to locate in this area, and commercial discussions are ongoing in this regard. Sites such as this are particularly valuable, in light of the high level of demand for industrial and warehouse accommodation, and the need for new-build development over the plan period, as highlighted in the ELTP.

Ashley King Developments intend to deliver the site with a new masterplan, which will be the subject of discussion with Council Officers, prior to the submission of a planning application. This will promote the principles of good design, including the need to provide an attractive public frontage to the A16, good quality landscaping and a suitable layout of the buildings and open spaces within the site.

The delivery of this site will also bring local environmental improvements for existing residents on Spalding Drove, and highway safety benefits, by providing an alternative route for traffic through to the A16. This would allow HGVs on the existing employment

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

land to the east, as well as from the new development, to avoid an unsuitable road access.

Proposed Mix of Uses

We welcome the recognition in the wider policy that there should be a more flexible approach to the provision of 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, in addition to the core B-class uses proposed, there would also be a need for A3 and A5 food and drink establishments. These would serve the large number of people working within or visiting the site, and they would be ancillary to the main B-class uses within the site, covering only a very small proportion of the site. The policy as drafted is ambiguous over whether such uses would be acceptable, but we understand from ongoing commercial discussions that this type of end user would be valuable in providing an attractive environment for new businesses. These uses can also provide useful additional funding to assist with the site's delivery. Finally, they can reduce the need for workers to travel off-site in search of food and drink, which can significantly reduce the number of vehicle trips associated with the site's operation. As such, they would make a valuable contribution towards the delivery of a sustainable form of development. We therefore believe that the table within the policy text should be amended to allow for A3 and A5 uses on the Clay Lake site, and other similar employment sites.

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. The site's location on the strategic road network makes it ideal for such a use. We understand that there is a strategic need for a truck stop in this area, to meet the needs of the many HGV drivers who regularly travel through the area, and that an accessible and visible location such as this is necessary for it to be a success. We believe that a flexible policy approach is required, to allow for uses such as this to be accommodated. As such, we suggest that the policy text should be amended to acknowledge that there may be circumstances in which other employment-generating uses, such as sui generis development, would be acceptable. The policy wording could suggest that such uses would be accepted, where they would be compatible with the character and function of the Main Employment Area, and where they would either generate employment or provide valuable assistance to the operation of the local economy. We have suggested

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

additional wording below.

Site Area
The area of the site shown on the draft Proposals Map relates to the footprint of existing business premises, and land owned by Ashley King Developments. However, it omits further land which is also under the ownership of Ashley King Developments, immediately to the north of the identified land, and bounded by Childer's South Drove. We believe that this land is just as suitable for employment use as the rest of the site, and that it is appropriate that the Local Plan should identify it as such.

The land contains glass houses, agricultural buildings and farm land. If the Clay Lake site were to be developed, this land would be left without any particular purpose, as it would be impractical to farm, and the existing buildings would have little utility. In addition, there is no strategic planning benefit in omitting this land, as it does not form any important gap or open space.

The Council's stated approach in the ELTP is to over-allocate land, to allow for non delivery. In this context, it is also difficult to discern the purpose of omitting this land from the allocation. If the land were to be promoted for development as part of a comprehensive masterplan for the wider site, and with identified end users, it is hard to see what the Council's planning grounds might be for refusing such a proposal.

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 otherwise seeks to deliver, and on one of the most suitably located employment sites identified. We have enclosed Drawing 224/201, which shows our proposed amendment to the Local Plan Proposals Map.

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	512	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link	
-----------------	-----	--------------------	------	-----------------	--------------------------	--------	--	----------	--

Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
-------------------	--	---------------	--	-----------------	------------------	-------------------------

