Littleworth Drove, Deeping St Nicholas

Sequential Test Report

November 2024

Client: W D Branton

Project: Proposed rural exception site of affordable housing

Project no: 615

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1.0 Introduction

1.1

This Sequential Test Report accompanies a full planning application by W D Branton for twenty four dwellings on land to the north-west of Littleworth Drove, Deeping St Nicholas.

1.2

The proposal seeks to develop the site to provide an affordable housing residential scheme comprising of twenty four houses together with associated parking and private amenity space. The proposal at its heart aims to create an affordable, sustainable high quality development that will contribute to the settlement of Deeping St Nicholas as well as improve the entrance to Deepng St Nicholas by creating a 'Gateway' scheme.

1.3

This statement forms part of a series of reports and documents submitted in support of the planning application.



Image Showing the Position of the Proposed Site in Relation to the Settlement of Deeping St Nicholas

2.0 Planning Policy Context

2.1 General

A planning policy overview is provided within the Design & Access Statement accompanying this application however planning policy in relation to flood risk is reviewed in more detail within this section of this report.

2.2 National Planning Policy Framework 2023

The National Planning Policy Framework 2023 through Climate Change policies seeks to locate new development within away from areas at the highest risk of flooding.

Paragraph 166 states '***Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.'***

Paragraph 167 goes on to say '**All plans should apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk and the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:**

a) applying the sequential test and then, if necessary, the exception test as set out below;

b) safeguarding land from development that is required, or likely to be required, for current or future flood management;

C) using opportunities provided by the new development and improvements in green and other infastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an intergrated approach to flood risk management); and

D) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development , including housing, to more sustainable locations.

The general aim of policy is to ***'steer new development to areas with the lowest risk of flooding from any source.'***

Paragraph 169 states that ***'If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed…'***

Paragraph 170 then clarifies that ***' The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at application stage. To pass the exception test it should be demonstrated that:***

A) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

B) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Both elements of the exception test must be satisfied for developments to be allocated or permitted.

2.3 South East Lincolnshire Local Plan (Adopted 2019)

The South East Lincolnshire Local Plan 2019 (SELLP) outlines the need for housing across the District and broadly supports sustainable development in line with the National Planning Policy Framework (NPPF).

Policy 4 specifically relates the approach taken within the adopted local plan. It does however acknowledge that much of the land within the Local Plan area is at significant risk of flooding and that this will increase with climate change:

'Policy 4: Approach to Flood Risk

Development proposed within an area at risk of flooding (Flood Zones 2 and 3 of the Environment Agency's flood map or at risk during a breach or overtopping scenario as shown on the flood hazard and depths maps in the Strategic Flood Risk Assessment) will be permitted where:

1. It can be demonstrated that there are no other sites available at a lower risk of flooding (i.e. that the sequential test is passed). The sequential test will be based on a Borough or District wide search area of alternative sites within the defined settlement boundaries, unless local circumstances relating to the catchment area for the development justify a reduced search area, i.e. there is a specific need for the development in that location. The sequential test is not required for sites allocated in the Local Plan, minor development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site).

2. It can be demonstrated that essential infastructure in FZ3a & FZ3b, highly vulnerable development…'

2.4 Planning Policy Context Conclusion

Both national and local planning policy follow the principle of guiding development to areas of the lowest risk. The South East Lincolnshire Local Plan recognises the unusual nature of the plan area and recognises that much of the land is at significant risk of flood risk. It also confirms that the sequential test approach is required and that this should be based on the Borough or District area unless there are specific local needs

that indicate a smaller catchment area should be used.

In this instance the planning application is for affordable housing meeting the needs of people within Deeping St Nicholas. On that basis it is appropriate to reduce the catchment area to that of Deeping St Nicholas itself. An assessment of sites within Deeping St Nicholas and their suitability has been undertaken and this is outlined in a later section of this report.

