
Planning, Economic and Retail Statement

Land to the South of Holbeach Road, Spalding

Commercial Development Projects Limited

July 2025



Contents

1.	Introduction	1
2.	Site Context	4
3.	The Proposed Development	5
4.	Review of Relevant Planning Policy	7
5.	Principle of the Proposed Development	11
6.	Securing Sustainable Economic Growth	14
7.	Sequential Approach to Site Selection	17
8.	Retail Impact Assessment	25
9.	Transport and Highways	34
10.	Design Considerations	37
11.	Environment and Amenity Considerations	39
12.	Summary and Conclusions	44

Appendices

1. Map to Show the Primary Catchment Area
2. GOAD map showing vacant units in Spalding town centre
3. Town Centre Health Checks
4. Retail Impact Assessment Tables

1. Introduction

- 1.1** This Statement has been prepared by Savills (UK) Limited on behalf of Commercial Development Projects Limited in relation to a full planning application submitted for development at the land to the South of Holbeach Road' in Spalding (the '**Site**'). It is intended to assist the Local Planning Authority's ('**LPA**') consideration of the development's accordance with local and national planning policies and all other material considerations.
- 1.2** The application proposal seeks to deliver a new foodstore and drive-thru coffee shop to be occupied by Costa Coffee, along with all associated works including revised access arrangements and landscaping.
- 1.3** The Site comprises approximately 1.34 ha of land to the south of Holbeach Road in Spalding, outlined in red on the submitted Site Location Plan. The Site is currently undeveloped, and predominantly consists of shrubland, grassland and a number of trees.
- 1.4** A number of planning applications for the development of the Site have been granted at various stages over the past 20 years and, as a result, there is extant permission for a mixed-use commercial scheme, which forms a fall-back position and is a 'material consideration' in the determination of the current application.
- 1.5** The proposed development has been subject to detailed pre-application discussions with officers of the LPA and its external retail consultants. The formal pre-application advice sets out that the principle of the development could be acceptable, subject to the application satisfying the range of development management considerations. The scope of documents to be submitted as part of the application was agreed as part of those discussions. The scope and approach to the sequential and impact tests was also agreed. The submission of this application also follows a public consultation undertaken throughout May and June 2025, which is summarised in the submitted Statement of Community Involvement ('**SCI**').
- 1.6** In line with the above, and in order to comprehensively assess the proposed development against the relevant planning policies, the remaining sections of this Report are structured as follows:

Section 2.0	Site Context
Section 3.0	The Proposed Development
Section 4.0	Review of Relevant Planning Policy
Section 5.0	Delivering Economic Growth
Section 6.0	Sequential Approach to Site Selection
Section 7.0	Retail Impact Assessment
Section 8.0	Transport and Highways
Section 9.0	Design
Section 10.0	Environment and Amenity Considerations
Section 11.0	Securing Sustainable Development

1.7 We finally set out in **Section 12.0** our Summary and Conclusions, which are that:

- a) The proposed development will deliver substantial economic benefits, including significant private investment and the creation of circa 98 new job opportunities (predominantly for local residents), plus additional jobs during construction. It accords with the Council's policies for delivering new economic growth, which is an objective of local and national imperative. That investment can be delivered now and should be afforded significant weight, in line with the NPPF.
- b) The proposed food store will improve choice and local access to convenience goods provision, and incorporates a range of measures to reduce carbon emissions and respond to climate change.
- c) The proposed development accords with the sequential approach and it has been demonstrated that there will be no significant adverse impact on investment in, or the vitality and viability of, defined town centres.
- d) The proposed development is acceptable in all other respects, including transport and highways, drainage, ecology, heritage, sustainability and other environmental matters.

1.9 In light of the above, we further conclude that:

- The proposal accords with the relevant policies in the development plan, when read as a whole;
- The proposal accords with the principal material considerations, namely the economic, social and environmental objectives to secure sustainable economic development established by the National Planning Policy Framework ('**NPPF**'), along with the sequential and retail impact tests; and
- There are no other material considerations that should outweigh the presumption in favour of granting planning permission for sustainable economic development.

1.10 As the proposal accords with the development plan, planning permission should be granted in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. Furthermore, where an application accords with the development plan, it is sustainable development and should be granted 'without delay' in accordance with Paragraph 11 of the NPPF.

2. Site Context

The Site and Surroundings

- 2.1** The Site is located on the southern side of Holbeach Road (A151), to the south-east of the Springfields Roundabout, which connects the A151 with Low Road (A16), both of which are main arterial routes running through Lincolnshire. It measures approximately 1.34ha, is irregular in shape and predominantly flat in terms of topography. The Site is undeveloped, greenfield land which comprises areas of scrubland and grassland, with several existing trees, predominantly at its borders. The precise location of the Site is shown on the submitted Location Plan (Ref: DRA-1500).
- 2.2** Immediately adjacent to the north-east of the Site lies Woodhouse Farm Hotel. Further to the north, on the opposite side of Holbeach Road, lies a McDonald's drive-thru and Petrol Filling Station ('PFS'). To the west of the Site comprises a number of commercial uses including Springfield Outlet Shopping and Leisure, a Travelodge hotel, along with some residential dwellings. More generally, the areas to the north, east and south of the Site comprise predominantly agricultural land, whilst the areas to the west (across the A16) lie the built-up areas of Spalding.

Planning History

- 2.3** In August 2005, planning permission was granted for the erection of a hotel, pub/restaurant, restaurant and drive through restaurant with associated works at the Site (Ref: H16-0397-04) (the '**2005 Permission**').
- 2.4** In June 2020, a Lawful Development Certificate was issued, which confirmed that the 2005 Permission has been implemented (Ref: H16-0547-10) (the '**2020 LDC**'). It follows that the development permitted by the 2005 Permission remains extant and can be developed. It therefore provides a fall-back position which is a material consideration for the current application.

3. The Proposed Development

3.1 The planning application seeks permission to develop a new foodstore (measuring approximately 2,007 sq. m (GIA)), and a new drive-thru unit (measuring approximately 167 sq. m (GIA)). The foodstore will be occupied by a high quality convenience goods retailer and the drive-thru unit is designed for occupation by Costa Coffee. The Site is provisionally to be known as South Holland Retail Park.

3.2 The proposal also seeks permission for all associated works including the provision of vehicle parking bays (including electric vehicle, disabled and parent & child bays), servicing areas, landscaping and revised access arrangements from the A151 Holbeach Road.

3.3 The formal description of development is as follows:

“Development of Site to provide a Food Store and Drive-Thru, along with all Associated Works and Access”

3.4 Full details of the design elements of the proposed scheme are provided in the Design & Access Statement, prepared by The Harris Partnership, however in summary the works include:

- The erection of a retail foodstore and coffee shop, with the foodstore up to 7.5m in height, built from a predominant palette of brick and render, with glazed frontages.
- The improvement and widening of the existing access from the A151 appropriate to accommodate the increase in traffic travelling to and from the Site, including by servicing vehicles. Egress from the Site will be a “left only” arrangement onto the A151, with vehicles then able to travel east via the Springfield roundabout, if required;
- Retention of trees and vegetation wherever possible (particularly along the boundaries of the Site), with a mix of ornamental and native trees and hedgerows proposed to be planted in order to mitigate the visual impact of the proposal;
- Structured landscaping across all areas of the Site;
- Provision of 185 parking spaces within the Site, including eight disabled spaces, six parent & child spaces and 10 electric vehicle charging spaces (which will be operated by EVN); and

Planning, Economic and Retail Statement

Land to the South of Holbeach Road, Spalding



- Provision of a dedicated servicing area to the rear of the foodstore, accessed via the internal estate road.

4. Review of Relevant Planning Policy

Introduction

- 4.1** The starting point for the consideration of the acceptability of a development proposed in a planning application is an assessment against the development plan. If a development is in accordance with the plan, and the plan is up-to-date, then the decision should be to grant planning permission unless material considerations indicate otherwise.
- 4.2** Material considerations can include, amongst other things, more up to date policy guidance in the NPPF and Planning Policy Guidance ('PPG'). The NPPF does not change the statutory basis on which planning decisions are founded, but is a material consideration in the determination of planning applications. LPAs should have proper regard to such statements and must give clear and convincing reasons if they elect not to follow them.

The Development Plan

- 4.3** The development plan for South Holland comprises the South East Lincolnshire Local Plan, adopted in March 2019 (the '**Local Plan**'). The Local Plan Policy Map demonstrates that the Site is within the 'Countryside', in line with Policy 1.
- 4.4** The Local Plan policies relevant to the consideration of the proposed development are considered to be:
- Policy 1 – Spatial Strategy
 - Policy 2 – Development Management
 - Policy 3 – Design of New Development
 - Policy 4 – Approach to Flood Risk
 - Policy 5 – Meeting Physical Infrastructure and Service Needs
 - Policy 6 – Developer Contributions
 - Policy 9 – Promoting a Stronger Visitor Economy
 - Policy 24 – The Retail Hierarchy

- Policy 27 – Additional Retail Provision
- Policy 28 – The Natural Environment
- Policy 30 – Pollution
- Policy 33 – Delivering a More Sustainable Transport Network
- Policy 36 – Vehicle and Cycle Parking

Material Considerations

The National Planning Policy Framework and Planning Practice Guidance

- 4.5** The NPPF was most recently published in February 2025. It is a material consideration in the determination of all planning applications in England. The PPG sets out the Secretary of State's expectations on how the policies in the NPPF are to be applied.
- 4.6** The NPPF maintains the presumption in favour of sustainable development¹. It sets out that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It requires significant weight to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (Paragraph 85).
- 4.7** Section 7 of the NPPF seeks to ensure the vitality and viability of town centres. In this respect, it retains the 'town centre first' approach to retail development in seeking to ensure the vitality and viability of town centres. The vitality of town centres is ensured by promoting them as the first choice for town centre uses under the sequential test and ensuring any development outside of a centre does not significantly adversely impact on in-centre investment, or the vitality and viability of a centre.
- 4.8** NPPF Paragraphs 91 and 92 require a sequential assessment to be undertaken in respect of planning applications for main town centre uses which are proposed to be located outside of town centres (which are not in accordance with an up-to-date plan). The sequential test requires main town centre uses to be located

¹ Paragraph 11 of the NPPF

firstly in town centres, then in edge-of-centre locations, and only if suitable sites are not available (or expected to become available within a reasonable period) should out-of-centre sites be considered.

4.9 When considering edge or out-of-centre proposals, the NPPF requires a preference be given to accessible sites which are well connected to the town centre. It requires applicants and LPAs to demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge-of-centre sites are fully explored, but does not require schemes to be disaggregated. We comment on the sequential test further in Section 5.

4.10 NPPF Paragraph 94 requires an impact assessment for retail and leisure development outside of town centres and which are not in accordance with an up-to-date plan. An assessment is only required where proposals exceed 2,500 sq. m gross, or a locally set threshold, which as detailed under Policy 24 of the Local Plan, is 250 sq.m GIA for proposals outside of Spalding town centre. It requires an assessment of the potential impact of the proposal on:

- a) existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- b) town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment (as applicable to the scale and nature of the scheme).

