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Principal Planning Officer
Development & Growth
South Kesteven District Council
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Our Ref: 28398/A5
16th June 2021

Dear Phil,

DOWNTOWN GRANTHAM DESIGNER OUTLET – ENVIRONMENTAL STATEMENT ADDENDUM REVIEW

In February 2021, Barton Willmore undertook an independent review (on behalf of South Kesteven District Council (SKDC)) of the 2020 Environmental Statement (ES) Addendum in relation to the outline planning application (Planning ref: S17/255) for a Designer Outlet retail development on land at Gonerby Moor, Grantham. The review was undertaken in accordance with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)¹, and criteria issued by the Institute of Environmental Management and Assessment. The review is included as Appendix A of this letter.

The February 2021 review (Appendix A) identified the requirement for the applicant to provide further information and clarification in accordance with Regulation 25 of the 2017 EIA Regulations, including:

- To provide construction phasing information for the Proposed Development and clarify how it has affected (or otherwise) technical assessments;
- To identify and assess interactive effects, or justify why they are not anticipated;
- To provide a shorter and more concise Non-technical Summary in non-technical language;
- SKDC to confirm its scope of the ES Addendum is acceptable;
- Highways Authority to confirm if 2017 baseline data is acceptable and applicant to provide clarification why these data are considered valid to support the EIA;
- To provide clarification on the significance of effects (including Chapter 7 Socio-Economic/Retail Impact); and
- To provide a complete reference list.

A subsequent Response to the Review by Barton Willmore on the 2020 ES Addendum was provided by the applicant in February 2021 (Appendix B). Barton Willmore have undertaken a review of the applicant's response and consider that this addresses the requirements for further information and clarification as listed in Appendix A and above. No further action is therefore required.

¹ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 SI No.571) (as amended in 2018 by SI No. 695 and in 2020 by SI No.505)



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Yours sincerely



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APPENDIX A
BARTON WILLMORE ES ADDENDUM REVIEW REPORT

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
ENVIRONMENTAL PLANNING

HERITAGE
GRAPHIC COMMUNICATION
PUBLIC ENGAGEMENT
DEVELOPMENT ECONOMICS



Downtown Grantham Designer Outlet Environmental Statement Addendum Review

February 2021

Downtown Grantham Designer Outlet Environmental Statement Addendum Review

Prepared on behalf of South Kesteven District Council

Job Number:	28398/A5/ES Review	
Status:	Draft	Final
Issue/Rev:	01	02
Date:	January 2021	February 2021
Prepared by:	NP	NP
Checked by:	LW	LW

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1 INTRODUCTION

- 1.1 This document sets out the findings of an independent review (undertaken on behalf of South Kesteven District Council (SKDC)) of the Downtown Grantham Designer Outlet Environmental Statement Addendum July 2020 ('hereafter referred to as the 2020 ES Addendum').

Background

- 1.2 An outline planning application (ref: S17/255)¹ was submitted to SKDC in November 2017 for development at Gonerby Moor, Grantham, Lincolnshire. The planning application sought permission for:

'Outline planning permission for the erection of a Designer Outlet Centre of up to 20,479 sqm (GEA) of floorspace comprising retail units (A1), restaurants and cafes (A3), and storage. Additional large goods retail (5,574 sqm GEA), garden centre (5,521 sqm GEA) and external display area for garden centre (1,393 sqm), tourist information and visitor centre, training academy, leisure unit and offices. Demolition of existing garden centre and sales area and existing warehouse. Improvements to existing Downtown Grantham store elevations. Reconfigured car parking and provision of new multi-storey car park. Increased coach parking. Access improvements, drainage works, hard and soft landscaping and all ancillary works. All matters reserved with the exception of access.'

- 1.3 The planning application was supported by an Environmental Statement (ES) (hereafter referred to as the '2017 ES'). Further information was submitted in support of the ES in March 2018 (the '2018 ES Addendum').
- 1.4 The planning application was subsequently approved subject to conditions and s106 agreement² by the SKDC's planning committee on 5th February 2019. The s106 agreement has now been finalised however following the adoption of the South Kesteven Local Plan 2011-2036³ on 30th January 2020, Officers consider that, procedurally the application should be returned to Committee. In advance of this, a detailed review of the 2017 ES and 2018 ES Addendum has been undertaken by the applicant to determine if the assessments are considered to date and whether further environmental assessment was required. The updates to the 2017 ES and 2018 ES Addendum are provided in a 2020 ES Addendum.

¹ With all matters reserved except access

² Mechanism which make a development proposal acceptable in planning terms and which are focussed on site specific mitigation of the impact of development

³ South Kesteven District Council. SKDC Local Plan 2011-2036. 2020

Approach

- 1.5 This review of the Downtown Grantham 2020 ES Addendum has been undertaken in accordance with the requirements of the *Town and Country Planning (Environmental Impact Assessment) 2017 Regulations (as amended)*⁴.

Structure of the Review Report

- 1.6 The structure of this review report is as follows:
- Chapter 1 sets out an introduction to the report, including the purpose and background;
 - Chapter 2 sets out the methodology used in the review of the 2020 ES Addendum;
 - Chapter 3 contains the tables comprising the 2020 ES Addendum Review; and
 - Chapter 4 provides the conclusions.

⁴ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 SI No.571) (as amended in 2018 by SI No. 695 and in 2020 by SI No.505)

2 ENVIRONMENTAL STATEMENT REVIEW METHODOLOGY

2.1 This review of the Downtown Grantham Designer Outlet 2020 ES Addendum is based on the requirements of the 2017 EIA Regulations (as amended), as set out above, and uses a review template produced by the Institute for Environmental Management and Assessment (IEMA) for assessing the quality of Environmental Statements as part of its Quality Mark⁵ process. Barton Willmore is a registrant of the IEMA Quality Mark. The IEMA method involves reviewing the following criteria:

- EIA Regulatory Compliance;
- EIA Context and Influence;
- EIA Content; and
- EIA Presentation.

2.2 Given that a review of an ES Addendum has been undertaken, rather than an ES, any elements of the template which are not applicable have been indicated in the review tables below.

