

DECISION DELEGATED TO HEAD OF PLANNING
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Application No:	H23-0869-25	Applicant:	InPost UK
Proposal:	Siting of InPost Parcel Locker - Retrospective		
Location:	Whaplode Food Store 217 High Road Whaplode		
Terminal Date:	15th January 2026		

Planning Policies

South East Lincolnshire Local Plan - Adopted: March 2019

01	Spatial Strategy
02	Development Management
03	Design of New Development
36	Vehicle and Cycle Parking

National Guidance**National Planning Policy Framework December 2024**

Section 2 - Achieving sustainable development
Section 4 - Decision-making
Section 6 - Building a strong, competitive economy
Section 7 - Ensuring the vitality of town centres
Section 9 - Promoting sustainable transport
Section 12 - Achieving well-designed places
Section 14 - Meeting the challenge of climate change, flooding and coastal change

Representations:

	Object	Support	No Obj.	Comments
PARISH COUNCIL	0	1	0	0
WARD MEMBER	0	0	0	0
HIGHWAYS & SUDS SUPPORT	0	0	0	1
SOUTH HOLLAND INTERNAL DRAINAGE BOARD	0	0	0	1
RESIDENTS	2	0	0	0

CASE OFFICER ASSESSMENT

Site Description

The application site is the Co Op foodstore and fuel filling station which lies to the south of High Road in Whaplode (both the plans submitted and Google refer to it as Main Road, but history on site and on surrounding applications refers to High Road).

Specifically, the proposed lockers abut the northern elevation of the shop in the gap between it and the pavement. The plans do not clearly show the extent of the pavement area, but as the application is retrospective, this can be seen on site.

Directly on the northern side of the road are some residential properties, and slightly to the north-east is another fuel filling station.

About 5m to the north-west of the lockers there is a pedestrian refuge in the middle of the road. It is not served by any lights or formal crossing.

Proposal

The proposal seeks full planning permission for the siting of a parcel delivery box containing a number of lockers used for the delivery of parcels and self collection. The unit would be a white fronted, yellow sided metal container, measuring 3.5m by 0.9m with a canopy over the central section. The canopy would be just under 1.7 m and would slightly overhang the pavement, albeit at a height of about 2.3m. It provides CCTV.

A summary of the applicants supporting statement sets out that:

InPost parcel delivery lockers are presented as a vital part of the UK's sustainable last mile delivery infrastructure. By reducing the need for individual home deliveries, they contribute to climate change mitigation while enhancing community assets and stimulating local economies through incremental spending. As a leading provider working with a wide range of retailers, InPost offers lockers that are accessible 24/7 in visible, convenient locations. This service is particularly valuable as more people return to office working, providing a secure solution that reduces parcel damage and theft.

The company argues that its network of lockers aligns with Planning Policy objectives by supporting economic growth, creating well designed places, and facilitating services that reduce greenhouse gas emissions. By situating lockers at supermarkets, convenience stores, and other high footfall areas, InPost encourages customers to combine parcel collection or returns with existing activities, thereby increasing local spending and community engagement. This integration of services into everyday routines strengthens the role of lockers as both practical infrastructure and contributors to wider social and economic benefits.

Safety and inclusivity are central to InPost's design principles. All lockers are equipped with CCTV, motion sensors, and multiple compartment sizes, including "Easy Access" options for users with mobility needs. Integrated LED lighting ensures visibility and security, while placement principles guide the selection of suitable locations such as train stations, forecourts, and car parks. By reducing vehicle trips and easing pressure on the road network, InPost maximises environmental benefits while ensuring lockers are accessible, safe, and seamlessly integrated into existing public spaces.

Planning History

Application Site:

H23-0842-17. Demolish Existing Filling Station building, remodel forecourt.

The proposal sought to provide a new forecourt layout with additional parking and an expanded retail unit. It was approved and implemented.

Adjacent Sites:

None of relevance.

Consultation Responses

The responses received from consultees which can be viewed in their entirety through the South Holland website, can be summarised as follows:

Whaplode Parish Council

Support. Assume Highways are supportive, disappointing that a large company fails to comply with planning regs.

