



RETAIL STATEMENT

In respect of

**THE BELL INN, 33 CHURCH STREET, PINCHBECK, SPALDING, PE11
3UB**

On behalf of

VENTURE BUSINESS SPACE LTD

Prepared by: **KDM/DB**

Authorised by: **MR**

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1. INTRODUCTION

- 1.1 This Retail Statement has been prepared by ROK Planning, on the instruction of Venture Business Space Ltd, to support a planning application relating to the Site at The Bell Inn, 33 Church Street, Pinchbeck, Spalding, PE11 3UB.
- 1.2 The application seeks planning permission for the following proposal:
- “Proposed change of use of ex-Bell public house to fall within Use Class E including part demolition, single storey rear extension and external works including hard and soft landscaping, external lighting and plant compound.”*
- 1.3 The application seeks the change of use of a vacant former public house in order to create a new convenience store.
- 1.4 The Site is located within Pinchbeck which, whilst falling outside of the identified retail hierarchy, is classed as a ‘Main Service Centre’. Policy 24 of the South East Lincolnshire Local Plan promotes the development of individual local shops within a settlement boundary which meet the day-to-day needs of nearby residents.
- 1.5 Whilst the proposed convenience store, by way of its location and small scale, is clearly intended to meet the day-to-day needs of nearby residents in line with Local Plan policy direction, this Retail Statement provides a full assessment of the proposed development against relevant retail policies.
- 1.6 The application of this assessment follows the requirements of the National Planning Policy Framework (NPPF) (2026) and its accompanying Planning Practice Guidance.
- 1.7 The subsequent sections of this assessment are structured as follows:
- **Section 2** sets out the relevant planning policy context;
 - **Section 3** explores the proposed development against the relevant planning policy context;
 - **Section 4** details the application of the Sequential Assessment;
 - **Section 5** details the application of the Impact Assessment and Retail Need; and
 - **Section 6** provides an analysis and conclusion.

2. RELEVANT PLANNING POLICY CONTEXT

2.1 This section sets out the relevant policy that forms the basis of the assessment contained within this Statement.

2.2 The following planning policy and guidance is relevant to the context of the application site:

- The National Planning Policy Framework (2026) (NPPF);
- South East Lincolnshire Local Plan 2011-2036 (adopted March 2019);
- South East Lincolnshire Local Plan 2011-2036 (2019) Policies Maps; and
- Planning Practice Guidance.

2.3 These are addressed where relevant below.

National Planning Policy Framework (2026)

2.4 The Retail Sequential Test is a vital part of national planning policy and is used to support the vitality of existing retail centres.

2.5 Chapter 8, Ensuring the vitality of town centres, sets out the objective of promoting the long-term vitality and viability of town centres by prioritising them as locations for main town centre uses and allowing them to adapt to changing community and business needs, in a way which reflects their locally distinctive roles and opportunities.

2.6 Policy TC3, Main Town Centre Uses Outside Town Centres, states:

“A sequential test should be applied to proposals for main town centre uses for which planning permission is required, where these are neither in an existing centre nor in accordance with an allocation for that purpose in an up-to-date development plan.

The sequential test means that main town centre uses involving new development should be located within town centres identified in the development plan; then, if this is not feasible, in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When considering edge of centre and out of centre locations, preference should be given to accessible sites which are well connected to the town centre by sustainable transport modes.”

2.7 In this case, the proposal Site is defined as an ‘out-of-centre’ location due to its location further than 300m from the Spalding Town Centre boundary.

- 2.8 In terms of retail impact, Policy TC4, Assessing the Impact of Development on Town Centres, of the NPPF states that:

“Development proposals for retail and leisure uses located outside town centres should be accompanied by an impact assessment if the proposal exceeds a floorspace threshold set out in an up-to-date development plan, and is not on a site which is allocated for the proposed use in the plan. If no threshold for impact assessments has been set in the development plan, a default threshold of 2,500m² gross floorspace should be applied.

In circumstances where an impact assessment is required, it should be demonstrated that the development would be unlikely to have a significant adverse impact on:

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

- 2.9 Finally, policy S4, Principle of Development within Settlements, of the NPPF (2026) states that, development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF.

- 2.10 Such adverse effects include (but are not restricted to) situations where the development would:

“A. Have a substantial adverse impact in relation to:

i. The allocation or safeguarding of land or buildings for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or.

ii. The application of the policies in this Framework for existing recreational land and facilities (HC7), Local Green Space (HC8), areas of particular importance for biodiversity and geodiversity (N6), Protected Landscapes (N4) and development within residential curtilages (L2(1)(d)).

B. Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable compensatory provision is made that does not increase the risk of flooding either on or off-site); or

C. Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.

- 2.11 It is worth noting that the Site is a vacant former public house located within the settlement boundary of Pinchbeck. Additionally, it is considered that points A to C of policy S4 are not applicable in this case.
- 2.12 The requirement for a Retail Sequential Assessment and Retail Impact Assessment is also set out within local planning policy. This is detailed further below.

South East Lincolnshire Local Plan 2011-2036 (2019)

- 2.13 To begin, it is relevant to consider the application of Local Plan policy 27, *Additional Retail Provision*, and its relevance to this planning application.
- 2.14 Policy 27, part C, states:

“C. Other Local Shops and Town Centre Uses

Individual local shops, leisure and services and small neighbourhood clusters of them which meet the day-to-day needs of nearby residents, without the need to use a car, will be protected. Proposed new shops in such circumstances, will be limited to a maximum 100sqm (net) floor space, unless a qualitative need to remedy a geographical deficiency in the distribution of food shopping can be demonstrated, in which case units up to 500sqm (net) floor space will be permitted. Extensions which would take existing local shops up to these sizes to improve their viability will be permitted, subject to the same demonstration of geographical deficiency for proposals over 100sqm”.

- 2.15 It is considered that part c. of policy 27 provides policy support for small-scale retail development of less than 100sqm, or up to 500sqm (net) where a geographical deficiency can be demonstrated, where they will meet the day-to-day needs of nearby residents. In other words, where such a development is proposed, this is supported by policy 27 and neither the retail sequential nor retail impact assessments will be required.
- 2.16 Whilst the store proposed within this planning application does primarily seek to serve the day-to-day need of nearby residents, the proposed floor space exceeds 100sqm. Whilst the net floorspace does not exceed 500sqm, and thus would otherwise be permissible under policy 27 where a qualitative need to remedy a geographic deficiency in the distribution of food shopping was demonstrated, this is not an explicit requirement in order for a proposal to be acceptable.