Limitations

2.3 There are a number of limitations of this review identified as follows:

- The review has been desk based and has not involved a site visit so statements about the baseline and existing site description and context are taken as correct;
- The review has not taken account of additional information that may have been supplied to SKDC by the applicant but has not been made available;
- It is not the purpose of the review to provide an in-depth technical check of the individual specialist discipline areas. This means that the review does not:
 - Check the actual survey work undertaken was fully executed according to the cited methods;
 - Review the consultation undertaken in depth to allow a check of whether this has been included in methods or assessments and addresses consultees concerns adequately; or
 - Check whether the application of the methods used in qualification or quantification of impacts is correct and the results are accurate and as those reported;
- Compliance with the EIA Regulations has been reviewed but the authors are experienced EIA practitioners rather than legal professionals.

⁵ Registrants to the IEMA Quality Mark have had their work assessed and found to be committed to excellence in EIA.

Reports Reviewed

2.4 The following report has been included in the review:

- Downtown Grantham Designer Outlet Environmental Statement Addendum (July 2020) including Non-Technical Summary Addendum and Technical Appendices in so far as data within them are relied on by the assessments within the ES chapters i.e. the review does not provide assurance that the technical details within the appendices are correct.

3 2020 ES ADDENDUM REVIEW TABLES

EIA REGULATORY COMPLIANCE

TOPIC	Yes/No/Non Applicable	COMMENTS	Action Required
EIA Process			
<p>A) Does the ES contain a clear section, or sections, providing a description of the development comprising information on the site, design and size of the development during construction and operation?</p>	<p>N</p>	<ul style="list-style-type: none"> • 2020 ES Addendum Chapter 3 (page 6) Application Site notes that the location and physical site context of the Proposed Development remains unchanged from that assessed as part of the 2017 ES and 2018 ES Addendum. • 2020 ES Addendum Chapter 4 Proposed Development provides description of the development (as amended). The chapter clarifies that the only amendment to the Proposed Development from that assessed as part of the 2017 ES and 2018 ES Addendum is in the apportionment of the proposed B1 offices. The Proposed Development previously apportioned 5,251 sqm of B1 office across B1 offices (2,796 sqm) and B1 start-up offices (2,455 sqm). The Proposed Development seeks to remove this apportionment across the total B1 office floorspace of 5,251 sqm. The amount of office floorspace sought therefore remains as previously proposed and is also located as previously planned, above the Downtown Grantham Garden Centre and the Downtown@Home retail unit. • 2020 Addendum Chapter 4 also makes reference to the previous Parameter Plans which formed this basis of the ES assessment. The 4 plans provide parameters in respect of land use, building heights, circulation areas and landscaping areas and are included in Appendix 4.1. • There is a general lack of information concerning the construction programme. 2020 ES Addendum Chapter 7 (Socio-Economics/Retail Impact) indicates that the proposed development is envisaged to be delivered in a single phase, over a period of 30 months (2.5 years) and be completed by 2022/2023. The chapter also indicatives separately (page 23) that it will be completed by 2023, so is not clear. No other technical ES Chapters include information on the indicative construction programme. There is no detail in the introduction chapters of the ES Addendum on the construction programme, to advise if this has been updated from the 2017 ES and 2018 ES Addendum and implications for the assessment of construction effects. There is also no indication if the indicative construction programme and activities and working hours would be 	<ul style="list-style-type: none"> • Applicant to provide construction phasing information for the Proposed Development and clarify how it has affected (or otherwise) technical assessments

TOPIC	Yes/No/Non Applicable	COMMENTS	Action Required
		influenced by the Covid 19 pandemic.	
B) Does the ES contain a section, or sections, that outline of the main alternatives studied by the developer and an indication of the main reasons for his choice, taking into account the environmental effects?	N/A	<ul style="list-style-type: none"> • 2020 ES Addendum Chapter 6 considered the Site Selection and Consideration of Alternatives. The chapter states that the alternatives considered were set out in the 2017 ES and the 2018 ES Addendum. • The Proposed Development has remained largely as previously assessed - the only change is the apportionment of the proposed B1 offices and therefore no updated assessment of the design alternatives has been provided. 	• None
C) Does the ES contain a clear section, or sections, that provides the data required to identify and assess the main effects which the development is likely to have on the environment?	Y	<ul style="list-style-type: none"> • The 2020 ES Addendum contains 14 addendum assessments: Chapter 7 Socio Economics/Retail Impact, Chapter 8 Landscape and Visual, Chapter 9 Ecology, Chapter 10 Water and Drainage, Chapter 11 Ground Conditions, Chapter 12 Transport and Access, Chapter 13 Air Quality, Dust and Odour, Chapter 14 Noise and Vibration, Chapter 15 Utilities infrastructure and Waste, Chapter 16 Lighting, Chapter 17 Heritage, Chapter 18 Climate Change, Chapter 19 Human Health and Chapter 20 Accidents and Disasters. • All chapters set out if the likely significance of environmental effects arising from the Proposed Development remains unchanged from the 2017 ES and 2018 ES Addendum. Consideration has been given to any planning and legislative changes, the validity of the baseline studies reported within each technical chapter, the significance of effects, design and mitigation, residual effects and cumulative effects. 	• None
D) In the light of the development being assessed has the ES identified, described and assessed effects on: - Population	Y	<ul style="list-style-type: none"> • 2020 ES Addendum Chapter 7 Socio Economics/Retail Impact addresses effects in terms of employment, accessibility and social inclusion and economic factors related to population. • The chapter appears to provide a repeat assessment of the Proposed Development rather than an Addendum assessment. Consequently, it is not clear if any construction and operational effects are considered different to those identified in the 2017 ES and the 2018 ES Addendum. 	• None
- Human Health	Y	<ul style="list-style-type: none"> • 2020 ES Addendum Chapter 19 assesses if there has been any change to the likely significant effects on human health. 	• None
- Biodiversity	Y	<ul style="list-style-type: none"> • 2020 ES Addendum Chapter 9 assesses if there has been any change to the likely significant effects on Ecology. 	• None