4.11 NPPF Paragraph 95 sets out that an application should be refused where it fails to satisfy the sequential test or is likely to have a significant adverse impact on one or more of the Paragraph 94 considerations. It should be noted that there is no requirement for a cumulative impact assessment under the terms of the NPPF.

4.12 The Planning Practice Guidance provides additional clarity on the impact test². It sets out:

‘What is the impact test?’

‘The purpose of the test is to consider the impact over time of certain out of centre and edge of centre proposals on town centre vitality/viability and investment. The test relates to retail and leisure developments

² Paragraph: 014 Reference ID:2b-014-20190722

(not all main town centre uses) which are not in accordance with up to date plan policies and which would be located outside existing town centres. It is important that the impact is assessed in relation to all town centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring authority areas'.

4.13 The PPG is instructive on when the impact test should be used in terms of impact on existing, committed and planned public and private investment in a centre or centres (i.e. criterion (a) at Paragraph 94 of the National Planning Policy Framework). This is set out at Paragraph: 015 Reference ID: 2b-015-20190722, which states:

'Where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment. Key considerations will include:

- the policy status of the investment (i.e. whether it is outlined in the Development Plan)*
- the progress made towards securing the investment (for example if contracts are established)*
- the extent to which an application is likely to undermine planned developments or investments based on the effects on current/forecast turnovers, operator demand and investor confidence'*

4.14 It follows that the assessment of a proposed development upon existing, committed and planned public and private investment in a centre or centres (i.e. criterion (a) at Paragraph 94 of the National Planning Policy Framework) is only carried out where that development or investment is 'in progress'.

Local Plan Evidence Base – Retail Study

4.15 The South East Lincolnshire Town Centre and Retail Capacity Study, produced in 2020, is the most up to date retail study for the area, and is considered to be a robust data source upon which the assessment of impact is based.

5. Principle of the Proposed Development

5.1 As identified in Section 4 above, the Site is located within an area of Spalding which is designated as 'Countryside' under Policy 1 of the Local Plan. In that regard, Policy 1 states:

"The rest of the Local Plan area outside the defined settlement boundaries of the Sub-Regional Centres, Main Service Centres, Minor Service Centre and Other Service Centres and Settlements is designated as Countryside. In the Countryside development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits."

12.1 Paragraph 8 of the NPPF confirms that in order to achieve sustainable development, the planning system has three overarching objectives – an economic, social and environmental objective. We comment on each objective as follows:

Social Objectives

- 1)** The provision of employment opportunities that create wage generation that are of a direct benefit to the employees, but also result in benefits for businesses in the surrounding area, which in turn improves the social wellbeing of the surrounding area and wider town.
- 2)** National retailers that will operate from the site will all have significant corporate social responsibility schemes and training and education schemes that promote economic and personal growth adding to the enhanced social benefits of the scheme.
- 3)** The development will involve a significant construction programme. Given the scale of the construction activity, there is considerable scope to provide opportunities for local young people to gain NVQ Level 2 and Level 3 training and practical experience in a range of different construction and engineering trades. Initiatives of this sort are typically run by a training provider in partnership with the main contractor for the construction programme.
- 4)** The proposal increases the opportunities for social interaction by providing physical retail and commercial service development.

- 5) The proposal provides social infrastructure in the form of cycling spaces and the site is well connected to surrounding cycling infrastructure.

Environmental Objective

- 1) The proposal raises no environmental issues of particular note.
- 2) The application site is well related to surrounding retail, employment and residential areas to benefit from short journeys that support reduced carbon output, as part of a linked-trip with the existing retail and employment facilities, or as part of a linked journey with another location (e.g. a home to work journey).
- 3) The application provides cycle parking to assist with reducing the dependency on the private car and high emission vehicles. The Site is well connected to public transport infrastructure, including a number of bus routes.
- 4) The application provides EV parking spaces. The provision of EV charging bays is clearly a positive as it demonstrates environmental commitment by offering a service for a more sustainable mode of transport
- 5) A significant landscape buffer is proposed around the perimeter of the Site which will allow for new habitats and enhance biodiversity features, in line with Policy 28 of the Local Plan which relates to the Natural Environment.

Economic Objective

- 1) Creation of approximately 98 full-time equivalent jobs on-site, of which 70 are expected to be filled by residents of South Holland.
- 2) Creation of an additional 40 jobs across the construction phase.
- 3) Generation of an additional £3.2m GVA contribution directly to the economy.
- 4) Provision of an additional £7.1m in public sector revenues (business rates) over 25 years.
- 5) Improves consumer choice and trade in the retail catchment of Spalding.

5.2 The above demonstrates that the proposal delivers significant net benefits across all of the three overarching

objectives for the planning system to deliver sustainable development, in line with the objectives of Paragraph 8 of the NPPF. We therefore consider that the proposed development meets the sustainable development requirements of Policy 1 of the Local Plan, and therefore the principle of the proposal is acceptable.

5.3 Further, the designation of the Site as countryside is not reflective of the development position of the Site. The Site benefits from a more substantial development that can be constructed at the Site than is proposed. It follows that the Site has a material fall-back against which the development proposal should be considered and results in the characteristics of the Site being an established location for development. When coupled with the assessment shown above. It can be seen that the proposal accords with Policy 1 and material considerations, further supporting the conclusion that the principle of the proposal is acceptable.

6. Securing Sustainable Economic Growth

Introduction

- 6.1** The proposed development will deliver substantial economic benefits, including significant private investment in South Holland and the creation of new job opportunities for local residents.
- 6.2** There is an urgent need to create job opportunities nationally. Private investment is needed to secure employment growth as the rapidly increasing size of the budget deficit means that the Government has decided that it cannot increase its borrowings to secure growth through a public sector-led stimulus. In short, the Government is relying on private sector investment to stimulate the economy now more than ever. This continues to be the case particularly the uncertainty of future national economic outlook.
- 6.3** Accordingly, the requirement for economic investment is a national imperative. Considerable weight should therefore be given to supporting proposals for economic development such as retailing that contribute to sustainable economic growth. That is the emphasis set out at Paragraph 85 of the NPPF.

Employment in the Retail Industry

- 6.4** The delivery of a range of employment opportunities in the retail sector should therefore be seen in a positive light, particularly against the backdrop of the overall contribution that retail employment plays to the UK economy, the quality of employers that operate within the sector and the declining requirement for physical retail space and the store closures that are arising as a result.
- 6.5** Retail employment is high quality and socially inclusive employment that also provides opportunities for flexible employment provision that reduces entry barriers to the employment market. A range of jobs will be provided from management and supervisor staff level to clerical, administrative and service positions. A range of hours are offered to staff and a shift pattern employed for certain roles which allows employees appropriate flexibility. Employees will generally be recruited locally, including in liaison with local job centres.

- 6.6** UK retail employment is a significant contributor to the UK's economic productivity and output. It was forecast that there are 2.8 million people employed in the UK retail industry in 2024³, which equates to almost 10% of the total employment in the UK (34 million at October 2024).
- 6.7** The proposal fully meets the development plan objective and national policy requirement to deliver economic growth, to which significant weight is required to be applied under the NPPF. This is demonstrated further below.

Economic Growth & Job Creation

- 6.8** The scheme will have a wide range of economic benefits, both within the construction period and throughout the operational phase. It represents a significant £7.5m private investment in Spalding by the Applicant.
- 6.9** The documents submitted with the planning application include an Economic Benefits Assessment, of the scheme, which confirms that the proposal will:
- Create approximately 98 full-time equivalent jobs on-site, of which 70 are expected to be filled by residents of South Holland.
 - Create an additional 40 jobs across the construction phase.
 - Result in an additional £3.2m GVA contribution directly to the economy.
 - Provide an additional £7.1m in public sector revenues (business rates) over 25 years.
- 6.10** The number of jobs created by the proposed development is a significant benefit which weighs in favour of the grant of planning permission, in line with the requirements of Paragraph 85 of the NPPF, which the LPA is required to give 'significant weight' in the decision-making process.

Summary and Conclusion

- 6.11** The proposal represents positive economic investment in Spalding. The delivery of a food retail store and drive

³ Source: <https://www.retailconomics.co.uk/library-retail-stats-and-facts>

thru, and resultant employment generated, is positive in all regards.

6.12 The proposed development therefore accords with the requirements of Policy 9 of the Local Plan in relation to economic development requirements and the overarching policy objective of the NPPF to support proposals that secure sustainable economic growth. Importantly, NPPF Paragraph 85 requires significant weight to be placed on the need to support economic growth. It follows that as the proposal supports economic growth, significant weight should be placed on this policy requirement which weighs heavily in favour of the grant of planning permission.

7. Sequential Approach to Site Selection

Introduction

- 7.1** Paragraphs 91 and 92 of the NPPF and Policy 24 of the Local Plan each state that the Council should apply a sequential test to planning applications for main town centres that are not in an existing centre, nor in accordance with an up-to-date development plan.
- 7.2** The Site is in an 'out-of-centre' location as defined by the NPPF⁴ and therefore a sequential assessment of potential alternative sites is necessary to support this application.

Background to the Sequential Test

- 7.3** The PPG provides guidance in the Section 'Ensuring the Vitality of Town Centres'. The criteria used to assess whether alternative sites exist are set out in Paragraph 011 of the PPG, as follows:
- *With due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly.*
 - *Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge-of-centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.*
 - *If there are no suitable sequentially preferable locations, the sequential test is passed.*

⁴ See Annex 2: Glossary of the NPPF

7.4 Paragraphs 012 and 013 of the PPG are also of relevant, with the latter incorporating the additional criteria of viability. These state:

*‘Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they **may only be accommodated in specific locations.**’*

*‘The sequential test supports the Government’s “town centre first” policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere **local planning authorities need to be realistic and flexible in terms of their expectations.**’ (Savills’ emphasis).*

7.5 Applying the sequential approach should have regard to the need, both from consumers and operators, which will be met by the development. It is not an academic exercise divorced from the commercial realities of what it is that developers and landlords are seeking to supply in response to market demand. For it to have meaning, the sequential approach must be applied in a way that allows the identified need to be fully met. That is the essence of Paragraph 91 of the NPPF.

7.6 There has been a series of decisions which provide the binding authority and guidance on the correct application of national policy relating to the sequential approach. The most relevant cases and decision are summarised at Appendix 2 and some of the key principles below:

- 1) The purpose of the assessment is directed to what an applicant is proposing; not to some reduced or reinvented proposal which the LPA might seek to substitute for it, which is for something less than that sought by the applicant. As per Paragraph 8.45 of the Rushden Lakes Secretary of State decision of June 2014 (Ref: APP/G2815/V/12/2190175) the relevant consideration is “...**whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site**”.
- 2) There is no policy requirement to disaggregate elements of a proposal, however a flexible

approach to the consideration of alternate sites must be properly demonstrated. In the Scotch Corner Secretary of State Decision in December 2016 (Ref: APP/V2723/V/15/3132873 & APP/V2723/V/16/3143678) the Inspector specifically stated that “...*whilst [the NPPF] indicates that applicants should demonstrate flexibility on issues such as format and scale, it does not require the applicant to disaggregate the scheme*”.