- 2.17 For clarity, policy 27 does not require that all planning applications for retail development that are less than 500sqm (net) floorspace must demonstrate a qualitative need. It simply provides policy support for such development where such a need can be demonstrated.
- 2.18 Instead, and as a result, the principle of the proposed development falls to be tested against the policy criteria of Local Plan policy 24, *The Retail Hierarchy*.
- 2.19 Indeed, policy 24 explicitly sets out the policy tests that apply to out of centre retail development *‘other than for provision under policy 27’*.
- 2.20 Policy 24, part C, states:
- “The vitality and viability of centres in the retail hierarchy will be maintained and enhanced. Proposals for retail use outside the Primary Shopping Areas as identified on the Policies Map, or for other main town centre uses, outside the town centre boundaries and where not provided for under Policy 27, will be required to demonstrate their suitability through a sequential test in line with the National Planning Policy Framework.*
- In addition, and other than for provision under Policy 27, a robust assessment of impact on nearby town centres will be required for any retail proposal that:*
- 1. provides a retail floor space of 500sqm (net) or more outside Boston town centre boundary (but within Boston Borough); and*
 - 2. provides a retail floor space of 250sqm (net) or more outside Spalding town centre boundary and the District and Local Centres (for Kirton within Boston Borough and for all other town centres within South Holland District).”*
- 2.21 This retail statement supports a proposed convenience store with a net sales area of 225sqm outside of Spalding Town Centre Boundary. On that basis, the following is required in order for the proposed scheme to be acceptable in retail terms:
- In line with policy 24, it is necessary to demonstrate compliance with the retail sequential assessment;
 - In line with the thresholds set out in policy 24, it is not necessary to undertake the retail impact assessment; and
 - Where the retail sequential assessment is satisfied, it is not necessary to demonstrate a qualitative need to remedy a geographic deficiency in food shopping in line with policy 27.
- 2.22 In recognition of the requirements set out in policy 24, this statement sets out compliance with the sequential assessment. Additionally, and despite not

reaching the threshold limit of 250sqm (net) retail floor space as set out within policy 24, this statement also provides an assessment of retail impact considerations.

Planning Practice Guidance

- 2.23 Planning Practice Guidance (PPG) provides information on the application of the Retail Sequential and Impact Test in decision making.
- 2.24 Regarding the sequential test, the guidance notes that the suitability of more central sites must be considered, and that due regard must be given to a degree of flexibility in considering this. The guidance continues to set out that when identifying sites, the suitability, accessibility, availability and viability of the site should be considered.
- 2.25 Ultimately, the guidance explains that where there are no suitable sequentially preferable locations, the sequential test is passed.
- 2.26 Regarding the impact test, the guidance notes that the test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible.
- 2.27 The guidance continues to set out a number of steps to undertaking the test, and notes that in terms of trade draw the assessment should relate to a certain geographic area (i.e. the distance people are likely to travel) and a particular market segment (e.g. convenience retail).

3. CONTEXT AND PROPOSED DEVELOPMENT

- 3.4 The Site is a vacant former public house known as 'The Bell Inn' fronting Church Street.
- 3.5 The Site is located at 33 Church Street towards the centre of Pinchbeck village on the eastern edge, opposite a public green space and a few doors down from the local St Mary CofE church.
- 3.6 Pinchbeck itself is mainly residential but benefits from a small collection of shops and facilities such as Knight Street Pharmacy, Pinchbeck Village Hall, and Pinchbeck East CofE Primary School. The Site is also located nearby to two small SPAR convenience stores.
- 3.7 The Site falls within the settlement boundary of Pinchbeck under policies 19, 22 and 23 of the South-East Lincolnshire Local Plan 2011-2036 (2019). It is also located within the Main Service Centre of Pinchbeck under policy 1 of the Local Plan (2019), which states that development will be permitted within such centres where it supports their role as a service centre for the settlement itself.
- 3.8 Beyond the Site's location within a 'Main Service Centre', policy 24 of the South-East Lincolnshire Local Plan also promotes the development of individual local shops within a settlement boundary which meet the day-to-day needs of nearby residents.
- 3.9 Given the broad policy support for the delivery of new facilities, and indeed for new shops, in locations such as the Site, a planning application was made under ref. H14-0583-25. However, following a request for further retail justification from South Holland District Council, this application was withdrawn on the 12th August 2025.
- 3.10 Application ref. H14-0583-25 was later superseded by planning application ref. H14-1002-25 which sought the following:

"Proposed change of use of ex-Bell public house to fall within Use Class E including part demolition, single storey rear extension and external works including hard and soft landscaping, external lighting and plant compound."

- 3.11 The existing public house building structure was to be retained alongside partial demolition, a single storey extension and external works. The ground floor of the building was proposed to become a new Use Class E (a) retail unit.
- 3.12 The proposed store was to have a gross internal area of 355sqm. When factoring in storage, staff areas and ancillary back-of-house requirements, it was anticipated that the store would provide an approximate net sales area of 225sqm. Notably, this falls well below the 280sqm limit contained within the Sunday Trading Act.
- 3.13 Indeed, given the scale of the proposed store, the proposed development was clearly intended to function as a local convenience food store serving those in the immediate locality, primarily as a day-to-day 'top-up' convenience shopping destination. The store was expected to sell a range of everyday goods including bread, milk, eggs, fruit and vegetables, fresh meat, ready meals, and snacks, along with daily newspapers, tobacco and magazines.
- 3.14 However, this application was refused by South Holland District Council on the 14th January 2026.

Response to Refusal Reasons

- 3.15 This statement seeks to support planning permission for the change of use of a vacant former public house in order to create a new convenience store. As such, this statement has considered each refusal reason relating to retail use below.
- 3.16 The first reason for refusal relating to retail use in application ref. H14-1002-25 is stated as follows:

"1. The proposed development is for a convenience retail unit with a net sales floor area of 225sqm, exceeding the 100sqm limit for new local shops under Policy 27(c) of the South East Lincolnshire Local Plan (2019). The applicant has not demonstrated a clear qualitative need to remedy a geographical deficiency in the distribution of convenience goods, nor that a larger unit is justified.

As such, the proposal would result in an over-provision of convenience retail outside the designated centre hierarchy, contrary to the aims of Policy 27(c) to support sustainable retail distribution and maintain the vitality of existing local centres. The proposal is therefore inconsistent with Policy 27(c) of the South East Lincolnshire Local Plan 2019 and the National Planning Policy Framework (December 2024)."

- 3.17 This retail statement supports the proposal for a small-scale convenience store in an out of centre location. However, as referenced within Section 2 'Relevant Planning Policy Context', there is no explicit need for all small-scale convenience stores to demonstrate compliance with policy 27. Policy 27 simply lends support to such proposals where the relevant criteria is met.
- 3.18 Instead, and as a result, the principle of the proposed use is required to be tested against the policy criteria of Local Plan policy 24, *The Retail Hierarchy*, which sets out requirements for out of centre retail development '*other than for provision under policy 27*'.
- 3.19 On that basis, this statement focuses on demonstrating compliance with the sequential assessment. Additionally, and despite not reaching the threshold limit of 250sqm (net) retail floor space, this statement also provides an assessment of retail impact considerations.
- 3.20 Given the above, the focus of this report considers the compliance of the proposed development with policy 24. Refusal on the basis of policy 27 part C is not considered relevant for the reasons set out above and within Section 2.
- 3.21 The second reason for refusal relating to retail use in application ref. H14-1002-25 is stated as follows:

"2. The proposed development fails to comply with the sequential approach to main town centre uses as required by Policy 24 of the South East Lincolnshire Local Plan (2019) and Paragraph 91 of the National Planning Policy Framework (December 2024).