Lincolnshire Highway and SUDs

Request further details of the height of the canopy that oversails the pavement.

A further response set out that:

The application site is located on the main High Road through Whaplode to the frontage of the existing Lincolnshire co-op food store and fuel filling station, which is served by a public footway to the site's frontage with supporting pedestrian crossing point and a pedestrian refuge across High Road, within close proximity to the location of the Inpost parcel locker and adjacent to the exit of the food store/fuel filling station.

The footway presently serves nearby amenities and the village of Whaplode, and it is not unreasonable to say that this location is subject to high footfall and can be congested due to the proximity of the pedestrian crossing facility located on metres away on High Road, this being the A151.

The provision of the InPost parcel locker situated directly adjacent to the adopted highway proposed in this application, would unacceptably have an impact and increase the incidence of pedestrians meeting vehicles parked on the footway, including those on motorised mobility units, wheelchairs, pushchairs/prams, and more vulnerable users, due to the limited width between the parked vehicles and the InPost parcel locker, having to take unreasonable manoeuvres in order to pass one another, resulting in the cumulative detrimental impact upon highway safety to all users.

The same can be said for drivers who park at this location to drop off or pick up parcels, including delivery drivers will do so inappropriately and become a conventional habit, which can already be seen from the recent photographs, causing delays for other road users as they are unable to pass or taking unreasonable manoeuvres, especially where visibility is reduced at the pedestrian refuge and the egress of the food store/fuel filling station.

Therefore, we suggest that the applicant makes further consideration of an alternative location for the InPost parcel locker further within the site, where vehicles can park safely in the existing allocated parking spaces without compromising highway safety as currently, the proposed would fail to provide safe and suitable access for all people and an unacceptable impact upon highway safety, contrary to the guidance provided within the National Planning Policy Framework document, Paragraphs 114.

Public Representation

This application has been advertised in accordance with the Development Procedure Order and the Council's Statement of Community Involvement. In this instance, 2 letters of objection have been received.

These can be summarised as follows:

Obstruction and Highway Safety Concerns: The locker's proximity to the pavement encourages vehicles to frequently stop or park illegally while users collect or deposit parcels, obstructing pedestrian flow and reducing visibility for drivers entering or exiting the Co-op car park, as demonstrated by photos. This causes an interruption to the safe and free flow of traffic both to vehicles and pedestrians. The driver comes to empty/fill the lockers he parks his van half on the path and main road in front of the lockers. There is a pedestrian crossing with bollards in the middle of the road extremely close to the lockers, due to where the van is parked vehicles which are travelling on the main road have to pass on the opposite side of the road, this also makes it extremely difficult for anyone who is wanting to exit either petrol stations.

It is also dangerous for users as they have to stand back from the opening locker to prevent getting hit by it leaving little room on the path making it awkward for anyone using the path with a pushchair or wheelchair as the path is narrower.

Visual Amenity: Proposed locker is a visual intrusion given its bright and industrial appearance which is out of place with the CoOp and the character and visual amenity of the locality.

Residential amenity: The locker is accessible 24/7, generating late-night noise and disturbance to local residents.

Availability of Alternative Locations: There are other suitable locations in the car park or rear delivery zone that could accommodate such a unit without impacting public footpaths or sightlines.

Evaluation

Section 38 (6) of the Planning and Compulsory Purchase Act 2004, as amended, requires that the Local Planning Authority makes decisions in accordance with the adopted Development Plan, unless material considerations indicate otherwise.

In this case, the adopted South East Lincolnshire Local Plan 2011-2036, adopted March 2019, forms the development plan for the District, and is the basis for decision making in South Holland. The relevant development plan policies are detailed within the report above.

The policies and provisions set out in the National Planning Policy Framework (revised December 2024, updated February 2025) are also a material consideration in the determination of planning applications, alongside adopted Supplementary Planning Documents.

Furthermore, where a Neighbourhood Plan has been adopted, this alongside the adopted Local Plan, forms part of the Development Plan for the District, and must be considered when assessing development proposals. In this instance, no relevant neighbourhood plans have been adopted.