Policy Number:	8	Map Number:		Introduction We believe that the provision of a high quality business park at Lincs Gateway can provide substantial benefits for Spalding and the wider South East Lincolnshire area. 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 particularly suitable to accommodate 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. We welcome the recognition in Policy 8 that Lincs Gateway is a prestige employment site. We believe that it provides the potential for high quality employment, and that it can bring something new to the area in terms of job creation and the diversification of the economy. This was the basis on which planning permission was granted for a new business park on the site, and its owners Ashley King Developments remain fully committed to the delivery of that vision. To this end, they have already invested over £1 million in the provision of enabling infrastructure, and they are also in the process of relocating their offices to the southern part of the site. Context The Lincs Gateway site benefits from an outline planning permission (H16-0009-14), which allows for the construction of a high quality business park. This would be characterised by a landscaped campus, and its prominent location on the A17, at the "gateway to the town. Whilst its location and the quality of its environment are seen as being key to its future success, the planning permission also permitted other uses which would have a synergy with the business park, such as a hotel and Conference / function centre. These are intended to address identified deficits which are currently an impediment to economic growth, and assist the development of new types of business for the town by helping it compete better with other regional Centres. This is in turn intended to stimulate a wider range of types of job, and broaden the local economic and skills base. The planning permission for Lincs Gateway is flexible, and it allows for any configuration of business uses within the main body of the site, within use classes B1, B2 and B8. Notwithstanding this flexibility, it was always Ashley King Developments'	The owners previous representations for the Lincs Gateway identified their preference for a range of non B Class uses to be accommodated on the site (that differ to the planning permission). This indicates that achieving the amount of employment land identified for the area previously (and that consented) was too high and unlikely to be achieved. This was reinforced by the developer's proposal to deliver housing on part of the site to help fund the delivery of employment land. The allocation was therefore reduced to take into account the developer's previous proposals: however, the site has planning permission and has been implemented so is able to be delivered irrespective of whether the allocation covers the whole consented site. The Lincs Gateway is an out of settlement site, with poor access to Spalding built-up area. Identification of retail development in this location would be contrary to national policy. The Local Plan identifies sufficient land to accommodate the identified retail need to 2026. There is also capacity within the town centre boundary to redevelop land to the west of Winfrey Avenue which would be sequentially preferable and consistent with the town centres first approach. This site would be capable of accommodating the identified retail need post 2026. This land has not been allocated because the precise site area is not known at this stage. It is not necessary to identify land to meet Spaldings full retail needs, the NPPF requires that where this cannot be achieved planning policies should be used to help deliver suitable proposals. Section 6 provides the framework within which retail development can be positively assessed, consistent with national policy.	Further consideration of this matter will be necessary as part of the Examination.
Site Allocation Number:						

Do you consider that this part of the Local Plan is

Legally Compliant

Sound

Prepared in accordance with Duty to Cooperate

Do you consider that the Local Plan is unsound because it is not:

Positively Prepared

Justified

Effective

Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Proposed Alterations Policy 8 should be altered in the following ways: o Amend the various references to Lincs Gateway in Policy 8 and on the Proposals Map, to make them consistent. o Amend Policy 8 to state that 16.5 Ha of mixed use employment land can be delivered at Lin Cs Gateway. o Amend Policy 8 to expand the list of use classes which could be accepted on the Lincs Gateway site, to include D1 and D2, in accordance with the extant planning permission for a conference and function centre, and to allow for the future provision of a minor element of training and education space. o identify a new residential allocation on the northern part of the Lincs Gateway site, in accordance with our Drawing 224/302, to provide funding to assist with the delivery of the prestige employment site and sustainable transport connections to the town centre.

Participate in Examination:

Why wish to participate

Because the issues raised in this representation would be best explained to the Inspector in the format of a round-table discussion.

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

intention that the site would be led by office-based development, in use classes B1a and B1b. These are the uses which would represent the high quality employment which is currently under-represented in the District. They would also deliver the majority of the new jobs envisaged, due to the relatively low employment density of other "B" class uses. We have noted in previous representations that the potential exists to deliver B2 industrial and B8 storage / distribution development on the nearby site at Clay Lake (Site SP012), which is also identified as an employment allocation in the draft Local Plan. These uses have the potential to be bad neighbours to a high quality office-based development, and they would in any case be well suited to the Clay Lake site. We have sought to highlight this potential to identify opportunities for other uses for the Lincs Gateway site, which may better compliment the site's primary purpose as a high quality office-based development, and which may assist its delivery. In light of the Council's conclusions following our previous representations, we wish to clarify that Ashley King Developments have no intention of allowing any alternative use of this land to undermine or compromise the delivery of the business park. Our previous representations have sought alternative uses within the site, including housing and retail development. Housing was sought both to meet an identified local need, and also to provide forward funding for the provision of infrastructure to help deliver the business park, including high quality landscaping and improved transport connections. We note that the Council have altered the Local Plan's proposals for the site, removing the area previously promoted for housing from the proposed allocation. This area is still subject to a planning permission for a business park, and it remains Ashley King Developments' intention that as much of the site as possible should be delivered for that purpose. We believe that the majority of the site should still be identified as a mixed use employment site on the Proposals Map, to avoid any potential frustration to its delivery in the future. There is no dispute from the Council that the site as a whole is suitable for this purpose, and that its delivery is highly desirable, However, we also propose a small area of housing on the northern part of the site, to provide funding to expedite the site's delivery and deliver sustainable transport connections, including a new footpath and cycle link to the town centre, and also to meet local housing needs. This is shown in Drawing 224/302, which accompanies this representation. The suggestion in our previous representations that the site could