The submitted sequential assessment does not demonstrate sufficient flexibility in scale, format, or layout to accommodate the proposed convenience store within Spalding Town Centre, including smaller units or multi-level premises. The application site is located outside the established neighbourhood centre of Knight Street, which already provides accessible convenience retail provision. The proposal would introduce an additional out of-centre retail unit without demonstrating a clear qualitative need to remedy a deficiency in local convenience goods provision, thereby undermining the sustainable distribution of retail and the vitality and viability of existing centres, both formal and informal.

The proposal is therefore contrary to South East Lincolnshire Local Plan (2019) policies 1, 24 and 27 and paragraph 91 of the National Planning Policy Framework (December 2024)."

- 3.22 The sequential assessment was completed with defined parameters that allowed for the flexibility of Sites that are +/- 15% of the total floorspace proposed in the case of sites requiring redevelopment, and +/- 10% of the total floorspace proposed in the case of existing retail sites.
- 3.23 Further information on the methodology adopted when undertaking the sequential assessment is listed within section 4 of this statement. This includes the factors such as the site's existing planning use, development constraints and availability.
- 3.24 As stated within the officer report attached to application ref. H14-1002-25, the exercise in identifying potential alternative sites meets the minimum procedural expectations established in the PPG and endorsed in cases such as Zurich Assurance v North Lincolnshire, Aldergate Properties, and Tesco v Dundee.
- 3.25 Nevertheless, South Holland District Council stipulate that more flexibility should be given in respect of whether the same store could operate in an adjusted configuration within a sequentially preferable site.
- 3.26 Resultantly, the sequential assessment completed with this application has taken extra measures when considering adjusted configurations and additional flexibility. Please find this set out within Section 4 and enclosed at Appendix A.
- 3.27 Refusal reason no. 2 also references Knight Street as an 'established neighbourhood centre'. In the first instance, it should be noted that consideration has been given to the existing facilities on Knight Street via the quantitative analysis of available expenditure in the impact assessment.
- 3.28 Nevertheless, the NPPF (2026) is clear in respect of how an impact assessment should be undertaken. Policy TC4, Assessing the Impact of Development on Town Centres, of the NPPF states:
- "2. In circumstances where an impact assessment is required, it should be demonstrated that the development would be unlikely to have a significant adverse impact on:*
- a. Existing, committed and planned public and private investment in a town centre or centres in the catchment area of the proposal; and*
- b. Town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)."*
- 3.29 The NPPF also clearly defines the application of the sequential assessment. Policy TC3, Main Town Centre Uses Outside Town Centres, of the NPPF states:

“The sequential test means that main town centre uses involving new development should be located within town centres identified in the development plan; then, if this is not feasible, in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When considering edge of centre and out of centre locations, preference should be given to accessible sites which are well connected to the town centre by sustainable transport modes..”

- 3.30 The NPPF defines a town centre as follows:

“Area defined in the local authority’s policies map in the development plan including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres as defined in the development plan but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or, including main town centre uses, do not constitute town centres..”

- 3.31 Knight Street is not formally identified as a Centre within any policy document. Resultantly, it is considered that the adopted approach is policy compliant whilst the evaluation of Knight Street as a designated centre would not be.

Proposed Development

- 3.32 This Retail Statement supports a revised submission for the same development as described above, providing a full assessment of the proposed development against relevant retail policy 24. Additionally, a new sequential assessment has re-examined and expanded on the suitability of alternative retail units.
- 3.33 In the first instance, whilst the Site is within a ‘Main Service Centre’, it is relevant to establish that such Centres are considered to fall outside of the retail hierarchy set out within the South-East Lincolnshire Local Plan.
- 3.34 The nearest designated retail centre to the Site is Spalding Town Centre, which is located 3.05km from the Site. Given that the Site is over 300m from the boundary of the Town Centre, the Site is by default ‘out-of-centre’ in retail terms.
- 3.35 Mindful of the above, it is necessary to acknowledge that the support for individual shops in out-of-centre locations within settlement boundaries as contained within policy 24 is contingent on the following:

- A demonstration of their suitability via the satisfaction of the sequential test; and
- A robust impact assessment of impact on nearby town centres for any retail proposal that provides a retail floor space of 250sqm (net) or more outside Spalding Town Centre boundary.

- 3.36 With the above in mind, the next section of this Statement contains the application of the sequential test.
- 3.37 In addition, whilst the net retail floorspace proposed falls below the threshold of 250sqm contained within policy 24, a retail impact assessment is contained within the penultimate section of this assessment for robustness.
- 3.38 The final section of this Statement provides an analysis and conclusion.

4. RETAIL SEQUENTIAL TEST

Introduction

- 4.1 This section details the methodology and application of the Sequential Test including how the search area has been defined, how sites have been assessed, and how sites have been identified. The methodology for discounting potential sites is fully explained in accordance with the requirements of the development plan and the NPPF (2026).

Defining the Search Area

Store Catchment Area

- 4.2 The proposed convenience store will total 355sqm GIA with a shop floor area of only 225sqm, being below the 280sqm limit contained within the Sunday Trading Act.
- 4.3 Based on market experience, a convenience store of this size would normally only sell approximately 2,500 product lines. In comparison to the range of lines generally sold in larger supermarkets (between 8,000 to 30,000), this is far fewer.
- 4.4 In line with its proposed use and size the store is expected to sell a range of everyday goods including bread, milk, eggs, fruit and vegetables, fresh meat, ready meals, and snacks along with newspapers, tobacco and magazines.
- 4.5 Mindful of the above, it is clear that the development is proposed to serve as a day-to-day top up convenience store, serving people in the immediate locality. This includes those that do not or cannot drive to larger centres.
- 4.6 On that basis, it is clear that the proposed development will serve a local catchment only. Indeed, it is generally accepted in various locations across the Country that a store of such a size operates with a catchment area of circa 1.5km (radius).

Site Location and Centres

- 4.7 The nearest Centre and Primary Shopping Area is Spalding Town Centre, as identified by policy 24 of the Local Plan (2019) and located 3km away from the application Site (a 5-minute drive or a 42-minute walk).
- 4.8 The second nearest designated Centre is Holbeach, as identified by policy 24 of the Local Plan (2019) and located 14.7km away from the application Site (a 20-minute drive or 3-hour and 18-minute walk).

