SUPPORTING PLANNING STATEMENT

LAND NORTH OF THE B1173 BARRIER BANK AND WEST OF THE A16, SPALDING, LINCOLNSHIRE – "LINCS GATEWAY"

ERECTION OF BUILDINGS TO COMPRISE UP TO 70,000 SQUARE METRES (GROSS INTERNAL AREA) OF CLASS B8 (STORAGE OR DISTRIBUTION) FLOORSPACE TO INCLUDE ANCILLARY CLASS E(G) (OFFICE) FLOORSPACE AND PROVISION OF ASSOCIATED INFRASTRUCTURE INCLUDING UTILISING EXISTING VEHICULAR ACCESS FROM B1173. OUTLINE WITH MEANS OF ACCESS TO BE CONSIDERED

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Document Title:	Supporting Planning Statement		
Proposal:	Erection of buildings to comprise up to 70,000 square metres (Gross Internal Area) of Class B8 (storage or distribution) floorspace to include ancillary Class E(g) (office) floorspace and provision of associated Infrastructure including utilising existing vehicular access from B1173. Outline with means of access to be considered		
Site:	Land North of the B1173 Barrier Bank and West of the A16, Spalding, Lincolnshire – "Lincs Gateway"		
Client:	Alcan Properties Limited		
Document Date:	21 April 2026	Revision:	2.2
Matter Ref:	ALC813/4		
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1. INTRODUCTION

1.1. OVERVIEW

This Supporting Planning Statement (**SPS**) has been prepared by Knights in support of an application (**Application**) made to South Holland District Council (**Council**). The Application seeks outline planning permission for development involving the erection of buildings to comprise up to 70,000 square metres of Class B8 (storage or distribution) floorspace to include ancillary Class E(g) (office) floorspace to be accessed from the existing junction with the B1173 Barrier Bank (**Proposed Development**).

The Application relates to Land North of the B1173 Barrier Bank and West of the A16, Spalding, Lincolnshire (**Site**).

The Application is made on behalf of Alcan Properties Limited (**Applicant**), owners of the Site.

Outline planning permission was granted on 20 October 2023 (Planning Application Reference: H16-0521-23) (**2023 Outline**) for the same development which is being sought by the Application.

In accordance with section 92 of the Town and Country Planning Act (1990) (**TCPA**), as amended by the Planning and Compulsory Purchase Act (2004) (**PCPA**), Procedurally, therefore, the 2023 Outline expires on 20 October 2026, unless an application for the approval of all outstanding reserved matters relating to the whole Site is made prior to this date and that application is subsequently approved.

The Application is materially consistent with the details submitted in support of the 2023 Outline and essentially seeks to 'renew' the previously consented scheme through a new application for outline planning permission. The description of the Proposed Development remains identical to that which was the subject of the 2023 Outline and the Application is supported by the same suite of drawings.

Whilst the Applicant has held numerous discussions with potential occupiers, these discussions have not advanced to the stage where an application for approval of reserved matters has been made. Rather than submitting a speculative application for approval of reserved matters in order to the prolong the lifetime of the 2023 Outline, the Applicant considers that the submission of a 'new' application for outline planning permission which is materially consistent with the scheme considered and approved previously by the Council in 2023 would be the most appropriate mechanism to secure a further consent for the Site. This approach has been discussed previously with senior officers[1] on an informal basis at the Applicant is grateful for the feedback received, acknowledging that these discussions were held in good faith and on a without prejudice basis.

As referenced above, the Application is materially consistent with the 2023 Outline insofar as the following:

- The extent of the Site is identical to that which comprised the 2023 Outline. The Application is supported by the same Site Location Plan (Drawing Reference: 22119-UMC-ZZZZ-SI-DR-A-0501-P03) considered by the Council previously and referenced within condition no. 3 of the 2023 Outline;
- The Application adopts the same description of development which formed part of the operative part of the 2023 Outline;
- The Application seeks approval for access. Consistent with the 2023 Outline, it is proposed to utilise the vehicular access that has already been constructed on the B1173 with a ghost island right turn lane arrangement. The existing access falls within the extent of the highway maintainable by Lincolnshire County Council, as highway authority, at the public expense.

[1] Meeting held on 21 November 2025.

- The Application is supported by the same suite of drawings[2] which, whilst indicative in nature, are consistent with those submitted in support of the 2023 Outline.

Crucially, in terms of the assessment of the planning balance required under the provisions of section 38(6) PCPA, the statutory development plan for South Holland remains unchanged from when the 2023 Outline was determined. The principal component being the South East Lincolnshire Local Plan (**SELLP**) which was adopted by the South East Lincolnshire Joint Strategic Planning Committee on 08 March 2019.

In considering the 2023 Outline, the Council determined that there was no conflict or breach with any policies of the SELLP, when considered in the round, and, therefore, Paragraph 11(c) of the National Planning Policy Framework was engaged. Accordingly, for decision making this dictated that an application should be approved, without delay.

In relation to the above, consistency in decision making is a well-established principle in planning law. The leading authority on the so-called the "principle of consistency" remains the judgment handed down by the Court of Appeal in *North Wiltshire District Council v Secretary of State for the Environment* [1993] 65 P & CR 137. More recently, the case of *R (Midcounties Co-Operative Limited) v Forest of Dean District Council* [2017] EWHC 2050 is also of relevance to the Site and its planning prospects. Pertinently, Mr Justice Singh observed in Paragraph 107 of the Approved Judgment that: *"Although the authorities demonstrate that a local planning authority is not bound by its earlier decision, nevertheless it is required to have regard to the importance of consistency in decision-making*".

The authority referenced above provides a clear direction that a decision-taker ought, when considering a materially similar proposal, to have regard to the principle of consistency and to have good reason if deciding to depart from the previous decision.

1.2. SUMMARY OF THE PROPOSED DEVELOPMENT

The Site is identified as a Prestige Employment Site (**PES**) within Policy 7 and the Policies Map (Inset Map No 2) (Site Reference: SP002) of the SELLP. The Site forms part of a wider allocation referred to as *"Lincs Gateway, Spalding"*. SELLP Policy 7 is a permissive policy and confirms that Lincs Gateway is allocated for development falling within Classes B1, B2, B8, A3, A4, and C1 (now E(g), B2, B8, E(b), Sui generis (public house / drinking establishment), and C1) of the Town and Country Planning (Use Classes) Order 1987 (as amended) (**UCO**). SELLP Policy 8 which sets out the overall requirements that apply to all the PESs and further detailed parameters that must be considered in bringing forward development on each PES. In the case of the Site (SP002), SELLP Policy 8 states the following:

Lincs Gateway, Spalding

- *Development will comprise B1, B2 and B8 uses with some ancillary A3 and A4 uses permitted.*
- *Access to be provided at two points off the B1173 and Barrier Bank from the A16/ A1175.*
- *Additional internal road infrastructure is required to service new development off the two access points to the site.*
- *Provide a scheme that delivers utilities, water & foul water, surface water drainage & flood mitigation upgrades.*
- *Deliver a landscaping scheme that ensures the site respects the character of the open countryside that is adjacent to the site.*

[2] 22119-UMC-ZZZZ-SI-DR-A-0501-P03 - Site Location Plan; 22119-UMC-ZZZZ-SI-DR-A-0010-P03 - Indicative Layout; 22119-UMC-ZZZZ-SI-DR-A-0503-P02 - Site Constraints Plan; 22119-UMC-ZZZZ-SI-DR-A-0604-P02 - Parameters Plan; and N1017(90)001 A - Landscape Masterplan.

The Proposed Development is described as:

> *"Erection of buildings to comprise up to 70,000 square metres (Gross Internal Area) of Class B8 (storage or distribution) floorspace to include ancillary Class E(g) (office) floorspace and provision of associated Infrastructure including utilising existing vehicular access from B1173. Outline with means of access to be considered".*

The Application seeks **outline planning permission with means of access to be considered**. Appearance, landscaping, layout, and scale are reserved for subsequent consideration as part of a future application for the approval of reserved matters should outline planning permission be forthcoming.

The Proposed Development is shown on Drawing Reference 22119-UMC-ZZZZ-SI-DR-A-0010-P03 prepared by UMC Architects – this drawing is included as part of the Application.

The Applicant made a request to the Council for a Screening Opinion (**Request**) under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (**EIA Regulations**) prior to the submission of the 2023 Outline. Consistent with the Application, the Request related to a proposed development involving the erection of buildings to comprise up to 70,000 square metres of storage or distribution floorspace under Class B8 of the UCO.

The Request was made to the Council on 06 April 2023. The Applicant received the Council's response to the Request on 28 April 2023. The Council's letter dated 28 April 2023 provides formal written confirmation that the Proposed Development does not amount to EIA development and, therefore, no formal Environmental Impact Assessment is required. Whilst the Request dates back to 2023, the Application is materially consistent with the 2023 Outline and, therefore, its conclusions are considered to remain valid.

1.3. PURPOSE AND FORMAT OF SUPPORTING PLANNING STATEMENT

It is a legal requirement that decisions on planning applications must follow the policies set out in the statutory development plan, unless other material considerations indicate that a different decision should be made. That principle was set out in section 70 (2) of the TCPA and subsequently taken forward through section 38 (6) of the PCPA (which amends and supplements the TCPA).

The purpose of this SPS is to provide an overview of the Proposed Development and to allow the necessary consideration of the Application against relevant planning policies and material considerations. The SPS provides an assessment of the Application against the provisions of the statutory development plan as well as pertinent material considerations, which include the Government's National Planning Policy Framework (2024) (**NPPF**), in accordance with Section 38 (6) of the PCPA. The relevant components of the statutory development include the SELLP and the Lincolnshire Minerals and Waste Local Plan (**LMWLP**) (2016).

The SPS sets out that the overall planning balances weighs significantly in favour of the Application and, accordingly, provides the justification for the granting of outline planning permission.

The SPS is structured as follows:

- **Section 2 – The Site and context**: provides a description of the Site and its immediate surrounding context. This section also includes photographs of the Site and aerial photography;
- **Section 3 – Site planning history**: provides an overview of the Site's planning history;
- **Section 4 – The Proposed Development**: provides a summary of the Application and includes copies of relevant plans submitted in support of the Application.
- **Section 5 – Planning policy context**: provides as summary of relevant policies contained within the SELLP alongside other material considerations, including the NPPF.

- **Section 6 – Planning assessment**: provides an assessment of the Application against relevant planning policies and material considerations in accordance with the requirements of Section 38 (6) of the PCPA.
- **Section 7 – Community and stakeholder consultation**: provides a summary of consultation undertaken with the local community and other key stakeholders.
- **Section 8 – Conclusion and planning balance**: provides an overall conclusion, summary and assessment of the wider planning balance.

1.4. SUPPORTING INFORMATION

The Application is supported by plans and additional supporting documents as detailed in the table below (**Table 1**). The reader is urged to read this SPS alongside the documents listed, which have been submitted separately to the Council.

REPORT / DOCUMENTATION	CONTRIBUTOR
Planning Application Form	Knights
Design and Access Statement	UMC Architects
Transport Statement	SLR Consulting
Framework Travel Plan	SLR Consulting
Addendum Ecological Appraisal	Allied Ecology
Biodiversity Net Gain Assessment (BNGA)	Allied Ecology
Statutory biodiversity metric	Allied Ecology
Flood Risk Assessment	Eastwood Consulting Engineers
Landscape and Visual Appraisal[3]	Influence Landscape Planning and Design
Noise Impact Assessment	Spectrum Acoustic Consultants
Lighting Impact Assessment	Delta Simons
Air Quality Assessment	Delta Simons
Geotechnical and Geo-Environmental Site Investigation	Eastwood & Partners
Archaeological Evaluation	Archaeological Project Services
Daylight and Sunlight Report	Waldrams

Table 1: Supporting technical documentation

[3] The Landscape and Visual Appraisal (LVA) was informed by an initial desktop study and a site visit was carried out in January 2023. The LVA was issued in May 2023.

The Application is materially consistent with the 2023 Outline insofar as the following: The extent of the Site is identical to that which comprised the 2023 Outline. The Application is supported by the same Site Location Plan (Drawing Reference: 22119-UMC-ZZZZ-SI-DR-A-0501-P03) considered by the Council previously and referenced within condition no. 3 of the 2023 Outline; and the Application adopts the same description of development which formed part of the operative part of the 2023 Outline. Moreover, the baseline position considered in the LVA remains applicable to the Application and there have not been any planning applications approved in the study area since May 2023 which would alter the conclusions reached. Accordingly, the Applicant has not instructed Influence Landscape Planning and Design Ltd to update the LVA prior to the submission of the Application.

The following plans and drawings are also submitted in support of the Application.

DRAWING REFERENCE	DRAWING TITLE
22119-UMC-ZZZZ-SI-DR-A-0501-P03	Site Location Plan
22119-UMC-ZZZZ-SI-DR-A-0010-P03	Indicative Layout
22119-UMC-ZZZZ-SI-DR-A-0503-P02	Site Constraints Plan
22119-UMC-ZZZZ-SI-DR-A-0604-P02	Parameters Plan
N1017(90)001 A	Landscape Masterplan

Table 2: Drawings

2. THE SITE AND CONTEXT

2.1. DESCRIPTION OF THE SITE

The Site is located on a parcel of land at the junction between the B1173 Barrier Bank and the A16, on the southern fringes of Spalding's main built-up area. The Site covers an area of approximately 18.5 hectares.

Figure 1 below shows the Site and its context in relation to the main built up of area of Spalding.

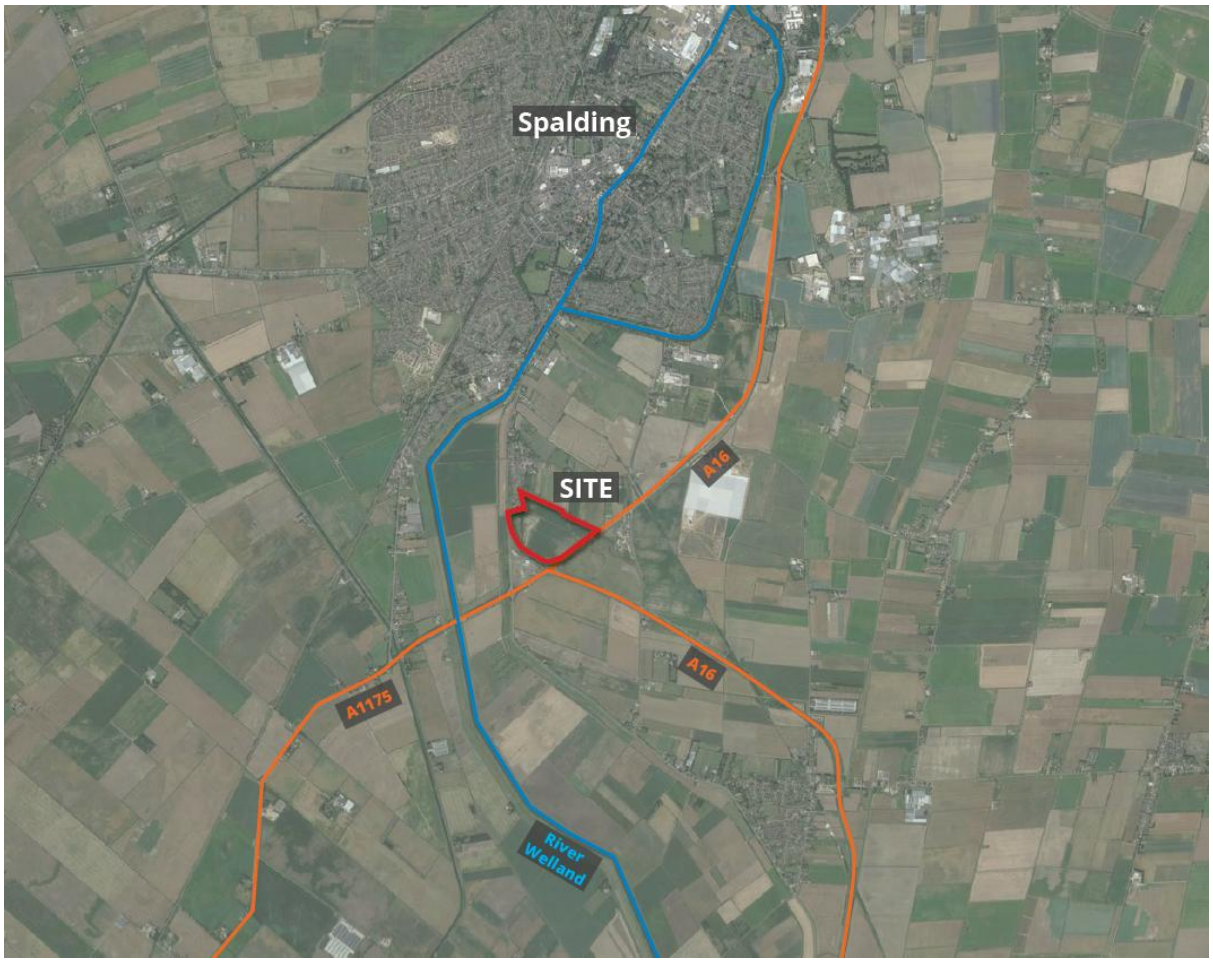


Figure 1: Context plan (reproduced from Design and Access Statement prepared by UMC Architects)

The extent of the Site is shown edged red on the Site Location Plan (22119-UMC-ZZZZ-SI-DR-A-0501-P03) which is submitted in support of the Application – this is reproduced at **Figure 2** which follows.



Figure 2: Site Location Plan (22119-UMC-ZZZZ-SI-M2-A-0501-P01) (NTS)

The grid reference of the centre of the Site is approximately TF245199.