TOPIC	Yes/No/Non Applicable	COMMENTS	Action Required
- Land (including land take)	Y	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 8 Landscape and Visual Impact Assessment and Chapter 11 Ground Conditions assess if there has been any change to the likely significant effects. 	<ul style="list-style-type: none"> None
- Soil	Y	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 11 assesses if there has been any change to the likely significant effects on Ground Conditions. This includes an assessment of risk posed to surface soils. 	<ul style="list-style-type: none"> None
- Water	Y	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 10 assesses if there has been any change to the likely significant effects on Water and Drainage. 	<ul style="list-style-type: none"> None
- Air	Y	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 13 assesses if there has been any change to the likely significant effects in terms of Air Quality, Dust and Odour. 	<ul style="list-style-type: none"> None
- Climate (example greenhouse gas emissions, impacts relevant to adaptation)	Y	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 18 assesses if there has been any change to the likely significant effects on Climate Change. 	<ul style="list-style-type: none"> None
- Material Assets	Y	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 17 assesses if there has been any change to the likely significant effects on Heritage. 	<ul style="list-style-type: none"> None
- Cultural Heritage	Y	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 17 assesses if there has been any change to the likely significant effects on Heritage. 	<ul style="list-style-type: none"> None
- Landscape	Y	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 8 assesses if there has been any change to the likely significant effects in terms of Landscape and Visual. 	<ul style="list-style-type: none"> None
E) Does the ES attempt to set out the interaction between the topics?	N	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 21 Summary (page 128) states that each topic author of the ES has reviewed the baseline and level of effects that has been reached for other chapters - in particular those that share a common resource e.g. the author of the Transport & Access Chapter has reviewed and inputted into the Water and Drainage Chapter, whilst the author of the Water & Drainage Chapter has inputted into the Utilities, Infrastructure & Waste Chapter. It is not clear how this has been done. It states that this iterative process has sought to minimise the level of effects across all of the environmental aspects through suitable design and mitigation approaches. The chapter concludes that the level of intra project effects would not result in any significant level of effects. It is not clear however how this conclusion has been reached as there no assessment of interactive affects in the main body of the 2020 ES Addendum. 	<ul style="list-style-type: none"> Applicant to identify and assess interactive effects, or justify why they are not anticipated

TOPIC	Yes/No/Non Applicable	COMMENTS	Action Required
F) Does the ES contain a section, or sections, that describe the likely significant effects of the proposed development on the environment, including as reasonably required: direct, indirect, secondary, cumulative, short, medium, long-term, permanent and temporary, positive and negative effects?	Y	<ul style="list-style-type: none"> Each addendum chapter describes if there has been any change to the likely significant effects and most chapters address any additional affects direct/indirect, permanent, temporary, cumulative, positive and negative effects. 	<ul style="list-style-type: none"> None (but see earlier comment on interactive effects, which are a type of cumulative effect)
G) Does the ES contain a clear section, or sections, that provides a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects?	Y	<ul style="list-style-type: none"> The 2020 ES Addendum chapters include design and mitigation measures. Any additional required over and above that identified with the submitted 2017 ES and 2018 ES Addendum is identified. The 2020 ES Addendum Chapter 20 (page 127) collates all the mitigation measures set out in the ES for clarity. This includes primary mitigation measures (design and mitigation measures embedded within the design proposals) and secondary mitigation measures, which have been agreed with SKDC and other relevant bodies through the mechanisms of planning conditions and S106 agreement. A summary of mitigation measures to be applied at the Construction and Operational Stages of the ES is also included from page 129 of the 2020 ES Addendum. 	<ul style="list-style-type: none"> None
H) Has a Non-Technical Summary been produced containing an outline of the information set out above?	N	<ul style="list-style-type: none"> An NTS Addendum is provided which sets out a detailed summary of the project and topic-based addendum assessments. The NTS should be shorter so it is accessible to all. At 83 pages in length, it is too long for the non-technical reader. The NTS uses overly complex terms and language, such as "called in", "s106", "receptors", "leakage", "1 in 100 year plus climate change event". Acronyms are not defined – e.g. HCA, GEA, NCA, Outline planning application should be explained/defined. 	<ul style="list-style-type: none"> Provide shorter and more concise NTS in non-technical language
I) Does the ES contain a section, or sections, that outline any difficulties encountered by the developer in compiling the information presented in the ES?	Y	<ul style="list-style-type: none"> Any limitations (specific to additional baseline data) have been provided in individual Addendum chapters where applicable. The 2020 ES Addendum Chapter 9 (Ecology) discusses limitations of additional ecological survey data. ES Addendum Chapter 12 (Transport) also discusses limitations of baseline data sources. Some updated baseline survey information does appear to have been gathered during the Covid 19 pandemic (2020 ES Addendum Chapter 9: Ecology states that an updated ecological appraisal field survey was undertaken on 6th April 2020), but there is no indication if this was limited in any way by the Covid 19 pandemic. 	<ul style="list-style-type: none"> None

EIA CONTEXT AND INFLUENCE

TOPIC	Yes/No/Non Applicable	COMMENTS	Action Required
A) Scoping			
i) Has the ES clearly stated what environmental topics will be addressed and how this decision was reached?	N/A	<ul style="list-style-type: none"> The 2020 ES Addendum addresses all topics scoped in to the 2017 ES. Additional topics introduced by the 2017 EIA Regulations (as amended): human health, accidents and disasters and climate (Schedule 4 of the 2017 EIA Regulations (as amended) requires, where significant, an assessment of the <i>impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change</i>), which were not assessed in the 2017 ES but which were assessed as part of the 2018 Addendum, have also been addressed as part of the 2020 ES Addendum. The 2020 Addendum considers whether the previous assessments undertaken are up to date. 	• None
ii) Are the main sensitive receptors and their locations clearly identified with an explanation of the risks posed from the development?	N/A	<ul style="list-style-type: none"> No new receptors (over and above those identified in the 2017 ES and 2018 Addendum) have been identified in the 2020 ES Addendum 	• None
iii) Does the ES identify the environmental topics, raised during the scoping process, that will not be assessed and explain why they are not being considered further?	N/A	<ul style="list-style-type: none"> The 2020 ES Addendum considers all topics scoped in to the 2017 ES as well as those assessed in the 2018 ES Addendum – the 2020 Addendum considers whether the previous assessments undertaken are up to date. 	• None
iv) For those environmental topics scoped into the EIA, is it clear that the assessment has focussed on sub-issues relevant to the proposed development effects on each topic?	N/A	<ul style="list-style-type: none"> As above, the topics scoped in to the 2017 ES and 2018 ES Addendum and relevant sub-issues have been considered in the 2020 ES Addendum. 	• None
B) Alternatives, including iterative design			
i) Does the ES set out the main alternatives / iterations that were considered at different points during the development of the proposal?	N/A	<ul style="list-style-type: none"> Chapter 6 of the 2020 ES Addendum is Site Selection and Consideration of Alternatives). The chapter states that the alternatives considered were set out in the 2017 ES and the 2018 ES Addendum. 	• None