- 4.9 It is noted that the Site is located in close proximity to Knight Street, which contains the two small scale SPAR convenience stores. However, Knight Street is not recognised as a retail centre by Local Plan policy 24.
- 4.10 As noted within Section 3 of this assessment, the NPPF (2026) defines a town centre as follows:
- 4.11 *“Area defined in the local authority’s policies map in the development plan including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres as defined in the development plan but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or, including main town centre uses, do not constitute town centres.”*
- 4.12 Resultantly, impact on these units is considered within Section 5 whilst the sequential assessment must consider the nearest designated retail centre.
- 4.13 Given the fact that the proposed store is intended to serve a local-catchment only, it is not considered appropriate to consider alternative sites within Holbeach Town Centre.
- 4.14 Indeed, even the defined boundary of Spalding Town Centre and Primary Shopping Area is located at a greater distance from the Site than the generally accepted catchment area for a store of the proposed scale (1.5km). The Centre is considered in further detail below.

Spalding Town Centre and Primary Shopping Area

- 4.15 The defined boundary of Spalding Town Centre and Primary Shopping Area are both identified on the Council’s Local Plan (2019) Policies Maps, Inset map 2 – Spalding and Pinchbeck.
- 4.16 The Spalding Town Centre boundary stretches from The Crescent in the south up towards Spalding Railway Station and Kings Rd to the north-west, and stretches eastwards towards Spalding Police Station at Westlode St, circling back around along the River Welland and High St.
- 4.17 The defined Spalding Primary Shopping Area covers Hall PI, Market PI, Vine St, Gore Ln and Sheep Market within Spalding Town Centre and is approximately 245 metres wide.
- 4.18 Existing retail provision within Spalding Town Centre consists of a number of convenience outlets and supermarkets, including the Sainsburys, Iceland, Lidl

and Aldi. It also hosts further small-scale convenience provision (off-licenses, green grocers), some small-scale comparison shops, restaurants, cafes, hotels, galleries and a few public houses.

Search Area

- 4.19 Notwithstanding that Spalding Town Centre is located at a greater distance from the Site than the generally accepted catchment area for a store of the proposed scale (1.5km), to ensure robustness and to comply with relevant policy, a search for alternative sites has been undertaken within the defined Spalding Town Centre boundary plus 300m 'edge-of-centre' boundary.

Defining the criteria used to assess sites

Size

- 4.20 The primary criteria used to determine whether an alternative site would be suitable for the development is the necessary size, incorporating a degree of flexibility.
- 4.21 The Site area for the proposed development is approximately 1,608 sqm.
- 4.22 At 355sqm gross, with a net shop floor area of only circa 225sqm, the proposed store will be in any case of a small scale.
- 4.23 Notwithstanding this, the proposed development will also include the provision of an external refuse, recycling and plant area, 25 no. car parking spaces including 1 no. disabled bay, 2 no. EV charging bay, 4 no. cycle parking spaces, 1 no. motorcycle parking space and a dedicated off-street service vehicle unloading area.
- 4.24 Plant is essential to the operation of the store. In addition, the proposed car parking provision complies with the requirements set out within the parking standards at Appendix 6 of the Local Plan (2019).
- 4.25 On this basis, it is not considered that the level of car parking or the size of the external refuse, plant and recycling area can be reduced in order to accommodate the proposed development onto a smaller site, should this be available.
- 4.26 Similarly, it is not considered appropriate to consider far larger sites as suitable for the proposed development, as a development of the proposed scale on these sites would constitute an inefficient use of the land. Furthermore, increasing the scale of the proposed development in order to fit a larger site would negate the purpose of the store as a top-up convenience shop only.

- 4.27 When considering the suitability of existing units only (which already have consent for use as a retail convenience store) as opposed to re-development opportunities, only the GIA of the unit itself will be taken into consideration (given car-parking would not be a policy requirement).
- 4.28 Therefore, in order to be considered suitable for the development, alternative sites must be able to accommodate the following requirements with regards to size:
- Sites requiring re-development must provide the ability to accommodate:
 - An internal floorspace area of 355sqm gross and 225sqm of net sales floorspace;
 - At least 25 no. car-parking spaces;
 - A suitably sized refuse, plant and recycling enclosure; and
 - A total Site area between 1,366.8sqm and 1,849.2sqm (+/- 15% of the 1,608 sqm total Site area proposed as part of the application).
 - Existing retail sites must provide the ability to accommodate:
 - An internal floorspace area of between 320sqm and 390sqm (+/- 10% of the 355sqm floorspace proposed as part of the application); and
 - Suitable space to accommodate a refuse, plant and recycling enclosure.
- 4.29 Similarly, sites which are approximately 20% larger than the overall site area will not be considered appropriate for the reasons given in paragraph 5.24.
- 4.30 This methodology aligns with a March 2012 Supreme Court judgement (Tesco Stores Limited v Dundee City Council). The Judgement, at paragraph 45 (onwards), ruled that when undertaking a sequential exercise the word 'suitable' means the proposal for which the applicant is seeking permission, and not whether the proposed development could be altered or reduced to fit an alternative site.

Other Considerations

- 4.31 For those sites which are considered suitable to accommodate the requirements of the proposed development in terms of size, further considerations are taken into account. This includes:
- Where the site is not already in retail use, whether the existing use of the site is protected by planning policy and thus not suitable for retail development;
 - Whether any other development constraints would prevent retail development of the scale proposed; and
 - Whether the site is currently available.

4.32 The methodology for identifying sites is detailed below.

Identification of Sites

4.33 The following paragraphs set out how potential sites have been identified and their application within the Sequential Assessment relative to the above methodology. The assessment of the sites is split into two parts:

- Sites identified via independent online property searches;
- Sites identified through liaison with local property agents; and
- Independent search of online planning records.

4.34 For each of the above, a detailed assessment of each site has been undertaken including an assessment of size, availability, and any further potential constraints prohibiting the site from accommodating the proposed development.

Sites identified via independent online property searches

4.35 The following national and local property agent online listings have been reviewed to source alternative sites:

- Savills;
- Property Link;
- On The Market;
- Knight Frank;
- Prime Location;
- LoopNet;
- Carter Jonas; and
- Zoopla.

4.36 Searches were undertaken in August and September 2025, as well as February and March 2026.

4.37 The sites identified via search of the above property listings are assessed in the table attached at **Appendix A**.

Liaison with Local Property Agents

4.38 The following local property agents were contacted regarding the availability of sites:

- Ark Property;

- William H Brown;
- Sedge Homes;
- Pygott & Crone Spalding;
- Longstaff; and
- Nominal Land.

4.39 No sequentially preferable sites were identified within Spalding Town Centre by local property agents.

Independent Search of Online Planning Records

4.40 An independent search of the online planning records published by South Holland District Council also been undertaken.

4.41 There is no permitted retail floorspace approved within Spalding Town Centre or the 300m 'edge-of-centre' boundary yet to be constructed.

4.42 There are no current planning applications for the development of additional retail floorspace within Spalding Town Centre or the 300m 'edge-of-centre' boundary.