The Site itself was previously in a combination of uses which have influenced the current appearance and form of the Site. The Site is currently predominately in agricultural use although it was previously occupied by a building used for storage or distribution purposes under Use Class B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended) (**UCO**). This building was sited in north-western corner of the Site before it was destroyed by fire in 2006 and has since been demolished. However, the Site retains some elements of hardstanding, and is in part previously developed land in accordance with the definition provided at Annex 2 of the National Planning Policy Framework (**NPPF**). Earth bunds within the Site were constructed for the purpose of attenuating noise from the legacy B8 use with the bunding remaining in-situ and representing a noticeable physical feature on the Site.

To the west of the existing bunding is a Public Right of Way (**PRoW**) which consists of a public bridleway (Spal/894/1). PRoW Spal/894/1 runs for approximately 250 metres in a general north-south direction from the edge of Fen Lane to where it ceases at boundary of the Site, beyond this there is no formal connection to the wider footway network.



Figure 3: Photographs of PRoW Spal/894/1

The Site benefits from an existing vehicular access from the B1173 Barrier Bank which has a ghost island arrangement for right turning vehicles. The junction has 10m radii, suitable for accommodating Heavy Goods Vehicles (HGVs) and a central refuge for pedestrians crossing the B1173.



Figure 4: Photograph of existing vehicular access

The B1173 Barrier Bank is a single carriageway road, between the A151 to the north and the A16/ A1175 to the south and provides access to Spalding. In the vicinity of the Site, the B1173 is 7.3m wide, has lighting present and is subject to the national speed limit (60mph). There is left / right 'in only' access for the Applegreen roadside services facility, approximately 60m to the south of the Site access on the western side of the B1173.

In terms of wider pedestrian infrastructure, there is a 2m footway (approximately 96m in length) on the western side of the carriageway between the Applegreen services access and an uncontrolled

pedestrian crossing to Site at the existing vehicular access point. The pedestrian crossing point benefits from tactile paving and a central refuge.

Excluding the man-made bunding, the Site is relatively level. Site levels are at circa 2.88m Above Ordnance Datum (**AOD**) on the western boundary to 1.92m AOD on the south eastern boundary.

In terms of characteristics, the Site can generally be divided into three areas. The western c.10%, located west of PRoW Spal/894/1 mostly comprises a grassed paddock, with mature trees present in the north and adjacent to the PRoW. Immediately east of the PRoW, a large bund extends from the Site entrance in the south-west up to the north-western boundary, before returning in an easterly direction for approximately 100m; The area west and south of the bund comprises derelict land surfaced with bare soil (made ground), with the main site access from the B1173 present in the south west. This comprises around c.15% of the total Site area and can reasonably be considered to amount to previously developed or 'brownfield' land. The remaining c.75% of the Site, north and east of the area of previously developed land, comprises arable farmland. Two drainage ditches cross the farmland trending roughly west to east, with further ditches present along the north, south and eastern boundaries. Overhead electricity cables cross the north west of the Site.

2.2. SITE DESIGNATIONS

The Site has no statutory nature conservation designation nor is it located immediately adjacent to a site with such a status.

Cowbit Wash Site of Scientific Interest (**SSI**), designated in 1999, is located approximately 450 metres south-west of the Site.

The Site is not located within an Environment Agency Source Protection Zone (**SPZ)** and there are no SPZs or groundwater abstractions within 2km of the Site.

The Site does not lie within a coal mining affected area and there are no British Geological Survey recorded mineral sites located within 500 m of the Site.

There are no Tree Preservation Orders (**TPO**) or Ancient Woodland blocks within or adjacent to the Site.

On the north-western perimeter of the Site a Priority Habitat of deciduous woodland is cut vertically with approximately two thirds of the designation falling within the Site boundary.

The Site is not located within a designated Conservation Area (**CA**).

The Site is not listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (**P(LBCA)A**) and, therefore, not considered to be of special architectural or historic interest.

The Environment Agency's Flood Map for Planning service confirms that the Site lies within Flood Zone 3 and is, therefore, assessed as having a 1 in 100 or greater annual probability of river flooding in any year (greater than 1%), and a 1 in 200 chance or greater annual probability of flooding from the sea (less than 0.5%). The Flood Map for Planning does not take into account flood defences as water can overtop or breach the defences in extreme conditions.

3. SITE PLANNING HISTORY

3.1. PLANNING APPLICATION SUMMARY

Table 3 provides a summary of the Site's recent relevant planning history, listed in chronological order.

APPLICATION REFERENCE	TYPE	DESCRIPTION	STATUS
H16-0009-14	Outline	Proposed business park, hotel, public house/restaurant, conference and function centre, petrol filling station, restaurant/cafe with ancillary retail together with associated landscaping, access, highways, parking, drainage, utilities and services and infrastructure works.	Approved 10 October 2014
H16-0195-15	Non-material Amendment (Section 96A of the TCPA)	Conference and function centre to land parcel B2. Proposed business park, hotel, public house/restaurant, conference and function centre, petrol filling station, restaurant/cafe with ancillary retail together with associated landscaping, access, highways, parking, drainage, utilities and services and infrastructure works (Approved under H16- 0009-14) - Amendment to Conference and Function Centre to Land Parcel B2, Omit 4 windows on north west elevation to room G17. Omit 1 window on north east elevation to room G18. Swap rooms G3 and G4 over including associated windows on south west elevation. Alter glazing arrangement to window.	Approved 20 April 2015
H16-0166-15	Non-material Amendment (Section 96A of the TCPA)	Proposed business park, hotel, public house/restaurant, conference and function centre, petrol filling station, restaurant/cafe with ancillary retail together with associated landscaping, access, highways, parking, drainage, utilities and services and infrastructure works, approved under H16-0009-14. Amendments to include installation of photovoltaic cells on roof, solar shading to some windows and revised ventilation grilles.	Approved 11 May 2015
H16-0025-15	Variation of condition (Section 73 of the TCPA)	Proposed business park, hotel, public house/restaurant, conference and function centre, petrol filling station, restaurant/cafe with ancillary retail together with associated landscaping, access, highways, parking, drainage, utilities and services and infrastructure works - approved under H16-0009-14. Modification of condition 8 to amend requirement to set finished floor levels of the buildings within parcels B3a and B3b from 1 metre above existing ground level to not less than 600mm above ground level.	Approved 23 June 2015
H16-0918-21	Full	Phase 2 of the Lincs Gateway development, to include 4 office buildings and 24 small industrial units	Approved 12 January 2022

H16-0521-23	Outline with means of access to be considered	Erection of buildings to comprise up to 70,000 square metres (Gross Internal Area) of Class B8 (storage or distribution) floorspace to include ancillary Class E(g) (office) floorspace and provision of associated infrastructure including utilising existing vehicular access from B1173. Outline with means of access to be considered.	Approved 20 October 2023

Table 3: Site Planning History

3.2. 2023 OUTLINE

As referenced in Section 1.1. and Table 3 of this SPS, outline planning permission was granted on 20 October 2023 (Planning Application Reference: H16-0521-23) (**2023 Outline**) for the same development which is being sought by the Application.

Specifically, the 2023 Outline approved the following development:

> *"Erection of buildings to comprise up to 70,000 square metres (Gross Internal Area) of Class B8 (storage or distribution) floorspace to include ancillary Class E(g) (office) floorspace and provision of associated infrastructure including utilising existing vehicular access from B1173. Outline with means of access to be considered".*

As referenced in Section 1.1, the Application is materially consistent with the 2023 Outline insofar as the following:

- The extent of the Site is identical to that which comprised the 2023 Outline. The Application is supported by the same Site Location Plan (Drawing Reference: 22119-UMC-ZZZZ-SI-DR-A-0501-P03) considered by the Council previously and referenced within condition no. 3 of the 2023 Outline;
- The Application adopts the same description of development which formed part of the operative part of the 2023 Outline;
- The Application seeks approval for access. Consistent with the 2023 Outline, it is proposed to utilise the vehicular access that has already been constructed on the B1173 with a ghost island right turn lane arrangement. The existing access falls within the extent of the highway maintainable by Lincolnshire County Council, as highway authority, at the public expense.
- The Application is supported by the same suite of drawings[4] which, whilst indicative in nature, are consistent with those submitted in support of the 2023 Outline.

The 2023 Outline was considered at the Council's Planning Committee on 04 October 2023 with a recommendation to grant planning permission subject to conditions a planning obligation to cover the highway authority's legal and administrative costs in investigation and progressing a Traffic Regulation Order (TRO) for a reduced speed limit on this part of the network.

In recommending approval, officers set out the following within the Planning Committee Report:

> *"7.74.* ***Planning Balance***
>
> *7.75. Section 38(6) of the Town and Country Planning Act, as amended by the 2004 Act, states that the determination must be made in accordance with the development plan unless material considerations indicate otherwise.*
>
> *7.76. The proposed development is for a use which is considered appropriate when assessed against the relevant policies in the SELLP and the NPPF and therefore is in principle considered*

[4] 22119-UMC-ZZZZ-SI-DR-A-0501-P03 - Site Location Plan; 22119-UMC-ZZZZ-SI-DR-A-0010-P03 - Indicative Layout; 22119-UMC-ZZZZ-SI-DR-A-0503-P02 - Site Constraints Plan; 22119-UMC-ZZZZ-SI-DR-A-0604-P02 - Parameters Plan; and N1017(90)001 A - Landscape Masterplan.

acceptable. Although all matters are reserved apart from access the application has provided a significant number of documents and plans to show how a development could be proposed which would both comply with the aspirations of the allocation and ensure that any prospective RM app would ensure no negative material impacts as discussed in this report.

7.77. In light of the above considerations, the proposal is considered to be in accordance with Policies 1, 2, 3, 4, 6, 1, 8, 28, 29,30, 51, 52,33, 36 and Appendix 6 of the South East Lincolnshire Local Plan (2019), as well as guidance in the National Planning Policy Framework (2023).

7.78. Overall, it is considered that the planning balance is in favour of the proposal.

7.79. ***Conclusion***

As set out above, in light of the above considerations, the proposal is considered to be in accordance with Policies 1, 2, 3, 4, 6, 1, 8, 28, 29, 30, 31, 32, 33, 36 and Appendix 6 of the South cast Lincolnshire Local Plan (2019), as well as guidance in the National Planning Policy Framework (2023).

7.80. Overall, it is considered that the planning balance is in favour of the proposal".

The recommendation for approval was moved by Councillor Bingham and seconded by Councillor Beal. It was agreed that permission be granted subject to the conditions listed at Section 9.0 of the Planning Committee Report and an additional condition requiring that an application for approval of reserved matters to include a scheme of works for the management, improvement and replacement where necessary, of the existing riparian watercourses within the Site (condition no. 7).

3.3. EIA SCREENING REQUEST

The Applicant made a request to the Council for a Screening Opinion on 06 April 2023 (**Request**) under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (**EIA Regulations**). Consistent with the Application, the Request related to a proposed development involving the erection of buildings to comprise up to 70,000 square metres of storage or distribution floorspace under Class B8 of the UCO.

The Request was supported by a suite of technical documentation which included the following.

REPORT / DOCUMENTATION	CONTRIBUTOR
Supporting Statement	Knights
Transport Statement	SLR
Framework Travel Plan	SLR
Landscape and Visual Scoping	Influence Landscape Planning and Desi
Noise Impact Assessment	Spectrum Acoustic Consultants
Lighting Impact Assessment	Delta Simons
Air Quality Assessment	Delta Simons
Flood Risk Assessment	LIN Consulting
Archaeological Evaluation	Archaeological Project Services
Geotechnical and Geo-Environmental Site Investigation	Eastwood & Partners

Table 4: Supporting technical documentation – request for a Screening Opinion under the EIA Regulations

The Supporting Statement (Knights, 06 April 2023, Revision 1.0) set out that the characteristics of the Proposed Development are not likely to give rise to significant environmental effects, alone, or when

considering cumulation with existing or approved developments within the vicinity of the Site. It was concluded that the Proposed Development is not considered to amount to EIA development and, therefore, no formal Environmental Impact Assessment is required. The Request was made to the Council to confirm this conclusion in advance of submitting the Application.

The Applicant received the Council's response to the Request on 28 April 2023. The Council's letter dated 28 April 2023 sets out the following conclusion.

> *"The proposed development has therefore been screened with reference to the relevant criteria in Schedule 3 and for the reasons explained above, the local planning authority is of the opinion that it is not likely to have significant effects on the environment and as such, the proposed development is not EIA development within the meaning of the Regulations. An Environmental Impact Assessment is therefore not required. The cumulative effects of other developments in the area have been taken into consideration when making this assessment".*

A copy of the Council's letter is provided at **Figure 5** below.

date: 27 April 2023
your reference: ALC813/1
our reference:
ask for: Sam Dewar
email: s.dewar@dpaplanning.co.uk
DDI: 07799 095613

SOUTH HOLLAND DISTRICT COUNCIL
Council Offices
Priory Road
Spalding
Lincolnshire PE11 2XE

tel: 01775 761161
fax: 01775 711253
www.sholland.gov.uk

Sent by email to: James.Rigby@knightsplc.com

Dear James,

Proposal: EIA screening request for a proposed Outline planning application for the erection of buildings to comprise up to 70.000 square metres (Gross Internal Area) of Class B8 (storage or distribution) floorspace to include ancillary Class E(g) (office) floorspace and provision of associated Infrastructure including utilising existing vehicular access from B1173.
Site Address: Land known as Lincs Gateway, Spalding. Grid reference of the centre of the Site is approximately TF245199.

A Supporting Statement has been submitted in support of a request made to South Holland District Council for a Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. This was accompanied by additional information/documents/plans covering Noise, Transport, Land Contamination, Landscape, Lighting, Air quality, Flood Risk, and Archaeology.

EIA procedures apply to all applications for EIA development which is defined as Schedule 1 development or Schedule 2 development which is likely to have significant effects on the environment by virtue of factors such as its nature, size or location. The proposal as described in your submission does not fall into any of the criteria in the definition of Schedule 1 development under the regulations. It is within the threshold of Part 10 (b) of Schedule 2 however is not considered to have significant effects on the environment by virtue of its proposed use, size and location. The site is not within a 'sensitive area' as defined by the Regulations. The threshold for a development in this category is 0.5ha which would be exceeded in this case. As such, the proposal is a Schedule 2 development and a screening opinion is necessary to determine whether significant effects on the environment are likely and hence whether an Environmental Impact Assessment is required.

When screening Schedule 2 projects, the local planning authority must take account of the selection criteria in Schedule 3 of the 2017 Regulations. The submitted information by the Applicant has been used to complete a Town and Country Planning (Environmental Impact Assessment) Regulations 2017 EIA screening matrix which is

attached to this screening opinion which assess the proposed development against the criteria of Schedule 3 of the 2017 Regulations.

The proposed development has therefore been screened with reference to the relevant criteria in Schedule 3 and for the reasons explained above, the local planning authority is of the opinion that it is not likely to have significant effects on the environment and as such, the proposed development is not EIA development within the meaning of the Regulations. An Environmental Impact Assessment is therefore not required. The cumulative effects of other developments in the area have been taken into consideration when making this assessment.

You are advised that the local planning authority's opinion on the likelihood of significant environmental effects is reached only for the purpose of adopting this screening opinion under the Environmental Impact Assessment Regulations 2017.

This screening opinion is given without prejudice to any subsequent consideration by the planning authority through the planning application process of the impacts of the proposed development and assessment of the acceptability or otherwise of the proposed development relative to development plan policy and other material considerations.

Yours sincerely,

Mr Sam Dewar BSc MA
Planning Consultant
for and on behalf of South Holland District Council

Figure 5: EIA Screening Request

The above provides formal written confirmation that the Proposed Development does not amount to EIA development and, therefore, no formal Environmental Impact Assessment is required.

4. THE PROPOSED DEVELOPMENT

4.1. DESIGN AND ACCESS STATEMENT

Further reading:

DOCUMENT	CONTRIBUTOR
Design and Access Statement	UMC Architects

Table 5: Further reading – Design and Access Statement

As required under Section 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended (DMPO), the Application is supported by a Design and Access Statement (**DAS**) prepared by UMC Architects. The reader is respectfully urged to read this section of the SPS alongside the DAS prepared by UMC Architects.



Figure 6: Design and Access Statement

4.2. SUMMARY

The Application is materially consistent with the details submitted in support of the 2023 Outline and essentially seeks to 'renew' the previously consented scheme through a new application for outline planning permission. The description of the Proposed Development remains identical to that which was the subject of the 2023 Outline and the Application is supported by the same suite of drawings.

4.2.1. KEY COMPONENTS

In summary, the Proposed Development broadly consists of the following main elements:

- Erection of buildings to comprise up to 70,000 square metres (Gross Internal Area) of storage or distribution floorspace (Use Class B8 of the UCO) to include ancillary Class E(g) (office) floorspace.
- Existing access retained and utilised off the B1173 to the south of the Site;
- Proposed internal roads and provision of dedicated HGV and car parking;
- Proposed new pedestrian and cycle links which connect to the existing network in order to encourage active travel opportunities.
- Creation of new publicly accessible open space and amenity area to the west of public bridleway (Spal/894/1). This area of open space will connect directly to the bridleway and is intended to provide seating and surfaced footways available for use by the wider community.
- Proposed landscaping measures around the margins of the Site as well as the provision of sustainable drainage systems (**SuDS**) features which will create species rich habitat and assist in achieving Biodiversity Net Gain objectives.
- Proposed landscape enhancements within the Site include:
    - Substantial shelter belt tree planting to the periphery of the Site;
    - Mixed native tree, shrub and hedgerow planting;
    - Areas of mixed wildflower and grassland;
    - Existing trees and vegetation retained, protected and enhanced; and,
    - Ecological enhancements through habitat creation and links into the local surrounding area.