- 3) Applying the suitability element of the sequential test means asking whether an alternative site is “suitable for the development proposed by the applicant”. The relevant question is whether there is a site that is suitable within or on the edge of a relevant town centre that could accommodate the proposal for which the developer seeks planning permission.

7.7 On this basis, the NPPF sequential test seeks to see if the application scheme (i.e. what is proposed), can be accommodated on a sequentially preferable site. The sequential test includes a requirement to be flexible on issues such as format and scale in the assessment of individual sites, but does not require the applicant to disaggregate the scheme. “Suitable” and “available” means suitable and available for the broad type of development that is proposed.

Methodology and Scope of the Assessment

7.8 In order to demonstrate compliance with the sequential test, the relevant catchment area for the proposal must first be established. Spalding is a sub-regional centre in South East Lincolnshire and, given the predominantly rural nature of the surrounding areas, serves a wide hinterland. As the Site is located within Spalding, it aims to draw trade from residents and visitors in the town and surrounding area. We therefore consider that the Primary Catchment Area for the proposed development will be the areas within a 15 minute drive-time isochrone from the application site, which broadly correlates to Zones 4, 5, 6 and 7 of the South East Lincolnshire Town Centre and Retail Capacity Study April 2020 (the ‘**2020 Retail Study**’). A copy of the plan showing the Primary Catchment Area is included at **Appendix 1**.

- 7.9** It should be noted that the Primary Catchment Area (i.e. the principal locations from which the proposal will draw trade) is distinguished from the Study Area (i.e. the limit of existing areas which the proposal may affect). The Study Area is duplicated from that which has been used to inform the 2020 Retail Study.
- 7.10** In identifying potential alternative sites, there is a requirement to consider the specific format of the development proposed and the role and function it is intended to meet. Only centres which are (a) within the catchment area and (b) of sufficient scale to accommodate large format foodstore retail operations of the type proposed are considered relevant for the purposes of satisfying the sequential test. Smaller centres in the hierarchy would not provide the same critical attraction for the prospective retailers (i.e. they would not meet the same market requirement). In short, small-scale local centres and neighbourhood shopping parades could not reasonably accommodate the scale and type of development proposed in this application. Further to the above, centres beyond catchment area would not meet the same market demand for a store in Spalding.
- 7.11** It follows that smaller centres and centres beyond the catchment area would not be suitable for the proposal. That context defines the site search criteria for the sequential test as none of the other adopted centres are relevant, given that they would not meet the same market and locational requirements of the proposed development and therefore would not be suitable for the proposal. We therefore conclude that the only centres required to be assessed under the sequential test are Spalding town centre and Holbeach district centre. That approach was agreed to be appropriate with the LPA and its advisors during pre-application discussions.

Market and Locational Requirements

- 7.12** Many mid-scale foodstore occupiers (such as Marks and Spencer, Lidl and Aldi) are now trading from highly efficient 2,000 – 2,500 sq. m store formats. Operating from a unit significantly smaller than 2,000 sq. m would render most mid-scale operators unable to offer their full range of products for sale, which would therefore leave the store compromised and vulnerable to competitors (and therefore, consideration of such would be beyond the realms of what is considered “flexibility” as set out above).

7.13 It follows that, whilst there is a requirement to demonstrate a flexible approach to the consideration of sequentially preferable sites, it is equally important to recognise that the development proposes land uses which have particular market and locational requirements.

7.14 In addition to the above minimum floorspace requirements, the sequential test must also take into account a number of market requirements relating to the proposed uses, as set out below:

- 1) **Car Parking** – a foodstore requires access to direct and level car parking, in order to allow customers to safely transport purchased goods back to their homes. This is considered to be a standard requirement of all major supermarket retailers in the UK and therefore in order to provide effective competition with other similar retailers, access to direct and level car parking is a critical market requirement of the proposal. The absence of such a critical component would render a store unviable when compared to other competitor stores.
- 2) **Drive-Thru Lane** – in terms of the proposed Costa Coffee drive-thru, it has previously been established by the Planning Inspectorate that, whilst the sequential test requires applicants to be flexible when considering alternative sites, the format of a drive-thru facility is a commercially important aspect of the development which must be able to be accommodated. In an appeal in Newquay⁵, the Inspector stated that:

“... it is difficult to envisage how a developer could be flexible in respect of the format of a drive through restaurant. Unlike a conventional restaurant, which could easily be accommodated on any of the identified sites, a drive-through by definition requires vehicular access and circulation through or around the building.”

- 3) **Prominent Location** – both the proposed foodstore and Costa operations require visual prominence from the highway network, in order to appeal to passing trade, in a location with access to a sufficient critical mass of customers

⁵ Appeal Ref; APP/Q0830/A/051182303

- 4) **Dedicated servicing** – it is well known that a foodstore requires a dedicated servicing yard and bay in order to receive, unload and sort regular deliveries of fresh good in a timely and efficient manner
- 5) **A Single-Storey, Uniform Layout** – a regularly shaped premises is required to enable the display of goods in linear aisles (a standard configuration for all medium and large format food stores) on a single level in order to facilitate the use of customer trolleys in store

7.15 As a result of the above, for any sequentially preferable site to be considered suitable to accommodate the proposal, it must be able to accommodate all of the following:

- 1) A minimum site area of 1.5 ha;
- 2) A prominent location on the highway network;
- 3) Contain both a retail unit and a drive-thru unit which are capable of accommodating the proposed operations set out above;
- 4) The operational requirements of the uses (i.e. servicing, drive-thru etc);
- 5) Provide a regular single storey retail format; and
- 6) Dedicated and direct customer car parking.

Demonstrating Flexibility

7.16 The proposals seek to accommodate a 2,007 sq. m (GIA) foodstore and a 167 sq. m drive-thru Costa coffee shop at the Site. An alternative site would need to be able to accommodate the entirety of the floorspace proposed at the application site, subject to demonstrating that a flexible approach has been adopted in accordance with the NPPF and PPG.

7.17 We have therefore extended the search for sequential sites to include sites which could accommodate a retail unit in the range of 1,700 – 2,300 sq. m (GIA) and a drive-thru unit in the range 150 – 180 sq. m, as well as considering a range of built forms/ layouts, but with the critical operational requirements as set out above at Paragraphs 7.14 and 7.15.

Consideration of Sequential Sites

7.18 The assessment of sequential sites has been undertaken in accordance with the relevant national policies, guidance and the latest binding authority from case law, as set out above. The focus of the search for sequentially preferable sites is vacant land or buildings within (or within 300m of) the Primary Shopping Area of Spalding town centre.

7.19 Following a desktop review and an on-site survey of Spalding town centre, we have not identified any realistic alternative sites within or edge of the town centre which could accommodate the proposed development. The largest vacant units within Spalding town centre are as follows:

- Former Wilko, Holland Market Retail Park – 1,460 sq. m
- Former Regent Bingo, Westlode Street – 1,020 sq. m

7.20 The remainder of the vacant units comprise floorspace of less than 500 sq. m, with the majority comprising floorspace between 10–150 sq. m (see **Appendix 2**). As confirmed by the Local Planning Authority in preapplication discussions, there are no available development sites within the town centre. It is clear from the above that both of the two units listed above are too small to accommodate the whole of the proposed development. It is clear that neither site is suitable for the proposed development, even having regard for the need to demonstrate flexibility.

7.21 In respect of Holbeach district centre, there are no sites within the town centre, or on the edge of the town centre, that are capable of accommodating the proposed development. It is worth noting that there is a new local centre planned for the Holland Park Sustainable Urban Extension, as set out within Policy 24 of the Local Plan. These centres will provide for local food shopping (up to 500 sq.m net) and additional small scale shops and local services.

7.22 Notwithstanding that the planned centre does not yet exist and therefore cannot be considered available, the proposed scale and nature of the centres means that they would serve local, day-to-day needs of the new communities and therefore would not be suitable to accommodate the proposal.

7.23 The LPA has not been able to identify any other available sites during the course of pre-application dialogue which might be considered suitable to accommodate the proposal. The LPA have therefore concluded in their pre-application response that the sequential test has been satisfied. Further, it is important to note that the conclusions of the above are supported by the Council's own findings in the Spalding Retail Paper (2017), prepared as part of the Evidence Base for the Local Plan, which assessed whether a range of sites within Spalding were suitable to allocate for retail development. None of the sites within or at the edge of the town centre were considered to be appropriate, resulting in the Council to allocate land for the expansion of the Springfields Outlet Shopping Centre (an out of centre location).

Summary and Conclusions

7.24 The assessment undertaken to inform this Statement in accordance with national policy, demonstrates that there are no sites in sequentially preferable locations that are available, suitable and viable for the proposed development, even allowing for flexibility in approach. No other sites that would benefit from a preference under the sequential test have been identified.

7.25 We conclude that the Application Site is the most sequentially preferable site to accommodate the proposed development and therefore accords with the sequential test under NPPF Paragraphs 91 and 92, and Policy 24 of the Local Plan.

8. Retail Impact Assessment

Introduction

- 8.1** Paragraph 94 of the NPPF states that planning applications for retail and leisure developments that exceed 2,500 sq. m, or any proportionate, locally set floorspace threshold, not in an existing centre and not in accordance with an up to date development plan, should be accompanied by an assessment of the potential impact of the development. Policy 24 of the Local Plan provides that the locally adopted threshold for the assessment of impact for proposals outside of Spalding town centre boundary is set at 250 sq. m (GIA).
- 8.2** Paragraph 015 of the PPG requires impact assessments to be undertaken in a way that is proportionate to the scale of floorspace proposed. Built within the application of the impact assessment is an understanding that the type, nature and location of development proposals will result in different levels of impact. Notably, the question is not whether there will be any impact, but whether that impact will be significant.
- 8.3** Paragraph 017 of the PPG states that the impact test should draw on existing information wherever possible. In this case, the most recent data available is contained within the 2020 Retail Study, which was recently used by Aldi Stores Ltd in support of their planning application in Holbeach (Ref: H09-1057-22), granted permission by the Council in March 2023. It is therefore considered to be a robust source of data, upon which the assessment of impact is based and the LPA has confirmed the appropriateness of utilising the Study to base the impact assessment upon.

Relevant Centres for the Impact Test

- 8.4** As set out above, Spalding town centre and Holbeach district centre are the only centres within the catchment which have the potential to be impacted by the proposed development. Whilst Boston town centre is located outside of the catchment area, it is a larger scale centre within the hierarchy and so there is some prospect that small amounts of trade may be diverted from existing stores therein, particularly given the location of the application site in a prominent position on the road network. Given the nature of the proposal, any local centres

in the catchment are not of a sufficient size, scale or nature that would be directly impacted. On that basis, our assessment of the two aspects of the impact test in the NPPF is set out below.