Alongside the sequential test is the exception test and both parts of this must be passed. A detailed site specific Flood Risk Assessment has been prepared and accompanies this planning application. As the scheme is for affordable housing meeting direct housing need within Deeping St Nicholas it is felt that this provides wider sustainability benefits to the community that outweigh the flood risk.

3.0 Flood Risk Status of the Site

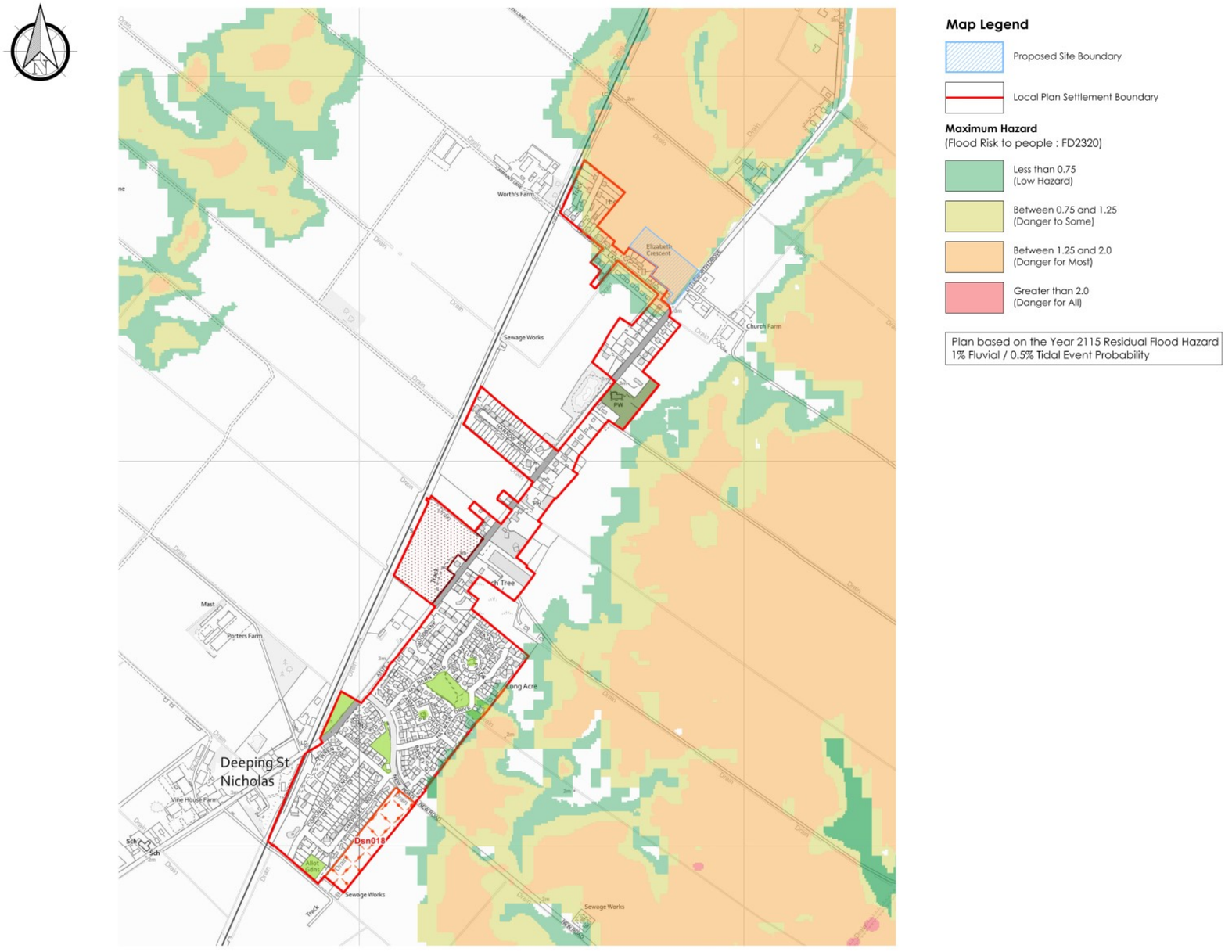
A separate Flood Risk Assessment has been prepared for the site and this accompanies this report as part of the planning application.