4.2.2. DESCRIPTION OF THE PROPOSED DEVELOPMENT

The Proposed Development is described as:

> *"Erection of buildings to comprise up to 70,000 square metres (Gross Internal Area) of Class B8 (storage or distribution) floorspace to include ancillary Class E(g) (office) floorspace and provision of associated Infrastructure including utilising existing vehicular access from B1173. Outline with means of access to be considered".*

The Application seeks **outline planning permission with means of access to be considered**. Appearance, landscaping, layout, and scale are reserved for subsequent consideration as part of a future application for the approval of reserved matters should outline planning permission be forthcoming.

The Proposed Development is shown illustratively on Drawing Reference: 22119-UMC-ZZZZ-SI-DR-A-0010-P03 prepared by UMC Architects – this drawing is included as part of the Application.

Drawing Reference: 22119-UMC-ZZZZ-SI-DR-A-0010-P03 provides an indicative layout which illustrates 3 no. units that would operate under Use Class B8 of the UCO with an element of ancillary office space provided to support administrative functions (Use Class E(g)).

Use Class B8 of the UCO includes a wide range of permissible uses under "storage or distribution". Whilst this can include traditional warehousing uses as shown indicatively on Drawing 22119-UMC-ZZZZ-SI-DR-A-0010-P03, the UCO does not define the term "storage" nor qualify the goods involved. Therefore, permissible uses under Use Class B8 would also include a data centre[5] and buildings which accommodate electronic data storage and handling systems.

The indicative layout provides for a total of 62,615 square metres (Gross Internal Area (**GIA**)) of employment generating floorspace.

Drawing 22119-UMC-ZZZZ-SI-DR-A-0010-P03 shows, indicatively, 3 no. warehousing units as follows:

UNIT	ACCOMMODATION BREAKDOWN
Unit 100	Warehousing use (Class B8) – 11,035 sq. m GIA Ancillary office use (Class E(g) – 577 sq. m GIA Miscellaneous – 232 sq. m GIA **Total – 11,844 sq. m GIA**
Unit 200	Warehousing use (Class B8) – 34,789 sq. m GIA Ancillary office use (Class E(g) – 1,831 sq. m GIA Miscellaneous – 260 sq. m GIA **Total – 36,880 sq. m GIA**
Unit 300	Warehousing use (Class B8) – 12,894 sq. m GIA Ancillary office use (Class E(g) – 765 sq. m GIA Miscellaneous – 232 sq. m GIA **Total – 13,844 sq. m GIA**
Total	62,615 sq. m GIA

Table 6: Schedule of accommodation

Drawing 22119-UMC-ZZZZ-SI-DR-A-0010-P03 is reproduced below on a not-to-scale basis.

[5] The online planning resource DCP describes a data centre as:

"A data centre is a physical facility that houses critical IT infrastructure, such as servers and networking equipment, to store, process, and manage large amounts of data. These facilities are essential for all digital services, from online banking and streaming services to Artificial Intelligence (AI) development".



Figure 7: Extract from Drawing 22119-UMC-ZZZZ-SI-DR-A-0010-P01 (NTS)

4.2.3. TIME LIMITS FOR IMPLEMENTATION AND PHASING CONSIDERATIONS

Condition no. 1 of the 2023 Outline requires an application for approval of reserved matters to be made not later than three years beginning with the date of that permission, and the development must be begun before the expiration of two years from the final approval of reserved matters.

As referenced within Section 1.1. of this SPS, the Applicant has held numerous discussions with potential occupiers, however, these discussions have not advanced to the stage where an application for approval of reserved matters has been made. Should the Application be approved, the Applicant is hopeful that the commercial interest which has already been shown in the Site will lead to the delivery of employment generating floorspace through the submission of applications for approval of reserved matters in the immediate future. However, there remains wider economic uncertainty domestically as the economy faces renewed headwinds from higher energy prices and a worsening inflation outlook driven by the conflict in the Middle East. With the economic outlook uncertain, the Applicant respectfully requests that should the Council be minded to approve the Application that an extended period for the submission of approval of reserved matters is allowed by any planning permission granted.

Section 92(4) of the TCPA provides powers for a local planning authority to *"substitute"* the 'standard' three year prescribed in section 92(2)(a) for the application for approval of reserved matters to *"other periods respectively (whether longer or shorter) as they consider appropriate"*. The Applicant requests that a seven year period is prescribed, with condition no. 1 of the 2023 Outline amended to the following:

> *1. Application for approval of reserved matters must be made not later than **seven years** beginning with the date of this permission, and the development must be begun before the expiration of two years from the final approval of reserved matters or in the case of approval on different dates, the final approval of the last such matter to be approved.*
>
> *Reason: As required by Section 92 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.*

Considerations in relation to phasing were discussed with officers prior to the determination of the 2023 Outline and, again, in recent pre-application discussions with officers prior to the submission of the Application. The Applicant would welcome further discussions with officers prior to the determination of the Application is relation to the specific wording of any proposed draft planning condition in recognition of the fact that the delivery of the Proposed Development is likely to be phased and subsequent applications for reserved matters and those to discharge planning conditions may be made by multiple parties. Given the size of the Site and the amount of employment generating floorspace proposed, in-built flexibility within any planning permission to allow for the phased submission of applications for approval of reserved matters would provide a more favourable and deliverable consent for the market.

4.3. SITE ACCESS ARRANGEMENTS

Further reading:

DOCUMENT	CONTRIBUTOR
Transport Statement	SLR Consulting
Framework Travel Plan	SLR Consulting
Design and Access Statement	UMC Architects

Table 7: Further reading – site access arrangements

4.3.1. VEHICULAR ACCESS

It is proposed to utilise the vehicular access that has already been constructed on the B1173 with a ghost island right turn lane arrangement. The existing access falls within the extent of the public highway

maintainable by Lincolnshire County Council (**LCC)** as highway authority at the public expense. It is therefore part of the adopted highway.



Figure 8: Existing access and ghost island right turn lane arrangement

A General Arrangement of the existing site access arrangement on the B1173 Barrier Bank is provided at Appendix 03 of the Transport Assessment prepared by SLR. The access has been designed for use by the types of vehicles that would access the Proposed Development, including the forecast HGV movements.

Access was considered and approved as part of the 2023 Outline with 7.16 of the Planning Committee Report setting out the following:

> *"*[The existing junction is] *constructed to the appropriate Design Manual for Roads and Bridges standards and is considered to be suitable to provide safe access and egress for the use being proposed in this Application. The appropriate junction visibility is available for drivers emerging from the proposed development and in-bound, right-turning vehicles are able to wait safely in the central right-turn lane for any on-coming vehicles to pass without impeding the passage of following vehicles. The eventual occupiers of the commercial units will enjoy very good connectivity with the principal national highways network via the adjacent A16/A1175 roundabout".*

Officers then conclude:

> *"7.20. Subject to the request for a TRO LCC Highways concluded that the proposed development would not be expected to have an unacceptable impact upon highway safety or a severe residual cumulative impact upon the local highway network and therefore does not wish to object to this planning application.*
>
> *7.21. In the case of the proposed development, it has been demonstrated that there would not be an unacceptable impact on highway safety, nor would the residual cumulative impacts on the road network be severe and therefore the site is considered to be a sustainable location in line with Policies 33 and 36 and Paragraph 111 of the NPPF".*

4.3.2. PEDESTRIAN AND CYCLE ACCESS

The existing public bridleway (Spal/894/1) provides a point of connection into the Site for pedestrians and cyclists arriving from the north (which is likely to be the majority of pedestrians and cyclists, given the location of the Site). Pedestrians would also be able to access the Site from the roadside services on the other side of the B1173 Barrier Bank using the existing footways and central refuge at the vehicular access.

4.3.3. PARKING PROVISION

Further details on parking provision are provided in the Transport Statement prepared by SLR Consulting. The following paragraphs are informed by the Transport Statement and provide a summary of the provision shown on the indicative layout (Drawing 22119-UMC-ZZZZ-SI-DR-A-0010-P03).

4.3.3.1. CAR PARKING

The SELLP Appendix 6 requires the following minimum number of car parking spaces for a B8 warehousing use:

Standard

- One space per 150m2 of gross floor space for employees/visitors, subject to a minimum provision of three spaces.

Disabled

- No specific disabled % requirements

Electric vehicle charging

- Where more than 50 parking spaces are provided, at least one double electric vehicle charge point will be required (2 spaces). For each additional 50 parking spaces, one double charging point should be provided up to a maximum of three (6 spaces).

A total of 428 car parking spaces are shown on the indicative layout (11 more than the minimum required for the quantum of development and eight lower than the minimum required for the maximum Gross Internal Area of 69,677 sq. m), as follows:

Unit 100

- 76 standard;
- 5 disabled (7% of total); and

Unit 200

- 214 standard;
- 14 disabled (7% of total); and
- 23 electric vehicle charging

Unit 300

- 68 standard;
- 5 disabled (7% of total); and
- 23 electric vehicle charging

4.3.3.2. CYCLE PARKING

The SELLP requires the following minimum number of cycle parking spaces:

- Space required for a secure cycle shelter for 40 to 50 cycles for each unit.

a) secure, covered, convenient storage for bicycles for employees should be provided close to an entrance to the building. Changing and shower facilities should be provided where possible; and

b) secure, covered bicycle storage for visitors are located close to the main entrance to the building.

A total of 192 cycle parking spaces are shown on the indicative layout, as follows:

Unit 100

- 48 spaces

Unit 200

- 96 spaces

Unit 300

- 48 spaces

4.3.3.3. HGV LOADING AND PARKING

Whilst there are no LCC HGV parking space standards, in addition to the loading bays for each unit, a total of 182 HGV parking spaces are shown on the indicative layout, as follows:

Unit 100

- 48 HGV parking spaces

Unit 200

- 95 HGV parking spaces

Unit 300

- 39 HGV parking spaces

A comment was received at the public consultation event in relation to an existing issue of inappropriate HGV parking within the vicinity of the Site and the wider area, and the potential for HGVs associated with the proposed development not being able to park on Site. HGV loading bay and parking space requirements for the specific end user(s) will be identified and shown in the final site layout that will be submitted with the associated reserved matters applications and therefore mitigating the potential for any HGVs not being able to park on the Site.

In the highly unlikely event of a vehicle not being able to park on site (i.e. if all HGV loading bay or parking spaces are full), vehicles may be able to temporarily park at informal locations within the Site boundary. Also, dependant on the end user and its operation, it may be possible to communicate with drivers enroute to the Site who could be instructed to park in a Truckstop or layby (and not any local road near the Site), until such a time that spaces become available. Mechanisms such as this could be set out in an operational traffic management plan secured by an appropriately worded planning condition.

4.4. SCALE PARAMETERS

Sensitivities around residential amenity and the potential impact of any building erected in the north-western corner of the Site are well understood and appreciated by the Applicant – particularly following comments made by a number of local residents living along Fen End Lane who attended a public consultation event held on 13 March 2023 and prior to the submission of the 2023 Outline. Accordingly, the indicative layout has been through several rounds of revisions prior to the submission of the Application in order to ensure that, ultimately, a satisfactory relationship, in planning terms, can be

demonstrated. Further commentary on the iterative design process is set out within the Design and Access Statement prepared by UMC Architects.

In order to provide a neighbourly response and to ensure that the residential amenity of residents currently living on Fen End Lane is not materially harmed, the Application is supported by a Parameters Plan. The Parameters Plan (Drawing 22119-UMC-ZZZZ-SI-DR-A-0604-P02 - Parameters Plan) provides a mechanism to ensure that no buildings ae erected within 50 metres of the Site boundary in the north-western corner (adjacent to Fen End Lane) of the Site. This 50 metre 'no development zone' exceeds the 40 metre zone stipulated by condition no. 17 of Planning Application Reference H16-0009-14[6] which consented a mixed use development on the Site in October 2014.

Moreover, it is proposed to restrict the height of any units proposed within 100 metres of the boundary to Fen End Lane to a 15 metres ridge height (above finished floor levels). Beyond this 100 metre zone, the remaining parcels of land will have a maximum ridge height of 21m above finished floor levels. The proposed scale parameters are detailed on the Parameters Plan which is reproduced at **Figure 9** on a not-to-scale basis.

Notwithstanding the fact that the Application is made in outline form (with means of access to be considered) the submission of a Parameters Plan is accepted good practice and provides an effective development management tool to ensure that any subsequent application for the approval of reserved matters remain with the parameters considered as part of the parent outline planning permission. Such an approach was considered acceptable by Inspector David Prentis BA BPl MRTPl when considering the planning merits of an appeal against Milton Keynes Council's refusal of an application for employment uses, comprising, amongst others, of warehousing and distribution (Class B8) floorspace (including mezzanine floors) with ancillary Class E office space (Appeal Reference: PP/Y0435/W/20/3251121[7]). Appeal Reference: PP/Y0435/W/20/3251121 was determined following an Inquiry which sat for a total of 7 no. days. The application which was subject to the appeal included a Parameters Plan and a Land Use Plan which together defined the broad disposition of development and land uses across the Site. These were supported by an Indicative Masterplan which Inspector Prentis took into account as an illustrative drawing. In Paragraph 5 of the decision letter, Inspector Prentis states that: *"Noting that the application is in outline, I am satisfied that a condition could be imposed (by reference to the Parameters Plan) to ensure that any reserved matters applications fall within the parameters assessed in the ES".* Accordingly, in allowing the appeal, condition no. 2 binds any subsequent application for the approval of reserved matters to the submitted Parameters Plan.

The Applicant considers that condition no. 2 of Appeal Reference: PP/Y0435/W/20/3251121 represents good practice and, therefore, would respectfully suggest that this condition (or a modified version of it) would provide an appropriate mechanism to safeguard the residential amenity of the residents of Fen End Lane. Accordingly, the Applicant would have no objection to the imposition of the condition below:

> *2) Approval of the details of the appearance, landscaping, layout and scale (hereinafter called "the reserved matters") shall be obtained in writing from the local planning authority before any development is commenced on the relevant phase or individual plot with a phase. Reserved matters applications shall reflect the provisions of the Parameters Plan 22119-UMC-ZZZZ-SI-DR-A-0604-P02- Parameters Plan) hereby approved.*

[6] H16-0009-14 - Proposed business park, hotel, public house/restaurant, conference and function centre, petrol filling station, restaurant/cafe with ancillary retail together with associated landscaping, access, highways, parking, drainage, utilities and services and infrastructure works. Approved 10 October 2014.

[7] Appeal Ref: APP/Y0435/W/20/3251121 – Land at Brickhill Street, South Caldecotte, Milton Keynes MK17 9FE.

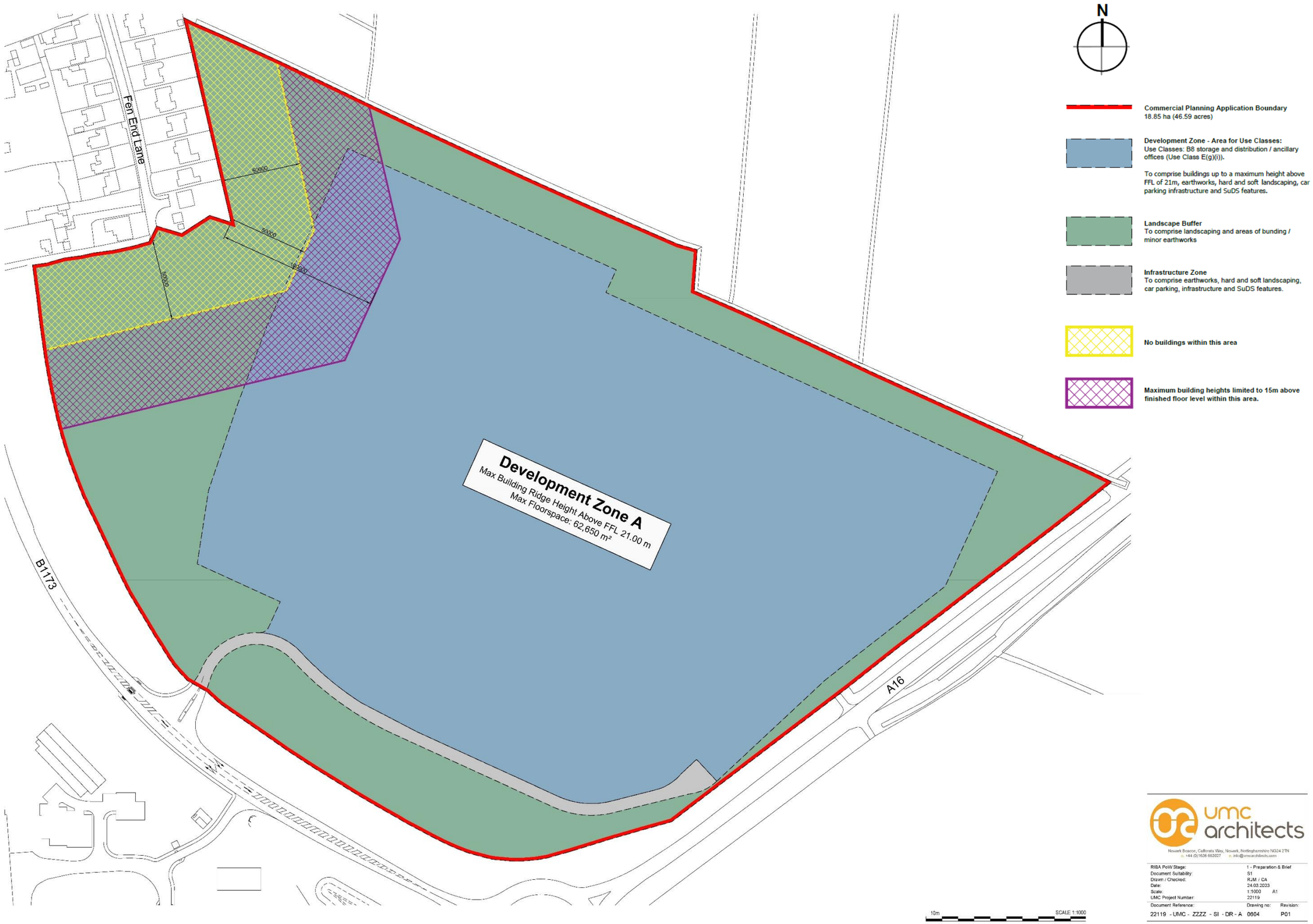


Figure 9: Drawing 22119-UMC-ZZZZ-SI-DR-A-0604-P02- Parameters Plan

4.5. DEMAND DRIVERS

The SELLP evidence base identifies a significant need for the provision of and allocation of new employment generating floorspace over the plan period, The Employment Land Technical Paper (**ELTP**) (2016) identifies that up to 10,300 B-class jobs could be required in the Local Plan period, including for business, transport/storage, manufacturing and agri-food industries. The Spatial Strategy Background Paper (2016) indicates that about 17,600 jobs could be required overall, including from the growth sectors of health, education, low carbon industries and leisure.

