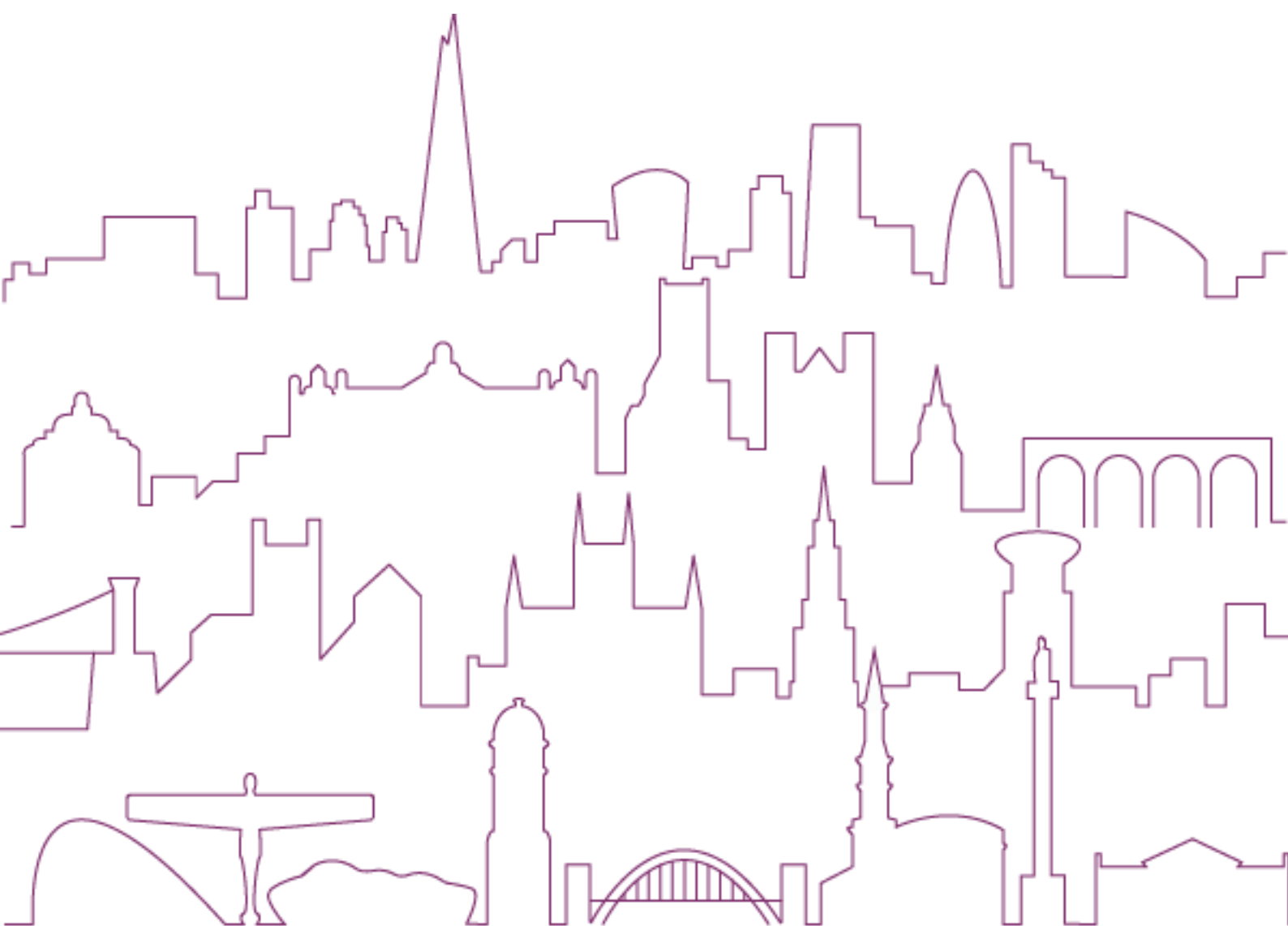


Holbeach Meadows Retail Policy Statement



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Appendix 1 - Context Plan illustrating site, town centre and housing allocations.

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1. Introduction and Background