According to the Environment Agency's flood maps the site lies within Flood Zone 3.

The South East Lincolnshire Strategic Flood Risk Assessment (2017) makes a more detailed assessment of flood risk within the District. The 2115 (1% fluvial, 0.5% tidal) hazard and depth mapping is the preferred map for use in the sequential test. Currently the site is shown as 'Danger for Most' within the hazard map.



Extract from Environment Agency Flood Mapping



Extract Map Overlaying Flood Hazard Data over Deeping St Nicholas SELLP Map

4.0 Site Assessment

4.1 Sequential Test Approach

The National Planning Policy Framework (2023) requires Local Plans and decisions to apply a sequential, risk based approach to the location of development avoiding where possible flood risk to people and property.

Generally there is an expectation that sites within Flood Zone 1 are developed before those within Flood Zone 3.

Many of the settlements within the plan area, and therefore potential housing sites are entirely or largely within Flood Zone 3. Where sites are within settlements in the same Flood Zone it is necessary to use the 2115 hazard and depth mapping to choose the most sequentially preferable.

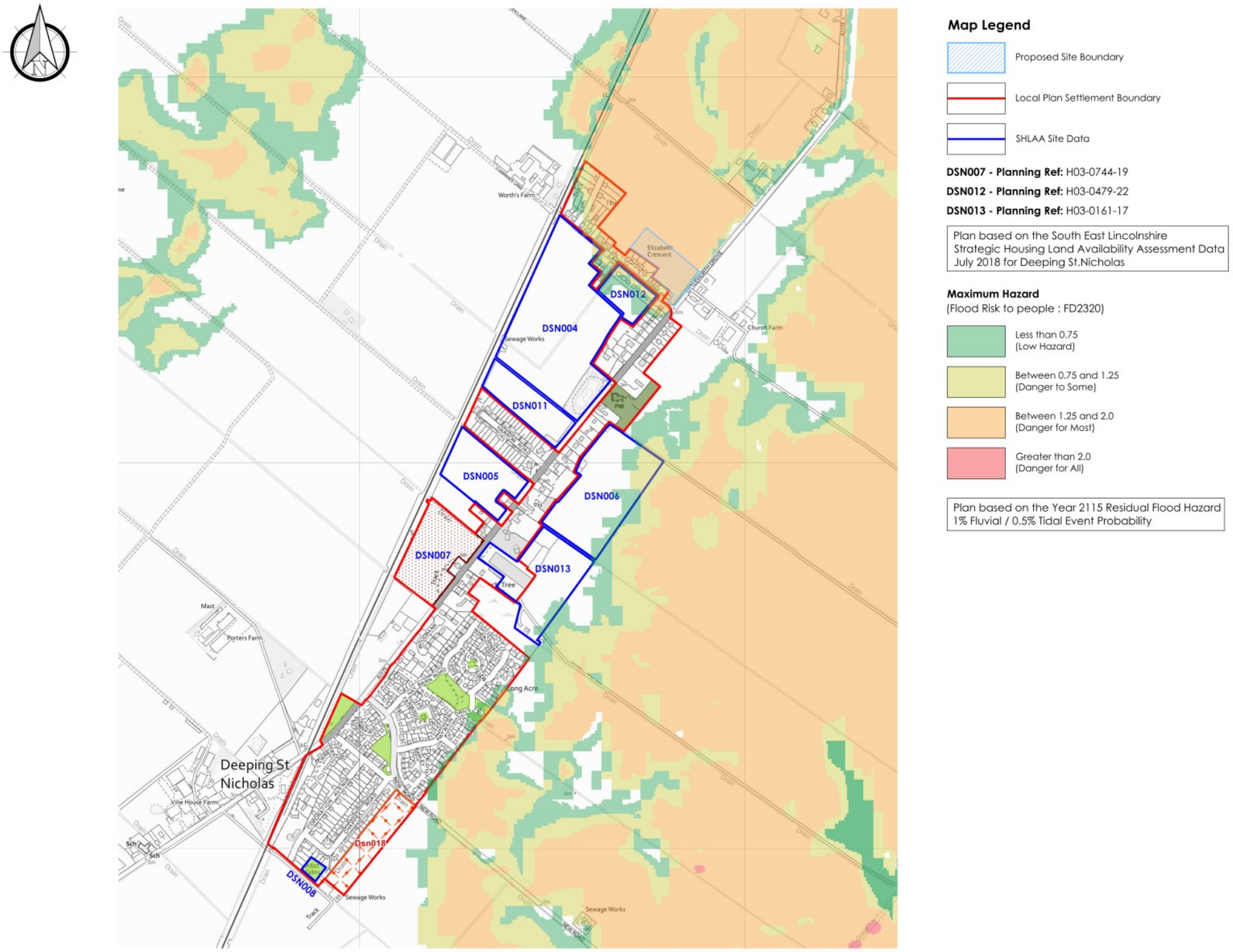
4.2 Catchment Area

Given that the application is for affordable housing meeting local need the proposed catchment area is Deeping St Nicholas itself.

4.3 Site Assessment

The following is an assessment of potentially available sites for development. This assessment uses information from the Strategic Housing Land Availability Assessment together with known planning permissions.

For the purposes of the assessment, sites that do not abut the existing settlement boundary have been excluded given that these sites would not meet the rural exception site policy.



Site Name	Area Hectares	Approximate Capacity	Availability	Achievability	Suitability	Flood Classification	Overall Assessment
Dsn007/ H03-0331-16	3.19	66	No - Site received planning permission prior to adoption of local plan and has been developed.	No	No	Flood Zone 3a No hazard No depth	Site has been developed as a market housing site.
Dsn005	2.82	70	No - land being promoted by landowner and other parties for market housing. Potential ownership issues relating to the need for third party land to achieve visibility splays.	Yes	No - based on an up-dated assessment of the site.	