Impact upon Existing, Planned or Committed Investment

Spalding Town Centre

8.5 In recent years, both South Holland District Council and Lincolnshire County Council have been successful in seeking funding from a variety of sources, in relation to planned investments in Spalding. This includes:

- £8.4m for the A16/A151 Springfield Roundabout Improvement scheme, as part of £20m in Levelling Up (Round 1) funding awarded to the County Council in October 2021;
- £250,000 for the Spalding Reconnected: Historic Town & Riverside programme, awarded to South Holland District Council by The National Lottery Heritage Fund in February 2023;
- £3.39m awarded to South Holland District Council as part of the UK Shared Prosperity Fund and Rural England Prosperity Fund; and
- £20m awarded to South Holland District Council for the redevelopment of the Castle Sports Complex, as part of the Levelling Up Fund (Round 2) in October 2023.

8.6 In addition to the above, in September 2023, the Government announced the Long-Term Plan for Towns, in which Spalding was one of 55 towns across the UK that received a share of a £1.1 billion worth of endowment style funding and support over a 10 year period. As a result, the Spalding Town Board has now been formed (a requirement of the funding criteria) which will determine how the funding will be spent.

8.7 Whilst the above demonstrates that there is significant and ongoing funding into Spalding at all levels of Government, it is not considered that the proposed development of the Site has the potential to cause any impact upon those investments (let alone a “significant” impact). In each of the above cases, funding has already been committed to identified programmes, and in some cases (e.g. the Springfield Roundabout Improvements) are already being delivered. As a result, the benefits of that series of investments will not be prejudiced by the development of this Site.

Boston Town Centre & Holbeach District Centre

- 8.8** We are not aware of any planned or committed development proposed within either Boston town centre or Holbeach district centre. It follows that there is no committed or planned investments in either centre that the proposal could have an impact on.

Impact upon the Vitality and Viability of Relevant Centres

- 8.9** A review of the vitality and viability of Spalding & Boston town centres and Holbeach district centre is set out in **Appendix 3** and forms the baseline against which the proposal should be assessed. Importantly, it demonstrates that the health of those existing centres means that the proposed development is less likely to trigger a significant adverse impact upon either investment in or the vitality and viability of those centres. Neither of the centres are at a tipping point where they might be more vulnerable to the effects of a proposed development.
- 8.10** The quantitative assessment of the impact of the proposals upon the vitality and viability of existing stores is set out in the Tables at **Appendix 4** and summarised below. It should be noted that the impact assessment is focused on convenience goods; given the nature of the proposal for a foodstore, as any comparison good sales will be ancillary and will have an imperceptible impact on existing trade.

Turnover of Existing Stores

- 8.11** The Tables provided at Appendix 11 of the 2020 Retail Study use the estimated population within each zone, alongside the estimated per capita convenience goods expenditure, to determine the total available convenience goods expenditure. Utilising the results of a household survey undertaken by NEMS research, the Market Share of each store within the Study Area is then calculated. The turnover of each of the existing stores within the Study Area is then calculated as a percentage of the total available convenience expenditure.
- 8.12** For the assessment of the current application, the population of each Zone within the Study Area at 2018 is taken directly from the 2020 Retail Study. However, rather than using the population projections from Experian

set out in the 2020 Retail Study, we have instead applied a population growth rate of 8% over the period 2018-2030, which is based on ONS population projections for both South Holland and East Lindsey over the same period⁶. As a result, the population of the Study Area is expected to grow to a total of 212,770 people at 2030 (Table 1 of **Appendix 4**).

8.13 Similarly with regard to per capita expenditure on convenience goods, the 2018 figures are taken from the 2020 Retail Study and adjusted to allow for the predicted reduction in convenience expenditure in the period up to 2030, as set out in Experian Retail Planner Briefing Note 22 (Table 2 of **Appendix 4**).

8.14 Assuming that the Market Share from the 2020 Retail Study remains constant, Table 4 of **Appendix 4** illustrates the turnover of existing stores in the Study Area at both 2018 and 2030. Table 4 has also been adjusted to redistribute the turnover of the former M&S store in Spalding town centre, which was vacated in 2021. We anticipate that the majority of that store's turnover will have been absorbed primarily by existing stores in Spalding, with some trade redistributed further afield given the likelihood that the former M&S would have drawn in trade from a wider area, as the only such store in the Study Area. The pattern of trade redistribution from the former M&S to other stores in the Study Area is set out below.

Store Location	Former M&S Trade Redistributed
Sainsbury's Spalding	25%
Morrisons, Spalding	20%
Tesco, Holbeach	15%
Aldi, Spalding	10%
Lidl, Winsover Rd, Spalding	10%
Lidl, Holbeach Rd, Spalding	10%
Other	10%

⁶

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesenglandtable2>

Turnover of Aldi, Holbeach

8.15 Further to the above, Table 5 of **Appendix 4** calculates the turnover of the Aldi store located at the edge of Holbeach district centre, which opened in January 2025. Table 6 illustrates how the opening of that new Aldi store impacts upon the existing stores in the Study Area.

8.16 The figures contained within Tables 5 & 6 are duplicated from the assessment undertaken in support of the planning application for Aldi, which was supported by the Council through the grant of planning permission. Therefore, it is considered that the pattern of trade diversion set out at Table 6 is very robust and takes into account existing information, as advocated for in the PPG.

Turnover of the Proposal

8.17 Based upon the proposed 2,007 sq. m retail unit, the proposed foodstore will have a net sales area of 1,468 sq. m. Table 7 of **Appendix 4** sets out the turnover of the proposed store at 2030 (the design year) – consistent with the approach taken in the 2020 Retail Study – as summarised below.

	Net Sales Area (sq. m)	Turnover (£ per sq. m) ⁷	2022 Turnover (£ m)	2030 Turnover (£ m)
Proposed Foodstore	1,486 sq. m	£9,864	£14.66m	£14.73m

Impact of the Proposed Development

8.18 At Table 8, the turnover of the development is drawn from existing stores/ centres in the Study Area, based on an understanding of the location of the Site, proximity to existing stores, trading characteristics of the use, and the extent to which the proposal will compete with competitive facilities. As a guiding principal, impact is assessed on a like-for-like basis in respect of a particular sector (e.g. food retail) competing with their most comparable competitive facilities. Consideration has also been given to the pattern of trade diversion set out in the application for Aldi at Holbeach.

⁷ Source: Mintel Retail Rankings 2023

8.19 The pattern of trade diversion illustrated at Table 8 results in the following impacts upon existing stores in the Study Area:

Store	Impact
<u><i>In Centre</i></u>	
Sainsbury's, Spalding	-9.7%
Aldi, Spalding	-3.1%
Lidl, Spalding	-8.7%
Iceland, Spalding	-3.7%
Tesco, Holbeach	-6.7%
<u><i>Out of Centre</i></u>	
Morrisons, Spalding	-9.4%
Lidl, Holbeach Road	-14.5%
Aldi, Holbeach	-3.0%
Asda, Boston	-0.7%
Tesco, Boston	-0.6%

8.20 Given the location of the Site at the junction of two major arterial roads at the edge of Spalding, it is considered that the proposed foodstore will generate a not insignificant amount of trade from stores located outside the Study Area, as a result of pass-by trade. Therefore, a total of 15% of the proposed foodstore's trade is predicted to originate from outside the Study Area.

8.21 From the above, the largest individual impacts upon stores within existing centres are predicted to be upon Sainsbury's in Spalding and Tesco, in Holbeach – which is unsurprising given the proximity of the Site to those centres and the trading nature of both the existing and proposed stores. The degree of impact upon stores within Spalding and Holbeach are considered to be minor and within acceptable levels, whilst trade drawn from stores in Boston will be almost imperceptible. That is especially the case when considering the degree to which stores within those centres are overtrading (compared to their company benchmark), as set out below:

8.22 A higher proportion of trade is expected to be diverted from existing stores in out of centre locations which lie in close proximity to the Site, such as the Morrisons on Wardentree Lane and Lidl on Holbeach Road, in Spalding. As shown in Table 8, the impact at 2030 is 9.4% and 14.5% respectively.

Store	Post Development Turnover (2030) (£m)	Nett Convenience Sales Area (sq. m)	Sales Density 2024 (£/ sq. m)	Benchmark Convenience Turnover (£m) ⁸	Store Overtrading Post-Development ?
Tesco, Holbeach	£21.6m	1,242 sq. m	£10,086	£12.5m	Yes
Sainsbury's, Spalding	£36.5m	2,258 sq. m	£9,128	£20.6m	Yes
Aldi, Spalding	£24.5m	817 sq. m ⁹	£14,100	£11.5m	Yes
Lidl, Spalding	£8.4m	705 sq. m ¹⁰	£10,118	£7.1m	Yes
Iceland, Spalding	£4.1m	482 sq. m ¹¹	£6,254	£3.0m	Yes
Morrisons, Spalding	£37.1m	2,989 sq. m	£8,191	£24.5m	Yes

8.23 The evidence provided above suggests that all existing in-centre stores will continue to be overtrading (when compared to company benchmarks) once the development of the Site is completed. In addition, and although not a consideration for the impact test, the nearby Morrisons and Lidl stores will both continue to trade significantly above the company benchmark.

Impact of the Proposal on Existing Centres

8.24 Both Policy 24 of the Local Plan and Paragraph 94 of the NPPF are explicit that the impact of a newly proposed retail development should be considered upon town centre vitality and viability as a whole, and not upon individual stores within those centres. Table 9 demonstrates the impact of the proposal upon convenience goods spending Spalding and Boston town centres, as well as Holbeach district centre, by assessing the total trade drawn from the combined convenience goods turnover of the stores within those centres. The impact of the proposed foodstore is therefore summarised below:

⁸ Calculated as each company's average turnover psm from Mintel (2023) multiplied by the nett conv sales area.

⁹ Aldi Nett Sales Area taken from application docs (Ref: H16-0843-16). Nett Conv Sales Area assumed at 80% of NSA.

¹⁰ Nett Sales Area assumed as 75% of GIA. Nett Conv Sales Area assumed at 80% of NSA.

¹¹ Nett Sales Area taken from application documents (Ref: H16-0462-13).

Adopted Centre	Convenience Goods Impact
Spalding Town Centre	-7.0%
Holbeach District Centre	-5.2%
Boston Town Centre	-0.4%

8.25 From the above, the impact of the proposal upon convenience goods spending in Spalding town centre will be -7.0%. The majority of this trade diversion will be from the existing Sainsbury's store, as the main supermarket in the town centre. As noted above, the Sainsbury's store is trading significantly above benchmark turnover levels, and will continue to do so even accounting for the trade draw to the proposed foodstore.

8.26 There would be a limited impact on convenience goods spending in other stores within the town centre. Generally, facilities will compete on a like for like basis, and we therefore expect trade to primarily be drawn from the major existing supermarkets. Apart from the main supermarkets, the majority of the convenience stores in the town centre are small, independent or specialist retailers, who would not be significantly impacted by the development. We consider that there is no reason why these smaller units cannot continue to trade well in light of competition from the proposed foodstore.

8.27 In terms of Holbeach, the impact of the proposal on convenience goods spending will be lower at 5.2%. The vast majority of this trade diversion will be from the existing Tesco Superstore, which is the anchor supermarket in the town centre. This doesn't give rise to any concern however given the Tesco score is trading significantly above benchmark levels (around 40% higher), even when considering the trade draw to the proposed foodstore and the new Aldi.