18.1ha refers to the total site area (the Existing and Proposed Mixed Use Employment Area). In practice, the majority of the Existing Employment Area has full planning permission and is under construction. Therefore 13.8ha is available to the market for a mix of uses (the Proposed Mixed Use Employment Area). However the SELAA assumes that 20% of the Proposed Site would be taken with infrastructure such as roads, car parking, SuDS and landscaping to create a business park setting. In practice it is expected that approx 11ha would be available for a mix of uses, of which Policy 8 suggests approx. 3.7ha would be available for B Class development (to reflect the developers previous representations and demand for B Class development in the area - evidence from local agents indicates that demand for office development is not high and the developer is proposing to re-locate B2 and B8 development to another site). This approach is also supported by the developers representation that retail development should be considered on the northern site: this indicates that all of the Proposed Site is not available for B Class development. The site is also identified by Policy 8 as a Prestige Employment Site, consistent with the developers representations.

The planning application to alter the existing planning permission has not been submitted. It would be inappropriate for the Local Plan to prejudge the planning application process and change Policy 8 until the outcome of that planning application is known.

The intention of Policy 8 is to support the development of Mixed Use Areas which are mostly consented or have masterplans being prepared and not to encourage additional non B development in these locations. However should a use be ancillary to those uses identified in Policy 8 it would be supported.

No detailed plans are available relating to the Springfields development therefore it is not possible to determine whether car parking to the extent identified will be lost. Any retail provision at Springfields would be restricted to comparison goods floorspace only (as set out by Policy 23). The site is part of an established retail destination therefore the indications are the environment would lead to a deliverable retail development.

Change Policy 8 to: Consented Mixed Use developments which incorporate main employment uses together with

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

accommodate retail development was made in the context of the Council's assessment that there was a need for 10,810 sq m of comparison retail floorspace, but no site had at that time been identified to accommodate this development. In response, Officers initially identified the southern part of the Lincs Gateway site (referred to in the Retail Paper as SHR004) as a suitable location for retail development, but this proposal was ultimately not taken forward following a lack of support by the Joint Strategic Planning Committee (JSPC). We understand that the Council have now identified a single site which they believe is potentially suitable for retail development, at Springfields Outlet, to which the Local Plan proposes to allocate 5,400 sq m of retail floorspace. We discuss this further below, but note that the local Plan does not identify any site which could accommodate all of the comparison retail development required within the plan period. The potential remains for retail development to be accommodated on the Lincs Gateway site, subject to the availability of sequentially preferable retail sites. We note that the draft Local Plan identifies the Lincs Gateway site as a prestige employment site, whilst the Proposals Map identifies it as a combination of an existing and proposed mixed use employment area. In addition, the Proposals Map identifies the site as SP014, but there is no reference to this site in the draft Local Plan. Policy 8 calls the site SP002, and the Retail Paper identifies the site in two parts as SHR004 and SHR005. We suggest that there may be a need to simplify these various references and terms, and explain or correct the reference on the Proposals Map within the Local Plan document. A Prestige Employment Site Ashley King Developments remain committed to the delivery of a high quality business park at Lincs Gateway. A 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 new jobs on this site. We welcome the Local Plan's continuing recognition of Lincs Gateway as a prestige employment site, within Policy 8. 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

other identified appropriate employment-generating uses, will be supported in Mixed-Use Areas identified #. Any new non B development will only be supported where the applicant can show that it is ancillary to the effective functioning of the Mixed-Use Area.

Conclusions
 Change paragraph 4.1.7: Therefore in order to protect the town centres and to promote sustainable development, any non B development within these allocations should be ancillary to the main employment function of the site.

Change Inset Map 2: replace reference number for the Lincs Gateway with SP002 to provide consistency with Policy 8 and the evidence base.