Since the adoption of the SELLP in 2019 there has been a dramatic shift and expansion in the warehousing and logistics sector. These are summarised in the *"the size and make-up of the UK warehousing sector"* published in 2021 by UKWA, in association with Savills (**2021 UKWA Report**).

The foreword to the 2021 UKWA Report states that:

> *"Clearly, in the last twelve months both Brexit and the global pandemic have driven and amplified the core changes. In particular, the massive acceleration of e-commerce and home delivery. As Savills notes in the 2021 UKWA report, research from Prologis indicates that for every extra £1bn spent online, a further 775,000sq ft of warehouse space is needed to meet the new demand.*
>
> *This change in shopping habits looks set to stay, and as retailers move from high street premises to online channels to serve consumer demand for home delivery, more fulfilment and distribution facilities will be needed to support the new normal".*

The foreword goes on to state that UK warehousing sector has been pivotal in supporting the growth of online retail and the delivery of thousands of new jobs, and it will continue to be in the spotlight as the global economy recovers from the effects of the pandemic.

The 2021 UKWA Report highlights the following key trends relevant to the Application.

- Since 2015, there has been a clear trend showing that warehouses are getting larger in size and scale. While warehouses under 500,000 sq ft still account for the majority of units, making up 66% of the stock, units over 500,000 sq ft now make-up 34% of the stock, up from 30% in 2015.
- The trend for larger warehouse units has seen the average sized unit increase from 217,000 sq ft in 2015 to 340,000 sq ft in 2020. In the corresponding period, the average eaves height of warehouses has increased from 11m to 14m.

In conclusion, the UKWA Report makes the following pertinent observations.

> *"A 2020 paper from Savills also suggests that for every additional £1bn invested in manufacturing processes, an additional 175,000 sq ft of warehouse space is needed in the wider supply chain.*
>
> *Coupled with the fact that warehouses are getting bigger, this means that sites capable of delivering large scale warehouse space will be developed out much quicker than historical trends suggest.*
>
> *It is therefore crucial that policy makers appreciate the size and scale of the industry in its present form, but also understand that all forecasts point to continued and amplified growth, which will require more land to be allocated for this critical use".*

Whilst the Application is made in outline form and, at the time of writing, the identity of any end user(s) is unknown, the trends highlighted in the 2021 UKWA Report are useful in terms of setting out the key market forces and drivers contributing to the unprecedented demand for additional warehousing space.

4.6. JOB CREATION AND ECONOMIC BENEFITS

The Proposed Development will provide much needed storage and distribution space and will generate significant employment opportunities for the local population during both the construction phase and once the units are occupied.

The logistics sector is changing. Increasingly, there is a variety of different activities which take place within large warehouse units – particularly those designed to Grade-A specification. These changes are being driven by technology with a broader employment base now typical.

Alongside warehousing floorspace, the Proposed Development is expected to include a significant amount of ancillary office and administrative space which will provide further employment opportunities.

It is possible to calculate projected job creation figures using best practice set out in the Homes & Communities Agency published Employment Density Guide (2015) (**EDG**). Employment density refers to the average floorspace (in square metres) per full-time equivalent (**FTE**) member of staff. It is used as a measure of intensity of building use and an indicator of how much space each person occupies within the workplace. The Table of Employment Densities provided in Section 4 of the EDG sets out the following employment benchmark.

USE CLASS	SUB-CATEGORY	DENSITY (SQM)	NOTES
B8	National Distribution Centre	95	GEA
E(g)	General Office	13	NIA

Table 8: Employment benchmark figures

By applying the schedule of accommodation provided on the indicative layout (22119-UMC-ZZZZ-SI-DR-A-0010-P03), job creation figures for the Proposed Development have been calculated. These figures have been calculated by applying employment density figures to the total proposed B8 and E(g) floorspace.

USE CLASS	FLOORSPACE	DENSITY	CALCULATION	EMPLOYMENT GENERATION (FTE EQUIVALENT)
B8	58,718 sq. m	95 sqm	(58,718 / 95)	618
E(g)	3,173 sq. m	13 sqm	(3,173 / 13)	244
				862

Table 9: Employment calculations

The underpinning aim of the SELLP's Spatial Strategy to consolidate and grow the role of Spalding and Boston as the principal settlements within South East Lincolnshire. SELLP Policy 7 states that the South East Lincolnshire authorities will, in principle, support proposals which assist in the delivery of economic prosperity and some 17,600 jobs in the area, 3,800 in Boston Borough and 13,800 in South Holland District.

As shown in **Table 9**, the Proposed Development would give rise to demonstrable economic benefits – these include an anticipated employment generation of 862 FTE jobs once fully operational. Alongside this, there is likely to be a significant albeit unquantifiable amount of additional, indirect, employment opportunities which would be generated as a result of multiplier effects.

5. PLANNING POLICY CONTEXT

5.1. OVERVIEW AND STATUTORY FRAMEWORK

5.1.1. LEGISLATIVE FRAMEWORK

It is a legal requirement that decisions on planning applications must follow the policies set out in the statutory development plan, unless other material considerations indicate that a different decision should be made. That principle was set out in Section 70 (2) of the TCPA and subsequently taken forward through Section 38 (6) of the PCPA which amends and supplements the TCPA.

5.1.2. STATUTORY DEVELOPMENT PLAN

In accordance with regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the South East Lincolnshire Joint Strategic Planning Committee (**the Joint Committee**) adopted the South East Lincolnshire Local Plan (**SELLP**) on 08 March 2019, under the provisions of section 23 of the PCPA. The Joint Committee is a partnership of Boston Borough, South Holland District and Lincolnshire County Councils. The SELLP was prepared with a plan period from 01 April 2011 to 31 March 2036.

Alongside the SELLP, the Lincolnshire Minerals & Waste Local Plan: Core Strategy & Development Management Policies (**LMWLP**) was adopted in June 2016 and set out the key principles to guide the future winning and working of minerals and the form of waste management development In the County up to 2031. It also sets out the development management policies against which planning applications for minerals and waste development will be considered. The Applications are not a County (planning) matter as defined in statute[8] and, therefore, falls to the South Holland District Council as local planning authority (**LPA**).

5.1.3. THE ENVIRONMENT ACT

Mandatory biodiversity net gain as set out in the Environment Act (2021) requires all new developments (unless exempt[9]) under the Town and Country Planning Act 1990 to deliver at least 10% biodiversity net gain from 12 February 2024, with small sites requiring biodiversity net gain from 02 April 2024.

The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Schedule 7A (Biodiversity Gain in England) of the TCPA. This legislation was inserted into the TCPA by Schedule 14 of the Environment Act (2021) and was amended by the Levelling Up and Regeneration Act (2023). The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations (2024) made consequential amendments to other parts of the TCPA.

5.1.4. MATERIAL CONSIDERATIONS

5.1.4.1. NATIONAL PLANNING POLICY FRAMEWORK

The Ministry of Housing, Communities and Local Government (**MHCLG**) published a new National Planning Policy Framework (**NPPF**) on 12 December 2024. The NPPF was revised in response to the *Proposed reforms to the National Planning Policy Framework and other changes to the Planning system*

[8] County (planning) matters are defined by statute and listed in:
As 'Minerals Planning Authority' under Schedule 1 of the Town and Country Planning Act 1990 (as amended by the Planning and Compensation Act 1991) and:
As 'Waste Planning Authority' under the Town and Country Planning (Prescription of County Matters) (England) Regulations 2003.
[9] The Biodiversity Gain Requirements (Exemptions) Regulations (2024).

consultation on 12 December 2024 and sets out the Government's planning policies for England and how these are expected to be applied. MHCLG published an amended version on 07 February 2025 to correct cross-references from Footnotes 7 and 8, and amend the end of the first sentence of paragraph 155 to make its intent clear.

5.1.4.2. PLANNING PRACTICE GUIDANCE

On 06 March 2014 the then Department for Communities and Local Government (**DCLG**) launched a planning practice guidance web-based resource (**PPG**). The PPG adds further context and a layer of more technical guidance to the NPPF and it is intended that the two documents should be read together. The PPG replaced over 7,000 pages of planning guidance that was previously published in separate documents – Planning Policy Guidance notes and Planning Policy Statements – which were cancelled on the launch of the PPG. The PPG was created following the recommendations of the *External Review of Planning Practice Guidance* prepared by Lord Taylor of Goss Moor – known as the Taylor Review - published in 2012.

5.1.4.3. THE NATIONAL DESIGN GUIDE

The National Design Guide (**NDG**), published on 1 October 2019 by the Ministry of Housing, Communities & Local Government complements the NPPF and PPG and provides further guidance on design and place making initiatives. Though the NDG does not constitute formal planning policy, it is a relevant document and material consideration which establishes the characteristics the Government expects to find within "well-designed" places.

5.2. SUMMARY OF KEY POLICIES AND GUIDANCE

5.2.1. SOUTH EAST LINCOLNSHIRE LOCAL PLAN (2019)

Policy 1 – Spatial Strategy

The South East Lincolnshire spatial strategy seeks to concentrate growth on the Sub-Regional Centres of Spalding and Boston alongside 9 no. designated Main Service Centres. More limited growth is directed to designated Minor Service Centres in order to support their role as a service centre for the settlement itself, helps sustain existing facilities or helps meet the service needs of other local communities.

Policy 2 – Development Management

SELLP Policy 2 acts as an overarching development management policy to be used in assessing the sustainable development attributes of all development proposals. All types of planning applications requiring a decision will be subject to the considerations of this policy. It requires new development to be appropriate to a site, to achieve a high quality of design and efficient use of land and buildings, and to respond creatively to the character and distinctiveness of the surrounding area.

Policy 3 – Design of New Development

SELLP Policy 3 identifies key issues that should be considered when formulating, so that development sits comfortably with, and adds positively to, its historically-designated or undesignated townscape or landscape surroundings. It requires all development proposals to create distinctive places through the use of high quality and inclusive design and layout and, where appropriate, make innovative use of local traditional styles and materials. SELLP Policy 3 confirms that design which is inappropriate to the local area, or which fails to maximise opportunities for improving the character and quality of an area, will not be considered acceptable.

Policy 4 – Approach to Flood Risk

SELLP Policy 4 and its explanatory text acknowledge that much of the land within the SELLP area is at significant risk of flooding and this will increase with climate change. SELLP Policy 4 provides a policy framework which facilitates appropriate development to continue in a way that is resilient to the potential consequences of flooding.

Policy 5 – Meeting Physical Infrastructure and Service Needs

SELLP Policy 5 confirms that planning permission will be granted for new development provided that developers can demonstrate that there is, or will be sufficient physical infrastructure and service needs capacity to support and meet the needs of a proposed development. The policy goes on to state that a planning condition and/or planning obligation may be required to help secure the arising needs.

Policy 6 – Developer Contributions

Like its sister policy (SELLP Policy 5), SELLP Policy 6 seeks to ensure that, where appropriate, developers will either make direct provision or will contribute towards the provision of local and strategic infrastructure and services required by the development, either alone or cumulatively with other developments The policy acknowledges that developer contributions will only be sought when they meet the policy tests set out in the NPPF (now NPPF Paragraph 58).

Policy 7 – Improving South East Lincolnshire's Employment Land Portfolio

SELLP Policy 7 states that the South East Lincolnshire authorities will, in principle, support proposals which assist in the delivery of economic prosperity and some 17,600 jobs in the area, 3,800 in Boston Borough and 13,800 in South Holland District. The policy directs the majority of new employment land and therefore jobs, to the Main and Local Employment Areas within the Sub-Regional Centres of Boston and Spalding and the Main Service Centres

Policy 8 – Prestige Employment Sites

SELLP Policy 7 identifies 6 no. Prestige Employment Sites and the potential employment and other uses expected to be delivered on those sites. SELLP Policy 8 provides the overall requirements that apply to all the Prestige Employment Sites and further detailed parameters that must be considered in bringing forward development on each site.

Policy 28 – The Natural Environment

SELLP Policy 28 provides a policy framework which seeks to safeguard existing designated sites and creates a high quality, comprehensive ecological network of interconnected designated sites, sites of nature conservation importance and wildlife-friendly greenspace.

Policy 29 – The Historic Environment

SELLP Policy 29 requires development proposals to conserve and enhance the character and appearance of designated and non-designated heritage assets, such as important known archaeology or that found during development, historic buildings, conservation areas, scheduled monuments, street patterns, streetscapes, landscapes, parks (including Registered Parks and Gardens), river frontages, structures and their settings through high-quality sensitive design.

Policy 30 – Pollution

SELLP Policy 30 states that new development must take into account the potential environmental impacts on people, buildings, land, air and water arising from the development itself, existing land uses and any former use of a site, including, in particular, adverse effects arising from pollution. In conjunction with SELLP Policy 2, SELLP Policy 30 provides a policy framework to assess proposed new uses and to prevent, or minimise impact on amenities by way of: air quality, light levels, noise, odour and vibration.

Policy 31 – Climate Change and Renewable and Low Carbon Energy

SELLP Policy 31 states that all development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated.

Policy 32 – Community, Health and Well-being

SELLP Policy 32 states the development shall contribute to: the creation of socially-cohesive and inclusive communities; reducing health inequalities; and improving the community's health and well-being. Amongst other requirements, the policy states that the proposals should protect and enhance existing public rights of way, and, where possible, creates new links to the rights of way network.

Policy 33 - Delivering a More Sustainable Transport Network

SELLP Policy 33 seeks to promote sustainable alternatives to the car through new development, whilst recognising that as a predominantly rural area, the private car will remain the dominant form of transport. Amongst other requirements, the policy states that major new developments should provide for walking and cycling routes and/or links to existing networks, to key public transport corridors and to transport interchanges. The policy also recognises the importance of existing footpaths, cycle routes and public rights of way, stating that, where feasible, development should create a more coherent walking and cycling network through the provision of new multi-user routes.

Policy 36 - Vehicle and Cycle Parking

SELLP Policy 36 states that all new development, including change of use, should provide vehicle and cycle parking, in accordance with the minimum Parking Standards adopted by the Local Planning Authorities (in Appendix 6), unless a high quality-design can demonstrate that a lower standard of provision.

5.2.2. NATIONAL PLANNING POLICY FRAMEWORK (2021)

Key chapters:

2. Achieving sustainable development

The NPPF states, in Paragraph 7, that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. NPPF Paragraph 8 advises that achieving sustainable development means that the planning system has three overarching objectives (an economic objective; a social objective; and an environmental objective), which are interdependent and need to be pursued in mutually supportive ways

NPPF Paragraph 9 advises that the objectives as set out in NPPF Paragraph 8 should be delivered through the preparation and implementation of plans and the application of the policies within the NPPF. It goes on to clarify they are not criteria against which every decision can or should be judged.

The presumption in favour of sustainable development remains at the heart of the NPPF. NPPF Paragraph 11 of the NPPF is clear that "*plans and decisions should apply a presumption in favour of sustainable development*". For decision-taking, NPPF Paragraph 11 directs that:

> *"For decision-taking this means:*
>
> *c) approving development proposals that accord with an up-to-date development plan without delay; or*
>
> *d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
>
> *i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
>
> *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination".*

NPPF Paragraph 12 states that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Notwithstanding this, the NPPF makes clear that local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

4. Decision-making

NPPF Paragraph 39 states that local planning authorities should approach decisions on proposed developments in a positive and creative way. Before adding that local planning authorities should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

NPPF Paragraphs 40-47 emphasise the importance of pre-application engagement and front-loading, stating that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.

NPPF Paragraph 48 highlights that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. It goes on to advise that decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

6. Building a strong, competitive economy

Chapter 6 of the NPPF seeks to develop a strong and competitive economy and, accordingly, highights at NPPF Paragraph 85 that "*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt*". NPPF Paragraph 85 goes on to state that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

NPPF Paragraph 87 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

NPPF Paragraph 88(a) makes clear that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings.

9. Promoting sustainable transport

Chapter 9 of the NPPF makes clear that transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solution that deliver well-designed, sustainable and popular places.

NPPF Paragraph 110 states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. However, it acknowledges that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

NPPF Paragraph 116 is clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

11. Making effective use of land

NPPF Paragraph 124 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

NPPF Paragraph 125 sets out that planning policies and decisions should (amongst others):

a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains…;

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be

caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

12. Achieving well-designed places

Chapter 12 of the NPPF confirms the Government's high-level aspiration that the creation of high-quality, beautiful and sustainable buildings, and places is fundamental to what the planning and development process should achieve. It goes on to state that good design is a key aspect of sustainable development which creates better places in which to live and work (NPPF Paragraph 131). This advice is consistent with the guidance contained within the PPG which also sets out that achieving good design is about creating places, buildings, or spaces that work well for everyone; look good; last well; and, will adapt to the needs of future generations.

NPPF Paragraph 135 states that planning policies and decisions should ensure that developments, amongst others, will function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history; and, establish or maintain a strong sense of place.

NPPF Paragraph 139 is clear that development which is not well designed should be refused by the decision-maker. Conversely it advises that the decision-maker should give significant weight in favour of proposals that involve outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings (NPPF Paragraph 139(b)).