4.43 There is a large allocation to the south of Pinchbeck intended to provide local shopping facilities. A desktop-based review and search via the South Holland District Council public access planning register reveals that, to date, no planning application has been submitted for this purpose. Additionally, a site masterplan for Phase 1 of allocation Pin024/045 (Vernatts Urban Extension) (H14-1218-21) comprising up to 400 new homes has been approved, and there is no inclusion of retail space within the proposals.

4.44 The location of the proposed development will therefore adequately serve the needs of Phase 1 of allocation Pin024/045 (and the need for additional retail to serve the new urban extension as highlighted within policies 24 and 27), serve the local catchment within Pinchbeck, and is potentially more accessible, and in a more sustainable location than any future retail provision within the Local Plan (2019) site allocations.

4.45 On this basis, no sequentially preferable sites located in Spalding Town Centre or the 300m 'edge-of-centre' boundary have been identified via search of online planning records, or within the South-East Lincolnshire Local Plan 2011-2036 (2019) site allocations for Pinchbeck and Spalding.

Summary of Sequential Assessment

- 4.46 10 properties were identified as being available within Spalding Town Centre or the 300m 'edge-of-centre' boundary as a result of extensive site research.
- 4.47 The Sites are assessed within the table enclosed at **Appendix A**.
- 4.48 The Sites are not suitable to accommodate the requirements of the proposed development. As set out above, the sites have been assessed against the defining criteria. Additionally, suitable flexibility has been allowed for in respect of layout changes and adaptability. This is considered on a case-by-case basis within Appendix A.
- 4.49 The sequential test has therefore been passed and there are no sequentially preferable sites available to accommodate the proposed development.
- 4.50 The retail impact assessment is set out in the following section.

5. IMPACT & NEED CONSIDERATIONS

- 5.1 This retail statement has already addressed the required policy tests to justify the proposed retail unit, namely, demonstrating compliance with the sequential assessment in line with policy 24.
- 5.2 As outlined, the provision of proposed retail units, aside from those under the provision of policy 27, are required to complete the retail sequential assessment, and where above 250sqm (net) retail floor space outside Spalding Town Centre, an impact assessment.
- 5.3 The proposed retail unit is to comprise a retail floorspace of only 225sqm. However, for robustness, this section considers the quantitative impact of the proposed development by detailing the methodology and application of the impact assessment. This includes how the study area has been arrived at and an assessment of how existing retail within the study area will be impacted.
- 5.4 Furthermore, and again in the interest of robustness and given previous comments from South Holland District Council, consideration has been given to qualitative need of the proposed convenience store as prescribed within policy 27 part C, despite not being required for the retail justification.

Impact Assessment

Defining the Study Area

- 5.5 As detailed within the preceding section of this report, the development is proposed to operate as a convenience store operating on a top-up basis to serve a local catchment.
- 5.6 The following aspects of the development demonstrate that the proposed store will serve a local catchment only:
- The store will be only 355sqm gross in size. Convenience stores of this size usually only sell approximately 2,500 product lines, far fewer than the range of lines generally sold in larger supermarkets (between 8,000 to 30,000);
 - The actual shop floor will be even smaller at circa 225sqm when factoring in back-of-house requirements, which is below the Sunday Trading Act threshold of 280sqm;
 - The shopping trips undertaken at convenience stores are of a small size, usually providing essential goods on a top-up basis;

- The proposed store is well below the national threshold of 2500sqm in terms of the requirement for the impact test; and
- The proposed store is additionally below the 250sqm threshold set out at within policy 24 of the Local Plan (2019).

5.7 As noted earlier, the Site is located within Pinchbeck Main Service Centre and Pinchbeck Settlement Boundary under policies 1, 19, 22 and 23 of the Local Plan (2019).

5.8 The development is therefore proposed to serve the local catchment of Pinchbeck village only, within a 1.5km radius.

5.9 The application Site is located 3km away from Spalding Town Centre, the nearest designated retail centre.

5.10 Furthermore, the Site is located a considerable distance from the second nearest designated retail centre, Holbeach, which is 14.7km away from the Site.

5.11 The NPPG states that the impact test should be *“undertaken in a proportionate and locally appropriate way”*.

5.12 Furthermore, as previously noted, the NPPF (2026) states the following in respect of how an impact assessment should be undertaken, Policy TC4, Assessing the Impact of Development on Town Centres, states:

“2. In circumstances where an impact assessment is required, it should be demonstrated that the development would be unlikely to have a significant adverse impact on:

a. Existing, committed and planned public and private investment in a town centre or centres in the catchment area of the proposal; and

b. Town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).”

5.13 A town centre is understood to mean the following, as set out within the NPPF Glossary:

“Area defined in the local authority’s policies map in the development plan including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and

local centres as defined in the development plan but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or, including main town centre uses, do not constitute town centres.”

- 5.14 With the above in mind, particularly the fact that the nearest designated town centre is located a greater distance than the general catchment area for such a store, it is considered reasonable to limit any assessment of impact to Spalding Town Centre only. That being said the assessment does account for the provision of existing nearby convenience stores located on Knight Street.

Convenience Expenditure within Catchment Area

- 5.15 The retail evidence base for the South Holland District Council area is the South East Lincolnshire (SEL) Town Centre and Retail Capacity Study (April 2020)¹ prepared by Reeves Retail Planning Consultancy and Williams Gallagher. The report's retail analysis is based on a household survey undertaken by NEMS Market Research in November / December 2019.
- 5.16 Importantly, the sample includes a total of 1,208 interviews undertaken across a series of 11 zones that reflect the settlement distribution within South East Lincolnshire². Zone 5 forms the Spalding area, which includes Pinchbeck village and Spalding Town Centre (and is therefore the 'zone' relevant to this assessment).
- 5.17 The SEL Town Centre and Retail Capacity Study (2020) estimates convenience expenditure by zone over the period of 2018-2036. As part of this, the study forecasts the expenditure per capita for each zone in 5-year intervals exc SFT which allows for SFT at 3.8% (Experian Retail Planner Briefing Note 17, Figure 5).
- 5.18 The forecast convenience expenditure per capita figures for zone 5 are set out within Table A11.2 of the SEL Town Centre and Retail Capacity Study (2020)³.
- 5.19 The figures for the exact years of 2025, 2026, 2027 and 2028 have been calculated for the purposes of this impact assessment, using a 0.1% annual growth rate (Experian Retail Planner Briefing Note 19, January 2022). These are outlined in Table 1 below.