8.28 Whilst the above demonstrates that the convenience goods impact of the proposal alone will not be significant, it should be remembered that impact is to be measured upon town centre vitality and viability "as a whole". Therefore, Table 9 goes on to assess the impact of the proposal upon each of the above centres, including both convenience and comparison goods retail expenditure.

8.29 When comparison goods expenditure is accounted for, the impact of the proposal drops to 2.2% for Spalding, 3.3% for Holbeach and 0.1% for Boston. On that basis, we conclude that the proposal will not have any impact on centres that could be characterised as significant.

Conclusion on Retail Impact

8.30 The above considers the extent to which the forecast retail turnover of the proposed foodstore will impact upon the vitality and viability of adopted centres in the South East Lincolnshire Study Area. The analysis concludes that the forecast level of impact from Spalding town centre would be low, when considered as a whole, and the role and function of the town centre would not be undermined as a result of the proposed development. There would therefore be no significant adverse impact to the vitality and viability of Spalding town centre, nor any other adopted centre in the hierarchy.

8.31 Overall, the assessment has demonstrated that there would not be any significant adverse impacts arising from the development. The proposed development therefore accords with the requirements of Paragraphs 94 and 95 of the NPPF and Policy 24 of the Local Plan.

9. Transport and Highways

- 9.1** The application is accompanied by a Transport Assessment, undertaken by AMA Consulting, which assesses the accessibility of the Site and the impacts of the proposal upon local transport networks.
- 9.2** The Transport Assessment demonstrates that the Site is in an accessible location. The A151 is a single carriageway two-way road which has a hard footway and cycleway, present along the north-east bound carriageway, therefore providing good accessibility to the Site for cyclists and pedestrians. The National Cycle Network Route 12 is located approximately 2.5km to the south west of the Site, providing access to Crowland and further afield.
- 9.3** It is also worth noting that as part of the proposals, an upgraded junction arrangement with Holbeach Road will be provided. Vehicular, walking and cycling access is proposed via this upgraded access which currently provides access to Woodhouse Farm Lodge. The access will form a proposed new ghost island right turn access with left out only egress.
- 9.4** In terms of public transport options, there are three bus stops situated approximately 650m from the northern site access, located on the A151 and within the Springfield's Outlet. These bus stops provide access to a number of bus routes that provide a combined frequency of approximately six buses per hour towards Peterborough, Stamford, Kings Lynn, Boston and within Spalding.
- 9.5** The Transport Assessment addresses the effects of the proposal in terms of its impact upon the operation of the highway network and demonstrates that it will not have any severe impacts (in line with the NPPF). At Section 5 of the Transport Assessment, the trip generation assessment details that the development proposals are anticipated to generate 147 two-way trips in the weekday AM peak hour, 164 two-way trips in the weekday PM peak hours and 164 two-way trips in the Saturday peak hour. On the bases that primary trips associated with the foodstore will be transferred from other offerings within the surrounding area, any 'new' trips during peak periods are likely to be minimal. Section 6 of the Transport Assessment therefore assesses the total development trips as being made up of 50% 'pass-by' trip and 50% 'new' or 'dedicated' trips on the network.

- 9.6** In terms of the impact of the proposal upon the existing highway network, operational assessments have been undertaken based on the 2024 survey data, grown to a base year of 2025 and the future year of 2030 using TEMPro. The modelling outputs show that all junctions within the vicinity of the Site that would continue to operate within design capacity, and none would experience high degrees of saturation or unacceptable queuing. It follows that the existing local highway network has sufficient capacity to accommodate the development.
- 9.7** In terms of the provision of car parking, the proposal seeks to provide 185 car parking spaces. This is in line with the parking standards set out in the South East Lincolnshire SPD. The proposal also includes provision for 10 no. Electric Vehicle charging spaces. It is well established that there is an identified need for Electric Vehicle charging on a national basis. Due to the climate crisis and more people driving electric vehicles, EV charging points are becoming a necessity for new developments as demand increases. The provision of EV charging bays is clearly a positive as it demonstrates environmental commitment by offering a service for a more sustainable mode of transport. These are also well located to the new highway infrastructure that the Council has delivered.
- 9.8** The Framework Travel Plan sets out a range of measures to reduce single occupancy car trips and encourage travel by non-car modes.
- 9.9** The application complies with local and national planning policies relating to improving accessibility and sustainable transport by:
- Providing a scheme that allows future customers and employees of the development the opportunity to travel by modes of transport other than private car, including walking, cycling and public transport;
 - Providing safe and suitable access by pedestrians, cyclists, public transport users and vehicular users
 - Providing priority to pedestrian and cyclist users through dedicated access points that cater for movement from these modes of travel.
- 9.10** As demonstrated in the Transport Assessment, the proposal does not generate levels of travel that can be

regarded as having a significant impact on the network. There are therefore no grounds to prevent or refuse the application on highway grounds.

9.11 The Transport Statement and Travel Plan together demonstrate that the impacts of the proposal upon the local highway network are acceptable and that appropriate access for all users may be achieved. Accordingly, the proposal delivers development that is accessible in accordance with the requirements of the Policies 33 and 36 of the Local Plan, and Chapter 9 of the NPPF.

10. Design Considerations

- 10.1** The full rationale for the design approach to the proposed development is set out in the Design and Access Statement, prepared by The Harris Partnership. The proposed site layout has largely been informed by the design constraints of the existing Site, including the location, orientation of the Site and surrounding uses, existing habitats and topography.
- 10.2** The proposed foodstore is to be situated to the south east corner of the Site, to minimise any visual impact on the street scene. The drive-thru coffee shop has been located to the west of the Site facing the A16 off the roundabout, allowing for easy access from the A151, whilst providing an active frontage to the A16. In terms of scale, the proposed height of the building is considered to be commensurate and sympathetic to the existing scale of the buildings within the surrounding area and also the extant 2005 Permission. The buildings in the immediate vicinity of the Site comprise industrial units with a McDonald's immediately to the north. These buildings span between 1-2 storeys, with a mix of flat and pitched roofs. The scheme proposes a scale and massing which will have no adverse impact upon the locality.
- 10.3** The units have been designed to make the most efficient use of the Site, and to naturally complement each other, providing a contemporary development. The properties in the immediate area of the Site vary in quality with the predominant material palette comprising of brick and render. Taking this into account, the overall design of the proposal has been developed in a contemporary modern style, with a simple palette of materials designed to complement the nearby properties whilst also contributing positively to the streetscape. The proposal will be striking and clear in overall form. Furthermore, each of the proposed units will be designed to a very high standard, in accordance with the specifications of the intended operators. The proposal therefore accords with Policy 3 of the Local Plan which relates to the design of new development.
- 10.4** In terms of landscaping provision, the development will feature a number of landscaped areas, including a significant landscape buffer around the majority of the perimeter of the Site. Where possible, the existing trees and vegetation are to be retained and protected along the southern boundary of the Site.
- 10.5** A mix of ornamental and native trees are proposed along the boundary of the site to enhance the appearance

of the Site from the road network. Mixed species native planting has also been proposed along the western boundary along the A16. This will replace and strengthen borders where areas of established trees and vegetation are to be removed. This buffer planting will help screen the development and create a 'green corridor', between the Site and existing soft landscape belt to the south. All planting species throughout the development have been selected based on their suitability to the site, colour, form and seasonal interest. During planting design and species selection consideration has also been given to the future maintenance, durability and creation of a biodiverse landscape which will make a positive contribution to the streetscape and enhancement of the wider Public Realm. Landscaping has played a fundamental part of the overall design of the scheme. The proposal therefore fully complies with Policy 2 Of the Local Plan, which seeks to ensure that development is of a high quality design, and takes into account the relationship of the proposal to existing development and land uses by virtue of scale, size, layout and character of the area.

- 10.6** It is concluded that the proposal fully accords with the requirements of Policies 2 and 3 of the Local Plan, and Chapter 12 of the NPPF relating to design.

11. Environment and Amenity Considerations

- 11.1** Any new development must demonstrate that it does not present significant detrimental impacts on the surrounding environment. Below, we assess the merits of the proposed development against the Council's policies regarding environment and amenity.

Air Quality

- 11.2** An Air Quality Assessment, prepared by Dragonfly Consulting, has been submitted as part of the application. Due to the scale and location of the proposed development, the report assesses the potential impact of both the construction and operational phases of the development on nearby sensitive receptors.
- 11.3** The assessment concludes that during the operational phase of the proposed development, there will be a negligible impact on NO₂, PM₁₀ and PM_{2.5} concentrations at existing sensitive receptors, leading to an effect which is considered to be not significant.
- 11.4** No mitigation measures are therefore required. However for completeness, and in line with the East Midlands Air Quality Network 'Air Quality and Emissions Mitigation - Guidance for Developers' document, it is recommended that, relevant Type 1, Type 2 and Type 3 mitigation measures are included within the proposed development, due to the development classification being 'Major'.
- 11.5** Based on the above, air quality does not pose a constraint to the development of the Site and the proposals meet the requirements of both national and local air quality planning policy. The proposal therefore fully accords with Policy 30 which relates to pollution and air quality.

Archaeology

- 11.6** A Desk-Based Heritage and Archaeological Assessment has been submitted as part of the application. The report considers both designated and undesignated, identified and unidentified heritage assets lying within and adjacent to the application site.

- 11.7** The Assessment concludes that the proposal will not cause any impact on the setting of the designated heritage assets within the study area, and there are no recommendations for further investigation or mitigation.

Ecology and Trees

- 11.8** A Preliminary Ecological Appraisal ('PEA') has been submitted as part of the application. The ecological interest of the Site and its surroundings has been thoroughly investigated, and the findings set out in the Report.
- 11.9** Due to the presence of suitable scrub and grassland habitats on Site, a number of recommendations have been made for further surveys to be undertaken, including for commuting/ foraging bats, invertebrates and reptiles. At the time of the application submission, those surveys are in the process of being finalised. The PEA also includes a series of recommendations intended to guide and shape the design of the Site, including appropriate native species planting, wildflower seeding, sympathetic lighting and incorporation of bird/bat nesting and roosting features.
- 11.10** From a Biodiversity Net Gain perspective, the submitted Biodiversity Net Gain Plan details that the baseline value of the existing site is calculated as 12.27 Habitat Units and 0.24 Watercourse Units. In order to provide a 10% net gain in biodiversity, as required by the Environment Act 2021, the proposed development would need to achieve 13.50 Habitat Units and 0.26 Watercourse Units.
- 11.11** Unfortunately, due to the spatial requirements of the proposed development (i.e. the erection of the commercial floorspace and works to create access road and parking areas), the proposals will result in a loss of 11.32 Habitat Units and 0.24 Watercourse Units on-site. Scope for mitigating the loss of existing habitats on-site is limited, and therefore consideration will be given to off-site options for delivering net gains in biodiversity, which is likely to be secured through agreement with a third party habitat bank.
- 11.12** A Tree Survey and Arboricultural Impact Assessment have also been submitted as part of the application. 16 individual trees and 2 tree groups will require removal to implement the proposed development. The trees

to be removed are categorised as either Category C (low quality) or Category U (poor condition). The removal of these trees is therefore considered to be acceptable. Nonetheless, the removal of trees will be mitigated with new tree planting as indicated on the submitted plans.

