AUSTIN JOHN LTD

Town Centre Sequential Assessment



Proposed Change of Use from B8 Storage and Distribution to Class E Photography Studio at The Bungalow, Camelgate, Spalding, PE12 6ES

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1.0 Introduction

This Town-Centre Sequential Assessment has been prepared on behalf of Slice of Life Photography Limited in support of a full planning application for the change of use of the bungalow-style commercial premises at The Bungalow, Camelgate, Spalding, from storage or distribution within Use Class B8 to a photography studio within Use Class E.

The premises would be used as a specialist portrait photography studio providing maternity, newborn, family and pet photography. All customer visits would be arranged in advance, with approximately two to four appointments taking place each day. The business would not operate as a walk-in retail service and would not rely upon passing trade.

The site lies outside the defined Spalding town centre. This statement therefore considers the town-centre sequential approach under Policy TC3 of the August 2026 National Planning Policy Framework. This assessment is separate from the flood-risk Sequential Test. Policy F5(2)(c)(iii) of the August 2026 NPPF expressly excludes ordinary changes of use from the flood-risk Sequential Test. Flood risk is addressed separately within the submitted Flood Risk Assessment and Planning Statement.

This document should be read in conjunction with the following drawings and supporting information:

- AJA/1418/26/00 - Existing Plans
- AJA/1418/26/01 - Proposed Plans
- Business Plan and Operational Statement
- Planning Statement
- Design and Access Statement
- Flood Risk Assessment
- Biodiversity Net Gain Exemption Statement

2.0 Application Site and Proposal

The application relates to an existing bungalow-style commercial building of approximately 167 square metres. It forms part of a wider site with an established storage or distribution use within Use Class B8.

Relevant planning history includes application H16-0246-04, relating to an extension of the office accommodation serving the wider commercial operation, and application H16-1366-01, relating to the established storage or distribution use of the wider site. The earlier office accommodation appears to have been ancillary to the wider B8 operation rather than an independent office use. The present application has therefore been submitted on the basis of a material change from Use Class B8 to a photography studio within Use Class E.

The building has remained vacant and unused by the current occupying company for approximately two years. The proposal would bring it back into active and beneficial commercial use without displacing an existing operational business. Slice of Life Photography Limited is an established portrait photography business which has traded in the local area for approximately 13 years. It currently operates from premises in Whaplode but requires larger and more suitable premises to support its continued development. The business would operate strictly by appointment, typically accommodating approximately two to four sessions per day. Each session would generally last between one and three hours. Customers would normally arrive in one vehicle per appointment, with two vehicles attending only occasionally. Movements would be limited, predictable and distributed throughout the working day.

The Camelgate premises provide:

- Approximately 167 square metres of accommodation
- Sufficient internal space for studio sets and photographic equipment
- A choice of rooms for different photography sessions
- Secure storage for cameras, lighting, backdrops and props
- Ground-floor accommodation

- An existing access ramp
- Level internal circulation
- Suitable facilities for customers attending with babies, children, prams or pets
- Direct access between the parking area and studio;
- On-site parking spaces
- Convenient access for occasional courier deliveries.

3.0 Planning Policy Context

National Planning Policy Framework, August 2026

Policy TC3 applies a sequential test to proposals for main town-centre uses requiring planning permission where they are neither within an existing centre nor in accordance with an allocation for that purpose in an up-to-date development plan. Policy TC3 establishes that main town-centre uses involving new development should first be located within town centres identified in the development plan. If this is not feasible, edge-of-centre locations should be considered. Out-of-centre locations should only be considered where suitable town-centre and edge-of-centre sites are not available or expected to become available within a reasonable period. 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. Applicants and local planning authorities are required to exercise flexibility when considering matters such as format and scale so that opportunities to use suitable town-centre or edge-of-centre premises are fully explored. The NPPF definition of main town-centre uses includes retail development, professional services, offices and arts and cultural development. Although the proposed photography studio would operate differently from a conventional walk-in shop or service, this assessment takes a precautionary approach and assesses the availability of sequentially preferable premises.

Policy TC4 concerns the impact of qualifying retail and leisure development upon town centres. The proposed photography studio would provide approximately 102 square metres of floorspace and would accommodate only two to four pre-booked appointments per day.

It would therefore fall substantially below the default 2,500-square-metre threshold and would not require a quantitative town-centre impact assessment.

Policy E2 requires substantial weight to be given to the economic benefits of commercial development which allows businesses to invest, expand or adapt. The proposal would enable an established local creative business to relocate to larger premises and continue its development.

Policy L2 gives substantial weight to proposals which make better use of vacant or underutilised land and buildings. The proposal would bring an existing vacant commercial building back into productive use without requiring additional development or land take.