TOPIC	Yes/No/Non Applicable	COMMENTS	Action Required
ii) Are the main reasons, environmental or otherwise, for the selection of the proposal over distinct alternatives and design iterations easily identifiable?	N/A	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 6 (page 14) states that details on the environmental reasoning behind the alternatives considered were set out in the 2017 ES and the 2018 ES Addendum. In considering alternative designs, the Proposed Development has remained largely as previously assessed. The only change is the apportionment of the proposed B1 offices, therefore no updated assessment of the design alternatives has been provided. The chapter states that the Retail Impact Assessment (RIA) of the 2017 ES and subsequent RIA Addendum have considered whether there are any sequential preferable sites for the Proposed Development. The sequential test has been re-run as part of the updated RIA and includes the office element of the Proposed Development alongside the retail and leisure elements. The sequential test has demonstrated that there are no alternative sites that are available and suitable occupying a sequentially preferable location to the site. environmental information is provided. 	• None
iii) Does the ES clearly indicate how the EIA process, environmental effects and consultee responses influenced the iterative design process that led to the proposed development?	N/A	<ul style="list-style-type: none"> As above, the environmental reasoning behind the alternatives considered were set out in the 2017 ES and the 2018 ES Addendum. The Proposed Development has remained largely as previously assessed and there has been no further consultee feedback which would have influenced the design process. 	• None
C) Consultation			
i) Does the description of any consultation include an indication of those contacted, including statutory and non-statutory consultees, and the public?	N	<ul style="list-style-type: none"> Statutory consultation was undertaken as part of the original 2017 ES. Consultation by SKDC comprised the majority of the consultation. There is no indication of subsequent consultation undertaken as part of the 2020 ES Addendum assessment. Addendum Chapter 12 Transport makes reference to previously consultation with Lincolnshire CC and highways England (as part of the 2017 ES) to agree trip rates, but that these would not have changed so no further consultation required. Chapter 2 (Methodology) identifies additional cumulative schemes which have come forward since the 2017 ES and 2018 ES Addendum and which have been assessed through the 2020 ES Addendum. There is no indication if this list was agreed with SKDC. 	• SKDC to confirm if scope of the ES Addendum is acceptable
ii) Does the main text of the ES provide a summary of the main issues, pertinent to the EIA, raised by consultees?	N/A	<ul style="list-style-type: none"> The 2017 ES set out the responses to the scoping report which included the statutory consultation undertaken by SKDC as part of the scoping process. No further record of consultation is included in the 2020 ES Addendum. 	• None

TOPIC	Yes/No/Non Applicable	COMMENTS	Action Required
iii) Does the ES set out if any of the issues pertinent to the EIA raised by consultees will not be dealt with in the ES? If so is clear justification set out as to why the issue was scoped out?	N/A	<ul style="list-style-type: none"> As above, no further consultation has been undertaken as part of the 2020 ES Addendum. The 2020 ES Addendum addresses all the previous topics raised in the 2017 ES and 2018 ES Addendum 	<ul style="list-style-type: none"> None

EIA CONTENT

	Yes/No/Non Applicable	COMMENTS	Action Required
A) Baseline			
i) Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development?	Y/N	<ul style="list-style-type: none"> All chapters of the ES explain if there has been any update to the baseline that is likely to be significantly affected by the Proposed Development. 2020 Addendum Chapter 12 (Transport) states that baseline traffic data has not been updated and that the traffic data used in the 2017 ES remains current. The Traffic Data Section on page 76 of the Addendum chapter states that it is industry practice to accept that traffic counts are valid for at least three years from the date of collection - the traffic counts that form the basis of analysis in the TA were collected in June 2017 and therefore remain valid. The ES Addendum was completed in July 2020 so technically the traffic data assessed is not valid as it is now 3.5 years old. 2020 Addendum Chapter 13 (Air Quality, Dust and Odour) (page 86) states that updated traffic data (including AADT flows and fleet composition as Heavy Duty Vehicle (HDV) proportion) was provided by the project transport consultant and used for the purposes of the addendum Air Quality Assessment. 2020 Addendum Chapter 14 (Noise and Vibration) (page 99) states that no change is known to have taken place to typical traffic levels, which was confirmed by the project transport consultant. Clarity should be provided on the use of the traffic data throughout the assessment. Where relevant, updated baseline data sets have been factored in to the addendum assessments. 2020 ES Addendum Chapter 13 (Air Quality, Dust and Odour), utilises updated predictions of background pollutant concentrations produced by DEFRA, as updated in May 2019. 	<ul style="list-style-type: none"> Highways Authority to confirm if 2017 baseline data is acceptable. Applicant to provide clarification why these data are considered valid to support the EIA

	Yes/No/Non Applicable	COMMENTS	Action Required
ii) Is the sensitivity of the baseline environment clearly evaluated?	Y	<ul style="list-style-type: none"> No new environmental designations have been identified in the 2020 ES Addendum over and above those identified in the original 2017 ES and 2018 ES Addendum. 2020 Addendum Chapter 9 Ecology states that an updated ecological appraisal field survey was undertaken on 6th April 2020. Section 9.5 of the Addendum chapter identifies that the only substantive change since the 2017 ES relates to the confirmed presence of a small population of great crested newts in off-site waterbody P10. No further sensitive receptor locations have been identified in the 2020 ES Addendum over and above those identified in the original 2017 ES and 2018 ES Addendum. 	• None
iii) Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable?	Y	<ul style="list-style-type: none"> Limitations of updated baseline information have been provided in individual Addendum chapters where relevant. 2020 ES Addendum Chapter 9 (Ecology) (page 52) discusses limitations of additional ecological survey data although none are deemed to be significant limitations. 2020 ES Addendum Chapter 12 (Transport) includes a separate section on limitations of the report including external baseline data sources. 	• None
B) Assessment			
i) Are the methods for establishing the magnitude of effects on the receiving environment clearly defined?	N/A	<ul style="list-style-type: none"> The methods for establishing the magnitude of effects on the receiving environment were defined in the original 2017 ES. This has not been repeated in the 2020 ES Addendum. 	• None
ii) Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified?	N/A	<ul style="list-style-type: none"> The EIA methodology and identification of the likely 'significance' of environmental effects arising from the Proposed Development remains unchanged from the 2017 ES and 2018 ES Addendum (as clarified in 2020 ES Addendum Chapter 2 Approach to the EIA). 	• None
iii) Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment?	/N	<ul style="list-style-type: none"> Most of the 2020 ES Addendum chapters have considered if there has been any change to the likely significant construction and operational effects to those reported in the 2017 ES and 2018 ES Addendum, and relate the effects identified to the condition of the updated baseline environment. As previously noted, 2020 ES Addendum Chapter 7 (Socio-Economics/Retail Impact) appears to provide a repeat assessment 	• Clarification Significance of effects to be confirmed