- 11.13** The proposal fully accords with Policy 28 of the Local Plan in regard to effects of the development upon the natural environment, and all relevant parts of the NPPF.

Flood Risk and Drainage

- 11.14** A Flood Risk Assessment ('FRA'), prepared by ARP Associates, has been submitted as part of the application. The Site falls within Flood Zone 3, indicating a high probability of flooding from fluvial sources (rivers). Notwithstanding this, the EA risk of flooding from surface water map suggests that the majority of the Site and the immediate surrounding area is at a 'very low' risk of flooding from surface water.
- 11.15** Consultation has taken place with South Holland Internal Drainage Board, who confirmed that they are "*not aware of any known/historical flooding within or near to the site*", and they have no records of any flood defence breaches in proximity to the Site. When applying Table 2 of the PPG, the flood risk vulnerability classification shows that the proposed end use is considered to be "Less Vulnerable" development.
- 11.16** As part of pre-application enquiries, the Environment Agency provided flood risk data from the Coronation Channel and the River Welland, and a plan showing the modelled fluvial flood events was provided. This plan shows that with flood defences in place, the Site and surrounding area are not considered to be at risk of flooding during the 1 in 30 year event, the 1 in 100 year event, the 1 in 1000 year event or the 1 in 100 year plus 20% climate change allowance event.
- 11.17** On the above basis, it can be concluded that the risk of flooding to the site which is suggested by the Flood Map for planning is a theoretical risk of flooding, in a scenario where no flood defences exist. In reality, defences are present and the risk is low. However, there remains a residual risk of potential flooding in the event that local flood defences are breached during a flood event. Therefore, a number of precautionary measures have been incorporated within the FRA. These include the finished floor levels being raised at

least 300mm above existing ground levels, consideration being given to integrating appropriate flood resistance measures into the design of the new building, and the provision of a sustainable water drainage system. The full list of potential mitigation requirements are summarised at Paragraph 6.52 of the submitted FRA.

- 11.18** In summary, the proposed development is acceptable from a flood risk perspective, and the report finds that the development meets the requirements of the sequential test for flood risk, and that application of the NPPF Exception Test is not required.
- 11.19** In respect of drainage, the submitted Drainage Strategy, also undertaken by ARP Associates, sets out the principles of a sustainable surface water management strategy for the proposed development. It has been determined that infiltration techniques are unlikely to be suitable on this particular Site, therefore it is proposed that surface water from the development be discharged to the existing Ordinary Watercourse within the south-east of the Site, which drains to the wider IDB catchment.
- 11.20** Surface water storage will be provided by means of below-ground storage tanks beneath parking and other hardstanding areas.
- 11.21** As there are no public sewers close to the site, it is proposed that foul drainage from the new development will be managed by an on-site package treatment plant, with treated foul effluent discharged via the proposed surface water outfall
- 11.22** It can be concluded that the proposal fully accords with Policy 4 of the NPPF in respect of Flood Risk, and all relevant paragraphs of the NPPF.

Ground Contamination

- 11.23** A Phase 1 Geo-Environmental Report has been submitted as part of the application. The report provides an assessment of the geological and coal mining aspects, site history, potential contamination sources and receptors, and other environmental aspects including radon gas and indicative flood risk.

- 11.24** These findings are presented in the report, which ultimately concludes that there is likely a requirement for ground investigation for geotechnical and engineering purposes, to include deep cable percussion boreholes.

Noise

- 11.25** A Noise Impact Assessment ('NIA') prepared by Dragonfly Consulting has been submitted as part of the application.
- 11.26** The assessment indicates that noise from all operations, excluding site servicing, is predicted to fall below the LOAEL, allowing for unrestricted operations. For site servicing, provisional measures consisting of operational restrictions on tonal reverse alarms during the night-time have been considered. It has been demonstrated that following inclusion of operational restrictions, noise contributions from site servicing is predicted to fall below the LOAEL.
- 11.27** The proposal therefore fully accords with Policy 30 of the Local Plan in relation to pollution, as there will be no adverse impact due to noise.

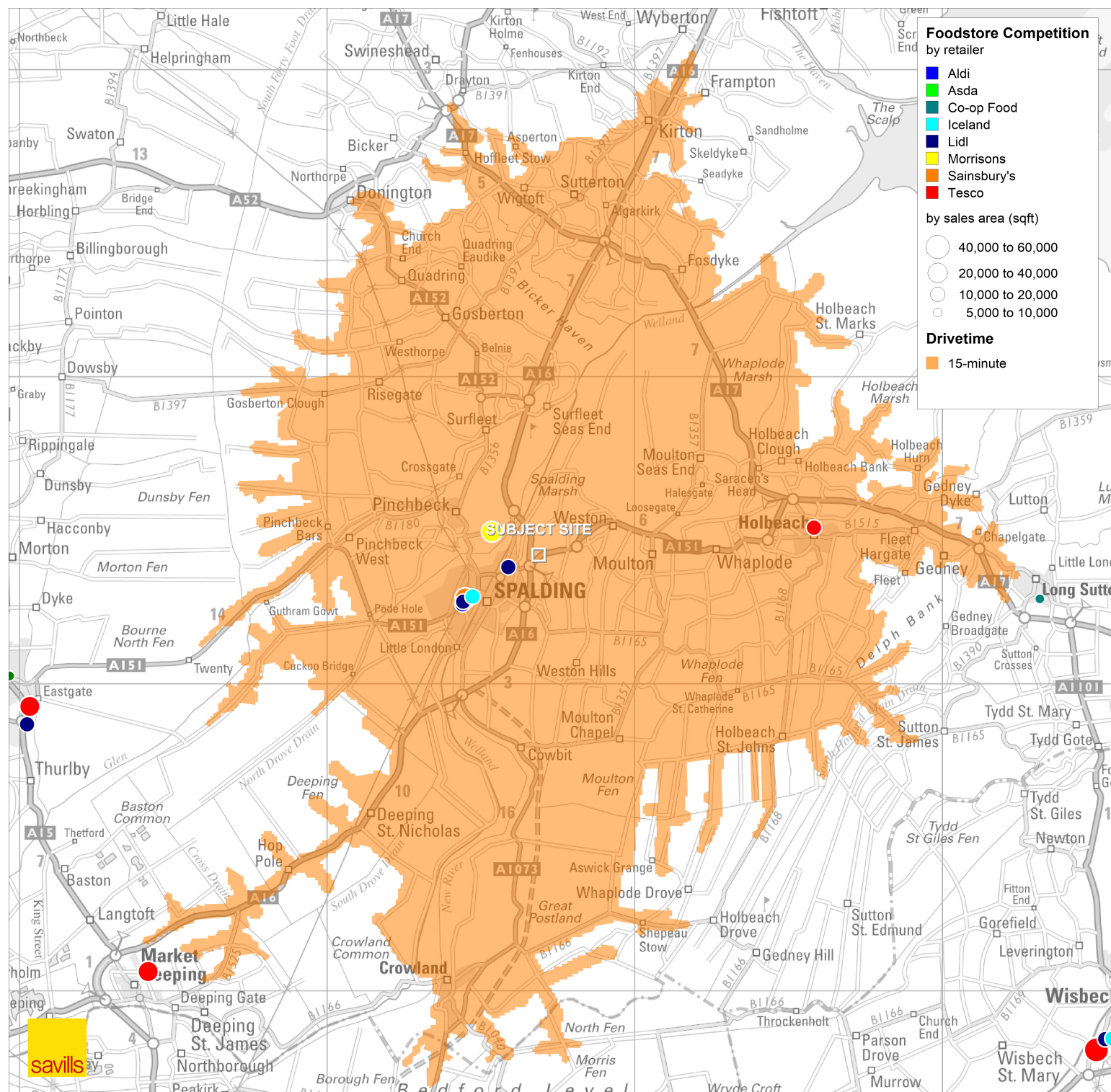
12. Summary and Conclusions

- 12.1** This application seeks planning permission for the development of the Site to include a foodstore, a drive-thru coffee shop unit to be occupied by Costa, a comprehensive landscaping scheme, and associated infrastructure and development.
- 12.2** The proposal will enhance convenience goods provision in the local area, allowing local residents a greater choice of convenience goods shopping facilities. It will provide a modest foodstore at an accessible site in close proximity to surrounding residential areas.
- 12.3** The assessment undertaken as part of this Statement has demonstrated that:
1. The proposal satisfies the sequential test. The application is a well-connected out of centre site and there are no available sites either within or at the edge of the relevant centres which could otherwise accommodate the proposal
 2. It has been demonstrated that there will be no significant adverse impact on investment in, or the vitality and viability of, defined town centres.
 3. The proposal secures sustainable economic growth and provides opportunities for local employment.
 4. The proposed development accords with all other relevant policies contained within the development plan, including those relating to design, flood risk, ecology and highway considerations.
 5. The application accords with relevant material considerations, including the overarching objectives of the NPPF to deliver sustainable development. Material considerations weigh in favour of approving the application.
- 12.4** In light of the assessment undertaken, we conclude that:

1. The proposal accords with the relevant policies in the development plan;
2. The proposal accords with the principle material considerations, namely the objective to secure sustainable development established by the NPPF; and
3. There are no other material considerations that should outweigh the presumption in favour of granting planning permission for sustainable development as outlined at Paragraph 11 of the NPPF.

12.5 The proposal therefore benefits from the presumption in favour of sustainable development outlined at Paragraph 11 of the NPPF, and planning permission should be granted in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