- 1.1. This Statement has been prepared to provide policy justification for the proposals for a 297 sqm convenience store within the Holbeach Meadows development.
- 1.2. Section 2 sets out the relevant planning policy.
- 1.3. Holbeach is identified in the South East Lincolnshire Local Plan as a Main Service Centre (Policy 1), it is the 3rd largest settlement in the administrative area of South East Lincolnshire which will also benefit from additional housing growth as outlined below. The South East Lincolnshire Town Centre and Retail Capacity Study Area identifies the population of the Holbeach catchment as 8,807 at 2025, generating a convenience shopping expenditure of £19.67m. This figure has been generated using the convenience expenditure per head figure from the Retail Capacity Study.
- 1.4. Outline planning permission was granted at 'Manor Farm' for residential development for 900 dwellings in December 2016. Condition 1 required reserved matters approval to be made for 501-600 dwellings to be made by December 2025. (H09-0521-14)
- 1.5. Reserved matters for 330 homes were granted in November 2017. (H09-0331-17). As part of this application, the Masterplan identifies 0.3ha for 'community facilities. Various non-material amendments have been made to this application.
- 1.6. In addition, 83 dwellings were approved in October 2020, now built out for 83 dwellings at land rear Fen Road (H09-0276-19). These houses are within walking distance of the convenience store proposal site.
- 1.7. A further 38 dwellings were approved in February 2022 at land off Fen Road, also within walking distance of the application site when the wider Holbeach Meadows site is complete. (H09-0784-21).
- 1.8. 5 units were approved in May 2022 at land to the rear of Tudor Lodge Fen Road.
- 1.9. Further housing growth is planned around Holbeach over the Local Plan period, including further housing to the west of Holbeach through the development of the Sustainable Urban Extension on land to the east of A151 (Hob048). As such, this will generate additional convenience expenditure in the catchment area benefiting the Centre and retailers. Estimates based on the planned housing numbers in the Local Plan suggest there could be an additional £11.77million in expenditure by 2030 (figures generated assuming an occupancy rate of 2.4 x convenience expenditure per head from the Retail Capacity Study).
- 1.10. In March 2024, planning permission (H09-0598-23) was granted for change of use from farmhouse to community use. Condition 3 states that the premises shall only be used for F2 of the Town and Country Planning (Use Classes) Order 1987 (as amended). The definition of F2 – Local Community - includes 'local shops' up to 280 sqm where there is no such facility within 1km. There are no permitted changes within this use class.
- 1.11. The proposal is marginally above the threshold which we do not consider to be materially different.
- 1.12. The town centre falls within a 1km radii of the town centre and therefore further policy justification is required to support the proposal.
- 1.13. The nearest convenience stores are the Co-op and the Holbeach Market Convenience Store, both 1.1km walking distance from the application site.
- 1.14. The context of the site is illustrated in Appendix 1.

2. Retail Planning Policy

National Planning Policy Framework (NPPF)

- 2.1. Section 7 of the NPPF ensures the vitality of town centres. Paragraphs 90 and 91 require local planning authorities to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. Paragraph 90 acknowledges the need for accessibility in new development, and the need for flexibility in the format and scale of development. Paragraph 94 requires an impact assessment for proposals over 2,500 sqm. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 94, it should be refused (paragraph 95).
- 2.2. Section 8 of the NPPF promotes healthy and safe communities. Paragraph 98 requires planning policies and decisions to plan positively for the provision of community facilities, including local shops to enhance the sustainability of communities and residential environments.

South East Lincolnshire Local Plan

- 2.3. The South East Lincolnshire Local Plan 2011-2036 (SELLP) was adopted by Boston Borough Council and South Holland District Council on the 8 March 2019. The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:
- 2.4. Policy 1: identifies Holbeach as one of the main service centres in the settlement hierarchy.
- 2.5. The site is identified on the proposals map as a 'housing commitment' confirmed by the planning history of the site.
- 2.6. Policy 24 'The Retail Hierarchy' – promotes individual local shops and small neighbourhood clusters within a settlement boundary, which meets the day-to-day needs of nearby residents. Proposals for retail use outside of Primary Shopping Areas are required to demonstrate their suitability through a sequential test. An impact assessment is only required where the proposal is over 250sqm net.
- 2.7. Policy 27 part C allows for individual shops which meet the day to day needs of nearby residents without the use of a car. In these circumstances, they are limited to 100sqm net unless a qualitative need to remedy a geographical deficiency in the distribution of food shopping can be demonstrated in which case units of up to 500sqm will be permitted.

Planning Practice Guidance (PPG)

- 2.8. The PPG outlines guidance relating to the application of the sequential test highlighting the need for assessments to be proportionate and appropriate to the given proposal and reiterating the need to demonstrate flexibility in the format and scale of the proposed development.

3. Sequential Approach

- 3.1. In line with the requirements of national and local policy, a sequential assessment is required to demonstrate that no other suitable, more centrally located sites are available for the proposed development. Guidance on preparing sequential assessments contained within the NPPG¹ has been followed as well as considerations from relevant case law and Secretary of State decisions. These provide further clarification and guidance on the application of the sequential test in respect of availability, suitability, flexibility, and the requirements to consider disaggregation of developments.

Relevant Decisions and Case Law

- 3.2. In respect of availability, NPPF paragraph 91 asks whether sequentially preferable sites are 'available' or 'expected to become available within a reasonable period'. However, the NPPF or PPG do not qualify what is meant by these terms but suggests "*when considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account*".