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

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 draft Local Plan that this area is an 'Existing Mixed Use Employment Site'. The original planning permission envisaged that the southern part of the site would accommodate a conference centre, but a further planning permission (H16-1293-16) has recently been granted to change the use of this area from D1 to B1, and it will now accommodate the new offices for Ashley King Developments themselves. The provision of this first office development within the site is expected to assist with the delivery of the northern part of the site, as it will begin to establish the site as a location for office development. It is intended that the northern part of the site will now accommodate the conference centre, where it can be part of a larger business hub. This would allow it to be placed more centrally within the overall site, and for it to be part of a linked facility with serviced office accommodation, designed for small and medium-sized companies. It would also place it within the most highly visible part of the site, close to the A16 frontage and in a landscaped setting. This part of the development would include a building or cluster of buildings with meeting rooms and other office and reception facilities for use by tenants. 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. Encouraging small businesses to start up 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, these businesses require suitable accommodation, which can meet their changing needs. Without this flexible 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 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

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

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 previously identified by consultants working for Lincolnshire County Council in 2009, and which is also noted in the Council's Employment Land Technical Paper (ELTP). 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 a 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 illustrates that there is a clear benefit in combining conference, meeting, research and office facilities within a relatively concentrated area. 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. 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 original 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 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

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

will reflect the outcome of these discussions, and a reserved matters application will be submitted in the near future. Amount of Employment Land Provision Policy 8 states that, whilst Lincs Gateway has a gross site area of 18.1 Ha, only 3.7 Ha would be provided. 3.7Ha is in fact the size of the smaller southern part of the site, identified on the Proposals Map as an "established mixed use employment area". Policy 8 therefore entirely ignores the potential for employment development on the larger northern part of the site. There is no explanation of why Policy 8 effectively ignores a large employment area, which is nevertheless identified on the Proposals Map as a "proposed mixed use employment site", and which received outline planning permission for B1, B2 and B8 development as recently as October 2014. The residual area within the northern part of the site, identified on our Drawing 224/302 as being available for a Mixed Use Employment Allocation, is around 16 Ha in area. The Council's policy, set out in the ELTP, is to assume that development coverage could be 80% of the site area for greenfield sites. This implies that Policy 8 should identify 12.8Ha of proposed mixed use employment land at Lincs Gateway. When added to the 3.7 Ha already included, this gives a new total for the site of 16.5 Ha of B class employment and provision. We have outlined above that it is Ashley King Developments' intention to bring forward the prestige employment site originally envisaged by the planning application in 2014. Indeed, without this area of land, the site would not constitute the prestige employment site which Policy 8 envisages. We have never suggested that the prestige employment site would not be delivered, and we have given the Council reassurance both in our representations and in separate discussions that it remains Ashley King Developments' priority to deliver the site as soon as possible. We understand from our discussions with the Council that they have been concerned at what they have perceived to be slow progress with the site's delivery. The Conference centre was under construction in 2015, soon after the grant of planning permission. However, this was halted due to a legal issue, which emerged during the Construction process, but which has now been overcome. This led to a year-long delay, during which time the masterplan for the site was reconsidered, in light of the need to relocate Ashley King Developments' offices from Holbeach. The site of the Company's Current offices will be subject to residential development, following a recently granted planning permission. A decision was taken to change the use of the emerging Conference Centre to new offices for Ashley King Developments,

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

whilst it was also decided that the Conference Centre should become part of the larger new Business Centre, described above. We find it curious that the Council should have decided to discount any potential from the main body of the Lincs Gateway site, in light of the fact that progress has already been made in delivering the site, and given the recognition in the ELTP that strategic employment sites can in any case take time to deliver. The table at page 19 of the ELTP suggests that the Council came to the conclusion that part of the site would not be delivered due to our suggestion that B2 and B8 uses could be accommodated in the first instance at Clay Lake, and due to the suggestion of residential development on part of the site. As we made clear in our previous representations, these suggestions were not expected to impact on the delivery of the prestige employment site on the northern part of the site, which is intended to be office-based. The development of office-based employment would 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. We believe that Policy 8 should be amended to clarify that the amount of B class employment expected at Lincs Gateway would be substantially higher than 3.7 Ha. We believe that there is the potential to deliver 16.5 Ha of mixed use employment land at Lincs Gateway. Complementary Uses We welcome the recognition within Policy 8 that a successful modern business park can accommodate more than simply B-class employment. The planning permission allows for a range of complimentary uses, which have a synergy with the site's primary function as a high quality business park; these included a hotel, pub / restaurant and conference centre. It is acknowledged that the provision of B1 office development on the site previously reserved for the conference centre will necessitate an alteration to the existing planning permission, to allow the Conference Centre to be provided on a different part of the site. The planning permission allowed for a Conference and function centre, in a combined D1 and D2 use, allowing for the building to be used not only for business conference