Key Planning Considerations

The main issues and considerations in this case are:

- Principle of Development and Sustainability
- Visual Impact
- Impact on Amenity
- Highway Safety and Parking
- Flooding Risk Considerations
- Climate Change
- Biodiversity Net Gain

Principle of Development and Sustainability

The South East Lincolnshire Local Plan (2019) sets out the settlement hierarchy in respect of delivering sustainable development that meets the social and economic needs of the area whilst protecting and enhancing the environment; in order to provide enough choice of land for housing to satisfy local housing need, whilst making more sustainable use of land and to minimise the loss of high-quality agricultural land by developing in sustainable locations and at appropriate densities.

Policy 1 of the South East Lincolnshire Local Plan (2019) sets out a spatial strategy for delivering sustainable development across South East Lincolnshire to 2036. Policy 1 (Spatial Strategy) expresses this sustainable framework of settlements, ranking the settlements deemed to be most sustainable in descending order.

The most sustainable locations for development are situated within the 'Sub-Regional Centres', followed by 'Main Service Centres'. Lower down the hierarchy in respect of sustainable development are areas of limited development opportunity including 'Minor Service Centres', with areas of development constraint comprising 'Other Service Centres and Settlements'. The countryside is at the bottom of the settlement hierarchy and represents the least sustainable location.

Policy 1 (Spatial Strategy) of the South East Lincolnshire Local Plan (2019) indicates that within 'Minor Service Centres', development will be permitted that supports their role as a service centre

for the settlement itself, helps sustain existing facilities or helps meet the service needs of other local communities. This policy goes on to detail that development within 'Minor Service Centres' will normally be limited to Allocated and Committed sites and infill.

The application site in this instance is within Whaplode, a 'Minor Service Centre', and lies within the defined settlement boundaries as detailed by Policy 1.

As such, the proposal is considered to be in accordance with the requirements of Policy 1 of the South East Lincolnshire Local Plan (2019) when viewed in principle. This is subject to the assessment against site specific criteria; including (but are not limited to) the impact of the proposal on the character or appearance of the area, impact on the residential amenities of neighbouring occupiers, impact on highway safety and flood risk, which are discussed in turn as follows.

Visual Impact

Paragraph 135 of the NPPF states that new development should function well and add to the overall quality of the area and should be visually attractive as a result of good architecture and appropriate landscaping.

Policy 2 of the Local Plan outlines sustainable development considerations for development proposals, providing a framework for an operational policy to be used in assessing the sustainable development attributes of all development proposals.

Proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to, amongst other matters size, scale, layout, density and impact on the amenity, trees, character and appearance of the area and the relationship to existing development and land uses.

Policy 3 accords with the provisions of Section 12 of the NPPF, in that it requires development to comprise good design; identifying issues that should be considered when preparing schemes so that development sits comfortably with, and adds positively to, its historically-designated or undesignated townscape or landscape surroundings.

Policy seeks high quality and inclusive design and layout in new development requiring, the appropriate treatment of facades to public places, including shop frontages to avoid visual intrusion by advertising, other signage, security shutters, meter boxes and other service and communication infrastructure.

Whilst the proposal does have a functional appearance, it is relatively small and read within the surrounding context of being adjacent to a fuel filling station. It is not considered, even when lit, that it would be unduly obtrusive such to be detrimental to the character and appearance of the area.

Taking account of the design, scale and nature of the development, as detailed above, the proposal would not cause an adverse impact to the character or appearance of the area.

Impact on Amenity

Paragraph 135 of the NPPF states that development should create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Policies 2 and 3 of the Local Plan set out that residential amenity and the relationship to existing development and land uses is a main consideration when making planning decisions.

Proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to amongst other matters impact on the amenity, access and vehicle generation levels.

The nearest dwellings are opposite the site.

The comings and goings of people picking up parcels is unlikely to generate a noticeable increase in activity above and beyond that generated by the commercial use of the filling station and the shop. The Co-op is currently open from 7am to 10pm and there does not appear to be any planning restrictions on that use. However collecting parcels could occur 24/7 which could result in the stopping and starting of vehicles and doors slamming during the night time. This does count against the proposal but needs to be factored against the noise of the road.

