



## SEQUENTIAL TEST

PROJECT: PROPOSED OFFICE AND LEISURE FACILITY

AT:  
BRIDGE FARM,  
HOLBEACH ROAD,  
SPALDING,  
PE12 6JP

Project Reference: 25171  
Drawing References: 25171-PL001, 25171-PL005, 25171-PL006,  
25171-PL010, 25171-PL011A, 25171-PL015D,  
25171-PL016, 25171-PL017A, 25171-PL018,  
25171-PL020.

Date: 16/12/25  
Written by: S-J. KNIGHT

## SEQUENTIAL TEST

### 1.0 Existing Site and Context

The application site is located on Holbeach Road (dwelling easting and northing 526880x and 324158y) approximately 450m from Springfields Roundabout, Spalding. The application site is as shown on Location plan indicated on drawing 25171-PL001 and is currently being purchased by Gramaro Properties Ltd.

### 2.0 Introduction

This Sequential Test Report has been prepared in support of planning application H16-1089-25 for a proposed padel facility comprising of 3 outdoor padel courts, ancillary leisure floorspace in the form of a Pilates studio, changing facilities, and associated parking at land off Holbeach Road, Spalding, Lincolnshire.

The purpose of this document is to demonstrate compliance with the National Planning Policy Framework (NPPF) specifically but not limited to Section 7 paragraphs 92 and 93, which seek to ensure the vitality and viability of town centres by directing main town centre uses to appropriate locations.

This report assesses the suitability, availability, and viability of alternative sites in sequentially preferable locations and concludes whether the proposed development is appropriately located in policy terms.

### 3.0 Policy Context

#### **National Planning Policy Framework:**

Section 7, Paragraphs 92 and 93 of the National Planning Policy Framework set out the Government's approach to supporting town centres and managing proposals for main town centre uses. Below summarises these two sections:

- Paragraph 92 emphasises the role of planning policies and decisions in supporting the vitality and viability of town centres, including by promoting a diverse range of uses and directing development to town centres where possible.

- Paragraph 93 requires that main town centre uses not in an existing centre, nor in accordance with an up-to-date local plan, are subject to a sequential test. This test requires applicants to demonstrate flexibility in format and scale and to consider sites in the following order:
  1. Town centre locations
  2. Edge-of-centre locations
  3. Out-of-centre locations

#### **South East Lincolnshire Local Plan 2011-2036:**

Policy 24 of the South East Lincolnshire Local Plan 2011-2036 (SELP) outlines the sequential approach for town centre uses. The policy seeks to ensure that main town centre uses are directed to the town centre first, then to edge-of-centre sites, and only to out-of-centre locations where sequentially preferable sites are unavailable, unsuitable, or unviable.

Policy 24 complements NPPF paragraphs 92 and 93 by providing the local framework for the delivery of sustainable leisure, retail, and service development.

#### **4.0 Description of the Proposed Development**

The proposal comprises the erection of a purpose-built padel tennis and leisure facility including 3 outdoor padel courts, ancillary leisure floorspace internally in the form of a Pilates studio, changing rooms, and associated car parking.

The facility would operate for both general public use and community use including use for local schools and weight loss clubs- details of this can be found within the supporting statement dated December 2025 supplied by '77 Padel Club', the business wishing to construct this facility. The location of the site means that the development proposed does not constitute as a main town centre use (as defined by the NPPF) and therefore requires assessment under the sequential approach.

The Site is located out-of-centre and is approximately 2.5 km from Spalding Town Centre however, Spalding's large shopping enterprise, Springfields, is just 450m from the application site therefore this is also over 2km from Spalding's Town Centre.

### 5.0 Definition of the Sequential Test Area

The primary catchment area for the proposed development has been defined as the settlement of Spalding and its immediate catchment, reflecting the nature of the proposed use, its catchment, and the hierarchy of centres identified in the South East Lincolnshire Local Plan.

The focus of the sequential test is **Spalding Town Centre**, being the most appropriate and relevant centre in accordance with the development plan, Policy 24 of the SELP, and the NPP.

### 6.0 Methodology

In recognition of potential challenges relating to leisure uses and their relationship with town centres, this Sequential Test has been undertaken with particular regard to Planning Practice Guidance confirming that the test is one of *location*, not of maximising town centre footfall.

The assessment focuses on whether there are genuinely sequentially preferable sites capable of accommodating the proposal in a realistic and deliverable manner, rather than hypothetical or highly constrained alternatives.