Flood Zone 2 /3a No hazard No depth	Site is not allocated within SELLP. The site was assessed within the SHLAA as being suitable for residential development. However given that some time has passed since the production of the SHLAA and national policies have evolved we believe the SHLAA assessment should be reviewed: ENVIRONMENTAL IMPACTS - The SHLAA assessment states that development would likely have no adverse impacts on natural, built or heritage assets. We disagree with this assessment, should the site be reassessed in 2024 we believe that there would be a significant impact on the natural environment. The site in 2023 was unfarmed and allow fallow as grassland. This alongside the significant hedge to the south-eastern boundary would mean that to achieve the 10% BNG improvement it is highly likely that off-site habitats would need to be purchased at a significant cost, making the site financially unviable as a rural exception affordable housing site. INFASTRUCTURE - We partially agree with the assessment within the SHLAA but disagree in that based on the current Anglian Water infrastructure maps significant improvements would need to be undertaken to allow the site to be developed. LOCATION - We agree with the assessment within the SHLAA.

Site Name	Area Hectares	Approximate Capacity	Availability	Achievability	Suitability	Flood Classification	Overall Assessment
							SITE CHARACTERISTICS - We partially agree with the assessment within the SHLAA but would suggest that the proximity to the railway line is significant and would create the potential for conflict in the future. TRANSPORT - We partially agree with this assessment relating to services and facilities. However, based on a desktop study we do not agree that a junction and visibility splay could be achieved without the need for encroachment on third party land. On the basis of the above revised assessment the site is discounted as being less sequentially preferable due to the adverse impacts on the environment and our belief that access cannot be gained to the site without the use of third party land giving rise to land ownership issues.
Dsn011	2.23	56	No - land being promoted by landowner and other parties for market housing. Potential ownership issues relating to the need for third party land to achieve visibility splays.	Yes	No - based on an up-dated assessment of the site.	Flood Zone 2 /3a No hazard No depth	Site is not allocated within SELLP. The site was assessed within the SHLAA as being suitable for residential development. However given that some time has passed since the production of the SHLAA and national policies have evolved we believe the SHLAA assessment should be reviewed: ENVIRONMENTAL IMPACTS - The SHLAA assessment states that development would likely have no adverse impacts on natural or heritage assets and would not have an adverse impact upon the character and appearance of the area. We strongly disagree with this assessment. The sites current appearance to Littleworth Drove is characterised by a significant mature hedge with further landscaping behind. This provides a soft visual break between the frontage development and significantly adds to the streetscene.