¹ South East Lincolnshire Town Centre and Retail Capacity Study (April 2020)

² South East Lincolnshire Town Centre and Retail Capacity Study (April 2020), Executive Summary

³ South East Lincolnshire Town Centre and Retail Capacity Study (April 2020), Appendix 11, Table A11.2

Table 1: Expenditure per capita forecasts for zone 5 (SELTCRCS 2020)⁴

	2025	2026	2027	2028
Zone 5 (SELTCRCS)	£2,153	£2,155	£2,157	£2,160
Growth Rate	0.1%	0.1%	0.1%	0.1%

- 5.20 The SEL Town Centre and Retail Capacity Study (2020) uses 2018 population estimates and 2020-2036 projections from Experian. However, since the publication of the SEL Town Centre and Retail Capacity Study (2020), the Office for National Statistics (ONS) has published population data from the 2021 Census. These figures are considered more appropriate and will provide a more accurate understanding of present-day available retail expenditure.
- 5.21 The ONS provides 2021 population data for the area of Pinchbeck and Surfleet specifically. The population of Pinchbeck and Surfleet in 2021 was 7,375 persons⁵ (ONS Nomis).
- 5.22 The estimated total convenience expenditure for Pinchbeck and Surfleet can be calculated using the overall zone 5 expenditure per capita forecasts from the SEL Town Centre and Retail Capacity Study (2020), and population data from the ONS.
- 5.23 However, this calculation provides the estimated total available convenience expenditure. Given the proposed store is a local top-up convenience store only, it is necessary to estimate the total available expenditure for top-up convenience alone.
- 5.24 Taking into account the distance between the application Site and identified retail centres, and factoring in general shopping trends, it is considered that shoppers are likely to undertake one bulk shop per week with essential top-up shops undertaken more frequently. On this basis, the total available convenience expenditure figures are halved in order to calculate the available top-up convenience expenditure within Pinchbeck village. This is presented in Table 2 below.

Table 2: Available 'Total' and 'Top-Up' Convenience Expenditure within Pinchbeck (50% of total convenience expenditure)

⁴ South East Lincolnshire Town Centre and Retail Capacity Study (April 2020), Appendix 11, Table A11.2

⁵ Office for National Statistics Nomis, 2021 Census Area Profile for Pinchbeck and Surfleet Ward (as of 2022), South Holland Local Authority and England Country

Population (7,375)	2025	2026	2027	2028
Total convenience expenditure	£15,878,375	£15,893,125	£15,907,875	£15,930,000
Top-up convenience expenditure	£7,939,188	£7,946,563	£7,953,938	£7,965,000

- 5.25 It should be noted that these projections assume no further population growth within Pinchbeck and Surfleet from 2021 to 2028, and thus are extremely conservative estimates.

Existing Retail Provision within Pinchbeck

- 5.26 In terms of existing retail convenience of comparison to the proposal, the following falls within Pinchbeck Main Service Centre:
- Spar at 32-34 Knight St, Pinchbeck, PE11 3RB; and
 - SPAR Pinchbeck at 47,49 Knight St, Pinchbeck, PE11 3RA.
- 5.27 There are no available permissions to view on the South Holland District Council planning register which provide floorspace figures for either of the aforementioned retail convenience stores.
- 5.28 Instead, from a satellite imagery review, the Spar at 32-34 Knight St is estimated to be 200sqm GIA. Adopting a 70:30 gross:net floorspace ratio (as generally accepted and utilised within the SEL Town Centre and Retail Capacity Study (2020)) would therefore equate to 140sqm shop floor area. In addition, the SPAR Pinchbeck at 47,49 Knight St is estimated to be 286sqm GIA, and adopting the same 70:30 gross:net floorspace ratio would therefore equate to a 200sqm shop floor area.
- 5.29 The SEL Town Centre and Retail Capacity Study (2020) includes a 2025 Benchmark Sales density figure for Convenience Floorspace (£ per sqm) of £9,535 per sqm⁶.
- 5.30 The sales density figures are provided in Table 3 below, factoring in yearly growth as per the estimations provided within the Experian Retail Planner Briefing Note 21 (February 2024):

⁶ South East Lincolnshire Town Centre and Retail Capacity Study (April 2020), Experian Retail Planner Briefing Note 17, Figure 3a

- No forecast increase in sales densities during 2025;
- Small average increase of +0.2% per annum during 2026 to 2030; and
- Even smaller average increase of +0.1% per annum thereafter.

Table 3: Forecast sales density figures for convenience floorspace (Spar and SPAR Pinchbeck)

	2025	2026	2027	2028
Estimated Sales Density	£9,535 per sqm	£9,554 per sqm	£9,573 per sqm	£9,592 per sqm

- 5.31 Taking the assumed sales floorspace of both the Spar and SPAR Pinchbeck on Knight St, and multiplying by the estimated sales density for convenience floorspace provided by the SEL Town Centre and Retail Capacity Study, it is possible to calculate the estimated turnover of existing convenience retail provision within Pinchbeck village. This is presented in Table 4 below.

Table 4: Estimated turnover of existing retail provision in Pinchbeck village

Existing retail convenience provision	2025	2026	2027	2028
Spar and SPAR Pinchbeck (total 340sqm sales floor space)	£3,241,900	£3,248,360	£3,254,820	£3,261,280

- 5.32 The above figures illustrate the total estimated turnover of existing top-up retail provision, of a comparable type and scale to the proposal, within Pinchbeck Main Service Centre.

Proposed Retail Provision

- 5.33 The application seeks to provide a local convenience store of 355sqm gross, translating to a shop floor area 225sqm.
- 5.34 For the purposes of assessing the potential turnover of the proposed store, the forecasted sales density figures for 2025-2028 (as presented in Table 3),

calculated by using the 2025 figure from the SEL Town Centre and Retail Capacity Study (2020), are adopted.

- 5.35 As per the approach in Table 4, it is possible to apply the estimated sales densities and the proposed sales area of the development (shop floor area 225sqm) in order to estimate the projected turnover of the proposed store. This is presented below in Table 5.

Table 5: Estimated turnover of proposed store

Premises	2025	2026	2027	2028
Application Site (225sqm)	£2,145,375	£2,149,650	£2,153,925	£2,158,200

- 5.36 The estimated turnovers of both existing and proposed convenience retail provision in Pinchbeck Main Service Centre can be used to assess retail impact. This is conducted in the next section.

Assessment of Impact of Proposed Store

- 5.37 The total available expenditure for convenience goods within Pinchbeck village has been calculated using the forecast expenditure per head provided within the SEL Town Centre and Retail Capacity Study (2020) for zone 5 and the population of Pinchbeck and Surfleet. This figure equates to £15,878,375 in 2025.
- 5.38 This has been halved in order to estimate the total available expenditure for top-up convenience goods. This figure equates to £7,939,188 in 2025.
- 5.39 This can be compared to the sum of estimated turnover of existing stores and the estimated turnover of the proposed store in order to review whether sufficient capacity remains. This is set out in Table 6 below.