It is recognised that the proposal includes CCTV which is likely to discourage anti-social behaviour.

As detailed above, the proposal would result in some minor adverse impact to residents as a result of the potential for overnight noise but not so much that would warrant a refusal of the application.

Highway Safety and Parking

Paragraphs 115 and 116 of the NPPF sets out that development should provide safe and suitable access for all users and that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe, following mitigation.

Policy 2 of the Local Plan sets out that proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to: the relationship to existing development and land uses; access and vehicle generation levels; the capacity of existing community services and infrastructure.

Policy 3 seeks high quality and inclusive design and layout in new developments requiring consideration to be given to crime prevention and community safety.

Policy 36 of the Local Plan, in conjunction with Appendix 6, sets out minimum vehicle parking standards.

Whilst there are no yellow lines to the front of the site on High Road, parking directly by the lockers would not be possible without blocking either the carriageway or footway or both.

There are parking spaces within the Co-op site where cars and the delivery vans could park, however it appears from representations provided that cars and vans are stopping half on and half off the carriageway. This is more likely to occur if someone is trying to quickly collect a parcel, or they think it could be heavy or because they do not wish to cross the filling station forecourt. However, the delivery van driver seems to also be parking there and depending on the number of lockers that need to be filled and the ease of inputting codes, this could take some time.

The short term parking of vehicles directly adjacent to the lockers obstructs the pavement, obstructs visibility existing the petrol filling station and shop. Furthermore, the proximity to the pedestrian refuge means that cars could not overtake the waiting vehicle unless they go onto the other side of the road or wait.

The applicants were contacted to see if they could find an alternative and have responded to say that this has not been possible. They would be happy to provide a sign to say 'no parking' however it is considered that human nature would still prevail and that unlawful stopping would continue.

Consequently it is considered that there would be an unacceptable impact on highway safety for all users contrary to Policies 2 and 3 of the South East Lincolnshire Local Plan and Paragraph 116 of the NPPF.

Flooding Considerations

Section 14 of the National Planning Policy Framework (December 2024) explains that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere".

This goes on to state, within Paragraph 172, that all plans "should apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk and the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test as set out below".

Paragraph 173 of the National Planning Policy Framework (December 2024) goes on to state that "A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding", by following the steps set out within Section 14 of the National Planning Policy Framework (December 2024).

Paragraph 174 goes on to state that, "Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding", with the strategic flood risk assessment being the tool to demonstrate this.

Paragraph 175 details that "The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)".

If, following the application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in Zones with a lower probability of flooding, the Exceptions Test can be applied if appropriate.

The site lies within Flood Zone 3 of the Environment Agency's Flood Maps. These have been created as a tool to raise awareness of flood risk with the public and partner organisations, such as Local Authorities, Emergency Services and Drainage Authorities. The Maps do not take into account any flood defences.

The South East Lincolnshire Strategic Flood Risk Assessment (SFRA) provides an overview of how flood risk has been considered in shaping the proposals of the Local Plan; including the spatial strategy and the assessment of housing and employment sites. Policy 4 of the South East Lincolnshire Local Plan (2019) is clear in that "Development proposed within an area at risk of flooding (Flood Zones 2 and 3 of the Environment Agency's flood map or at risk during a breach or overtopping scenario as shown on the flood hazard and depths maps in the Strategic Flood Risk Assessment) will be permitted" in instances where specific criteria is met.

It is worth noting that large parts of the district of South Holland lie within Flood Zone 3. It is therefore necessary to use the refined flood risk information (Hazard and Depth maps) within the South East Lincolnshire Strategic Flood Risk Assessment (2017) as a basis to apply the sequential test.

A flood risk assessment was submitted with the application. It concludes that the parcel locker constitutes minor development (just 3.5sqm), is a 'less vulnerable' use, and will have no impact on the risk of flooding at the site, or elsewhere. Nor would it increase the risk from flooding to users of the locker. It is therefore acceptable in terms of its flood risk impact. The proposal accords with Policies 2, 3 and 4 of the South East Lincolnshire Local Plan (2019) and the intentions of the National Planning Policy Framework (December 2024) in this regard.