14. Meeting the challenge of climate change, flooding and coastal change

NPPF Paragraph 162 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change and, specifically, that it should encourage the reuse of existing resources, including the conversion of existing buildings.

NPPF Paragraph 164(b) states that new development should be planned for in ways that and help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

NPPF Paragraph 159 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

NPPF Paragraph 173 states that a sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding. NPPF Paragraph 174 states that, within this context, the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The NPPF clarifies that the strategic flood risk assessment will provide the basis for applying this test.

NPPF Paragraph 177 states that once having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in NPPF Annex 3.

15. Conserving and enhancing the natural environment

NPPF Chapter 15 contains a series of statements in relation to the underpinning objective of conserving and enhancing the natural environment. Of relevance is NPPF Paragraph 187 which states, amongst others, that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).

16. Conserving and enhancing the historic environment

Charter 16 of the NPPF deals with the historic environment. NPPF Paragraph 207 states that local planning authorities *"should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting*" and that *"the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance"*.

NPPF Paragraph 210 sets out an overarching set of principles that local planning authorities should take account of when determining planning applications which include:

a) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*

b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

c) *the desirability of new development making a positive contribution to local character and distinctiveness.*

Specific guidance in relation to the consideration of potential impacts and how these should be considered in the balancing exercise is set out in NPPF Paragraphs 212-221.

6. PLANNING ASSESSMENT

6.1. PRINCIPLE OF DEVELOPMENT

The explanatory text at SELLP Paragraph 3.2.3 states that the ability of the residents of South East Lincolnshire to access employment opportunities close to home, and the ability of a location to sustain local businesses dictates that housing and employment growth are closely linked. Accordingly, the South East Lincolnshire Spatial Strategy, through SELLP Policy 1, seeks to concentrate growth in the Sub-Regional Centres of Spalding and Boston alongside 9 no. designated Main Service Centres. More limited growth is directed to designated Minor Service Centres in order to support their role as a service centre for the settlement itself, helps sustain existing facilities or helps meet the service needs of other local communities.

Specifically in terms of Spalding, Paragraph 3.2.5 states that the Sub-Regional Centres of Spalding and Boston *"need to continue to accommodate the level of services and economic opportunities for the benefit of communities over a widespread area"*.

The underpinning aim of the Spatial Strategy to consolidate and grow the role of Spalding and Boston as the principal settlements within South East Lincolnshire is reflected within SELLP Policy 7 – Improving South East Lincolnshire's Employment Land Portfolio. SELLP Policy 7 is an ambitious policy which is permissive in nature and sets an aspirational growth target of close to 14,000 new jobs being created within South Holland District over the SELLP plan period (up to 2036).

The Site is identified as a Prestige Employment Site (**PES**) within Policy 7 and the Policies Map (Inset Map No 2) (Site Reference: SP002). The Site forms part of a wider allocation referred to as *"Lincs Gateway, Spalding"*[10]. SELLP Policy 7 is a permissive policy and confirms that Lincs Gateway is allocated for development falling within Classes B1, B2, B8, A3, A4, and C1 (now E(g), B2, B8, E(b), Sui generis (public house / drinking establishment), and C1) of the Town and Country Planning (Use Classes) Order 1987 (as amended) (**UCO**).

An extract from the Policies Map (Inset Map No 2) is reproduced below with the Site edged in red.

[10] In total the land identified as Lincs Gateway by the Policies Map amounts to 22.2 hectares. Lincs Gateway consists of two main parts. The Site is allocated as a PES whilst land to the south of Barrier Bank is identified as an Existing Mixed Use Employment Site. The Existing Mixed Use Employment Site is accessed from Barrier Bank and the A1175.

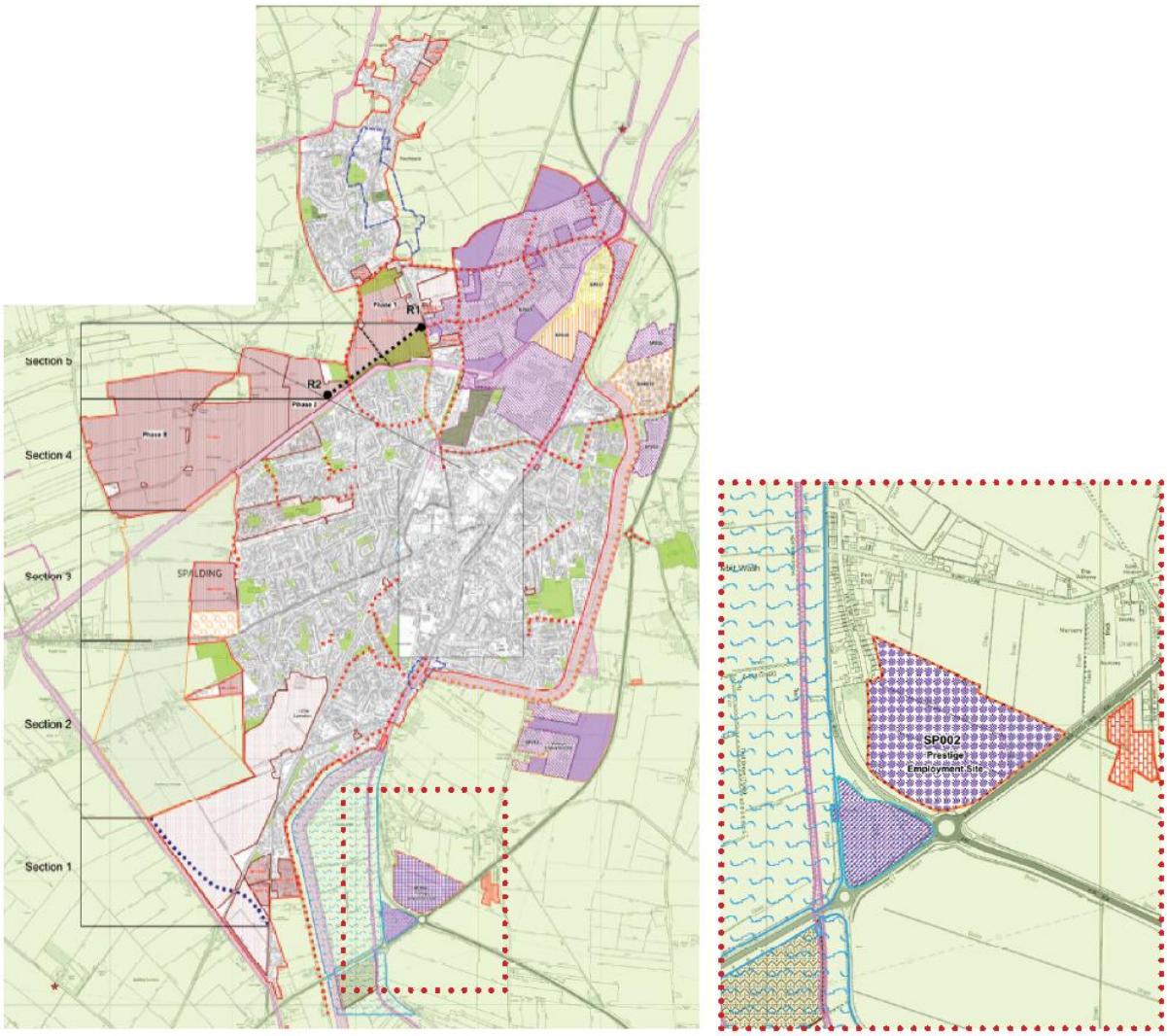


Figure 10: Extract from the Policies Map (Inset Map No 2)

SELLP Policy 8 which sets out the overall requirements that apply to all the PESs and further detailed parameters that must be considered in bringing forward development on each PES. In the case of the Site (SP002), SELLP Policy 8 states the following:

Lincs Gateway, Spalding

- *Development will comprise B1, B2 and B8 uses with some ancillary A3 and A4 uses permitted.*
- *Access to be provided at two points off the B1173 and Barrier Bank from the A16/ A1175.*
- *Additional internal road infrastructure is required to service new development off the two access points to the site.*
- *Provide a scheme that delivers utilities, water & foul water, surface water drainage & flood mitigation upgrades.*
- *Deliver a landscaping scheme that ensures the site respects the character of the open countryside that is adjacent to the site.*

Table 10 which follows considers the Proposed Development against the Site Specific Requirements set out in SELLP Policy 8.

SITE SPECIFIC REQUIREMENTS	COMMENTARY
Development will comprise B1, B2 and B8 uses with some ancillary A3 and A4 uses permitted.	The Application seeks outline planning permission for the erection of buildings to comprise up to 70,000 square metres (Gross Internal Area) of Class B8 (storage or distribution) floorspace to include ancillary Class E(g) (office) floorspace. The Application is entirely consistent with the schedule of uses considered to be acceptable for the allocation.
Access to be provided at two points off the B1173 and Barrier Bank from the A16/ A1175	This Site Specific Requirement relates to the wider Lincs Gateway allocation which also includes land to the south of Barrier Bank identified as an Existing Mixed Use Employment Site. The Existing Mixed Use Employment Site is accessed from Barrier Bank (B1173) and the A1175. The Proposed Development will utilise the existing vehicular access that has already been constructed on the B1173 with a ghost island right turn lane arrangement – this is consistent with the Site Specific Requirement.
Additional internal road infrastructure is required to service new development off the two access points to the site.	Whilst the Application is made in outline form, Drawing 22119-UMC-ZZZZ-SI-DR-A-0010-P03 provides an indicative layout which illustrates a proposed estate road following the southern boundary. Dedicated access to the car parks and service yards will be provided off the internal estate road to minimise car and HGV interactions for both operational and health and safety reasons. Further details would be provided in support an application for the approval of reserved matters.
Provide a scheme that delivers utilities, water & foul water, surface water drainage & flood mitigation upgrades.	Surface water drainage will discharge to the network of field drains around the site at a restricted rate of 1.4 l/s/ha managed via pumped systems due to site levels. Infiltration-based SuDS are not viable because of impermeable clay soils and shallow groundwater; instead, attenuation will be provided through a combination of Type B permeable paving, underground storage, basins, and swales. The proposed discharge rate, infilling and re-alignment of existing field drains has been agreed in principle with the from South Holland District Internal Drainage Board. Foul drainage will discharge by pumping to the public foul sewer north-west of the site. The drainage systems will be privately managed. In order to ensure compliance accordance with the Environment Agency Pollution Prevention Guidelines (**PPG3**), surface water run-off will be treated prior to discharge to watercourse. Run-off

	from hardstanding areas shall be treated through the use of filter drains and swales designed in accordance with current standards. Anglian Water are obligated to accept the foul flows from any development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Council grant planning permission. The Applicant submitted a Pre-Development Request to Anglian Water. Anglian Water's response dated 28 February 2023 sets out that the nearest practicable connection is to the 150mm diameter sewer at manhole 2100 in Fen End Lane at National Grid Reference NGR TF2429920144.
Deliver a landscaping scheme that ensures the site respects the character of the open countryside that is adjacent to the site.	The Application seeks outline planning permission with means of access to be considered. Appearance, landscaping, layout, and scale are reserved for subsequent consideration as part of a future application for the approval of reserved matters. The Application, therefore, only provides indicative details in relation to landscaping. Notwithstanding this, the Proposed Development provides an opportunity to deliver significant and interconnected green infrastructure. Landscaping provides an opportunity to add interest to the design of the buildings, create features and assist in breaking up scale and massing. Additional landscaping provided around the margins of the Site as well as the provision of sustainable drainage systems (**SuDS**) features will create species rich habitat and assist in achieving Biodiversity Net Gain objectives.

Table 10: SELLP Policy 8

Pre-application discussions with the Council involved dialogue around the specific terminology of SELLP Policy 8 and whether storage or distribution (Class B8) could reasonably be held to be "Prestige". Following the receipt of additional information, the Council's informal pre-application response confirmed (without prejudice) that[11]:

> *…the principle of commercial development has been established with the Local Plan allocation and previous outline planning permission, albeit in a different form to that originally envisaged and approved under the recent reserved matters. So I would not disagree with your own professional opinion that B8 use would be acceptable on this site, subject to final detailed designs.*

The Council were particularly encouraged by the aspiration to deliver Grade-A facilities or "best in class" warehousing. During pre-application discussions, the Applicant provided case studies of comparable schemes which have either been approved or delivered recently – the ambition is for the Proposed

[11] Email from Richard Fidler (South Holland District Council) to James Rigby (Knights) dated 17 May 2022 12:32.

Development to achieve similar levels of performance and energy efficiency. One relevant example is *Crewe 460*, a new 456,736 sqft logistics unit at a prime development site at Basford West in Crewe. *Crewe 460* is to be constructed in accordance with the UK Green Building Council Carbon Net Zero standard. Furthermore, the design has been developed to minimise embodied carbon during construction. It also includes numerous measures to enable the end occupier to transition easily and affordably to carbon net zero operation including solar photovoltaics, air source heating and cooling, LED lighting, as well as electric car charging points. Moreover, the building is designed for the occupier's future flexibility such as a strengthened roof to enable full coverage of solar photovoltaics and underground infrastructure to allow 100% of all car and HGV parking spaces to have electric charging points.

Technology and innovation are increasingly important in the logistics sector and Grade-A facilities are built specifically to suit a modern supply chain. Many of the features built into Grade-A facilities increase operational efficiency by adopting smart warehouse management systems in order to reduce warehousing challenges and inefficiencies. A key feature of Grade-A facilities is optimal warehouse layout and layout flexibility – this includes greater floor to ceiling heights to allow greater stacking and careful consideration given to structural solutions to facilitate wide spaces between columns.

Whilst further details will come forward as part of a future application for the approval of reserved matters, the Proposed Development will utilise green design and energy efficiency technologies.

The Proposed Development will deliver buildings that will achieve a minimum Building Research Establishment Environmental Assessment Method (**BREEAM**) 'Very Good' accreditation to ensure the proposals are highly sustainable[12] – this certification can be secured through a planning condition. However, the expectation is that through the detailed design process, the aim will be to improve on this further and to target a BREEAM 'Excellent' rating. The detailed design will also pay particular emphasis on carbon reducing measures.

In summary, the Proposed Development can be shown to fully with SELLP Policies S1, S7, and S8. At a strategic level, NPPF Paragraph 85 states that the significant weight should be placed on the need to support economic growth and productivity. As shown in **Table 9**, the Proposed Development would give rise to demonstrable economic benefits – these include an anticipated employment generation of 862 FTE jobs once fully operational. Alongside this, there is likely to be a significant albeit unquantifiable amount of additional, indirect, employment opportunities which would be generated as a result of multiplier effects.

Moreover, the Proposed Development also accords with NPPF Paragraph 87 which states that planning policies and decisions should recognise and address the specific locational requirements of different sectors including storage and distribution operations at a variety of scales and in suitably accessible locations.

6.2. TRANSPORT AND ACCESS

Further Reading:

REPORT / DOCUMENTATION	CONTRIBUTOR
Transport Statement	SLR Consulting
Framework Travel Plan	SLR Consulting

Table 11: Further reading – transport and access

The Proposed Development would be accessed from the existing access on the B1173 Barrier Bank, which has a ghost island facility for right turning vehicles. There is a refuge in the middle of the road to

[12] A BREEAM assessment uses recognised measures of performance, which are set against established benchmarks, to evaluate a building's specification, design, construction and use. The measures used represent a broad range of categories and criteria from energy to ecology. Each category focuses on the most influential factors, including reduced carbon emissions, low impact design, adaptation to climate change, ecological value and biodiversity protection (Source: Building Research Establishment - https://bregroup.com/products/breeam/how-breeam-works/)

assist pedestrians crossing between the Site and the roadside services, where employees can access food and drink retail offerings.

Car parking would be provided to meet the minimum standards set out in the SELLP (Appendix 6: Parking Standards), with disabled spaces and electric vehicle charging spaces. Cycle facilities are in excess of the minimum standards set out in the SELLP.

Discussions are currently ongoing with the highway authority (Lincolnshire County Council (**LCC**)) regarding potential off-site pedestrian and cycle improvements.

An analysis of trip generation for staff of the Proposed Development has been undertaken using trip rates from the TRICS database and compared to those anticipated to arise as a result of Planning Application Reference H16-0918-21 (**2022 Planning Permission**).

The result of the trip generation analysis shows there would be a reduction in the peak hour movements in the morning and evening peak hours compared to those which would arise as a result of the 2022 Planning Permission. A sensitivity test by increasing the trip generation in the peak hours would still result in fewer vehicle movements than those arising as a result of the 2022 Planning Permission. Based on the 25% sensitivity test, the two-way movements would be 164 in the morning peak hour and 113 in the evening peak hour.

An analysis of maximum parking demand shows that there would be sufficient spaces to accommodate the likely number of employee vehicles expected as part of the Proposed Development.

Taking the above into consideration, the Transport Assessment demonstrates that the Proposed Development does not result in an unacceptable impact on highway safety. Furthermore, the residual cumulative impacts on the road network are not considered to amount to severe when applying NPPF Paragraph 116.

6.3. LANDSCAPE AND VISUAL IMPACT

Further Reading:

REPORT / DOCUMENTATION	CONTRIBUTOR
Landscape and Visual Appraisal	Influence Landscape Planning and Design

Table 12: Further reading – landscape and visual impact

The wider local landscape is very much an agricultural working landscape of irregular sized and shaped fields divided by linear field ditches and B roads. Main road routes such as the A16 and A1175 are bound by linear tree belts which align the roads. The predominately agricultural landscape is punctuated by several buildings of a significant scale and mass – these include Spalding Power Station and the recently erected glass houses at Clay Lake Bank – particularly along the main arterial routes and the urban-rural fringe.

The Site itself consists of an open arable field divided by linear field ditches, this is typical of this local landscape character and not out of the ordinary.