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

uses, but potentially for other events, which would help to make it profitable. Whilst a planning application is being prepared for this alteration, it would be sensible for the allocation in Policy 8 to also include an allowance for an element of D1 and D2 use, to be consistent with this position. In a similar manner, should a higher education establishment be located on the site, this could result in an element of education and training. As we have noted above, we believe that a limited amount of D1 space would be required to accommodate this type of use. Should this happen, again a planning application would be made for the new use, but it is also a further reason for Policy 8 to include D1 within the list of uses which may be found within the site. The Local Plan's Approach to Retail Development We have noted above that the suggestion in our previous representations that the site could accommodate retail development was made at a time when the Council had identified the need for a large amount of new comparison retail development in Spalding during the plan period, but no suitable site had been identified to accommodate it. Officers initially concluded that the southern part of the Lincs Gateway site was the only suitable location for retail development, but the JSPC decided not to pursue this option. The current draft of the Local Plan identifies only one site which the Council consider a suitable location for retail development, within the existing Springfields Outlet centre; this site had not been promoted for retail development until the second call for retail sites in summer 2016. The site's owners suggested in their previous representations that the full allocation of 10,810 sqm could be delivered at the Springfields Outlet. We have doubts over whether such a large scale of retail floorspace could be delivered on this site. The land owner's representations to the previous Local Plan Consultation envisaged an intensive development of new retail floorspace at the northern end of the site. This would involve the loss of a car park of 156 spaces, and the loss of the overflow car park. The new retail floorspace would generate a need for a minimum of 541 additional spaces, to accord with the parking standards in the draft Local Plan, and this would increase substantially should food outlets be included on the site. No mention is made of car parking in either the representations or Transport Assessment which accompanied the land owner's submission to the previous consultation. In light of this, we believe it is questionable whether such an intensive use of the existing site is either feasible or desirable, and also whether such an offer and environment would lead to a successful retail development. We note that the Council

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

have decided to allocate only half of the required new retail floor space to the Springfields Outlet site, with the remainder to be accommodated in as yet unknown sites, later in the plan period, when the availability of town centre sites can be reassessed. These town centre sites have major impediments to their delivery, which are identified in the Council's Retail Paper. They are not currently available, and we believe that there is a very limited prospect that they will be available later in the plan period. In this context, it is sensible to be mindful of alternative options. Council Officers previously rated Lincs Gateway as the most suitable available option for retail development, following an objective assessment which applied a sequential approach. The approach envisaged by the draft Local Plan is that the matter will be reconsidered at or after 2026, with regard to the availability of potential retail sites at that time. The sequential test will then need to be applied, and it may well be that Officers will reach a similar conclusion to the one they reached in summer 2016, and find that Lincs Gateway is the preferable location. This representation is accompanied by a specialist assessment of the issue by Chase & Partners, included at Appendix 1 [provided by email], which whilst it was prepared for the previous Local Plan consultation remains entirely relevant to the latest draft of the Local Plan and our representations. Chase and Partners are clear in their view that the Local Plan should identify potential locations which may deliver the required level of 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 development 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. The Potential for Retail Development at Lincs Gateway Ashley King Developments recognise that it may take some time for the whole site to be developed for employment purposes. In this context, it is envisaged that land will remain available within the site for retail development in the medium to long-term, should it be required. We believe that suggesting retail development could potentially be located at Lincs Gateway is compatible with the Local Plan's policies taken in the round. As