Methodology

- 3.3. The following methodology has been followed for this sequential test:
- Define the catchment area – 5 minutes walking distance of the site.
 - Define the operator's requirement recognising the importance of flexibility.
 - Identify vacant units/sites within the town centre.
 - Assess those identified based on their suitability, availability, and viability.

Catchment Area

- 3.4. A 5 minute catchment area has been identified as, whilst the scale of the shop is over 100sqm net as defined in Policy 27, it is less than the 500sqm net which can still be defined as a local shop. The shop is likely to perform a mainly 'top-up' function serving a future local need.
- 3.5. The proposal is designed to serve a local need in line with **Policy 27** and can in theory be sustained at benchmark levels by the occupants of Holbeach Meadows, when complete, alone as detailed in Section 4 below.
- 3.6. Holbeach centre lies within a 1km radii of the site, however, the nearest convenience provision is 1.1km walking distance.
- 3.7. For completeness, we have carried out a sequential analysis of the centre to demonstrate the lack of opportunities for

Operator Requirement

- 3.8. The operator's requirement is to provide a top-up facility for people living within walking distance of the proposal. The format provided by the operator is one of sufficient size to enable the community to meet their top up needs in an affordable format store. A substantially larger store would mean that a main food shopping function was being served, having a larger catchment area, which could potentially compete with the town centre. On the other hand, a smaller format would not achieve the economies of scale to ensure the products are affordable.
- 3.9. Whilst the store will be of a scale that would mainly attract top-up shopping, there will be an operator requirement for dedicated parking spaces in line with policy requirements and loading facilities. The store size of 297sqm net is the optimum size to provide a viable facility. The sequential approach requires flexibility and therefore sites +/- 10% should be explored.
- 3.10. The proposal involves the sustainable re-use of an existing building which to a lesser extent also dictates the size of the store.

¹ Paragraph 011: Reference ID: 2b-011-20190722

Sequential Test

- 3.11. This section considers the proposed development against the requirements of the sequential test as set out at NPPF paragraphs 90 – 93 and Local Plan Policy 24 'The Retail Hierarchy'. The catchment plan does not identify any centres and therefore passes the sequential approach. Notwithstanding this, we have still considered Holbeach District Centre for a flexible and robust approach.

Vacant District Centre sites

- 3.12. There are several distinct local factors that hinder the development of a comparable retail development 'in centre', including the compact nature of the centre resulting from the existing pattern of development, road and infrastructure networks, conservation area status and listed buildings and the tightly drawn defined limits to the centre boundaries.
- 3.13. There are currently 1 property for sale in Holbeach the former 'Boxes of Hope' meeting centre on the High Street which has a net internal area of 147sqm. The property is too small to accommodate the proposals.

Image 6.1 – Vacant Unit in Holbeach Town Centre



Source: Rightmove.co.uk 2024

- 3.14. As a result, no alternative sites capable of accommodating a comparable development have been identified and it is therefore concluded that there are no sequentially preferable sites available within the catchment area.