Site Name	Area Hectares	Approximate Capacity	Availability	Achievability	Suitability	Flood Classification	Overall Assessment
							INFASTRUCTURE - We do not agree with this statement. Current Anglian Water infrastructure maps show that significant improvements would need to be undertaken to allow the site to be developed and provided with positive foul and surface water connections. Furthermore the site encroaches on an access road serving sewage treatment works to the north-western boundary of the site. LOCATION - We agree with the assessment within the SHLAA. SITE CHARACTERISTICS - We partially agree with the assessment within the SHLAA but would suggest that the proximity to the railway line is significant and would create the potential for conflict in the future. TRANSPORT - We partially agree with this assessment relating to services and facilities. However, based on a desktop study we do not agree that a junction and visibility splay could be achieved without the need for encroachment on third party land. On the basis of the above revised assessment the site is discounted as being less sequentially preferable due to the adverse impacts on the environment and our belief that access cannot be gained to the site without the use of third party land giving rise to land ownership issues.
Dsn004	12.99	325	No - land being promoted by landowner and other parties for market housing.	Yes	No - based on an up-dated assessment of the site.	Flood Zone 2 No hazard No Depth	Site is not allocated within SELLP. The site was assessed within the SHLAA as not being suitable for residential development due to the environmental impacts created and the size of the site.

Site Name	Area Hectares	Approximate Capacity	Availability	Achievability	Suitability	Flood Classification	Overall Assessment
							On the basis of the above the site is discounted as being less sequentially preferable due to the adverse impacts on the environment.
Dsn012/ H03-0479-22	0.74	9	No - site was not allocated within the SELLP but received planning permission in 2022.	No	No	Flood Zone 2/ 3 56% Danger to Some 44% Low Hazard Depth 40% 0 - 0.25m Depth 59% 0.25 - 0.50m Depth 1% 0.5 - 1.0m	Site has been developed as a market housing site.
Dsn006	6.28	157	No - land being promoted by landowner and other parties for market housing.	Yes	No	Flood Zone 2/ 3 72% No hazard 17% Low Hazard 11% Danger to Some 74% No Depth 16% Depth 0 - 0.25m 10% Depth 0.25 - 0.50m	Site is not allocated within SELLP. The site was assessed within the SHLAA as not being suitable for residential development due to the environmental impacts created and the potential highways access issues around accommodating an adoptable road together with their associated visi-bility splays. On the basis of the above the site is discounted as being less sequentially preferable due to the adverse impacts on the environment and potential highways issues.
Dsn013/ H03-0161-17	4.7	155	No - site was not allocated within the SELLP but received planning permission in	No	No	Flood Zone 2/ 3 94% No hazard 6% Low Hazard	Site received outline planning approval in 2017 for market housing. Recently a Reserved Matters approval has been granted with a start on site imminent.

