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03 March 2017

Central Lincolnshire Local Plan Team  
c/o North Kesteven District Council  
District Council Offices  
Kesteven Street  
Sleaford  
NG34 7EF

Dear Sir / Madam

**Proposed Main Modifications Consultation – Central Lincolnshire Local Plan  
Representations on behalf of Standard Life Investments Ltd**

These representations are submitted on behalf of Standard Life Investments Ltd owners of St Marks Retail Park. An outline planning application with all matters reserved for the comprehensive redevelopment of the retail park comprising a retail-led mixed use scheme was submitted in February 2017 (application reference 2017/0096/OUT).

The main modifications document proposes the following change to **Policy LP6** (MM/16):

Towards the end of the Policy, amend paragraph as follows:

“Development proposals for ~~retail and/or other~~ **main** town centre uses in out-of-centre and edge-of-centre locations will be required to demonstrate their suitability through a sequential site test in line with the NPPF. In addition, a robust assessment of impact on nearby centres will be required for any retail, **leisure or office** proposal that **is located**:

- a. ~~Provides a floorspace that is greater than 500 m<sup>2</sup> gross unless it is located within 1km of Lincoln city centre boundary~~ **primary shopping area** and is greater than 2,500 m<sup>2</sup> ~~whereby a 2,500m<sup>2</sup> threshold applies; or~~
- b. Is located within 500 m of the boundary of a District Centre and is greater than 300 m<sup>2</sup> gross; or
- c. Is located within 500 m of the boundary of a Local Centre and is greater than 200 m<sup>2</sup> gross; or
- d. Is located in any other location not covered by a-c above and is greater than 500 m<sup>2</sup>.**

The effect of the inclusion of criterion (d) is that development that is located in centres that proposes more than 500 sq m of retail, leisure or office floorsapce is required to provide an impact assessment. Whilst this may be an unintended consequence of the redrafting of the policy it could potentially cause issues for in-centre development over the course of the plan period.

For example, an application for 2,000 sq m of retail floorspace in an out-of-centre location but within 1km of the Lincoln primary shopping area by virtue of criterion (a) would not be require an impact assessment. An application comprising 2,000 sq m of retail floorspace in the Lincoln primary shopping area would need to be supported by an impact assessment by virtue of criterion (d).

### **Not Consistent with National Policy**

Main Modification MM/16 is not consistent with national policy which states at paragraph 26 that:

*“When assessing applications for retail, leisure and office developments outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set threshold (if there is no locally set threshold, the default threshold is 2,500 sq m).”*

National policy does not require an impact assessment for in-centre development. It is therefore suggested that further clarity is provided with regard to the application of this policy to remove any ambiguity in the future. The following change to **Policy LP6** is made:

*“Development proposals for main town centre uses in out-of-centre and edge-of-centre locations will be required to demonstrate their suitability through a sequential site test in line with the NPPF. In addition, a robust assessment of impact on nearby centres will be required for any edge-of-centre or out-of-centre retail, leisure or office proposal that is located:*

- a. Within 1km of Lincoln primary shopping area and is greater than 2,500 m<sup>2</sup> or*
- b. ~~Is located~~ within 500 m of the boundary of a District Centre and is greater than 300 m<sup>2</sup> gross; or*
- c. ~~Is located~~ within 500 m of the boundary of a Local Centre and is greater than 200 m<sup>2</sup> gross; or*
- d. ~~Is located~~ in any other location not covered by a-c above and is greater than 500 m<sup>2</sup>.”*

The proposed amendments will provide clarity moving forwards and prevent ambiguity in terms of the application of the policy. If you have any queries please do not hesitate to contact me.

Yours faithfully



**Penny Moss**  
**Montagu Evans**