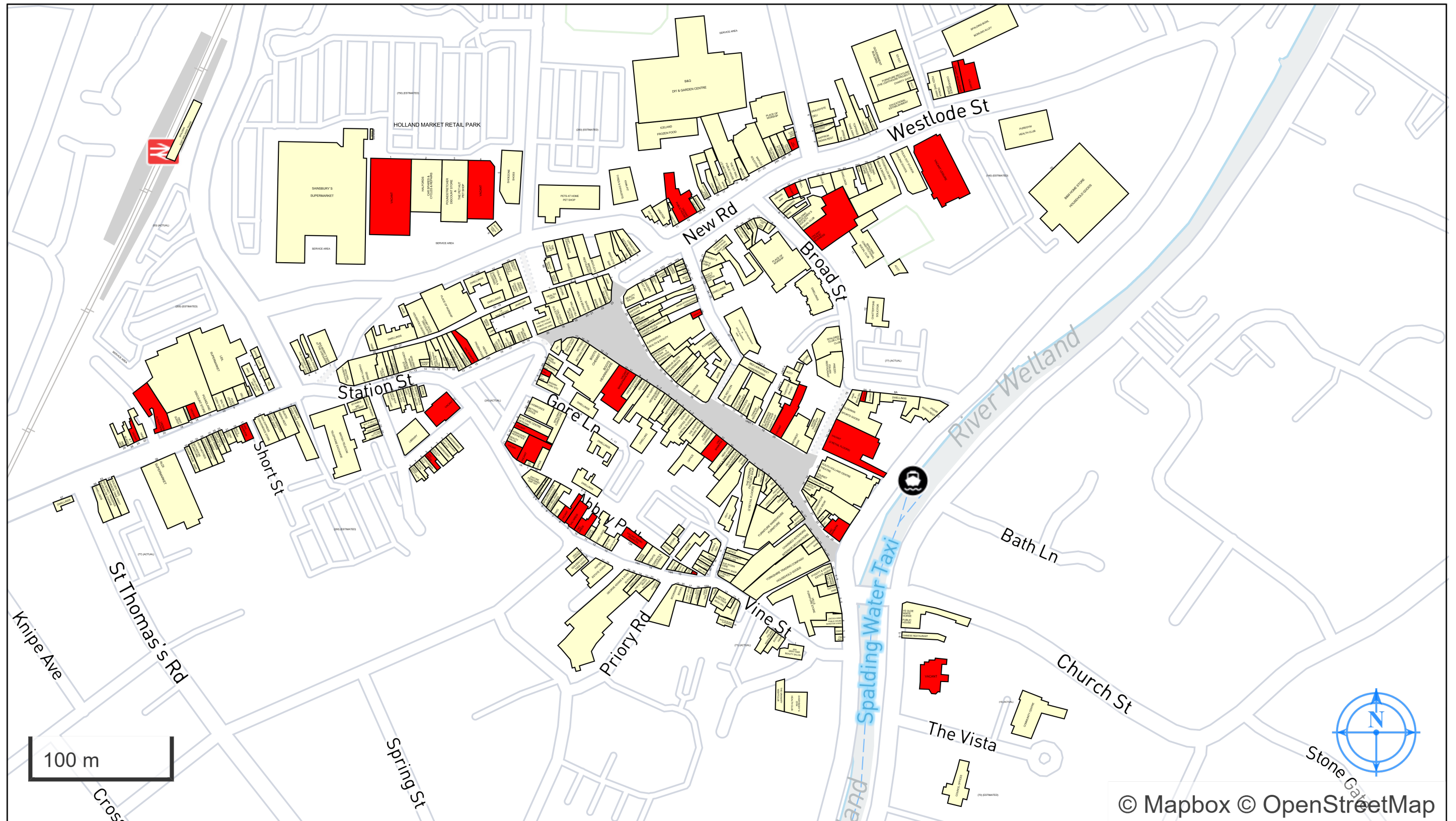
Appendix 1 – Map to Show the Primary Catchment Area



Appendix 2 – GOAD Map showing vacant units in Spalding town centre

Spalding (Spalding Vacancies September 2024)

Modified: 27-Jun-25 11:55:05 / Surveyed: 04-Sep-24



Appendix 3 – Town Centre Health Checks

Appendix 3 – Vitality and Viability Assessment

1.0 The Vitality and Viability of Defined Centres

- 1.1 Paragraph 94 of the National Planning Policy Framework published in February 2025 ('NPPF') sets out the requirements for an impact assessment for retail and leisure uses. The second element requires an assessment of potential impacts upon town centre vitality and viability. In light of this it is important to gain an understanding of the existing level of vitality and viability of relevant defined centres. The PPG provides further guidance on assessing the 'health' of town centres.
- 1.2 Data used to provide an indication of vitality and viability can be derived from research companies such as GOAD, and include retailer representation; vacancy rates; diversity of uses; and retailer requirements. An on-site survey of the centre has also been carried out by Savills, which has been used in addition to data contained in the Council's Retail Study. This information has been used to provide an up-to-date assessment of the vitality and viability of **Spalding Town Centre**. In addition, a summary of **Holbeach District Centre and Boston Town Centre** has been provided, reflecting the more limited data in the public domain for these centres.
- 1.3 The findings demonstrate that all centres are considered to be vital and viable.

2.0 Spalding Town Centre

- 2.1 The defined town centre of Spalding covers two distinct areas – the historic core centred around the Market Place and south of New Road/ Sheep Market, and the more modern and larger units to the north, east and west. This includes larger foodstores operated by Sainsbury's, Aldi and Lidl, in addition to comparison retailers including B&M and B&Q.
- 2.2 In addition to a high number of national multiple retailers, there are a range of independent retail shops, cafes, beauty salons and bakeries.
- 2.3 There are a total of 344 units within the town centre. In terms of the vacancy rate, there are currently 27 vacant units¹ which represents a vacancy rate of circa 7.8%, which is well below the current national average of 14.1%². This demonstrates that the town centre is performing well.

¹ Figure determined by Site Visit, March 2024

² Experian, May 2025

Appendix 3 – Vitality and Viability Assessment

- 2.4** The pedestrianised area of Market Place is clearly a popular destination for visitors to the town centre, as evidenced during our site visit. The centre is easily accessible by a variety of transport modes including car, bus and cycle. There are several bus services that run to and through the town centre, along with Spalding railway station which is located in the town centre and provides services Peterborough, Boston, Lincoln, Holbeach and further afield.
- 2.5** The town centre is generally well kept with limited evidence of anti-social behaviour or vandalism.
- 2.6** In summary, Spalding town centre provides a strong comparison offer and varied convenience goods provision, commensurate with its role in the hierarchy. Vacancy rates are also lower than the national average. The centre is well used by foot and public transport, has a broad retail offer and we conclude that it is a vital and viable centre.

3.0 Holbeach District Centre

- 3.1** Holbeach District Centre benefits from predominantly local and independent businesses, with some national operators integrated throughout the town centre. For example, Boots, Nationwide, Tesco and the Co-op are all situated within the town centre. In addition to the retail units, there are a mix of hair and beauty, take aways, betting offices and other main town centre uses.
- 3.2** The retail offer in Holbeach is concentrated on High Street, which comprises the vast majority of the Primary Shopping Area and Primary Shopping Frontage. More modern units are provided at the eastern end where the Co-op is located, along with a post office and library.
- 3.3** In terms of the vacancy rate, a total of 13 out of the 131 units are currently vacant³, which represents a vacancy level of circa 10%. This is again a sign that the town centre is generally performing well.
- 3.4** The heart of the town centre is designed for both pedestrians and car users, and there are several traffic calming measures (such as crossing points) enabling pedestrians to direct themselves around the centre safely.

³ Figure taken from Experian Goad

Appendix 3 – Vitality and Viability Assessment

- 3.5** The centre is easily accessible from the surrounding area, served by the A17 close to its junction with the A151. There are also several bus services that run through the heart of the centre via High Street and Fleet Street.
- 3.6** The centre is again generally well kept and appears to have an overall sense of safety. There is no evidence of anti-social behaviour in the centre, such as litter or graffiti, further supporting that the centre has an overall safe feel to it.
- 3.7** In summary, Holbeach District Centre is well used by foot and public transport, has a broad retail offer and we conclude that it is a vital and viable centre.

4 Boston Town Centre

- 4.1** Boston town centre is an important and historic centre which continues to have an important subregional role.
- 4.2** Whilst there has been an increase in vacancy rates in recent years, the vacancy rate currently stands at around 15% which is only just above the national average. It should also be noted that most of the vacant units comprise small-scale high street stores of less than 150 sq.m.
- 4.3** Notwithstanding the above, the centre continues to have a number of strengths, including a market, independent stores and strong edge-of-centre foodstore provision.

Appendix 4 – Retail Impact Assessment Tables



Commercial Development Projects Limited
Proposed M&S, Spalding
Table 1 - Population of Study Area

Population of Study Area												
	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Total
2018	46,061	13,957	9,846	8,841	37,592	9,739	8,528	11,800	7,357	11,528	31,760	197,009
2030	49,746	15,074	10,634	9,548	40,599	10,518	9,210	12,744	7,946	12,450	34,301	212,770

Notes
2018 Population taken from South East Lincolnshire Town Centre and Retail Capacity Study April 2020
Population growth rate of 8% taken from ONS population projections for South Holland and East Lindsey for the period 2018-2030

Commercial Development Projects Limited
Proposed M&S, Spalding
Table 2 - Expenditure Per Head

Expenditure Per Head (Exc SFT)											
	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11
2018	2,173	2,387	2,407	2,406	2,267	2,339	2,353	2,381	2,401	2,382	2,401
2019	2,141	2,352	2,371	2,370	2,233	2,304	2,317	2,346	2,365	2,347	2,365
2020	2,256	2,479	2,499	2,498	2,353	2,428	2,442	2,472	2,493	2,473	2,493
2021	2,216	2,434	2,454	2,453	2,311	2,384	2,398	2,428	2,448	2,429	2,448
2022	2,103	2,310	2,329	2,328	2,193	2,263	2,276	2,304	2,323	2,305	2,323
2023	2,033	2,234	2,252	2,251	2,121	2,188	2,201	2,228	2,247	2,229	2,247
2024	1,995	2,191	2,209	2,209	2,081	2,146	2,159	2,186	2,204	2,187	2,204
2025	1,977	2,171	2,190	2,189	2,062	2,127	2,140	2,166	2,184	2,167	2,184
2026	1,963	2,156	2,174	2,173	2,047	2,112	2,125	2,151	2,169	2,152	2,169
2027	1,951	2,143	2,161	2,160	2,035	2,100	2,112	2,138	2,156	2,139	2,156
2028	1,943	2,135	2,153	2,152	2,027	2,091	2,104	2,129	2,147	2,130	2,147
2029	1,935	2,126	2,144	2,143	2,019	2,083	2,095	2,121	2,139	2,122	2,139
2030	1,928	2,118	2,135	2,134	2,011	2,074	2,087	2,112	2,130	2,113	2,130

Notes
2018 Convenience Expenditure taken from South East Lincolnshire Town Centre and Retail Capacity Study April 2020
Convenience Expenditure Growth Rate (Exc SFT) taken from Experian Retail Planner Briefing Note 21

Commercial Development Projects Limited
Proposed M&S, Spalding
Table 3 - Total Convenience Expenditure

Total Convenience Expenditure (Exc SFT)												
	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Total
2018	100,103,082	33,321,109	23,702,591	21,274,417	85,217,154	22,775,703	20,062,563	28,100,945	17,666,776	27,464,676	76,267,067	455,956,083
2030	95,897,774	31,921,297	22,706,851	20,380,683	81,637,202	21,818,901	19,219,740	26,920,431	16,924,599	26,310,891	73,063,105	436,801,474