	Yes/No/Non Applicable	COMMENTS	Action Required
		of the Proposed Development rather than an Addendum assessment. Consequently, it is not clear if any construction and operational effects are considered different to those identified in the 2017 ES and the 2018 ES Addendum.	
iv) Does the ES give appropriate prominence to both positive and negative effects relative to their significance?	Y	<ul style="list-style-type: none"> Both adverse and beneficial effects have been identified in the 2020 ES Addendum chapters. 	• None
v) Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES?	Y/N	<ul style="list-style-type: none"> The 2020 ES addendum technical chapters assess if there is any change to the likely significant effects pre and post mitigation, since the 2017 ES and 2018 ES Addendum were completed. As previously noted, 2020 ES Addendum Chapter 7 (Socio-Economics/Retail Impact) appears to provide a repeat assessment of the Proposed Development rather than an Addendum assessment. Consequently, it is not clear if any construction and operational effects are considered different to those identified in the 2017 ES and the 2018 ES Addendum. 	• Clarification Significance of effects to be confirmed
vi) Is it clear that the EIA has considered interrelationships in order to identify secondary, cumulative and synergistic effects?	N	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 2 (page 5) identifies a number of additional committed developments which have come forward since the completion of the 2017 ES and 2018 ES Addendum and have been assessed through the 2020 ES Addendum. Each technical 2020 ES Addendum chapter determines the potential cumulative effects that may arise when these developments are considered alongside the Proposed Development. Cumulative effects are identified in all chapters however a lack of detail on each of the cumulative schemes in chapter 2 raises the potential for ambiguity about the exact cumulative assessment undertaken by consultants. A description of the cumulative schemes and reference number as well as a map showing the location of the additional cumulative scheme would be helpful. Were these additional cumulative schemes also agreed with SKDC? In terms of interaction of topics, 2020 ES Addendum Chapter 21 (Summary and Conclusions) (page 129) states that the applicants design and environmental team have explored various design iterations to deliver an optimum masterplanning solution that minimises adverse effects and maximises beneficial effects. This has explored the impact and consequential effect on the environmental topics and the interaction between the topics. It is concluded that the level of intra project effects would not result in any significant level of effects however it is not clear from the 	• Applicant to confirm to SKDC and provide appropriate justification that there are no significant impact interactions

	Yes/No/Non Applicable	COMMENTS	Action Required
		individual 2020 ES Addendum chapters how this conclusion has been reached.	
C) Environmental Mitigation & Management			
i) Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development?	Y	<ul style="list-style-type: none"> The 2020 ES Addendum chapters include design and mitigation measures. Any additional required over and above that identified with the submitted 2017 ES and 2018 ES Addendum is identified. 2020 ES Addendum Chapter 9 describes addition mitigation measures relating to Great Crested Newts, through a Mitigation Strategy and obtaining a Great Crested Newt Licence from Natural England. 2020 ES Addendum Summary Chapter 20 (page 127) collates all the mitigation measures set out in the ES for clarity. This includes primary mitigation measures (design and mitigation measures embedded within the design proposals) and secondary mitigation measures, which have been agreed with SKDC and other relevant bodies through the mechanisms of planning conditions and S106 agreement. Where recommended mitigation measures for the Proposed Development remain unchanged from the original ES, this is stated in 2020 ES Addendum chapters. 	• None
ii) Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided?	Y	<ul style="list-style-type: none"> The chapters of the 2020 ES Addendum identify if there are any change to the effects of the Proposed Development pre- and post-mitigation thereby determining the efficacy of the proposed mitigation measures. No additional likely significant effects are identified over and above those identified in the 2017 ES and 2018 ES Addendum. 	• None
iii) Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies?	Y	<ul style="list-style-type: none"> As above, 2020 ES Addendum Chapter 20 (page 127) collates all the mitigation measures set out in the ES for clarity. This includes primary mitigation measures (design and mitigation measures embedded within the design proposals) and secondary mitigation measures, which have been agreed with SKDC and other relevant bodies through the mechanisms of planning conditions and S106 agreement. 	• None

EIA PRESENTATION

	Yes/No/No Applicable	COMMENTS	Action Required
ES Quality			
i) Does the ES make effective use of maps, figures, tables and diagrams? In particular covering: - the location of the site, its boundary and site layout; - operational appearance (where available); - main environmental receptors; and - environmental effects (where visual representation is appropriate).	Y/N	<ul style="list-style-type: none"> A Site location plan is not provided in the 2020 ES addendum. A Site location Plan is included in Chapter 3 (The Application Site) of the NTS Addendum. The red line boundary is included within Appendix 4.1: Application Drawings. The figures relating to each technical chapter are largely included in the 2020 ES Addendum Appendices. However, in some instances figures have been integrated into the ES Addendum text (e.g. Ecological Study Area in Chapter 9 Ecology (page 50) which seems inconsistent. The Application Drawings are provided in a separate appendix 4.1 and include the updated Parameter Plans (Land Use, Building Heights, Primary Circulation, Landscaping) and updated Illustrative Plans (Proposed development, Block Plan and Masterplan). These drawings are clear and legible. There has been no update to these drawings since the 2017 ES and 2018 ES Addendum. Use of tables and graphs (in colour) in the 2020 ES Addendum are widespread and clear, albeit have not been formatted consistently. 	• None
ii) Is the proposed development site clearly described?	Y	<ul style="list-style-type: none"> See Row 1 of this table 	• See Row 1 of this table
iii) Are the anticipated timescales of construction, operation and (where appropriate) decommissioning of the proposed development clearly set out in the main text?	N	<ul style="list-style-type: none"> See Row 1 of this table 	• See Row 1 of this table
iv) Is the ES presented in a manner that would allow a member of the public to logically locate the environmental information they were seeking?	N	<ul style="list-style-type: none"> The 2020 ES Addendum is laid out in a logical order in terms of its content. The list of supporting ES Appendices (for Chapter 4 (Proposed Development, Chapter 7 (Socio Economics/Retail Impact), Chapter 8 (Landscape & Visual), Chapter 9 (Ecology), Chapter 12 (Transport & Access), Chapter 13 Air Quality, Dust and Odour) and Appendix A Statement of Relevant Expertise) is also listed on page 3 of the 2020 ES Addendum. Consideration has been given in the 2020 ES Addendum assessment to any additional planning policy and legislative considerations and these are set out in Chapter 5. Separate Planning policy chapters however are generally not included in ESs 	• More concise NTS to be provided in non-technical language