Impacts of Climate Change

In respect of the climate emergency, Section 14 of the National Planning Policy Framework (December 2024) states that new development should be planned for in ways that: "avoid increased vulnerability to the range of impacts arising from climate change" with care taken to ensure that, where development is brought forward in areas which are vulnerable, "risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and help to reduce greenhouse gas emissions, such as through its location, orientation and design".

Paragraph 166 of the National Planning Policy Framework (December 2024) details that when determining planning applications, Local Planning Authorities should "expect new development to: a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption", with 'significant weight' given to "the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights)".

The application provides a statement which argues the sustainability credentials of in-post lockers.

Whilst some of the points made might be questionable, it is not considered that the proposal gives rise to greater energy consumption, or emissions nor would it increase the vulnerability of impacts from climate change. The proposal would therefore be in accordance with Policy 31 of the South East Lincolnshire Local Plan (2019) and Section 14 of the National Planning Policy Framework (December 2024).

Biodiversity Net Gain

Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) requires developers to deliver a minimum of 10% Biodiversity Net Gain using standardized biodiversity units measured by statutory biodiversity metrics. This is often referred to as the mandatory requirements for Biodiversity Net Gain.

"Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits".

The biodiversity gain condition is a pre-commencement condition. This relates to a condition that seeks, once planning permission has been granted, a Biodiversity Gain Plan that must be submitted and approved by the planning authority before commencement of the development, alongside the need to submit a Habitat Management and Monitoring Plan.

The effect of Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission is deemed to have been granted subject to the "biodiversity gain condition". The effect of this "biodiversity gain condition" is that development granted by this notice must not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan, or
- (c) the development is exempt from the biodiversity gain condition.

For applications that are submitted prior to the introduction of this requirement, the development would exempt from the mandatory 10% requirement and as such, the Biodiversity Gain Condition would not apply. However, this application was submitted following the introduction of this legislation.

The proposal falls within the de-minimis exemption under the Biodiversity Gain Requirements (Exemptions) Regulations 2024 as it impacts less than 25sqm of onsite habitat and less than 5 meters of linear habitat.

Planning Balance

As detailed above, Section 38 (6) of the Planning and Compulsory Purchase Act 2004, as amended, requires that the Local Planning Authority makes decisions in accordance with the adopted Development Plan, unless material considerations indicate otherwise. Whilst the benefit of InPost lockers is not disputed in the right locations, the siting of this set of lockers would give rise to an unacceptable impact to users of the highway impacting not only the safe and free flow of traffic and pedestrian movement but would also increase the potential for accidents.

Additional Considerations

Public Sector Equality Duty

In making this decision the Authority must have regard to the public sector equality duty (PSED) under s.149 of the Equalities Act. This means that the Council must have due regard to the need (in discharging its functions) to:

A. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act

B. Advance equality of opportunity between people who share a protected characteristic and those who do not. This may include removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the special needs of those with a protected characteristic; encouraging participation in public life (or other areas where they are underrepresented) of people with a protected characteristic(s).

C. Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The PSED must be considered as a relevant factor in making this decision but does not impose a duty to achieve the outcomes in s.149. It is only one factor that needs to be considered, and may be balanced against other relevant factors.

It is not considered that the recommendation in this case will have a disproportionately adverse impact on a protected characteristic.

Human Rights

In making a decision, the Authority should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as South Holland District Council to act in a manner that is incompatible with the European Convention on Human Rights. The Authority is referred specifically to Article 8 (right to respect for private and family life) and Article 1 of the First Protocol (protection of property).

It is not considered that the recommendation in this case interferes with local residents' right to respect for their private and family life, home and correspondence, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general public interest and the recommendation is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

Conclusion

Taking into consideration matters set out above, the proposal is considered to be contrary to Policies 2 and 3 of the Local Plan, in addition to the identified sections contained within the National Planning Policy Framework (NPPF) (December 2024). On this basis, the proposal is recommended for refusal.

Recommendation

Based on the assessment detailed above, it is recommended that the proposal should be refused under delegated authority.