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

drafted, Policy 8 only relies upon 3.7 Ha of land to be used for 'B' class employment development at Lincs Gateway, and so the "loss" of some of the residual part of the site would not affect the proposed employment strategy. We have also noted above that the prestige employment site would not rely on such a large area of land being available for employment development, given that office-based development is not as land-hungry as B2 and B8 employment development. There would therefore be no inconsistency in identifying part of the site as a potential area of search for future retail development. Should this land be identified as such, a future planning application would still be subject to a sequential test, in accordance with national policy, which would ensure that the suitability and availability of other potential retail sites would be given due consideration. The Council's Retail Paper suggests that retail development could not be accommodated at Lincs Gateway, as it may undermine the delivery of the prestige employment site. We have previously stated that this does not need to be the case, and a well designed retail development, which is consistent with the landscape-led, masterplanned approach which the business park would follow, could be compatible. We note that Chase and Partners concur on this point. There is sufficient space at Lincs Gateway to allow for an appropriate separation of these uses, and to give the different parts of the site distinctive characters. Lincs Gateway 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. Chase and Partners also note that, in their experience, many retailers will only locate in a new area if there is a site available which meets their needs, and Lincs Gateway is the only potential location which many retailers would consider, due to its excellent visibility. We commented in our previous representations that the residual area available in the southern part of the site may not be as suitable as a retail location as the northern part of the site. The Council's Retail Paper suggests that we have said the southern part of the site would not be large enough for retail development, and so it should be discounted from further Consideration. This is not the case. Our comment was made in the

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

context of the potential to deliver all of the 10,810 sq m which the Council had indicated was required on the northern part of the site. This could not be delivered in its entirety on the southern part of the site, and we suggested it would be more logical to accommodate it in one area, on the northern part of the site, rather than splitting the retail development between the two parts of the site. In the context that a smaller retail allocation may be required, there may well be potential to accommodate this on land which is currently available on either the southern or northern parts of the site. We suggest in our separate representations concerning Policy 23 (Additional Retail Provision) that Lincs Gateway could be identified as a potential future location for retail, should it be required. We do not propose any further alteration to Policy 8 in this regard.

Residential Development We have previously suggested that Lincs Gateway would be a suitable location for new residential development. 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. We propose a housing allocation of around 2.3Ha, in an area identified on our Drawing 224/302. The area to which this relates is largely outside the area which has planning permission for employment use, on vacant land adjacent to the highway. We propose that the broad highway verge, with its tree planting, should remain unchanged, and the housing could be accessed from the same access to the A16 as the new business park. The housing would be arranged around the existing right of way which runs from the end of Fen End Lane, and through the site. Housing in this location would sit apart from the business park, and a high quality landscaping scheme would ensure it would not effect the business park's character. It would also provide a suitable neighbouring use for the existing housing to the north. The existing footpath on Cowbit Road is in need of repair, and previous estimates from Lincolnshire County Council are that the cost could be in the order of £200,000, which places it beyond the Highway Authority's current budget. There is no requirement, under the existing planning permission, for the business park to improve this Connection. It would also be desirable to provide a cycle link to the town, along Cowbit Road, the cost of which would again be substantial. Up-front funding is also required to extend services to the site, and a capital injection from housing would speed this process. Housing can help to provide this funding. We believe

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

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 submitted separate 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 convenience retail, in the form of a small 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. The provision of a mix of uses within the wider 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. 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, suitable separation can be provided between retail and residential uses, we believe that this area of housing should be identified as an allocation in the Local Plan both because of the need for housing, and because of the wider sustainability benefits which it could provide through improved sustainable transport connections, and by enabling much needed economic development. The delivery of this limited scale of residential development would bring wide-ranging benefits which would assist with the delivery of the Local Plan's key purposes.

Post Title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

Response Number	547	Respondent Number:	2830	Comment Author:	Mr S Walton	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:			
Policy Number:	8	Map Number:		The three Sutton parishes abut each other sitting out on a limb in the east of the District. Combined they have the biggest population outside of Spalding and we wholly support the Council planning department in its recognition of the importance of the area in its Draft Plan. Policy 8. The central (Long Sutton/Little Sutton) site is designated a 'Major Employment Area'. A master plan will be required for prestige sites identified*. The Long Sutton/Little Site is designated as such. We are advancing this investment and including the surrounding land to assist in showing in the Planning Inspector how an holistic approach will deliver the national and regional economic and environmental planning objectives contained throughout the context of the Draft Local Plan that the present piecemeal and fragmented approach for the specific local area cannot achieve. We believe that at this stage this is the most practical approach and will submit the Master Plan to the Government for its considerations. We will participate in the oral part of the Inquiry to discuss the Master Plan or in any process deemed appropriate.	No masterplan has been received, therefore it is not possible to comment on whether this approach is more appropriate than that identified by the Local Plan.		No change to the Local Plan is required.			
Site Allocation Number:										
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:								
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>							
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>							
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input type="checkbox"/>							
		Consistent with national policy	<input type="checkbox"/>							
Compliant, Sound, Duty to Cooperate explanation:										
Proposed changes to make compliant or sound:										
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										