	Yes/No/No Applicable	COMMENTS	Action Required
		<p>or ES addendums as policy is planning statement issue.</p> <ul style="list-style-type: none"> As previously noted, 2020 ES Addendum Chapter 7 (Socio-Economics/Retail Impact) appears to provide a repeat assessment of the Proposed Development rather than an Addendum assessment. Consequently, it is not clear if any construction and operational effects are considered different to those identified in the 2017 ES and the 2018 ES Addendum. The NTS is too long and used complex technical terms. It is not accessible to the non-technical reader. The environmental information should be transparent and easily understood by all. 	
v) Are technical terms kept to a minimum, with a glossary (list of acronyms) provided?	N	<ul style="list-style-type: none"> As set out above, the NTS is too technical with some acronyms not defined. No glossary or list of abbreviations was identified, however the technical chapters define terms where needed. 	• Provide more concise NTS
vi) Is the length of the main text of the ES appropriate to the: proposed development, sensitivity of the receiving environment and significant environmental effects identified?	Y	<ul style="list-style-type: none"> At 136 pages, the length of the 2020 ES Addendum is not unreasonable. 	• None
vii) Does the ES set out the information demonstrating the ES has been prepared by competent experts?	Y	<ul style="list-style-type: none"> Appendix A of the 2020 ES Addendum provides a Statement of Relevant Expertise. 	• None
Reference list	Y/N	<ul style="list-style-type: none"> 2020 ES Addendum Chapter 9 Ecology, Chapter 10 Water, Chapter 13 Air Quality, Dust and Odour, Chapter 15 Utilities Infrastructure & Waste, Chapter 18 provide references (as footnotes). Other chapters do not provide references. 	• Applicant to provide complete reference list
B) Non-Technical Summary (NTS)			
i) Does the NTS provide sufficient information for a member of the public to understand the significant environmental effects of the proposed development without having to refer to main text of the ES?	N	<ul style="list-style-type: none"> At 83 pages the NTS Addendum is not a summary (although it is appreciated that the NTS should be read as a standalone summary of the findings of the ES and its addenda. Some explanation of some technical terms (through footnotes) and outlining all abbreviations in full (such as ATC) would help with understanding. 	• More concise NTS to be provided with all acronyms defined
ii) Are maps and diagrams included in the NTS that, at a minimum, illustrate the location of the application site, the boundary of the proposed	Y	<ul style="list-style-type: none"> The Site Location plan, Parameter Plans and Masterplan are included in the 2020 NTS Addendum. No plans showing the locations of sensitive receptors are included 	• None

	Yes/No/No Applicable	COMMENTS	Action Required
development, and the location of key environmental receptors?		in the 2020 NTS Addendum but information is included in the text.	
iii) Is it clear that the NTS was made available as a separate stand-alone document?	Y	<ul style="list-style-type: none"> • Provided as a separate PDF. 	• None

4 CONCLUSION

- 4.1 This independent review of the 2020 Environmental Statement Addendum in relation to the outline planning application for a Designer Outlet retail development on land at Gonerby Moor, Grantham has been undertaken in accordance with the requirements of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017*, and criteria issued by the Institute of Environmental Management and Assessment.
- 4.2 There is no detail in the introduction chapters of the ES Addendum on the indicative construction programme, to advise if this has been updated from the 2017 ES and 2018 ES Addendum and implications for the assessment of construction effects. The Applicant should therefore provide construction phasing information for the Proposed Development and clarify how it has affected (or otherwise) technical assessments.
- 4.3 Clarity should be provided in the 2020 ES Addendum on the use of the traffic data throughout the assessment. The transport chapter of the 2020 Addendum Chapter states that baseline traffic data has not been updated and that the data used in the 2017 ES remains current, as it is within three years from the date of collection. However, the ES Addendum was completed in July 2020 so technically the traffic data assessed is not valid as it is now 3.5 years old. The Applicant should provide clarification as to why the traffic data is considered valid to support the EIA. The Highways Authority should also confirm if 2017 baseline data is acceptable.
- 4.4 With regard to the assessments, the 2020 ES addendum technical chapters assess if there is any change to the likely significant effects pre- and post- mitigation, since the 2017 ES and 2018 ES Addendum were completed. However, in some instances (such as the Socio-Economics/Retail Impact Chapter), it is not clear if any construction and operational effects are considered different to those identified in the 2017 ES and the 2018 ES Addendum. Clarification on the significance of effects therefore needs to be confirmed in the ES addendum. The applicant should also confirm to SKDC and provide appropriate justification that there are no significant impact interactions.
- 4.5 At 83 pages in length, the Non-Technical Summary is too long for the non-technical reader while the document also includes some complex technical terms. The NTS should be shorter and in non-technical language so that it is accessible and easily understood by all readers.
- 4.6 Based on the points made above it is suggested that SKDC require the applicant to provide further information and clarification as set out in the 'Action Required' column of the review

and in accordance with Regulation 25 of the 2017 EIA Regulations. SKDC will note the timescales for consideration of this information and the advertising requirements.

APPENDIX B
RESPONSE TO THE REVIEW BY BARTON WILLMORE ON THE 2020 ES
ADDENDUM

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
ENVIRONMENTAL PLANNING

HERITAGE
GRAPHIC COMMUNICATION
PUBLIC ENGAGEMENT
DEVELOPMENT ECONOMICS



Response to the Review by Barton Willmore on the 2020 Environmental Statement Addendum

Downtown Grantham Designer Outlet
Outline Planning Application

Land at Gonerby Moor, Grantham

on behalf of
Oldrid & Co. Ltd

Prepared by:
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February 2021

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Appendices

Appendix 1	Non-Technical Summary of the Environmental Statement 2020 Addendum
Appendix 2	Schedule and Map of Additional Committed Developments
Appendix 3	Reference List of the Environmental Statement 2020 Addendum

1.0 INTRODUCTION

1.1 Context

1.1.1 An Environmental Statement (ES) was submitted to South Kesteven District Council (SKDC) as part of an outline planning application for a Designer Outlet Centre (DOC), known as Downtown Grantham Designer Outlet (DGDO), at land at Occupation Lane, Gonerby Moor, Grantham (ref: S17/2155) in November 2017 ('2017 ES'). Further information was submitted in support of the ES in March 2018 ('2018 ES Addendum').