The Proposed Development is wholly within the confines of the existing field boundary, conserving the field pattern. The central linear drainage ditches will be lost as part of the proposals, Sustainable drainage systems (**SuDS**) are however proposed which will link back into existing drainage ditches to the north and form new linear networks maintaining this narrative through the landscape whilst sustainably managing water on site.

The Proposed Development will enhance vegetated boundaries in particular to the east along the A16 and to the north. This will create a continuation of the existing green infrastructure in the form of linear tree belts which are a common feature in this landscape. Existing tree planting to the south will be retained and enhanced.

There are limited impacts overall on the wider study area, from many locations the proposals will not be appreciated at all and although this is a visual aspect it is part of the overall feature of this local landscape.

Given the character of this agricultural working landscape large scale shed development is not an uncommon feature, it is anticipated that there will not be a significant adverse impact.

In terms of visual amenity, potential visual receptors identified are:

- Residents on Fen End Lane to the north west and off Burr Lane to the north;
- Road users particularly of the A16 to the east, B1173 to the south and Burr Lane to the north;
- Users of Local PRoWs, Bridleway Spal 894/1 within the western portion of the Site and Footpath Spal 17/1 further west of the Site along the River Welland.

The majority of the assessed visual receptors listed above are judged to have impacts varying from high to low. Those which are assessed to have the greater degree of impact are residents at the southern end of Fen End Lane to the north west of the Site.

Receptors on Fen End Lane will experience the greatest impact due to their proximity to the Site. Residents will experience disruption during the construction period and a visual change upon completion of the works from an arable field to two distribution units and associated car parking and infrastructure. Existing features of the visual landscape will remain including the earth bund to the west of the Site and boundary vegetation to the south and west. The central linear drainage ditches will be rerouted to sustainably manage water on Site as part of a comprehensive surface water strategy. Existing open boundaries to the north and east will be planted with native tree shelter belt planting as these mature they will form visual connectivity and will mitigate views of the Site.

Users of PRoW, Bridleway Spal 894/1 within the western portion of the Site only experience views towards the Site for a short period when travelling north at the entrance to the Site. Users will experience change at this point and disruption during the construction period due to the proximity of the PRoW and the Site entrance. The existing entrance will be retained and once operational the Site will not be viewed as out of context within the local landscape. It is envisaged that over time and as the native tree and shrub planting within the Site matures and develops it will mitigate and reduce potential impacts.

Users of wider PRoWs to the west may experience construction activities in views east towards the Site from the elevated footpath. This will be temporary and once the Proposed Development is operational it is envisaged that views east towards the Site will not be changed as immediate vicinity is inconspicuous in these views.

Overall, the effects from the Proposed Development, which is not alien in the local landscape, are experienced by few sensitive receptors. There are some particularly sensitive visual receptors, in very limited locations, who, at worst, will experience a high to medium degree of change during the short construction phase, however this reduces once the Proposed Development is operational.

6.4. NOISE

Further Reading:

REPORT / DOCUMENTATION	CONTRIBUTOR
Noise Impact Assessment	Spectrum Acoustic Consultants

Table 13: Further reading – noise

A noise impact assessment (**NIA**) for the purpose of establishing the potential impacts associated with the Proposed Development.

This assessment starts with considering the principles set out in BS 4142:2014 *Methods for rating and assessing industrial and commercial sound*, by comparing the predicted noise levels from new sources associated with the Proposed Development, corrected for any particular characteristics (the Rating Level), with the existing background noise levels, as measured at locations representative of the nearby residential receptor locations.

The NIA is carried out assuming a potential use of the units for food distribution or similar. This is a B8 use that incorporates a substantial allowance of chilling and cooling mechanical services plant, which has the potential to generate additional noise. This therefore represents a robust noise assessment approach, covering worst case noise scenario.

Consideration has been given to the change in noise from increases in vehicle numbers on the public road network, resulting from operations of the Proposed Development. The increases are small and the increase in noise level is <0.5 dB, which is a negligible effect.

Predictions of noise from activities arising as a result of the Proposed Development, show that the potential for significant adverse effects may arise during night operations unless suitable noise mitigation measures are included within the scheme.

BS 4142 has been used as primary basis of the assessment with context relating to the Site, being considered in order to come to an overall conclusion on noise impact.

In order to further reduce the noise levels for night operation, the following mitigation measures have been tested out in the noise model and are now recommended:

- Installing a 2m high close boarded timber fence on top of the existing bunding just inside the northwest Site boundary
- Upgrading the sound insulation of the west/north walls and roof of the nearest unit to NSR 1 to Rw 38 and 30 respectively.
- A noise attenuation package of a combination of acoustic screening/acoustic louvres/silencers/acoustic lagging for each of the large mechanical plant zones to reduce sound power level from LwA 100dB to 90 dB.
- Consideration of an extensive arrangement of effective acoustic bunding and barriers. Outline initial designs show these will be highly effective to the north and east in particular. These might comprise up to 8m total heights between the north facades of units close to the northern boundary of the Site. Up to 5m high reducing to 3m on the north section of the eastern boundary (with the A16) and a barrier between the units on the west of the Site at 6m in height increased from 5m after pre-application discussions with the Council's Lead Environmental Protection Officer.

These mitigation measures designed to deal specifically with noise during night-time operation will further reduce noise levels by 3-6 dB at critical locations. This is a large reduction. In conclusion, based upon an illustrative layout of 3 warehouse units and a recommended noise mitigation scheme, the levels of noise impact to these and other sensitive receptors will be 'low'. This is both for daytime and importantly night-time operation. This would therefore mean that with this typical arrangement adopted there would be no justification for the hours of operation to be restricted through a planning condition.

6.5. ECOLOGY AND BIODIVERSITY NET GAIN

Further Reading:

REPORT / DOCUMENTATION	CONTRIBUTOR
Addendum Ecological Appraisal	Allied Ecology
Biodiversity Net Gain Assessment (BNGA)	Allied Ecology
Statutory biodiversity metric	Allied Ecology

Table 14: Further reading – ecology

6.5.1. ECOLOGICAL APPRAISAL

An 'extended' habitat survey was carried out on the 12 March 2026, based on the UK Habitat ('UK Hab') Classification methodology, whereby habitat types present were noted and mapped, together with an assessment of the general 'ecological value' and condition of each habitat. The Site was also surveyed for the presence of invasive species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

The Site is located to the south of Spalding, and largely comprises arable fields bound by wet ditches, with areas of semi-improved grassland, plantation woodland, dense and scattered scrub, and tall ruderal. The Site is bound by wet ditches at the north and south, and fence lines at the east, south and west. A tree line is also present at the north-west of the Site. Beyond the Site lies residential dwellings to the north-west, commercial development to the south, a caravan park to the east, and arable on all aspects.

An area of Priority Habitat 'Deciduous Woodland' and National Forest Inventory 'Broadleaved' woodland is identified at the north-west of the Site, albeit this habitat is to be fully retained and buffered as part of the Proposed Development. No records of any ancient, veteran or notable trees were returned from within or adjacent to the Site. Given the nature of the proposals, and the proposed retention of the Priority Habitat 'Deciduous Woodland' and National Forest Inventory 'Broadleaved' woodland, it is considered unlikely that any Priority Habitats, ancient woodland or any notable trees will be affected by the Proposed Development.

No non-statutory designations are present within or adjacent to the Site boundary, with all such designations being well separated from the Site by existing development, access infrastructure, and open countryside. Given the nature and scale of the Proposed Development, and physical distance from all non-statutory designations, it is considered by Allied Ecology that these designations are unlikely to be affected. Cowbit Wash SSSI is located approximately 440m to the south-west of the Site, albeit it is considered by Allied Ecology that the Proposed Development will have no adverse effects on the geological interest of the SSSI, for which it is designated. All other designations are sufficiently separated from the Site such that no adverse impacts are predicted – as set out further within the Ecological Appraisal.

Table 15 which follows is reproduced from the Ecological Appraisal and provides an executive summary of the Proposed Development's potential impact on habitats and protected species. The reader is respectfully urged to consider **Table 15** in conjunction with the further commentary provided within the Ecological Appraisal.

TOPIC	RECOMMENDATIONS
Habitats	
Habitats within the Site largely comprise arable fields bound by wet ditches, with areas of semi-improved grassland, plantation woodland, dense and scattered scrub, and tall ruderal. The Site is bound by wet ditches and fence lines, and a tree line is also present at the northwest of the Site.	New habitat creation proposed should comprise ecologically diverse and locally appropriate species, managed to benefit biodiversity.
Fauna	
Bats – No trees were identified within the Site as providing features with the potential to support roosting bats. Limited foraging opportunities are present in the form of dense scrub and woodland which are to be retained.	Implement precautionary clearance measures. Implementation of a sensitive lighting strategy for bats, and provision of new bat roosting opportunities.
Other mammals – No evidence of Water Vole or Otter was identified at the Site, and the on-site ditches and surrounding terrestrial habitats are assessed to be unsuitable to support these species. Other mammal species likely to be present are widespread and not afforded specific legislative protection.	General construction safeguards.

Great Crested Newt – A single waterbody is present within 250m of the Site boundary, to the south. Suitable terrestrial habitats are limited to the grassland, scrub and woodland to the west of the Site, which are to be retained.	Update environmental DNA (eDNA) Presence / Absence Survey.
Reptiles – The Site provides discrete areas of suitable habitat for reptiles, in the form of grassland, scrub, woodland and cropland field margins.	Update Presence / Absence Survey.
Birds – Suitable nesting habitat in the form of the line of trees and dense scrub, and suitable foraging habitats for widespread species present.	Avoid vegetation clearance within the nesting bird season. Introduce new nesting habitats.
Invertebrates – Common and widespread species likely to be present.	No specific measures proposed.

Table 15: Ecological Appraisal – executive summary

To summarise, Allied Ecology conclude that subject to the recommended mitigation and safeguarding measures, it is considered that no significant harm to any habitats or faunal species of interest will occur as a result of the Proposed Development.

6.5.2. BIODIVERSITY NET GAIN

The Application is supported by a Biodiversity Net Gain Assessment prepared by Allied Ecology which considers whether the Proposed Development is able to deliver a biodiversity net gain, and what that percentage net gain could be, utilising the Statutory Biodiversity Metric Calculation Tool (**SBMCT**).

Biodiversity Net Gain Assessment provides a summary of the results of the SBMCT and clarifies the choice of habitat definitions, distinctiveness, habitat conditions and temporal factors (where appropriate), and should be read in conjunction with the Ecological Appraisal (also prepared by Allied Ecology) which is submitted in support of the Application.

An update detailed baseline habitat survey was undertaken by Allied Ecology on 12 March 2026, based on the UK Habitat Classification methodology (**UK Hab**), which forms the basis of the SMBCT. During the survey, the habitat types present within the Site boundary were identified, characterised, and accurately mapped.

None of the habitats present within the Site are classified or characterised as representing an ‘irreplaceable habitat’. Therefore, this assessment criterion is not considered further.

No obvious unintentional or intentional habitat degradation, or degrading activities beyond typical ongoing site management, appears to have occurred prior to the baseline survey being undertaken.

Based on the extent, character, and assessed condition of the habitats within the Site, the onsite baseline is assessed to represent 44.51 Biodiversity Units.

At this stage it important to highlight that the Application is submitted in outline form with landscaping and layout reserved for subsequent consideration at reserved matters stage. The implications for existing onsite habitats and the contribution to onsite gains will, therefore, be uncertain at the time of the determination of the Application.

The Proposed Development is shown illustratively on Drawing Reference: 22119-UMC-ZZZZ-SI-DR-A-0010-P03 prepared by UMC Architects – this drawing is included as part of the Application.

Drawing Reference: 22119-UMC-ZZZZ-SI-DR-A-0010-P03 provides an indicative layout which illustrates 3 no. units that would operate under Use Class B8 of the UCO with an element of ancillary office space provided to support administrative functions (Use Class E(g)).

The Biodiversity Net Gain Assessment considers whether the indicative layout shown on Drawing Reference: 22119-UMC-ZZZZ-SI-DR-A-0010-P03 can achieve a 10% onsite post development gain. In this instance, the SMBCT shows a predicted deficit in the post-development value for the onsite habitat. However, it is important to reiterate that landscaping and layout are reserved for subsequent consideration at reserved matters stage. The final form of development, as considered at reserved matters stage, may not, therefore, replicate what is shown on the indicative material presented as part of the Application.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). The objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. Crucially, the PPG makes clear that *"this increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits"* (Paragraph: 001 Reference ID: 74-001-20240214).

The statutory framework for biodiversity net gain involves the discharge of the biodiversity gain condition following the grant of planning permission. The determination of the Biodiversity Gain Plan under this condition is the mechanism to confirm whether the development meets the biodiversity gain objective. On this basis, the PPG indicates, and this is a key point, that it would *"generally be inappropriate to refuse an application on grounds the biodiversity gain objective will not be met. Rather, decision makers must consider more broadly whether the biodiversity gain condition is capable of being successfully discharged".* (Paragraph: 002 Reference ID: 74-002-20240214). In the case of the Application, it is considered that the biodiversity net gain condition is capable of being discharged through a combination of onsite and offsite matters.

6.6. FLOOD RISK AND DRAINAGE

6.6.1. FLOOD RISK ASSESSMENT

Further Reading:

REPORT / DOCUMENTATION	CONTRIBUTOR
Flood Risk Assessment	Eastwood Consulting Engineers

Table 16: Further reading – flood risk and drainage

The NPPF sets out how the planning system should help minimise vulnerability and provide resilience to the impacts of climate change, and alongside planning policy guidance, and demonstrates how flood risk should be managed now and over the lifetime of the development, taking into account climate change. NPPF Paragraph 170 confirms that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). It goes on to state that, where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Much of the land within the SELLP plan area is at a significant risk of flooding. The South East Lincolnshire Strategic Flood Risk Assessment (**SFRA**) indicates that 85% of Boston lies within areas at risk of flooding (84% in Flood Zone 3 and 1% in Flood Zone 2) with 74% of South Holland within areas at risk of flooding (68% in Flood Zone 3 and 6% in Flood Zone 2). Moreover, many of the areas of land with a lower probability of flooding are in isolated locations, unrelated to settlements.

Inspectors Elizabeth Ord LLB(Hons) LLM MA DipTUS and Anne Napier BA(Hons) MRTPI MIEMA CEnv set out in the Report on the Examination of the South East Lincolnshire Local Plan (**the Inspectors' Report**) that *"in considering the relative distribution of development in relation to the spatial strategy and settlement hierarchy, flood risk has been balanced against the overall sustainability of the settlement"* (Paragraph 21). Pertinently, the Inspectors observe at Paragraph 25 of the Inspectors' Report that *"The allocated sites have been carefully considered and justified against reasonable alternatives, including in relation to the issue of flood risk. Having careful regard to the specific constraints of the Plan area, restricting the area of the sequential test to that of the particular settlement concerned is justified. Overall, although the approach to the sequential and exceptions tests differs from*

that specified in national planning policy, the Plan making process has satisfactorily addressed the need to consider the development of land sequentially in relation to flood risk. Accordingly, we are satisfied that the approach followed is robust and has been justified in this particular case".

In relation to the Application, NPPF Paragraph 180 states:

> *"Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account".*

The Site is identified as a Prestige Employment Site within Policy 7 and the Policies Map (Inset Map No 2) (Site Reference: SP002) of the SELLP. The Site forms part of a wider allocation referred to as "Lincs Gateway, Spalding". SELLP Policy 7 is a permissive policy and confirms that Lincs Gateway is allocated for development falling within Classes B1, B2, B8, A3, A4, and C1 (now E(g), B2, B8, E(b), Sui generis (public house / drinking establishment), and C1) of the UCO. Accordingly, when applying NPPF Paragraph 180, the sequential test is not applicable for the purposes of the Application.

The Environment Agency's Flood Map for Planning confirms that the Site lies within Flood Zone 3 and therefore is assessed as having a 1 in 100 or greater annual probability of river flooding in any year (greater than 1%) and a 1 in 200 chance or greater annual probability of flooding from the sea (0.5%). The Site is protected by Flood Defences and a list of Flood Defence Assets in the vicinity of the Site.

The Site is protected from fluvial / tidal flooding by existing flood defences. It would be impractical to raise finished floor levels (**FFLs**) above the River Welland predicted in-channel water levels which are between 1.66 and 3.16 metres higher than site levels.

Flood resistant design requiring the raising of FFLs is not a viable solution, therefore the Proposed Development must adopt a flood resilient design. Flood resilience measures should be incorporated into the design of the ground floor level of the buildings.

Recommended flood resilience measures are listed below:

- Use flood resistant materials that have low permeability
- Make sure any doors, windows or other openings are flood resilient
- Use flood resilient materials (for example lime-based plaster)
- Raise all sensitive electrical equipment, wiring and sockets
- Make it easy for water to drain away after flooding such as installing a sump and pump
- Make sure there is access to all spaces to enable drying and cleaning
- Ensure soil pipes are protected from back-flow by using non-return valves

The flood resilience measures will also provide protection from the surface water flood risk potentially affecting the Site during an extreme event.

Eastwood Consulting Engineers also recommend that an evacuation flood plan should be in place for each of the proposed units with the end user of each unit being signed up the Environment Agency Flood Warning System to allow for automated messaging when flooding is possible so that all buildings are evacuated prior to an event – appropriate flood risk mitigation can be secured through an appropriately worded planning condition.

6.6.2. LAND DRAINAGE CONSENT

Following approval of the 2023 Outline, the Applicant, through Eastwood Consulting Engineers, have been in regular dialogue with South Holland Internal Drainage Board (**Board**) following the submission of an application for Land Drainage Consent.

Following a meeting of the Board on 04 November 2025, the Applicant received written consent of the Board's intention to grant consent under the terms of its Byelaws and the Land Drainage Act (1991) for the discharge of surface water run-off from the Proposed Development to a riparian watercourse, for the alteration of a watercourse and for the diversion of a watercourse. This correspondence took the form of a *'Notice of Intention to Grant Consent'* letter.