Post Title: 4.2 Promoting a Stronger Visitor Economy

Response Number	225	Respondent Number:	1158	Comment Author:	Mr Paul Tame	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	9	Map Number:		We feel that Policy 9, especially paragraph 2 on small scale development to support the visitor economy, is totally in line with government policy and what the NFU would want to see in a local plan.	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input type="checkbox"/>						
		Consistent with national policy	<input type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 4.2 Promoting a Stronger Visitor Economy

Response Number	330	Respondent Number:	2320	Comment Author:	ID Planning	Client	UBS Triton Property Fund	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	9	Map Number:		These representations are submitted on behalf of UBS Triton Property Fund, owners of Springfields Outlet and Festival Gardens in Spalding. In representing the interests of Springfields and in the absence of sequentially preferable sites, our client has sought to assist the Council in meeting the need identified in the December 2013 Town Centre and Retail Capacity Study for additional comparison floorspace in Spalding. Policy 9 seeks to promote a stronger visitor economy in South East Lincolnshire and this is supported by our client. Springfields provides an important visitor asset for the tourist economy of South East Lincolnshire. Springfields attracts visitors to Spalding from a wide area with over 2.3 million visitors per year with all the potential spin off benefits that provides the local economy as well as providing around 500 jobs, many of which provide for local employment. Our client therefore welcomes the recognition given to the important role it provides in making Spalding an attractive place for tourists to visit. The inclusion of specific reference in Policy 9 to Springfields Shopping and Festival Gardens is also welcomed as is the support given to provision of facilities directly related to the functioning of the centre, consistent with Policies 21 and 23 of the Plan.	The support is noted and welcomed. For clarity reference to the notation on the Policies Map will be added to Policy 9. Change Policy 9 to: Springfields Shopping and Festival Gardens Development within the Springfields Shopping and Festival Gardens, as defined on the Policies Map (SHR010), will be supported		Further consideration of this matter will be necessary as part of the Examination.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is Legally Compliant <input checked="" type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		Do you consider that the Local Plan is unsound because it is not: Positively Prepared <input type="checkbox"/> Justified <input type="checkbox"/> Effective <input checked="" type="checkbox"/> Consistent with national policy <input type="checkbox"/>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	Having regard to the above there is one suggested minor text addition we would propose to link the policy more clearly to the designation shown on the Proposals Map and this would be the addition of the text shown in red font below to that part of Policy 9 as follows: Springfields Shopping and Festival Gardens Development within the Springfields Shopping and Festival Gardens, as defined on the Policies Map (SHR010), will be supported The above could be achieved through a minor modification to the Plan. This would make the plan more effective and therefore sound.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate	Not considered necessary on this minor text change sought.								

Post Title: 4.2 Promoting a Stronger Visitor Economy

Response Number	420	Respondent Number:	1843	Comment Author:	Neil Kempster	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	9	Map Number:		We believe that this policy would be enhanced by specific mention of the Fens waterways project which is a major economic regeneration project aimed at improving water links through the South East Lincolnshire area and beyond. The inclusion of Marinas, most notably as part of the Q2 development, has been identified as a way of maximising the benefits of this long term project and should be emphasised in this policy to reinforce the benefits to the visitor economy that could result from the project.	Policy 9 supports tourism and visitor development within the settlement boundaries which would apply to this site. It is considered that the remainder of Policy 9 would provide adequate support for other appropriate projects that may need to be located outside the settlement boundaries. However, to aid delivery of economic regeneration initiatives in Boston text will be added to highlight the importance of schemes that are underway. Add to Paragraph 4.2.2 last sentence: Development, such as those related to the Fens Waterways Project, that relates to key assets will be supported, while respecting the sensitivity of some of the areas where such development may take place. Paragraph 4.2.3 add to sentence 2: such as the proposed marina and related development at Q2: The Quadrant in Boston.		Minor modification - Further consideration of this matter will be necessary as part of the Examination.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input checked="" type="checkbox"/>						
Sound	<input type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>						
		Consistent with national policy	<input type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									