1.1.2 The planning application was subsequently approved subject to conditions and S106 agreement by the SKDC's Development Management Committee on 5th February 2019. The S106 agreement has now been finalised. However following the adoption of the South Kesteven Local Plan 2011-2036 on 30th January 2020, Officers consider that, procedurally the application should be returned to Committee. In advance of this, a detailed review of the 2017 ES and 2018 ES Addendum has been undertaken by the applicant to determine if the assessments are considered up to date and whether further environmental assessment was required. The updates to the 2017 ES and 2018 ES Addendum are provided in a 2020 ES Addendum.

1.1.3 SKDC instructed Barton Willmore to provide an independent review of the 2020 ES Addendum. The review (which is attached in full within Appendix A) follows a template produced by the Institute of Environmental Management and Assessment (IEMA) for assessing the quality of Environmental Statements. This includes a review of the following components:

- EIA Regulatory Compliance;
- EIA Context and Influence;
- EIA Content; and
- EIA Presentation.

1.1.4 The review recommended to SKDC a number of actions. SKDC have requested that these actions are addressed by the applicant. The actions and the response by the applicant is set out within this Response.

2.0 EIA REGULATORY COMPLIANCE

2.1 Applicant to provide construction phasing information for the Proposed Development and clarify how it has affected (or otherwise) technical assessments.

2.1.1 The construction timetable is set out in the 2017 ES & 2018 ES Addendum. It is expected that the Proposed Development would be completed and operational within 2.5 years.

2.1.2 The updated documents were prepared in summer 2020, and whilst it was anticipated that the application be returned to the Planning Committee before now, Oldrids & Downtown remain committed to delivering the development in accordance with the timetable.

- 2.1.3 The requisite details for the reserved matters applications have been advanced in the intervening period following the resolution to grant consent in February 2019, along with documents to discharge the pre-commencement conditions. These can be submitted immediately following grant of planning permission. Following reserved matters approval and discharge of relevant conditions, the development can commence. The Government has been clear that construction work should continue, and sites should remain open across the UK despite the COVID-19 pandemic. During the early stages of the pandemic, productivity in the industrial sector slowed, the industry has adapted positively to changes in working practices; supply chains and productivity have bounced back. As such there is no reason why the construction timetable is to be impacted by the pandemic. With a conservative 30 month programme the DGDO can be opened in Autumn 2023.
- 2.1.4 On the above basis, the 2017 ES and 2020 ES Addendum provide accurate assessments and design year forecasts including the likely significant effects of the Proposed Development during its construction phase and once completed.
- 2.2 Applicant to identify and assess interactive effects, or justify why they are not anticipated**
- 2.2.1 The interaction of topics has been considered. The applicant's design and environmental team have explored various design iterations to deliver an optimum masterplanning solution that minimises adverse effects and maximises beneficial effects. This has explored the impact and consequential effect on the environmental topics and the interaction between the topics.
- 2.2.2 The Transport & Access chapter provides baseline traffic flows and predicted traffic flows arising from the Proposed Development that are inter-related to other ES topics. The baseline traffic flows and predicted traffic flows are used to also determine environmental effects in the Air Quality and Noise Impact Chapters of the ES.
- 2.2.3 In addition, there is the potential for cumulative road vehicle exhaust emission impacts should other developments generate traffic which utilise the same routes as movements generated by the proposals. The 2020 ES Addendum Chapter 12 Transport and Access includes an analysis of trips produced from additional allocated and consented sites. This indicates the traffic forecasting predictions adopted in the 2018 ES Addendum remain robust when considering planned development in the local area. As such, an increase in vehicle movements on the local highway network associated with committed schemes have been accounted for in the flows utilised in the air quality dispersion modelling and noise dispersion modelling. Cumulative air quality effects and cumulative noise impact effects are therefore considered to be not significant.
- 2.2.4 Consideration has been given to the effects of climate change to each of the technical chapters of the ES. Technical notes and updated appraisals in respect of Ecology, Water Resources, Transport and Air Quality have been prepared in this 2020 ES Addendum which review minor amendments to baselines that were assessed in the 2017 ES/2018 ES Addendum. The assessment of significant effects in relation to the technical disciplines included in the 2020 ES Addendum are not materially influenced by changes to each of their respective topics and therefore the assessments set out in the 2017 ES/2018 ES Addendum remain valid. No likely

significant effects, that were not identified or identifiable at the time of the preparation of the 2017 ES/2018 ES Addendum, have been identified.

- 2.2.5 It is concluded that the level of intra project effects would not result in any significant level of effects.

Provide shorter and more concise NTS in non-technical language

- 2.2.6 A more concise Non-Technical Summary of the 2020 ES Addendum is located at Appendix 1.

3.0 EIA CONTEXT AND INFLUENCE

3.1 SKDC to confirm its scope of the ES Addendum is acceptable

- 3.1.1 The Barton Willmore review states that Chapter 2 (Methodology) identifies additional cumulative schemes which have come forward since the 2017 ES and 2018 ES Addendum and which have been assessed through the 2020 ES Addendum.

- 3.1.2 The following lists the additional commitments assessed and were agreed with SKDC to include allocations from the SKDC Local Plan 2020, consented schemes and schemes with a resolution to grant consent.

- k) Spitalgate Heath
- l) Rectory Farm (Phase 1 NW Quadrant)
- m) Rectory Farm (Phase 2 NW Quadrant)
- n) Prince William of Gloucester Barracks
- o) Easthorpe Road, Great Gonerby
- p) Grantham Southern Gateway
- q) Former Magistrates Court
- r) Holscot Industrial Linings, Alma Park Industrial Estate
- s) Land at 2 Venture Way
- t) Spittlegate Farm, Gorse Lane
- u) Land off Hanbury Avenue
- v) Land to the north of Longcliffe Road, Manthorpe
- w) Land at Bridge End Road
- x) 1 Ruston Road, Alma Park Industrial Estate
- y) Former Chandos House Care Home, Gorse Road

- 3.1.3 A schedule of the additional schemes, including a description of each scheme with a map identifying the location of the cumulative schemes is located at Appendix 2.

- 3.1.4 As set out in the 2020 ES Addendum, the authors of each of the ES Chapters have reviewed the available information to determine the potential cumulative effects that may arise when these developments are considered alongside the Proposed Development. The conclusions adopted in the 2017 ES and 2018 ES Addendum relating to environmental effects, including cumulative effects, are unchanged.