As clarified by the Board, the *'Notice of Intention to Grant Consent'* letter does not constitute a formal consent. Instead, the letter lists the conditions and specifications of the proposed consent, and asks the Applicant to confirm acceptance of these. The letter goes on to state that *the 'Notice of Intention to Grant Consent'* letter is a time limited and, pertinently in relation to the Application, that:

> *"If you are not ready to accept the conditions and specifications of this consent (for example if the proposals shown within your application were indicative, or if you are awaiting planning permission) please let us know and we will mark your application as withdrawn by applicant…Despite not being able to progress to receiving formal Land Drainage Consent, this notice will likely provide an assurance to you that, at the time of submission, the Board considered that the catchment had capacity for your proposals. This assurance may also prove useful for other interested parties, such as the Local Planning Authority. When ready, you can re-apply for Land Drainage Consent with increased confidence regarding the ability of the system to accept surface water from the site (assuming no material changes to the catchment's volumetric capacity has occurred)".*

It is a well-established principle that where regulatory control regimes overlap, a local planning authority is entitled to place reliance upon the effective operation of the other regulatory regime(s) in determining an application for planning permission. This approach was taken by the Council when approving the 2023 Outline with the imposition of condition no. 7 which required details of a scheme for the management, improvement and replacement where necessary, of the existing riparian watercourses that pass through and run along the northern edge of the Site to accompany an application for approval of reserved matters. Following the Applicant's ongoing dialogue with the Board, such a scheme has been previously agreed in principle under the Board's confirmed intention to grant consent under the terms of its Byelaws and the Land Drainage Act (1991).

6.7. LIGHTING

Further Reading:

REPORT / DOCUMENTATION	CONTRIBUTOR
Lighting Impact Assessment	Delta Simons

Table 17: Further reading – lighting

In terms of existing context, there is no existing lighting to the Site itself. The B1173 is one of the main access roads to the Site and is currently illuminated. The existing lighting is Public Lighting consisting of 10m mounting height columns, with post top, LED style luminaires. This Public Lighting runs from the roundabout with the A1175 and A16 for approx. 340m, this extends to just beyond the existing vehicular entrance. The luminaires on this Public Lighting can be seen from the Site and surrounding area.

The A16 runs northeast of the Site and is lit for a short stretch beyond the roundabout for approximately 80 metres. This area is also lit using 10m mounting height columns, fitted with post top, LED style luminaires.

The Applegreen Spalding Services currently comprises of several facilities and buildings, within which the parking areas and facilities are currently lit. In particular, the car park and petrol facilities are and consist of 8m mounting height columns fitted with post top, LED style luminaires, located within the verge at the back of existing parking spaces.

Environmental Zone examples from the Institution of Lighting Professionals Guidance Notes would indicate the area to be classified as an E3 environmental zone, being classed as suburban with medium district brightness, well inhabited rural and urban settlements, small town centres of suburban locations.

The Lighting Impact Assessment (**LIA**) concludes that by taking full advantage of the tight optical control of modern luminaries available, in conjunction with careful consideration of the colour temperature,

mounting height, location and orientation of the luminaire, as well as correctly selecting the applicable lighting levels required, the potential adverse effects associated with light trespass, glare, and sky glow, experienced by surrounding receptors will be minimised to fall in line with the limits specified in the best practice guidance issued by Institution of Lighting Professionals[13] (**ILP**). The ILP Guidance Note should be considered an industry-wide best-practice document with which adherence to it represents best practice for this development.

If required, rear louvres could be fitted to the luminaires to further restrict spill light outside of the Site extents.

There are many low-level lighting options for pedestrian and cycle path lighting which minimise spill and reduce overall illumination. Any new lighting associated with the public bridleway (Spal/894/1) will utilise low level illuminated bollards fitted with the appropriate hoods / deflectors to reduce uplighting.

There is potential for the proposals to be linked to an adaptive lighting system - be it simple switching or standalone dimming - this situation could be improved upon further if viable. Reducing lighting levels at times of low usage or switching off between a designated and agreed time would help towards minimising the environmental and ecological impact of any proposed lighting.

Therefore, with good design and management of the lighting, the effect of the additional lighting to the environment could be kept to an acceptable level contributing very little to the existing situation in many areas.

the effects described in the LIA report would not likely give rise to any significant environmental effects on the environment with respects to light pollution or energy usage, and that all reasonable steps have been identified within the LIA report to keep the impact to the environment to a minimum.

SELLP Paragraph 3.4.7 states that lighting should be designed to illuminate the desired building or space without spilling out beyond the boundary as this contributes to overnight light pollution and causes disturbance to both the human population and nocturnal wildlife. As demonstrated within the LIA, the potential adverse effects associated with light trespass, glare, and sky glow, experienced by surrounding receptors will be minimised to fall in line with the limits specified in the best practice guidance by adopting industry accepted standards and mitigation measures. Accordingly, and subject to the imposition of suitably worded planning conditions in relation to lighting, the Proposed Development would accord with SELLP Policy 3(g) and SELLP Policy 30.

6.8. AIR QUALITY

Further Reading:

REPORT / DOCUMENTATION	CONTRIBUTOR
Air Quality Assessment	Delta Simons

Table 18: Further reading – air quality

The Site is located in a largely rural area, with a small number of sensitive residential receptors located within 10m of its north-western boundary. With regard to ecological receptors, The Cowbit Wash Site of Special Scientific Interest (SSSI) is located approximately 450m south-west of the Site and its sensitivity to changes in air quality would require further consideration, accordingly.

The Site is located in an area where air quality is mainly influenced by road traffic emissions along the adjacent A16, B1173 and the local road network and as such, elevated pollutant concentrations may be experienced at this location. Consequently, the Proposed Development should be assessed to determine whether it has the potential to cause adverse impacts to existing pollutant levels at nearby sensitive receptors, as a result of fugitive dust and plant/vehicle emissions during construction and road vehicle exhaust emissions during operation.

[13] Institution of Lighting Professionals (2021), *Guidance Note 1 for the reduction of obtrusive light*.

Accordingly, an Air Quality Assessment (**AQA)** has been prepared to determine baseline conditions across and in the vicinity of the Site and to assess potential impacts associated with the Proposed Development, in accordance with the requirements of NPPF. The Air Quality Assessment, therefore, considers ambient pollutant concentrations namely nitrogen dioxide (NO2) and particulate matter (PM10 and PM2.5), across and in the vicinity of the Site.

Furthermore, due to its scale and nature, the Proposed Development would be classified as 'Major' in line with the East Midlands Air Quality Network (**EMAQN**) Air Quality and Emissions Mitigation Guidance for Developers (2017) document. As such, a Defra Emissions 'Damage' Cost Calculation has also been undertaken.

The AQA considers the potential air quality impacts during both the construction and operational phases of the Proposed Development. For both phases, the type, source and significance of potential impacts were identified, and the measures that should be employed to minimise these proposed.

The assessment of construction phase impacts associated with emissions of fugitive dust and fine particulate matter (**PM**) with an aerodynamic diameter of less than 10 and 2.5 microns (PM10 and PM2.5, respectively), has been undertaken in line with the relevant Institute of Air Quality Management (**IAQM**) guidance. This identified that there is a medium risk of dust soiling impacts and a low risk of increases in PM concentrations, due to unmitigated construction activities. However, through good site practice and the implementation of suitable mitigation measures, the effect of dust and PM releases would be significantly reduced. The residual effects of the construction phase on air quality are considered to be not significant.

Vehicle movements associated with the operation of the Proposed Development will generate exhaust emissions on the local and regional road networks which have the potential to affect both existing and proposed future residential receptors. An assessment was, therefore, undertaken using dispersion modelling in order to quantify potential changes in pollutant concentrations at existing sensitive locations in the vicinity of the Site, and to quantify pollutant concentrations at proposed future residential receptor locations. Based on the extent of predicted population exposure to the impacts on pollutant concentrations and the guidance provided by the IAQM, the overall effect of the Proposed Development is considered to be not significant.

Predicted concentrations of all pollutants considered for the operational phase, are below the relevant objectives without the risk of exceedance at sensitive existing receptor locations within the vicinity of the Site.

The Proposed Development is expected to result in an overall negligible impact associated with the operational phase traffic on nearby receptors and the residual effects are considered to be not significant, in line with Environmental Protection UK (**EPUK**) and IAQM significance criteria. Accordingly, it can be demonstrated that the Application accords with NPPF Paragraphs 110 and 199 as SELLP Policy 30.

6.9. ARCHAEOLOGY

Further Reading:

REPORT / DOCUMENTATION	CONTRIBUTOR
Archaeological Evaluation	Archaeological Project Services

Table 19: Further reading – archaeology

The Application is supported by an Archaeological Evaluation which documents the findings of an intrusive investigation undertaken in 2013. Twelve trenches, each measuring 50 metres long by 1.6 metres wide were excavated by mechanical excavator. Removal of topsoil and other overburden was undertaken using a toothless ditching bucket. The exposed surfaces of the trenches were then cleaned by hand inspected for archaeological remains.

During the evaluation no prehistoric or Roman remains were encountered. Evidence of post-medieval agricultural activity was revealed in the form of dylings, parallel arrangements of ditches used to enclose small fields. No other remains were encountered and no artefacts were recovered during the works.

Archaeology was considered by officers during the determination of the 2022 Planning Permission with the delegated officer report setting out the following on Page 10:

> *"Archaeology*
>
> *The LCC Historic Environment Officer made no comments as there are no known archaeological impacts. Previous phases did include evaluations but didn't find anything of interest, only relatively recent (post-medieval) field boundaries and agricultural features.*
>
> *A standard informative can be included to cover unexpected archaeology if found".*

Given the above, the same approach would be reasonable and expected when considering the Application.

6.10. GROUND CONDITIONS

Further Reading:

REPORT / DOCUMENTATION	CONTRIBUTOR
Geotechnical and Geo-Environmental Site Investigation	Eastwood & Partners

Table 20: Further reading – ground conditions

Superficial Tidal Flat Deposits are indicated across the Site. The underlying solid geology comprises the Oxford Clay Formation.

The Site is not within a coal mining affected area.

No elevated concentrations of contaminants or asbestos fibres have been recorded in the samples of topsoil collected and analysed as part of the Geotechnical and Geo-Environmental Site Investigation. It is expected that the topsoil can be reused without the need for any remedial works. However, the majority of the topsoil is expected to be removed from Site, due to the nature of the Proposed Development.

One sample of the surface made ground in the 'Brownfield' area (TP20 0.1 m) recorded a slightly elevated concentration of *Dibenz[a,h]anthracene*; TP20 is expected to lie below the footprint of one of the proposed warehouses. A modified mean has been calculated across the made ground samples (2.54 mg/kg) which falls below the assessment value of 3.5 mg/kg, and therefore a significant risk to future site users is not expected to be presented by this localised exceedance. No capping layer is considered to be necessary where made ground remains below soft landscaped areas.

No other elevated concentrations of contaminants or asbestos fibres were recorded. Elevated concentrations of contaminants were not recorded in the natural ground and therefore arisings of natural soil can be reused on site with no remediation required. Given the above, site-won materials are considered to be suitable for re-use as part of the development. Where made ground remains below soft landscaped areas, a minimum 100 mm growing medium should be provided for plants.

6.11. DECISION MAKING

Section 38(6) of the PCPA requires applications for planning permission to be determined in accordance with the development plan unless material consideration indicates otherwise.

Material considerations include the both the NPPF and PPG.

NPPF Paragraph 11 states that for plans and decisions should apply a presumption in favour of sustainable development which for decision making this means:

> *"c) approving development proposals that accord with an up-to-date development plan without delay; or*

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination".

NPPF Paragraph 48 identifies that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statuary timescales unless longer period has been agreed by the applicant in writing.

This section of the SPS has demonstrated that there is no conflict or breach with any policies of the SELLP, when considered in the round, and, therefore, NPPF Paragraph 11(c) is engaged. Accordingly, for decision making this dictates that the Application should be approved, without delay.

7. PRE-APPLICATION CONSULTATION

7.1. OVERVIEW

Prior to the submission of the 2023 Outline, the Applicant and their advisors carried out consultation and engagement with the local community as well as key stakeholders. Given the fact that the Application is materially consistent with the 2023 Outline and the information presented and discussed with the community would be same as presented previously it is not considered necessary or appropriate to carry out further pre-application consultation.

Nevertheless, this exercise remains relevant as it ultimately informed the proposals which were the subject to the 2023 Outline and are, in turn, submitted as part of the Application. The pre-application consultation carried out in 2023 is, therefore, summarised in the following paragraphs.

7.2. SCOPE AND NOTIFICATION

The 2023 consultation aimed to reach the following groups:

- Residents in the immediate area, as edged yellow on the plan shown in **Figure 11** – this area amounted to approximately 90 no. dwellings.
- Local businesses operating within close proximity to the Site, as edged orange on the plan shown in **Figure 11**.
- Spalding Town Forum – Spalding Town Forum was formed in 2000 to represent views in the area, and comprises District Councillors and representatives of local organisations[14].
- Cowbit Parish Council and Deeping St Nicholas Parish Council – the boundaries of both these parishes are located close to the Site.
- Ward Councillors for Spalding St Mary's Ward.

[14] *https://democracy.sholland.gov.uk/mgCommitteeDetails.aspx?ID=151* accessed 12 January 2023.

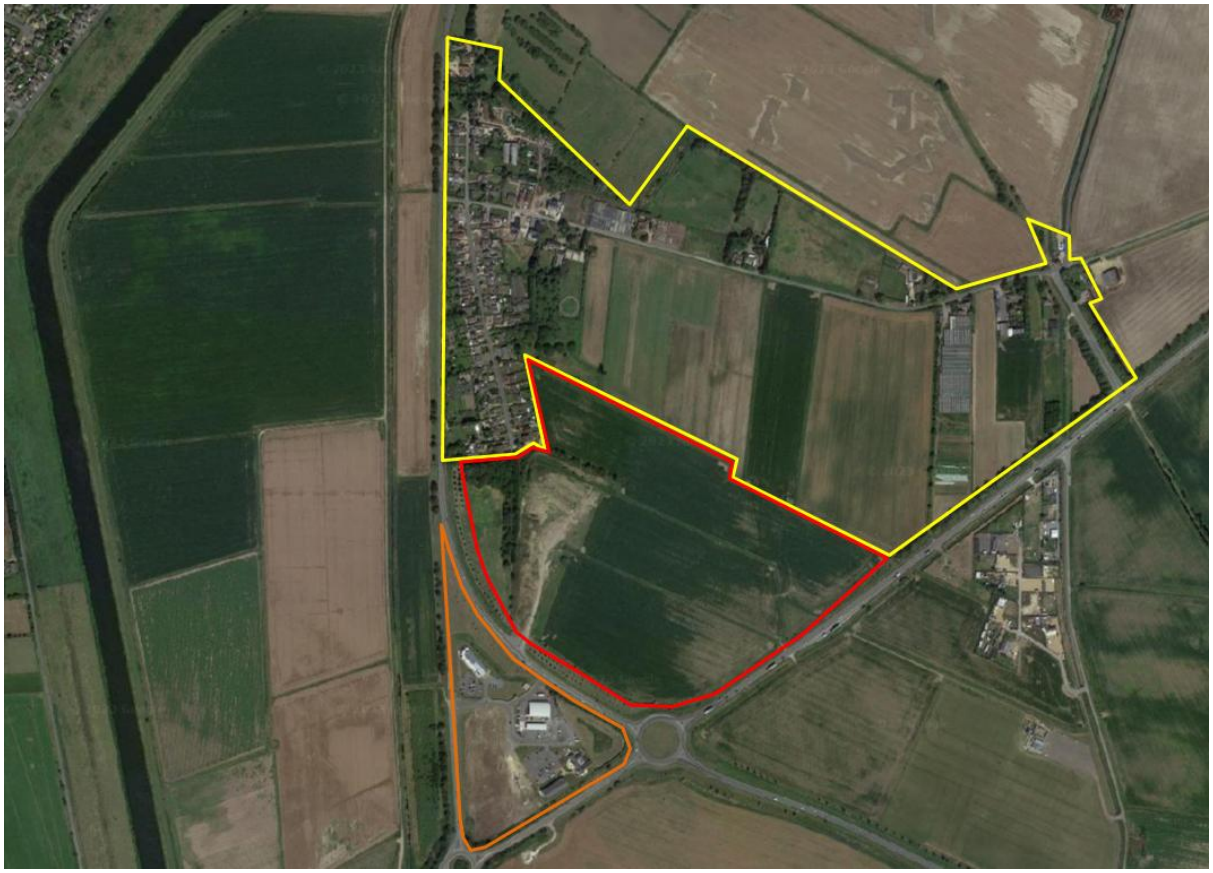


Figure 11: Scope of consultation notification

An in-person community consultation event was planned for the 13 March 2023 at the Welland Yacht Club, a short distance from the Site. The venue provided an accessible location for the community to be able to attend the event and discuss the proposal with various consultants.

Approximately 90 no. leaflets were distributed to the local community on the 03 March 2023 in the lead up to the consultation – this included Fen End Lane, Burr Lane and Spalding Drove. The leaflet encouraged local residents to provide their thoughts on the Proposed Development and, in addition to information about the community event, details were provided directing the residents to a webpage hosted on Knights' website which was dedicated to the Proposed Development. Alongside the emerging indicative masterplan and all the boards that were presented to the public at the event, the webpage also included a link to a feedback form hosted by *SurveyMonkey* which could be completed by residents anytime during the 21-day consultation period and submitted directly to Knights (up to and including 03 April 2023). Alternatively, residents were given the option to contact Knights directly by email should they wish to discuss the proposal further or submit feedback by those means. The leaflet also gave a postal address and made clear the opportunity to request a paper copy of the consultation documentation by contacting Knights. It is therefore considered that residents were no excluded from the opportunity to provide feedback on the basis of a lack of internet connection or being unable to attend the 13 March event. The leaflet also made clear to local residents that this consultation process would not replace the Council's statutory consultation requirement and that they would be consulted, formally, by the Council on receipt of a formal planning application.