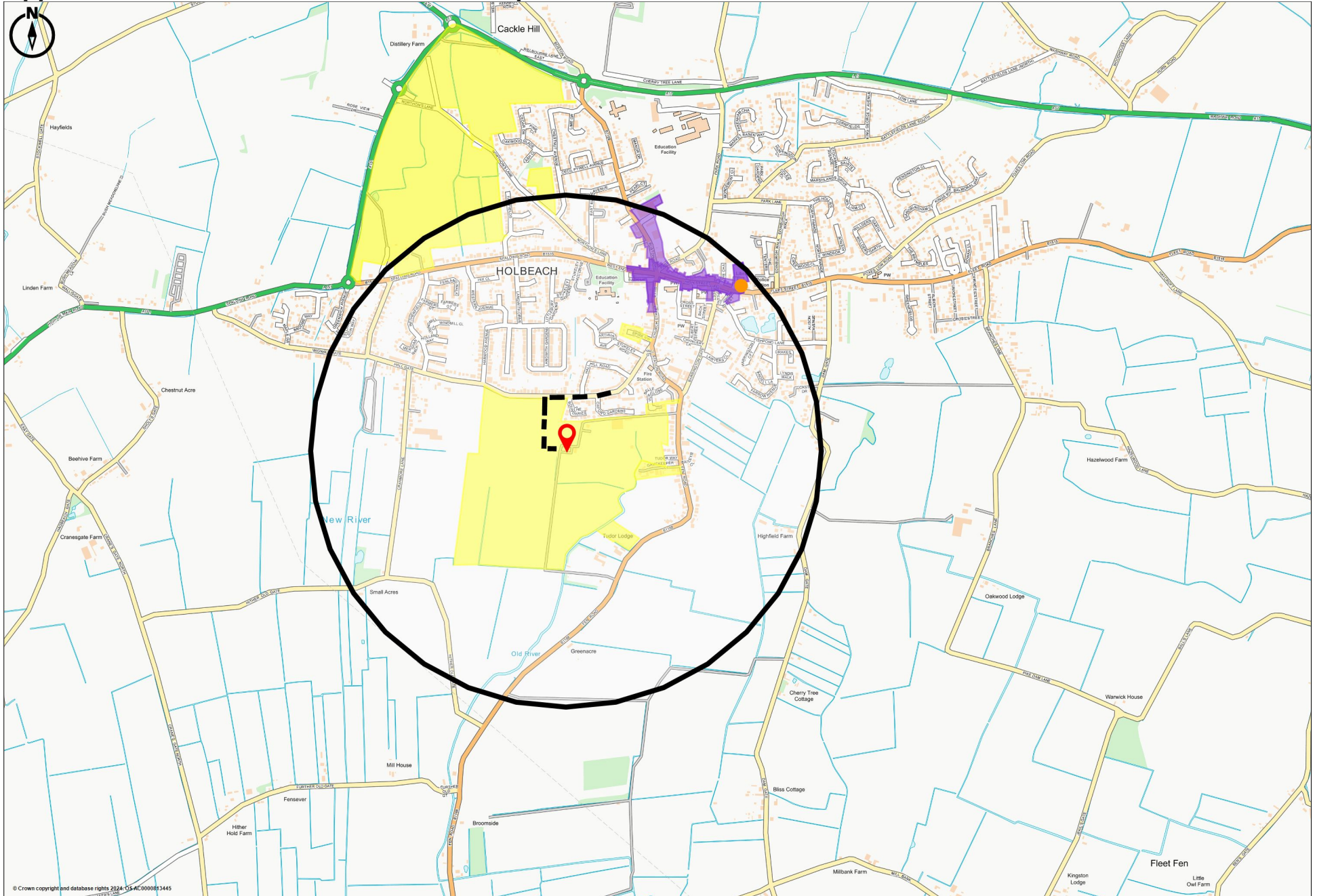
Conclusion

- 3.15. Following a review of locations within, or closer to the Holbeach District Centre within the defined catchment area. no suitable, available, or viable locations have been identified. As such, it is considered that there are no sequentially preferable sites to accommodate the proposed convenience store. Therefore, satisfying the sequential test set out at NPPF para 91 and Local Plan Policy 24.

4. Qualitative Need for the Proposals

- 4.1. The site already benefits from planning consent for a change of use to (F2) community use granted in March 2024. This would allow for a small shop. In principle, we would consider the use as a convenience store to be acceptable.
- 4.2. Policy 27 requires the applicant to justify the qualitative need for the proposals for local shops over 100sqm.
- 4.3. The proposal is designed to largely serve the top-up shopping needs of the new occupiers of Holbeach Meadows as well as those living west of Holbeach.
- 4.4. The proposals provide the opportunity for a walk in facility for existing residents to the south west of Holbeach as well as new occupiers at the Holbeach Meadows development. This in turn will reduce the need to travel, offering the opportunity for residents to walk instead of using the car for top-up shopping trips. There are no convenience stores on the western side of Holbeach, all convenience provision is within the town centre. The proposal therefore offers an opportunity for sustainable development in line with the NPPF and local planning policies, benefitting both existing and future residents.
- 4.5. The outline planning permission is for 900 dwellings, Condition 1 requires reserved matters approval to be made for 501-600 dwellings to be made by December 2025, the remainder should be made by December 2031.
- 4.6. If we are to assume that 600 dwellings would be built when the store was fully trading (2031 based on an opening date of 2026 plus 5 years), the convenience expenditure generated within the Holbeach Meadows catchment alone would be just over £3.2m. The benchmark turnover (Company average using Mintel turnover figures- UK Retail Rankings 2024) of the proposal is approximately £3.2m. A retailer would expect to be trading at this level around 5 years after opening when trading has settled. This demonstrates that the proposals can be accommodated within the new expenditure generated catchment area.
- 4.7. The benefit of providing the store at an early stage of development will mean that the shop is established and available as soon as residents move into the development cementing its position as a vital community facility.
- 4.8. It is logical that a convenience store would assist in ensuring that the community has access to a walk-in top-up shopping facility for a growing population, reducing the need to travel and therefore addressing a qualitative need.

Appendix 1 - Holbeach Meadows Retail Map



Map Key



Housing Allocations (including Holbeach Meadows)



Holbeach Town Centre Boundary



Holbeach Primary Shopping Area



Co-op, Holbeach Food Store (5 Fleet Street, Holbeach, Spalding, PE12 7AX)



1000m Buffer Zone (from the application site)



Application Site – Holbeach Meadows



5-minnute walking distance from the application site