4.0 EIA CONTENT

4.1 Highways Authority to confirm if 2017 baseline data is acceptable. Applicant to provide clarification why these data are considered valid to support the EIA

4.1.1 The DfT guidance states 'The assessment should include recent counts (normally surveyed within the last three years) for peak period turning movements at critical junctions'. However, this is only guidance and doesn't provide a hard and fast rule. The appropriateness of the data needs to be considered on a case-by-case basis depending on the local area.

4.1.2 When the ES was revised in June 2020, it would not have been appropriate to collect new data at that point due to the COVID restrictions in place. In fact, since the initial lockdown in March 2020, traffic flows in general have been significantly lower. As a result, using baseline data collected in June 2017 ensures the base traffic flows are representative and more typical traffic conditions ensuring a robust assessment. Furthermore, suitable growth factors were applied to the base data to inform future year assessments and this methodology was agreed with the local highway authority and Highways England.

4.1.3 Overall, the data is still considered relevant and robust for the purpose of informing the ES and Transport Assessment.

4.1.4 In terms of Air Quality, baseline traffic flows for 2017 were provided by the Transport Consultant and were used to inform the original Air Quality 2017 ES Chapter and 2018 ES Addendum. These were subsequently factored for use in the 2020 ES Addendum to represent the most up to date year of monitoring data available at the time of assessment to allow model validation. This is the reason for the difference between the baseline flows reported in the 2017 ES Chapter / 2018 ES Addendum and the 2020 ES Addendum. It should be noted that the predicted traffic flows as a result of the Proposed Development was unchanged between the 2018 ES Addendum and the 2020 ES Addendum.

4.1.5 In terms of Noise and Vibration, again baseline traffic flows for 2017 have been used.

4.2 Clarification – Significance of Effects to be confirmed (Chapter 7 Socio-Economic/Retail Impact)

Retail Impact

4.2.1 SKDC has received advice from its retail advisors, Stantec, on those elements of the applicant's Retail Impact Assessment (RIA) that it would like to see updated. It is relevant to note that SKDC's previous retail advisors, Peter Brett Associates (PBA), have been acquired by Stantec, so the advice follows that previously given to SKDC on the planning application pre-resolution.

4.2.2 Taking on board Stantec's suggested comments, an updated assessment of the key retail parameters relevant to the proposals has been provided. In doing so, the retail work demonstrates that the proposals continue to meet the two key 'tests' set out in the National Planning Policy Framework (NPPF), namely:

- The sequential approach taken to the selection of the application site; and
- The impact of the proposed development on existing centres.

4.2.3 Considering alternative sites within the Primary Catchment Area (PCA) remains appropriate and it is on this basis, applying the minimum site parameters set out in the original RIA, a fresh sequential assessment has been undertaken. No relevant additional sites beyond the sites previously assessed in the original RIA have been identified and this has been confirmed with SKDC.

4.2.4 The original sites considered were:

1. Bourne Core Area, Bourne (South Kesteven District)
2. King 31, Grantham (South Kesteven District)
3. Bass Maltings, Sleaford (North Kesteven District)
4. East Road, Sleaford (North Kesteven District)
5. Former Advanta Seeds, Sleaford (North Kesteven District)
6. Jessop Way, Newark-on-Trent (Newark and Sherwood District)
7. NSK Factory, Newark-on-Trent (Newark and Sherwood District)

4.2.5 These sites have been revisited and reviewed as part of the re-assessment and the conclusions remain that the sites are not sequentially preferable for the reasons stated in the revised retail work.

4.2.6 Stantec's advice to SKDC identified a number of updates to the RIA, to include:

- revised population projections;
- revised per capita expenditure;
- a review of comparison goods market shares / turnover (now and in the future);
- a review of sales efficiency per annum;
- the trade draw of the application proposal from residents;
- any new commitments, commitments which are no longer extant and commitments which are considered unlikely to come forward, which could affect trade diversion patterns of commitments; and
- new trade diversion patterns of the application proposal.

4.2.7 Taking this as a lead, an update of the RIA to include all of the above points has been undertaken, in addition to revised healthcheck assessments of existing centres. This is consistent with the PPG checklist for applying the impact test¹ and follows a widely adopted approach to quantitative analysis.

4.2.8 The updated assessment also considers the number of planning conditions and controls set out in the draft S106 agreement which have been subject to extensive dialogue and are now agreed. In many cases these were suggested by SKDC and PBA / Stantec in response to

¹ Paragraph: 018 Reference ID: 2b-018-20190722.

representations made to the planning application on the potential impact to vitality and viability of centres in SKDC and further afield. It is pertinent to note that these go beyond controlling the DOC and other elements of the proposed development, but also limit the operation and trading of the existing Downtown store, which presently benefits from an unencumbered open Class A1 consent.

- 4.2.9 The revised document, taking into account the revised assumptions and updates, maintains its conclusions, having regard to paras 89 and 90 of the NPPF, that the proposals will not result in 'significant adverse impact'.

Socio-Economic Impact

- 4.2.10 Much of the baseline data has been kept within the socio-economic assessment in order to provide a comparative effect of the proposals against the core economic data available for SKDC, the LEP and SEP for Greater Lincolnshire and the wider East of England, much of which has not been updated since the last study. It is also pertinent to note that the HCA / Homes England guidance as the key cornerstone to estimating employee per sqm area of use has also not changed.
- 4.2.11 However, the report has been updated in its approach to the calculation of employment, and therefore the economic advantage which the development will bring, notably in the revised proposed utilisation of the B1(a) (now Class E) business space, given it is now the intention of Oldrids & Downtown to occupy this space for its office functions.
- 4.2.12 The revised work also considers a revised employment density arising from the use of the remaining office space for its use as an office and meeting rooms suite to serve the DGDO, with the resultant figure reached in consultation with Freeport / DGDO Centre Management as proposed occupiers.
- 4.2.13 More generally the reviewed socio-economic assessment has been revised to include responses to comments made by Amion, on behalf of SKDC, ahead of the original planning committee. These were subsequently addressed, but for the sake of clarity are now included within the revision so it provides a consolidated response.

4.3 Applicant to confirm to SKDC and provide appropriate justification that there are no significant impact interactions

- 4.3.1 Please refer to Section 2.2 above.

5.0 EIA PRESENTATION

5.1 More concise NTS to be provided in non-technical language

- 5.1.1 A more concise Non-Technical Summary of the 2020 ES Addendum is located at Appendix 1.

5.2 Applicant to provide complete reference list

- 5.2.1 A complete reference list for the 2020 ES Addendum is located at Appendix 3.