A copy of the leaflet is provided at **Figure 12**.

What happens next?

We have a arranged a community drop-in session to be held 2pm - 7pm on Monday 13 March at Welland Yacht Club, River Bank, Spalding, PE11 3AA.

The proposals will be on display and Alcan Properties Limited's team will be available to answer any questions.

All information will be available to download as part of a digital consultation which will run from 13 March until 3 April. You can view larger copies of the images shown on this leaflet at any time on a dedicated consultation website which will launch on Monday 13th March.

This can be accessed via the QR code below or by visiting:

www.knightsplc.com/lincs-gateway-spalding

Residents will be consulted directly by South Holland District Council once a planning application is submitted.

Contact us by email:
james.rigby@knightsplc.com

Or by post: James Rigby, Knights, Olympic House, 995 Doddington Road, Lincoln, LN6 3SE.

Paper copies of materials available on request.

Knights

Proposed development at Lincs Gateway, Spalding

We want to hear from you - invitation to attend community consultation event

Dear Resident

We are writing to you on behalf of Alcan Properties Limited who are developing proposals for the construction of 750,000 square feet of storage and distribution floorspace on the edge of Spalding on land known as Lincs Gateway.

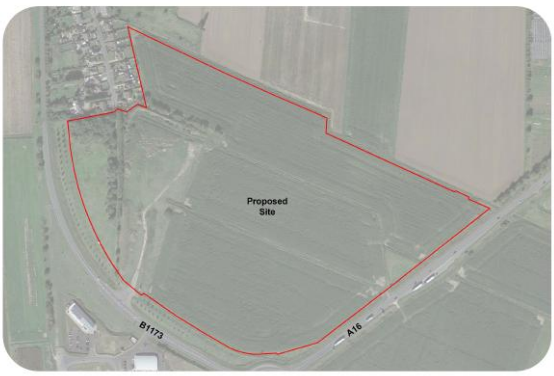
The proposals are for premium, energy-efficient warehouse and logistics facilities which aim to attract high-profile companies as end users.

While we have been working alongside South Holland District Council and Lincolnshire County Council in developing our scheme, we want to ensure that members of the community living closest to the site are provided with an opportunity to view the emerging proposals and provide feedback which will be given consideration by the wider design team.

We are keen to explain our plans and to hear the views of people and businesses local to the site, prior to submission of any application for planning permission, through a community consultation event to be held on **Monday 13 March** – details are provided at the back of this leaflet.

The Site

The site is located on the southern edge of Spalding, just over a mile south of the town centre. It is bounded by the B1173 to the south and A16 to the east, with residential development on Fen End Lane to the northwest. A location plan is provided **below** which shows the extent of the site edged in red.



Background

In policy terms, the site is identified as a Prestige Employment Site within the South East Lincolnshire Local Plan (2019) and referred to as "Lincs Gateway". The Local Plan allocation establishes that the principle of commercial development is acceptable on the site. The proposals seek to develop the site in accordance with the Local Plan allocation.

Knights

The Proposals

The proposals will provide much needed storage and distribution space and will generate significant employment opportunities for the local population during both the construction phase and once the units are occupied.

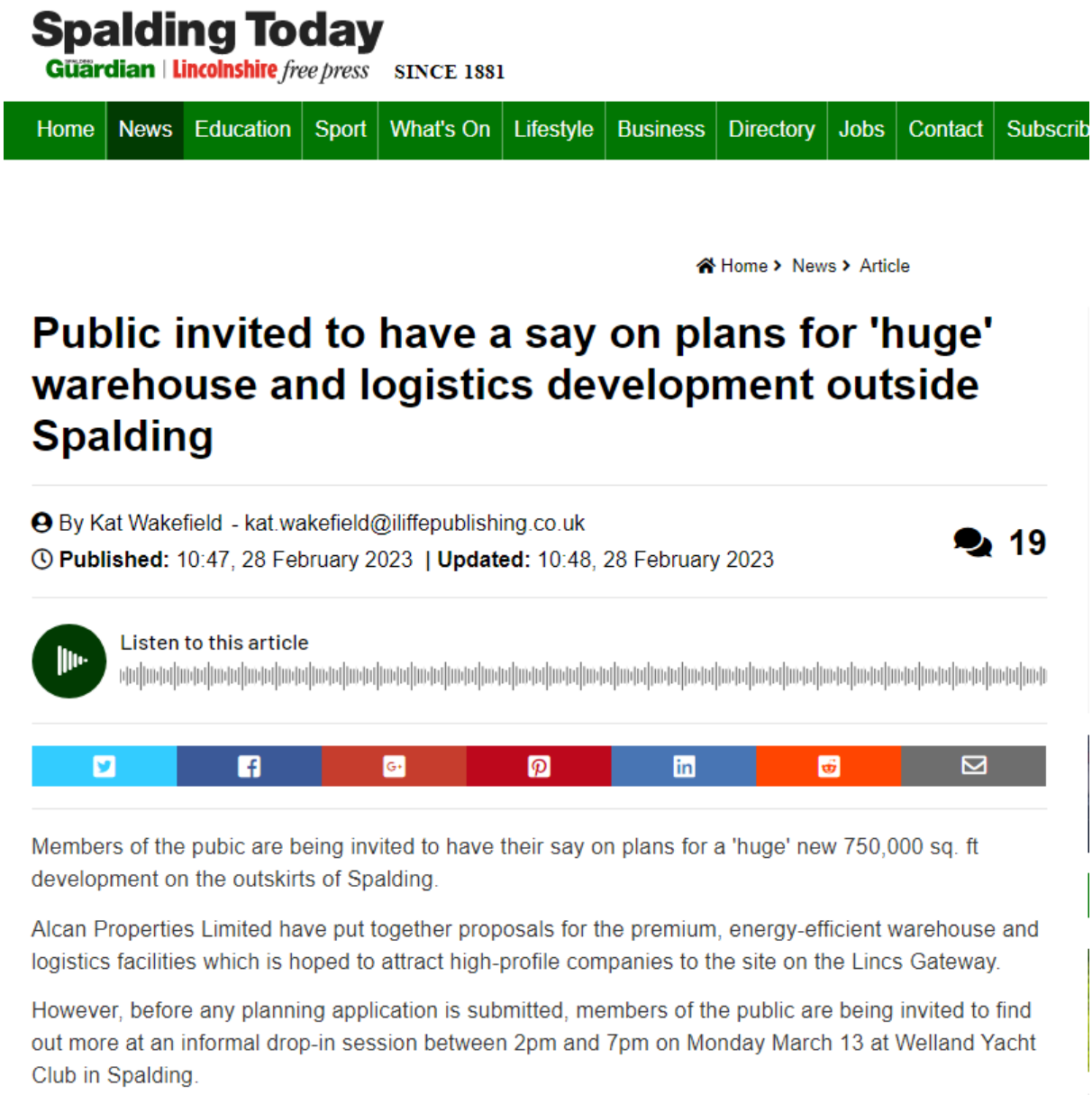
The aspiration is to deliver what are referred to as Grade-A facilities. Technology and innovation are increasingly important in the logistics sector and Grade-A facilities are built specifically to suit a modern supply chain. The units will utilise green design and energy efficiency technologies.

Vehicular access into the development would be via the existing adopted junction from the B1173. Pedestrian and cycle access to the site would be primarily from the existing bridleway from Fen End Lane with the proposals offering an opportunity to improve lighting and resurfacing. A concept plan of the proposals is provided **below**.



Figure 12: Leaflet distributed on 03 March 2023

Alongside publicity generated through the leaflet drop, there was also a press release issued to the local print and web-based media including both the including Spalding Voice and the Lincolnshire Free Press (including the Spalding Guardian).



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Public invited to have a say on plans for 'huge' warehouse and logistics development outside Spalding

By Kat Wakefield - kat.wakefield@iliffepublishing.co.uk
Published: 10:47, 28 February 2023 | **Updated:** 10:48, 28 February 2023

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Listen to this article

Members of the pubic are being invited to have their say on plans for a 'huge' new 750,000 sq. ft development on the outskirts of Spalding.

Alcan Properties Limited have put together proposals for the premium, energy-efficient warehouse and logistics facilities which is hoped to attract high-profile companies to the site on the Lincs Gateway.

However, before any planning application is submitted, members of the public are being invited to find out more at an informal drop-in session between 2pm and 7pm on Monday March 13 at Welland Yacht Club in Spalding.

Figure 13: Press publication

The publicity undertaken in advance of the consultation is summarised below.

TARGET GROUP	PUBLICITY DETAILS
Local residents	Approximately 90 no. leaflets were distributed to the local community on the 03 March 2023 in the lead up to the consultation – this included Fen End Lane, Burr Lane and Spalding Drove. Notices were affixed to lampposts close to the Site
Local businesses	11 no. letters posted directly to local businesses on 07 March 2023.

Spalding Town Forum	Email sent to Councillor Gambba-Jones (chairman) on 03 March 2023 providing details of the consultation event.
Cowbit Parish Council and Deeping St Nicholas Parish Council	Email sent to the clerks of Cowbit Parish Council and Deeping St Nicholas Parish Council on 03 March 2023 providing details of the consultation event.
Ward Councillors for Spalding St Mary's Ward	Email sent to Councillor Drury and Lord Porter on 03 March 2023 providing details of the consultation event.
Residents of Spalding and surrounding area	Press release issued to the local print and web-based media including both the including Spalding Voice and the Lincolnshire Free Press (including the Spalding Guardian).

Table 21: summary of publicity

7.3. EVENT DETAILS

An in-person community consultation event was held on the 13 March 2023 at Welland Yacht Club, River Bank, Spalding, PE11 3AA. The event was held between the hours of 14:00 and 19:00 and was attended by the Applicant, Knights and a number of technical specialists.

NAME	ROLE	COMPANY
Emma White	Prospective Developer	Alcan Properties Limited
James Rigby	Planning Consultant	Knights
Chris Allwood	Architect	UMC Architects
Stuart O'Neil	Drainage specialist	LIN Consulting
Daniel Moran	Highways specialist	SLR Consulting
Andrew Corkill	Noise and Acoustics Specialist	Spectrum Acoustic Consultants

Table 22: Consultation representation

The consultation event itself provided an opportunity for local residents to engage with the proposal and further appreciated the considerations which had informed the development. A1 sized boards and handouts were available offering further information in related to the Proposed Development – a copy of the display board which greeted local residents on the 13 March 2023 at the event is provided in **Figure 14**.

Proposed warehouse and logistics units at Lincs Gateway, Spalding

Welcome

Welcome to today's consultation event.

SCAN ME

Alcan Properties Limited are developing proposals for the construction of up to 750,000 square feet of storage and distribution floorspace on the edge of Spalding on land known as Lincs Gateway. The proposals are for premium, energy-efficient warehouse and logistics facilities which aim to attract high-profile companies as end users.

The aim of the event is to provide further information in relation to the proposed development as well as providing local residents with the opportunity to ask questions to the designers and technical specialists in attendance.

Members of the team will introduce themselves and will be positioned next to the information boards on display. Please feel free to read the information boards at your convenience and ask any questions to members of the team.

Name	Company	Role
Emma White	Alcan Properties	Prospective Developer
James Rigby	Knights	Planning Consultant
Chris Allwood	UMC Architects	Architect
Stuart O'Neil	LIN Consulting	Drainage Specialist
Daniel Moran	SLR Consulting	Highways Specialist
Andrew Corkill	Spectrum Acoustic Consultants	Noise and Acoustics Specialist

Allied Ecology · DeltaSimons Protecting people and planet · influence · LIN Consulting · SLR · SPECTRUM ACOUSTIC CONSULTANTS · umc architects · Knights

https://www.knightsplc.com/lincs-gateway-spalding

Figure 14: Copy of the display boards which greeted residents at the 13 March 2023 consultation

Photographs from the 13 March consultation are provided below at **Figure 15**.



Figure 15: Photographs from the 13 March consultation

Attendees were invited to fill out paper response forms detailing their thoughts on the Proposed Development, though they were also made aware that their comments could be made online or, alternatively, by email to Knights. Similarly, these options were also detailed on the leaflet distributed by hand and publicised on Knights' website. At the event it was also made clear to residents that the Applicant's consultation would not replace the Council's statutory consultation requirement and that they would be consulted, formally, by the Council on receipt of a formal planning application.

The community consultation event was attended by a total of 40 no. individuals. A total of 16 no. responses were collected throughout the 21-day consultation period (ending 3 April 2023). Of these responses, 14 no. were received via paper feedback forms completed on the day of the consultation event, 1 no. was received via *SurveyMonkey* and 1 no. received via email.

The first question sought to quantitively gauge whether residents supported or objected to the Proposed Development. A total of 16 answers were recorded as shown in **Table 23** which follows.

ANSWER	NUMBER OF RESPONSES	% OF RESPONSES
Yes	6	37.5%
Unsure	2	12.5%
No	8	50%

Table 23: Consultation responses – Question 1

The second question was an open question which allowed the respondent to provide any additional comments they wished to add in relation to the Proposed Development. In total 16 (100% of respondents) left additional comments in this section setting out their reasoning for their answer to Question 1. Responses included comments made in relation to the following categories:

- Location and principle of development
- Visual amenity
- Highways
- Active travel
- Drainage
- Lighting
- Noise
- Wildlife and ecology
- Other

The Applicant is of the opinion that the 2023 consultation event served as a beneficial and meaningful way of engaging with the local community. Following the consultation exercise a number of amendments have been with the Proposed Development now taking a different form to the earlier iteration which was presented to the local community.

8. CONCLUSION AND PLANNING BALANCE

Consistent with the 2023 Outline, the Application seeks outline planning permission for the erection of buildings to comprise up to 70,000 square metres (Gross Internal Area) of Class B8 (storage or distribution) floorspace to include ancillary Class E(g) (office) floorspace.

The Application is materially consistent with the 2023 Outline insofar as the following:

- The extent of the Site is identical to that which comprised the 2023 Outline. The Application is supported by the same Site Location Plan (Drawing Reference: 22119-UMC-ZZZZ-SI-DR-A-0501-P03) considered by the Council previously and referenced within condition no. 3 of the 2023 Outline;
- The Application adopts the same description of development which formed part of the operative part of the 2023 Outline;
- The Application seeks approval for access. Consistent with the 2023 Outline, it is proposed to utilise the vehicular access that has already been constructed on the B1173 with a ghost island right turn lane arrangement. The existing access falls within the extent of the highway maintainable by Lincolnshire County Council, as highway authority, at the public expense.
- The Application is supported by the same suite of drawings which, whilst indicative in nature, are consistent with those submitted in support of the 2023 Outline.

The Application and essentially seeks to 'renew' the previously consented scheme through a new application for outline planning permission

The Site is identified as a Prestige Employment Site within Policy 7 and the Policies Map (Inset Map No 2) (Site Reference: SP002) of the SELLP. The Site forms part of a wider allocation referred to as *"Lincs Gateway, Spalding"*. SELLP Policy 7 is a permissive policy and confirms that Lincs Gateway is allocated for development falling within Classes B1, B2, B8, A3, A4, and C1 (now E(g), B2, B8, E(b), Sui generis (public house / drinking establishment), and C1) of the Town and Country Planning (Use Classes) Order 1987 (as amended).

The Proposed Development seeks to develop the Site in accordance with the SELLP allocation – storage or distribution units are specifically referenced as being acceptable in principle within SELLP Policy 7.

At a strategic level, NPPF Paragraph 85 states that the significant weight should be placed on the need to support economic growth and productivity. The Proposed Development would give rise to demonstrable economic benefits – these include an anticipated employment generation of 862 full-time equivalent jobs once fully operational. Alongside this, there is likely to be a significant albeit unquantifiable amount of additional, indirect, employment opportunities which would be generated as a result of multiplier effects.

Moreover, the Proposed Development also accords with NPPF Paragraph 87 which states that planning policies and decisions should recognise and address the specific locational requirements of different sectors including storage and distribution operations at a variety of scales and in suitably accessible locations.

Beyond the above considerations which relate to the wider principle of development, the Application is accompanied by a number of technical reports prepared by suitably qualified and competent persons which consider the following issues:

- Transport, accessibility and movement;
- Flood risk and surface water drainage;
- Landscape and visual impact;
- Archaeology;

- Nature conservation, ecology and biodiversity;
- Noise;
- Lighting;
- Air quality; and
- Ground conditions

The suite of reports submitted in support of the Application confirm there are no technical barriers to the grant of planning permission subject to the imposition, where necessary, of suitably worded model planning conditions which offer a mechanism to mitigate any potential adverse impacts associated with the Application. Accordingly, it is demonstrated that there are no significant adverse impacts which arise from the Application that would significantly and demonstrably outweigh the benefits associated with this significant investment.

In considering the 2023 Outline, the Council determined that there was no conflict or breach with any policies of the SELLP, when considered in the round, and, therefore, NPPF Paragraph 11(c) of the was engaged. Accordingly, for decision making this dictated that an application should be approved, without delay. The principle of consistency – a well-established principle in planning law – directs that a decision-taker ought, when considering a materially similar proposal, to have regard to the principle of consistency and to have good reason if deciding to depart from the previous decision.

Crucially, in terms of the assessment of the planning balance required under the provisions of section 38(6) PCPA, the statutory development plan for South Holland remains unchanged from when the 2023 Outline was determined. The principal component being the SELLP which was adopted by the South East Lincolnshire Joint Strategic Planning Committee on 08 March 2019

This Supporting Planning Statement demonstrates that the Application results in no conflict or breach with any policies of the SELLP, when considered in the round, and, therefore, NPPF Paragraph 11(c) remains engaged. Accordingly, for decision making this dictates that the Application should be approved, without delay.