The following criteria have been applied when assessing alternative sites:

- **Availability** – whether the site is available now or likely to become available within a reasonable period
- **Suitability** – whether the site can accommodate the proposed development, having regard to size, configuration, access, policy constraints, and the need for flexibility
- **Viability** – whether the development would be commercially viable on the site

Appropriate flexibility has been applied to:

- Format
- Scale
- Layout
- Car parking provision

## 7.0 Identification of Sequentially Preferable Sites

### Town Centre Sites:

In considering potential town centre locations, specific regard has been had to the distinct operational characteristics of padel tennis and indoor leisure facilities, including:

- Minimum court dimensions and run-off zones
- Significant floor-to-ceiling height requirements
- Structural loading and column-free spans
- Noise containment and operational management
- On-site parking needs associated with leisure use both for the general public and the community.

A review of Spalding Town Centre has been undertaken, including vacant units, redevelopment sites, and allocated locations within the defined centre boundary.

While leisure uses can, in principle, be appropriate within town centres, padel courts represent a specialist sporting use that is materially different from gyms, studios, or smaller-scale leisure operators typically accommodated within town centre units. The external space required for the sport of Padel makes it difficult to find land within the town centre itself; any land available simply hasn't been found viable for leisure usage.

Edge-of-centre locations were considered with the same degree of flexibility applied to the town centre assessment. However, it is noted that edge-of-centre sites within Spalding typically comprise smaller, constrained plots or land subject to competing development pressures, such as residential or employment uses, limiting their realistic availability for a purpose-built leisure facility.

The absence of suitable town centre options is not a consequence of inflexibility on the part of the applicant but rather reflects the physical and operational incompatibility of padel courts within Spalding Town Centre. That, however, should not limit the area to have no opportunities for the growing sport of Padel.

Given the absence of suitable town centre and edge-of-centre options, out-of-centre sites were next considered. The application site at Bridge Farm, Holbeach Road, represents an accessible and available 'out-of-centre location'

that can accommodate the proposed development without adverse impacts.

The site is close enough to the town (a mere 2.5km away) for easy access and is on par with the shopping centre Springfields. The site location does increase the traffic demand which the town centre already has.

### 8.0 Assessment of the Application Site

The application Site at Bridge Farm, Holbeach Road has been assessed against the same availability, suitability, and viability criteria applied to alternative sites and is considered to be sequentially appropriate.

- **Availability:** The Site is under the control of the applicant and is available for development within the application timeframe. The applicant is keen to progress the development for the general public and community use.
- **Suitability:** The Site is of sufficient size and configuration to accommodate the padel courts, necessary run-off areas, building heights, parking, and servicing requirements. The use is compatible with the surrounding area and does not rely on a town centre location to function effectively. The nearby Shopping Centre is proof that use Class E establishments work within the location and have previously been granted permission.
- **Viability:** The proposed leisure facility is commercially viable on the Site and can be delivered without abnormal development costs that would undermine implementation. The allowance of new development ensures no disruption of any existing buildings.

The Site benefits from direct access from Holbeach Road, is accessible by car, cycle, and public transport, and serves a broad catchment area. The development is under the locally set floorspace threshold which is also a criteria under section 7 of the NPPF. The site location supports participation in sport and recreation without drawing trade away from town centre retail or service functions.

### 9.0 Conclusion

In addressing potential retail or leisure-based sequential challenges, it is important to emphasise that the NPPF and SELP Policy 24 do not require all leisure uses to be directed to town centres regardless of operational suitability. Paragraphs 92 and 93 seek to **support town centres**, not to force incompatible development into constrained locations.

Having undertaken a robust sequential assessment in accordance with NPPF paragraphs 92 and 93 and Policy 24 of the SELP, it is concluded that:

- The proposed padel tennis and leisure facility is a form of 'main town centre leisure use' that does not have a functional requirement to be located within the town centre
- There are no available, suitable, or viable sites within Spalding Town Centre or edge-of-centre locations capable of accommodating the development, even with appropriate flexibility
- The proposal will not undermine the vitality or viability of Spalding Town Centre and will not compete with its primary retail or service role.
- The development will positively contribute to local health, wellbeing, and leisure provision, consistent with the objectives of NPPF paragraph 92 and SELP Policy 24 (further details of 77 PADELS community use can be found within their Supporting Statement dated 15.12.2025).

The proposed development therefore **passes the sequential test** and is compliant with Section 7 of the NPPF and the South East Lincolnshire Local Plan.