National Planning Practice Guidance confirms that it is for the applicant to demonstrate compliance with the town-centre Sequential Test and that failure to undertake an assessment can constitute a reason for refusing permission. The guidance also confirms that the assessment should be proportionate and appropriate to the nature and scale of the proposal. Applicants must demonstrate flexibility over the format and scale of their development and clearly explain why any more central alternatives are unsuitable or unavailable.

South East Lincolnshire Local Plan

Policy 24 establishes the retail hierarchy for South East Lincolnshire, with Spalding performing a principal role.

Policy 25 seeks to support the vitality and viability of Spalding town centre. The availability of suitable town-centre and edge-of-centre premises has therefore been considered before relying upon the out-of-centre application site.

The proposal must also be considered against the Local Plan's wider support for economic development and the productive use of commercial premises.

4.0 Scope and Methodology

Although the proposal has been assessed as a potential main town-centre use, it would not operate in the same manner as a conventional shop or customer-facing professional service. The studio would be destination-based. Customers would make a deliberate journey for a pre-arranged appointment rather than visit because of passing trade, visibility from a shopping street or proximity to other town-centre services.

The business would not:

- Accommodate walk-in customers
- Depend upon passing pedestrian activity
- Operate as a conventional retail showroom
- Provide a high-frequency counter service
- Require a prominent retail frontage

The applicant has adopted a flexible approach to the format and scale of potential premises. These requirements arise from the nature of the business and its client base. However, any alternative property must be reasonably capable of accommodating the essential operational requirements of a professional photography studio. These requirements include:

- Approximately 167 square metres of usable accommodation
- Ground-floor or otherwise genuinely accessible accommodation
- Sufficient clear studio width, depth and ceiling height
- Space for lighting equipment, backdrops and photographic sets
- Separate or adaptable rooms for different session types
- Reception or waiting space
- Secure equipment and prop storage
- WC facilities
- Privacy and the ability to control internal lighting
- Level or ramped customer access
- Practical access for prams, young children and people with limited mobility
- Reasonable access for customers attending with pets

- Convenient loading for equipment and props
- Sufficient parking within or reasonably close to the premises
- Lawful or reasonably achievable use as a photography studio
- Availability within a reasonable period.

Property ownership and rental cost have not been treated as conclusive reasons for rejecting a sequentially preferable site. Cost and adaptation requirements may nevertheless form part of the overall assessment where they materially affect whether a property could realistically and viably accommodate the use.

5.0 Broad Sequential Assessment

Spalding Town Centre:
Spalding Town Centre contains a variety of retail, office and service premises. Many of these are traditional shop units arranged around active commercial frontages. Such accommodation is generally intended to benefit from pedestrian footfall, visibility, and passing trade.

The proposed photography studio has materially different operational characteristics. All sessions are booked in advance and typically last between one and three hours. The business does not require a prominent shop window or rely upon spontaneous visits. A conventional town centre retail unit may therefore provide frontage and footfall for which the business has no operational requirement, while not necessarily providing the depth, internal flexibility, controlled lighting conditions, storage or immediately accessible parking required for studio photography.

Upper-floor accommodation would be particularly difficult for clients attending with babies, young children, prams, pets and photographic belongings unless a suitable lift and convenient parking were available. Small office suites and serviced offices would also be unlikely to provide appropriate open studio space, controlled lighting conditions or facilities for the storage and movement of photographic equipment.

The applicant's monitoring of the town centre market did not identify accommodation that was both available within a reasonable period and capable of meeting the combined requirements of studio floorspace, internal flexibility, accessible ground-floor accommodation, storage and nearby parking.

The applicant has nevertheless approached the exercise flexibly. A smaller or differently configured town centre property could have been considered if it provided a workable studio layout and the necessary access arrangements. However, reducing the space to the extent that photographic sets, equipment storage or safe circulation could not be accommodated would materially alter the nature and effective operation of the proposal.

Edge-of-Centre Locations:

Edge-of-centre locations were considered as the next stage of the assessment. These locations can offer larger and more flexible accommodation than the historic town centre and may provide improved parking. However, the availability of suitable small commercial units in such locations is limited. Accommodation is frequently provided as larger retail, office or commercial units whose scale, layout or occupational arrangements are not proportionate to this small business.

No suitable and available edge-of-centre premises were identified that offered the necessary combination of:

- Approximately 167 square metres of adaptable ground-floor accommodation
- Appropriate studio dimensions
- Controlled and private photographic space
- Equipment and prop storage
- Convenient access for families, prams and pets
- Nearby parking and loading facilities
- Availability within a reasonable period

The applicant's consideration was not limited to an exact replication of the application building. Alternative arrangements and a reasonable variation in floorspace were considered, but no edge-of-centre option was identified that could satisfactorily accommodate the proposal.