Site Name	Area Hectares	Approximate Capacity	Availability	Achievability	Suitability	Flood Classification	Overall Assessment
			2017			Depth 0 to 0.75m 95% No Depth 5% Depth 0 - 0.25m	
Dsn018	1.9	48	No - land being promoted by landowner and other parties for market housing.	Yes	No - SELLP states that the site is a 'Reserve' site for market housing and that before the site can be brought forward both the Environment Agency and Anglian Water must be in agreement with a potential drainage strategy. To our knowledge this has not been done.	Flood Zone 2/ 3 No hazard No depth	Site is allocated within the SELLP as a 'Reserve' site but can only be brought forward if Policy 12 of the Adopted Plan is enacted. On the basis of the overall assessment the site is discounted as being less sequentially preferable due to the fact that it is a market housing 'Reserve' site and that significant infrastructure relating to drainage would be required that would need to be approved by the Environment Agency and Anglian Water.
Dsn008	0.41	10	No - land being promoted by landowner and other parties for market housing.	Yes	No - Site would have an unacceptable impact on existing infrastructure by virtue of the loss of existing allotments.	Flood Zone 2/ 3 No hazard No depth	Site is not allocated within SELLP. The site was assessed within the SHLAA as not being suitable for residential development due to the infrastructure impact because of the loss of allot-ment land and the subsequent loss of a community facility. On the basis of the above the site is discounted as being less sequentially preferable due to the loss of a community facility and the size of the site.
Application Site	1.4	24	Yes - site is available immediately	Yes	Yes - Site	Flood Zone 3 Danger for Most 7% Depth 0 - 0.25m	Site is not allocated within SELLP. The site has been assessed below using similar

Site Name	Area Hectares	Approximate Capacity	Availability	Achievability	Suitability	Flood Classification	Overall Assessment
						58% Depth 0.25 - 0.5m 35% Depth 0.5 - 1.0m	criteria to that contained within the SHLAA. ENVIRONMENTAL IMPACTS - It does not have any adverse impacts on the natural, built or heritage assets. A BNG ecology report has been produced and this demonstrates that the 10% improvement can be achieved on site. INFASTRUCTURE - The scheme will not lead to the loss of, or place undue burdens on, existing infrastructure, such as open space, green infrastructure or community facilities. LOCATION - It is accessible to Deeping St Nicholas' existing services and facilities and is located adjacent to Deeping St Nicholas' existing built-up area (defined settlement boundary). SITE CHARACTERISTICS - The site is accessed from Littleworth Drove. It will provide a significantly better 'entrance' to the village by virtue of well designed frontage to Littleworth Drove and the inclusion of landscape buffers to the open countryside. TRANSPORT - Services and facilities are accessible by foot, bicycle and public transport. The site is accessed by the creation of a new junction on to Littleworth Drove with appropriate visibility splays. Consequently whilst applying the same assessment criteria as the SHLAA and with no adverse impacts it is considered that the site is suitable for development and is available immediately for development. Furthermore the scheme would provide a positive visual enhancement to the entrance to Deeping St Nicholas and the streetscene of Littleworth Drove.

4.4 Exception Test

A full site specific Flood Risk Assessment accompanies the planning application. This demonstrates that with mitigation measures the site can be made safe for the length of its life. Furthermore the planning application is for a rural exception affordable housing scheme which meets the housing need for Deeping St Nicholas. Meeting this housing need is a community benefit and meets the sustainability needs of Deeping St Nicholas and the wider District.

Artists Impression

5.0 Conclusions

The need for affordable housing within Deeping St Nicholas is significant and despite market housing sites coming forward for development the need still remains high. This application seeks to assist with this demand by proposing a rural exception site in accordance with Policy 19 of the SELLP.

As part of this policy the application site is required to abut the settlement boundary and as such only sites that abut the settlement boundary have been considered as part of this Sequential Test Report. In particular sites brought forward in the SHLAA have been considered given that this is a good indication of a sites availability.

Following a comprehensive updated assessment of the sites available within the SHLAA we can confirm that with the exception of sites with an extant planning permission all other sites create adverse impacts on either the environment, infrastructure , transport or the character of the local area. On that basis given that the application site has no adverse impacts and in fact creates a significant visual improvement to the entrance to Deeping St Nicholas, we believe that the site is sequentially preferable.

The application site would be a community benefit and would meet the sustainability needs of Deeping St Nicholas and the wider District. It would also through mitigation measures be safe for its lifetime.

On that basis we believe that planning permission should be granted without delay.

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