Table 6: Comparison table

Premises	Estimated Turnover (£m)			
	2025	2026	2027	2028
(a) Existing retail convenience provision (Spar and SPAR Pinchbeck)	£3,241,900	£3,248,360	£3,254,820	£3,261,280

(b) Application Site	£2,145,375	£2,149,650	£2,153,925	£2,158,200
(c) Total top-up convenience turnover (a) + (b)	£5,387,275	£5,398,010	£5,408,745	£5,419,480
(d) Forecast available top-up convenience expenditure	£7,939,188	£7,946,563	£7,953,938	£7,965,000
(e) Surplus available top-up convenience expenditure (d) – (c)	£2,551,913	£2,548,553	£2,545,193	£2,545,520
(f) Forecast total available retail convenience expenditure	£15,878,375	£15,893,125	£15,907,875	£15,930,000
(g) (f) – (c) Surplus available total retail convenience expenditure	£10,491,100	£10,495,115	£10,499,130	£10,510,520

5.40 The table demonstrates that the following can be concluded:

- Taking into account the proposed store alongside the existing comparable provision in Pinchbeck, there would remain a surplus of circa £10.5million pounds available for other convenience expenditure outside of Pinchbeck Main Service Centre as a whole; and
- Taking into account the proposed store alongside the existing comparable provision in Pinchbeck, there would remain a surplus of circa £2.5million pounds available for other top-up convenience expenditure outside of Pinchbeck Main Service Centre as a whole.

- 5.41 Significant available convenience expenditure will remain. Indeed, total turnover in Pinchbeck from convenience spending (including the proposed store) will remain less than 70% of total available retail convenience expenditure. Mindful of Pinchbeck's identified role as a Main Service Centre, this is considered entirely acceptable.
- 5.42 Significant retail expenditure availability remains so as to ensure no adverse impact on Spalding Town Centre nor the existing convenience store nearby to the Site.

Quantitative Need Considerations

- 5.43 As noted throughout this statement, applications for retail units may benefit from provision under policy 27 rather than policy 24. In this case, the application has demonstrated compliance with policy 24 only. Nevertheless, and although not required, due to previous comments received from South Holland District Council, consideration has been given to the requirement set out in policy 27.
- 5.44 Policy 27 part C asks applicants who are proposing convenience stores of over 100sqm (net) floor space to justify their size in respect of qualitative need to remedy a geographical deficiency in the distribution of shopping.
- 5.45 To begin, it is worth considering national policy guidance on this matter. Since the 2012 version of the NPPF, guidance has based impact and sequential assessments, and therefore the suitability of out-of-centre locations, on 'effects on town centres' rather than on demonstrating 'need' as a standalone requirement. This notion has been maintained in all revision of the NPPF since.
- 5.46 Section 8, Ensuring the Vitality of Town Centres, of the NPPF (2026) covers the assessments required to demonstrate that proposals have adequately considered 'town centre vitality and viability'. As expressed through policies TC3 and TC4 this takes the form of the sequential and impact assessment only.
- 5.47 It should be noted that both of these national policy requirements have already been assessed within this report and are considered to have been adequately met.
- 5.48 With this in mind, the proposed development does not deny being geographically close to the two SPAR convenience stores located on Knight Street. However, this is not to say that qualitative need cannot be demonstrated.

- 5.49 Based on market experience, a convenience store of this size would normally only sell approximately 2,500 product lines.
- 5.50 As previously mentioned, the proposed retail unit will offer a range of everyday goods including bread, milk, eggs, fruit and vegetables, fresh meat, ready meals, and snacks along with newspapers, tobacco and magazines. Whilst this may not be unlike from the provision in the existing stores, it offers a larger cumulative supply and, importantly, variety.

Additional Considerations

- 5.51 The points below highlight the robustness of the approach taken throughout this retail statement and should be noted.
- 5.52 The population figure for Pinchbeck and Surfleet is taken from the ONS Nomis data website and for the purposes of this assessment, it has been assumed that population will not increase over the projection period (2021-2028).
- 5.53 South Holland District Council has a housing need (assessed under the standard method as per the NPPF published in December 2024) of 542 (up from 467 under the previous standard method)⁷. It can be assumed that at least some of this will be delivered within the Pinchbeck area, and therefore it can be concluded that the local population is likely to increase.
- 5.54 Furthermore, it should be noted that the NPPF published in August 2026, has further amended the standard method used to calculate housing need. Town Planning Consultancy, Pegasus Group, have calculated a new LHN for South Holland District Council, this figure comes to 569, representing a 4.9% increase from the figure used within the Councils latest 5-year Housing Land Supply Assessment. This change reinforces the likelihood of the local population increasing.
- 5.55 Zone 6 of the SEL Town Centre and Retail Capacity Study (2020) forms the Spalding Fringe area, and it can therefore be assumed that this extra population allows for additional retail capacity within the area.
- 5.56 A 2025 Benchmark Sales density figure for Convenience Floorspace (£ per sqm) of £9,535 per sqm has been used for the purposes of calculating estimated turnover for all existing and proposed stores within Pinchbeck. This figure can be considered highly robust mindful of the scale of these stores.

⁷ South Holland District Council 5-year Housing Land Supply Assessment (as of 31st March 2025) Section 1.0

- 5.57 On the above basis, the identified surplus within the preceding section of this Assessment is likely to be an under-estimation. Therefore, the statement is able to demonstrate that the proposed impact is acceptable and in line with national and local planning policy and guidance.

Summary

- 5.58 Whilst, as detailed earlier in this Statement, the net floorspace of the proposed unit falls below the threshold at which a Retail Impact Assessment is required, a high-level assessment has been undertaken for robustness.
- 5.59 The Assessment demonstrates that significant available convenience expenditure will remain when taking into account the proposed store. Indeed, total turnover in Pinchbeck from convenience spending (including the proposed store) will remain less than 70% of total available retail convenience expenditure. Mindful of Pinchbeck's identified role as a Main Service Centre, this is considered entirely acceptable.
- 5.60 Significant retail expenditure availability remains so as to ensure no adverse impact on Spalding Town Centre.
- 5.61 Additionally, and despite outlining fulfilment of policy 24 criteria within earlier sections of this report, consideration has been given to the policy 27 part C request for qualitative need to remedy a geographical deficiency in the distribution of shopping.

6. CONCLUSION

- 6.1 This retail sequential and impact assessment has been produced in order to support a planning application for the creation of a new convenience store on the existing application Site.
- 6.2 The assessment has been undertaken in order to fully comply with policy 24 of the Local Plan (2019), planning practice guidance and the NPPF (2026).
- 6.3 The sequential assessment is set out in full at Section 4 of this report. 10 sites were identified as available through extensive research and these sites are assessed at **Appendix A**.
- 6.4 The sites are not suitable to accommodate the requirements of the proposed development. Therefore, the application Site has passed the sequential test as there are no available sequentially preferable sites that could accommodate the propose development.
- 6.5 Whilst the net floorspace of the proposed store falls below the threshold where a retail impact assessment is required, one has been undertaken for robustness. The retail impact assessment is set out in full at Section 5 of this report. It is concluded that the proposed store will have no adverse impact on Spalding Town Centre.
- 6.6 The application will provide a number of retail benefits, such as improved access to convenience retail goods and the creation of additional employment opportunities.
- 6.7 The proposed development is therefore considered acceptable in retail terms.