Other Accessible Locations – Including the Springfields Area:

Other accessible commercial locations within Spalding, including the wider Springfields area, were also considered.

The Springfields area includes a substantial concentration of retail, leisure, food, employment and commercial activity. The application site is close to these existing facilities, although it lies outside the defined town centre and is treated as an out-of-centre location for the purposes of this assessment.

Commercial accommodation within and around Springfields is generally directed towards larger-scale retail, leisure or employment uses. The applicant's search did not identify a suitable alternative unit that was available within a reasonable period and offered the required small-scale studio accommodation, internal configuration, accessibility, storage and parking provision.

The application site is an existing commercial building within this established mixed commercial and employment setting. Its use would not introduce an isolated commercial destination into an otherwise undeveloped or predominantly residential area.

The Application Site:

The building at The Bungalow provides approximately 167 square metres of ground-floor accommodation. It has an existing ramped approach and level internal access and can accommodate the photographic sets, backdrops, lighting, props and storage required by the business.

The existing parking area is capable of serving the low and predictable level of demand associated with approximately two to four appointments per day, subject to the final site

plan confirming the number and dimensions of the spaces. Access is taken from the existing entrance on Camelgate and no alterations to the access are proposed.

The building has reportedly remained vacant or unused by the present occupier for approximately two years. Its reuse would bring an existing commercial building back into productive economic use without extending its footprint or materially altering its external appearance.

The site is accessible from Spalding by road and public transport and is situated close to the Springfields commercial area. Although clients are likely to travel primarily by car because they frequently attend with children, babies, prams, pets and other belongings, vehicle movements would be limited, pre-arranged and spread across the working day.

The site therefore provides a practical and accessible location for this particular low-intensity, destination-based service.

6.0 Flexibility in Scale and Format

Reasonable flexibility has been applied throughout the assessment. The applicant has not restricted the search to buildings of precisely the same size, appearance or layout as The Gables.

However, certain physical and operational requirements are fundamental to a photography studio. A property that cannot safely accommodate photographic backdrops, lighting equipment, client circulation and storage would not represent a realistic alternative. Similarly, premises lacking workable access for clients attending with babies, young children, prams or pets would materially restrict the services provided by the established business.

Dividing the operation between separate units would not provide a practical solution because the photographic sets, equipment, client facilities and staff presence need to be contained within a single operational premises. A substantially smaller shop or office would therefore change the nature of the proposal rather than amounting to reasonable flexibility in its format.

The assessment has consequently applied flexibility while preserving the essential operational characteristics of the business.

7.0 Effect on Spalding Town Centre

The proposed studio would not compete directly with the principal retail function of Spalding town centre. It would have no walk-in trade and would not depend upon passing customers, window shopping or a prominent retail frontage. Visits would be made only by prior appointment and would ordinarily involve one client group at a time.

The proposal concerns approximately 167 square metres of floorspace and does not comprise intensive retail or leisure development. It would not create a competing retail destination or divert a material volume of trade or footfall from Spalding town centre.

The proposal would instead facilitate the continued operation and growth of an established local business and bring a vacant commercial building back into beneficial use. A formal town centre impact assessment is not considered necessary, given the modest floorspace and the nature of the proposed operation.

8.0 Conclusion

This assessment has applied the sequential approach required by Policy TC3 of the National Planning Policy Framework.

The absence of complete historic property advertisements means that it has not been possible to provide a retrospective unit-by-unit schedule covering the whole search period. A proportionate assessment has therefore been undertaken of town centre, edge-of-centre and other accessible commercial locations within Spalding.

The applicant's search and the broader characteristics of the available commercial market have not identified a suitable and available alternative capable of accommodating the essential requirements of the business within a reasonable period. The assessment has

allowed flexibility in relation to floorspace and layout, while recognising the practical requirements of a functioning photography studio.

The proposed operation is a small, appointment-only and destination-based service that does not rely upon passing trade or linked shopping trips. It would generate approximately two to four appointments per day and would not operate as a conventional retail premises. Its location at Camelgate would therefore be unlikely to undermine the vitality or viability of Spalding town centre.

The application site offers suitable ground-floor accommodation, level internal access, equipment storage and parking within an established commercial area. It would also bring an existing building that has reportedly been vacant or unused for approximately two years back into productive use.

On the information available and having regard to the modest scale and particular operational characteristics of the proposal, it is considered that the sequential approach has been undertaken proportionately and that the application site represents a suitable location for the proposed photography studio.