Turnover of Existing Stores with M&S Spalding Removed (Exc SFT)	Market Share	Turnover	Turnover
	%	2018	2030
Zone 1			
In Centre			
Iceland, Boston	1.0%	4.56	4.37
Food Warehouse, Boston	0.7%	3.19	3.06
Boston Town Centre (Other Stores)	1.1%	5.02	4.80
Edge of Centre			
Asda, Boston	11.5%	52.43	50.23
Aldi, Boston	6.6%	30.09	28.83
Out of Centre			
Wyberton Village Centre	0.3%	1.37	1.31
Other Zone 1 Village Centres	0.0%	0.00	0.00
Tesco Superstore, Boston	13.7%	62.47	59.84
Lidl, Boston	3.7%	16.87	16.16
Co-Op, Boston	0.6%	2.74	2.62
Other Out-of-Centre Stores, Boston	1.2%	5.47	5.24
Zone 2			
Zone 2 Village Centres	0.5%	2.28	2.18
Zone 3			
Kirton Village Centre	0.4%	1.82	1.75
Zone 3 Other Village Centres	0.0%	0.00	0.00
Zone 4			
Donnington Village Centre	0.2%	0.91	0.87
Gosberton Village Centre	0.2%	0.91	0.87
Other Village Centres	0.0%	0.00	0.00
Zone 4 Out of Centre (Other Stores)	0.0%	0.00	0.00
Zone 5			
In Centre			
Sainsbury's, Spalding	8.7%	39.67	39.09
Aldi, Spalding	5.5%	25.08	24.46
Lidl, Winsover Road, Spalding	1.9%	8.66	8.74
Iceland, Spalding	0.9%	4.10	3.93
M&S Simply Food, Spalding	1.0%	4.56	0.00
Spalding Town Centre (Other Stores)	1.2%	5.47	5.24
Out of Centre			
Pinchbeck Village Centre	0.3%	1.37	1.31
Morrisons, Spalding	9.1%	41.49	40.40
Lidl, Holbeach Road, Spalding	2.5%	11.40	11.36
Zone 5 Out of Centre (Other Stores)	0.7%	3.19	3.06
Zone 6			
Zone 6 Village Centres	0.2%	0.91	0.87
Zone 7			
In Centre			
Tesco Superstore, Holbeach	5.9%	26.90	26.86
Co-Op, Holbeach	0.3%	1.37	1.31
Holbeach Town Centre (Other Stores)	0.1%	0.46	0.44
Zone 8			
Long Sutton Village Centre	1.2%	5.47	5.24
Sutton Bridge Village Centre	0.0%	0.00	0.00
Zone 9			
Crowland Village Centre	0.4%	1.82	1.75
Thorney Village Centre	0.1%	0.46	0.44
Zone 10			
Zone 10 Village Centres	0.1%	0.46	0.44
Zone 10 Out of Centre (Other Stores)	0.0%	0.00	0.00
Zone 11			
Zone 11 Village Centres	2.2%	10.03	9.61
Outside Study Area			0.44

Notes
M&S Turnover redistributed as:
25% Sainsbury's Spalding
20% Morrisons, Spalding
15% Tesco, Holbeach
10% Aldi, Spalding
10% Lidl, Winsover Rd, Spalding
10% Lidl, Holbeach Rd, Spalding
10% Inflow from Outside Study Area

Commercial Development Projects Limited
Proposed M&S, Spalding
Table 5 - Turnover of Committed Developments

Turnover of Committed Developments				
Store	Net Convenience Sales Area (sq. m)	Sales Density	2020 Turnover	2030 Turnover
Aldi, Holbeach	1,052	£11,734	£12.34	£12.10

Notes
Figures taken from Retail Impact Assessment for Aldi, Holbeach (App Ref: H09-1057-22)

Impact of Commitments	Turnover	Diversion to Aldi, Holbeach		Turnover Post- Commitments 2030
	2030	%	£	
Zone 1				
In Centre				
Iceland, Boston	£4.37		£0.00	£4.37
Food Warehouse, Boston	£3.06		£0.00	£3.06
Boston Town Centre (Other Stores)	£4.80		£0.00	£4.80
Edge of Centre				
Asda, Boston	£50.23		£0.00	£50.23
Aldi, Boston	£28.83	1.00%	£0.12	£28.71
Out of Centre				
Wyberton Village Centre	£1.31		£0.00	£1.31
Other Zone 1 Village Centres	£0.00		£0.00	£0.00
Tesco Superstore, Boston	£59.84	10.00%	£1.21	£58.63
Lidl, Boston	£16.16		£0.00	£16.16
Co-Op, Boston	£2.62		£0.00	£2.62
Other Out-of-Centre Stores, Boston	£5.24		£0.00	£5.24
Zone 2				
Zone 2 Village Centres	£2.18		£0.00	£2.18
Zone 3				
Kirton Village Centre	£1.75		£0.00	£1.75
Zone 3 Other Village Centres	£0.00		£0.00	£0.00
Zone 4				
Donnington Village Centre	£0.87		£0.00	£0.87
Gosberton Village Centre	£0.87		£0.00	£0.87
Other Village Centres	£0.00		£0.00	£0.00
Zone 4 Out of Centre (Other Stores)	£0.00		£0.00	£0.00
Zone 5				
In Centre				
Sainsbury's, Spalding	£39.09	10.00%	£1.21	£37.88
Aldi, Spalding	£24.46	5.00%	£0.61	£23.86
Lidl, Winsover Road, Spalding	£8.74	2.50%	£0.30	£8.43
Iceland, Spalding	£3.93		£0.00	£3.93
Spalding Town Centre (Other Stores)	£5.24		£0.00	£5.24
Out of Centre				
Pinchbeck Village Centre	£1.31		£0.00	£1.31
Morrisons, Spalding	£40.40	10.00%	£1.21	£39.19
Lidl, Holbeach Road, Spalding	£11.36	10.00%	£1.21	£10.15
Zone 5 Out of Centre (Other Stores)	£3.06		£0.00	£3.06
Zone 6				
Zone 6 Village Centres	£0.87		£0.00	£0.87
Zone 7				
In Centre				
Tesco Superstore, Holbeach	£26.86	40.00%	£4.84	£22.02
Co-Op, Holbeach	£1.31	1.00%	£0.12	£1.19
Holbeach Town Centre (Other Stores)	£0.44	0.50%	£0.06	£0.38
Zone 8				
Long Sutton Village Centre	£5.24		£0.00	£5.24
Sutton Bridge Village Centre	£0.00		£0.00	£0.00
Zone 9				
Crowland Village Centre	£1.75		£0.00	£1.75
Thorney Village Centre	£0.44		£0.00	£0.44
Zone 10				
Zone 10 Village Centres	£0.44		£0.00	£0.44
Zone 10 Out of Centre (Other Stores)	£0.00		£0.00	£0.00
Zone 11				
Zone 11 Village Centres	£9.61		£0.00	£9.61
Outside Study Area		10.00%	£1.21	
Total		100.00%	£12.10	

Notes
Figures taken from Retail Impact Assessment for Aldi, Holbeach (App Ref: H09-1057-22)

Commercial Development Projects Limited
Proposed M&S, Spalding
Table 7 - Turnover of the Proposed Development

Turnover of the Proposed Development					
	Net Sales				
	Area	Sales Density	2024 (£m)	2025	2030 (£m)
	(sq. m)				
Proposed M&S	1,486	£9,864	£14.66	£14.66	£14.73

Notes
Sales Density taken as the average of 3 mid-sized grocery retailers (Aldi, Lidl and M&S) from Geolytix Grocery Model 2025, adjusted to 2018 prices (Appendix 4b of Experian RPBN 22).
Sales Density Growth Rate taken from Experian Retail Planner Briefing Note 22

Commercial Development Projects Limited
Proposed M&S, Spalding
Table 8 - Impact of the Proposal at 2030

Impact of the Proposal	Turnover Post- Commitments	Diversion to M&S		Post- Development Turnover	Impact
	2030	%	£	2030	2030
Zone 1					
In Centre					
Iceland, Boston	£4.37		£0.00	£4.37	
Food Warehouse, Boston	£3.06		£0.00	£3.06	
Boston Town Centre (Other Stores)	£4.80		£0.00	£4.80	
Edge of Centre					
Asda, Boston	£50.23	2.5%	£0.37	£49.86	-0.7%
Aldi, Boston	£28.71		£0.00	£28.71	
Out of Centre					
Wyberton Village Centre	£1.31		£0.00	£1.31	
Other Zone 1 Village Centres	£0.00		£0.00	£0.00	
Tesco Superstore, Boston	£58.63	2.5%	£0.37	£58.26	-0.6%
Lidl, Boston	£16.16		£0.00	£16.16	
Co-Op, Boston	£2.62		£0.00	£2.62	
Other Out-of-Centre Stores, Boston	£5.24		£0.00	£5.24	
Zone 2					
Zone 2 Village Centres	£2.18		£0.00	£2.18	
Zone 3					
Kirton Village Centre	£1.75		£0.00	£1.75	
Zone 3 Other Village Centres	£0.00		£0.00	£0.00	
Zone 4					
Donington Village Centre	£0.87		£0.00	£0.87	
Gosberton Village Centre	£0.87		£0.00	£0.87	
Other Village Centres	£0.00		£0.00	£0.00	
Zone 4 Out of Centre (Other Stores)	£0.00		£0.00	£0.00	
Zone 5					
In Centre					
Sainsbury's, Spalding	£37.88	25.0%	£3.68	£34.20	-9.7%
Aldi, Spalding	£23.86	5.0%	£0.74	£23.12	-3.1%
Lidl, Winsover Road, Spalding	£8.43	5.0%	£0.74	£7.70	-8.7%
Iceland, Spalding	£3.93	1.0%	£0.15	£3.78	-3.7%
Spalding Town Centre (Other Stores)	£5.24	1.5%	£0.22	£5.02	-4.2%
Out of Centre					
Pinchbeck Village Centre	£1.31		£0.00	£1.31	
Morrisons, Spalding	£39.19	25.0%	£3.68	£35.51	-9.4%
Lidl, Holbeach Road, Spalding	£10.15	10.0%	£1.47	£8.67	-14.5%
Zone 5 Out of Centre (Other Stores)	£3.06		£0.00	£3.06	
Zone 6					
Zone 6 Village Centres	£0.87		£0.00	£0.87	
Zone 7					
In Centre					
Tesco Superstore, Holbeach	£22.02	10.0%	£1.47	£20.55	-6.7%
Co-Op, Holbeach	£1.19		£0.00	£1.19	
Holbeach Town Centre (Other Stores)	£0.38		£0.00	£0.38	
Edge of Centre					
Aldi, Holbeach	£12.10	2.5%	£0.37	£11.73	-3.0%
Zone 8					
Long Sutton Village Centre	£5.24		£0.00	£5.24	
Sutton Bridge Village Centre	£0.00		£0.00	£0.00	
Zone 9					
Crowland Village Centre	£1.75		£0.00	£1.75	
Thorney Village Centre	£0.44		£0.00	£0.44	
Zone 10					
Zone 10 Village Centres	£0.44		£0.00	£0.44	
Zone 10 Out of Centre (Other Stores)	£0.00		£0.00	£0.00	
Zone 11					
Zone 11 Village Centres	£9.61		£0.00	£9.61	
Outside Study Area		10.0%	£1.47		
Total		100.0%	£14.73		

Commercial Development Projects Limited
Proposed M&S, Spalding
Table 9 - Impact on Existing Centres at 2030

Impact of the Proposed Development on Existing Centres					
	Pre-Development Conv Turnover 2030	Post Development Conv Turnover 2030	Convenience Goods Impact 2030	Comparison Goods Turnover 2030	Impact 2030
Spalding Town Centre	£79.35	£73.82	-7.0%	£250.26	-2.2%
Holbeach District Centre	£35.69	£33.85	-5.2%	£55.60	-3.3%
Boston Town Centre	£91.17	£90.80	-0.4%	£303.53	-0.1%