APPENDIX A

APPENDIX A:

Sequential Assessment – Sites identified through online property listings & property agents (February 2026)

Site	Size (approx.)	Lawful / Existing Use	Distance from site	Planning policy / Heritage designations	Availability
Welland Workspace, Pinchbeck Road PE11 1QD	12sqm	Office (Use Class E)	3.0km	Spalding Town Centre Spalding Conservation Area	Actively marketed for sale
	Assessment: Although the site/property is located within the search area of Spalding Town Centre and 300m boundary, the site is too small to accommodate the requirements of the proposed development. The site is therefore discounted.				
Unit 1 24-25 New Road, PE11 1DQ	156.49sqm	Retail (Use Class E)	3.2km	Spalding Town Centre Spalding Conservation Area	Actively marketed for sale
	Assessment: Although the site/property is located within the search area of Spalding Town Centre and 300m boundary, the overall size of the Site is split across ground, first and second floor, totalling 156.49m2. The ground floor retail area comprises 62.36m2, as such this site is too small to accommodate the requirements of the proposed development. Even if the division of levels could be accommodated, the total internal floor area is still nearly 50% too small given the lower threshold deemed suitable to fit the requirements of the Site. The site is therefore discounted.				
10a Station St, Spalding PE11 1EF	Not Stated	Retail (Use Class E)	3.5km	Spalding Town Centre Spalding Conservation Area	Actively marketed for sale
	Assessment: The site/property is located within the search area of Spalding Town Centre and 300m boundary, and the agent for the Site was contacted on the 3 rd March 2026. The agent did not provide the size of the unit and noted that the site was under offer. Nevertheless, from an online review it can be seen that the Site is significantly below the lower threshold deemed suitable to fit the requirements of the Site. The site is therefore discounted. Contact detail were shared with the agent should further information become available.				

APPENDIX A:

Sequential Assessment – Sites identified through online property listings & property agents (February 2026)

7 Sheep Market, Spalding PE11 1BH	90sqm	Retail (Use Class E)	3.4km	Spalding Town Centre Spalding Conservation Area Spalding Primary Shopping Area	Actively marketed for sale
	Assessment: Although the site/property is located within the search area of Spalding Town Centre, 300m boundary and Spalding Primary Shopping Area, the overall size of the Site is split across two storeys, understood as retail space on ground floor plus ancillary accommodation, plus basement/cellar (unusable) totalling 90m2. Even if the division of levels could be accommodated, the total internal floor area is still nearly 50% too small given the lower threshold deemed suitable to fit the requirements of the Site. The site is therefore discounted.				
RED LION QUARTER, Red Lion St, Spalding PE11 1SX	21sqm	Office (Use Class E)	3.4km	Spalding Town Centre Spalding Conservation Area	Actively marketed for sale
	Assessment: The site/property is located within the search area of Spalding Town Centre and 300m boundary, however, is only available as a 21m2 unit. Additionally, the unit is listed as an 'individual office within a prestigious office building'. As such the site is not considered appropriate for the intended retail use. In any case, the site is too small to accommodate the requirements of the proposed development. The site is therefore discounted.				
Market Place, Spalding, PE11 1SU	215sqm	Retail (Use Class E)	3.4km	Spalding Town Centre Spalding Conservation Area Spalding Primary Shopping Area Primary Shopping Frontage	Actively marketed for sale
	Assessment: The site/property is located within the search area of Spalding Town Centre, 300m boundary and Spalding Primary Shopping Area. The Site is understood to encompass the ground floor, ancillary areas and staff kitchen/WC in the rear parts, as well as further attached storage building at the rear of the main building, with ground and first floor areas. The site is nearly 100sqm below the lower threshold deemed suitable to fit the requirements of the Site. The site is therefore discounted.				

APPENDIX A:

Sequential Assessment – Sites identified through online property listings & property agents (February 2026)

7 Market Place, PE11	1,706sqm	Retail (Use Class E)	3.4km	Spalding Town Centre Spalding Conservation Area Spalding Primary Shopping Area Primary Shopping Frontage	Actively marketed for sale
	Assessment: The site/ property is located within the search area of Spalding Town Centre, 300m boundary, Spalding Primary Shopping Area and Primary Shopping Frontage, the site has been considered as per the information shared on the online listing as well as the marketing brochure. It is understood that a total 1706 sqm is available to let across the two-storey site. This space is available in part or as a whole, excluding unit 1 which has been let to the 'original factory shop'. The lease of the site 'in-part' is understood to relate to the separate storeys, rather than the further splitting of the GF area. In any case, the ground floor unit area sits above the 10% + threshold used for this assessment. Nevertheless, and for robustness, consideration has been given to the further sub-division of the ground floor unit. However, concerns were flagged due to the difficulty to undertake the subdivision, leaving an oddly shaped remaining unit with difficulty ensuring that both have a ground floor frontage to the street. The site is discounted on this basis.				
24&25 Bridge Street, Spalding, Lincs PE11 1XG	120-238sqm	Retail (Use Class E)	3.5km	Spalding Town Centre Spalding Conservation Area Spalding Primary Shopping Area Cycle Route Policy 33	Actively marketed for sale
	Assessment: The site/property is located within the search area of Spalding Town Centre, 300m boundary and Spalding Primary Shopping Area, however, the total floor area of 238m2. Although the ground floor can be let separately to the upper parts if required, the site remains too small to accommodate the requirements of the proposed development. The site is therefore discounted.				
12 Market PI, Spalding PE11 1SL	141sqm	Retail (Use Class E)	3.4km	Spalding Town Centre Spalding Conservation Area Spalding Primary Shopping Area Primary Shopping Frontage	Actively marketed for sale
	Assessment: Although the site/property is located within the search area of Spalding Town Centre, 300m boundary and Spalding Primary Shopping Area, the overall size of the Site is 141m2. As such the total internal floor area is over 50% too small given the lower threshold deemed suitable to fit the requirements of the Site. The site is therefore discounted.				

APPENDIX A:**Sequential Assessment – Sites identified through online property listings & property agents (February 2026)**

10 Hall PI, Spalding, PE11 1SR	261.6Sqm	Retail (Use Class E)	3.4km	Spalding Town Centre Spalding Conservation Area Spalding Primary Shopping Area Spalding Primary Shopping Frontage	Actively marketed for sale
	Assessment: Although the site/property is located within the search area of Spalding Town Centre, 300m boundary and Spalding Primary Shopping Area. It is understood that planning permission LPA ref. H16-0518-25, approved on the 19 th September 2025, changed the use of the ground floor unit from Use Class E to Sui Generis (betting office) with external alterations. It is understood that Boylesports now operates the entire ground floor unit and only the office space at first and second floors remains available. This space is not suitable for the intended commercial use of the convenience store. In any case, when taken together, the first and second floors still fall below the – 10% proposed floorspace. The site is therefore discounted.				