

Sequential and Exceptions Test Assessment

Applicant: South Holland District Council

Proposal: Outline Planning Application for Proposed Extra
Care Housing Facility and Associated Infrastructure
Planning

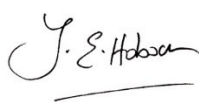
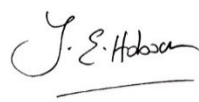
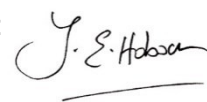
Site: South Holland Health and Wellbeing Hub and Extra
Care Facility, Castle Sports Centre & Swimming
Pool, Albion Street, Spalding PE11 2AJ

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Sequential and Exceptions Test Statement

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Sequential and Exceptions Test Statement

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Sequential and Exceptions Test Statement

1.0 Introduction.

Purpose of statement

1.0 This statement has been prepared by JEH Planning Ltd. on behalf of South Holland District Council to accompany an outline planning application, with all matters reserved for future determination, the replacement of the existing swimming pool at the Castle Sports and Leisure Complex in Spalding with the erection of an extra care housing facility. The provision of supporting infrastructure including additional car parking and landscaped areas would also be provided.

1.1 The red line area of the site to which the planning application relates is shown in figure 1 below Site Location Plan ('the Site').

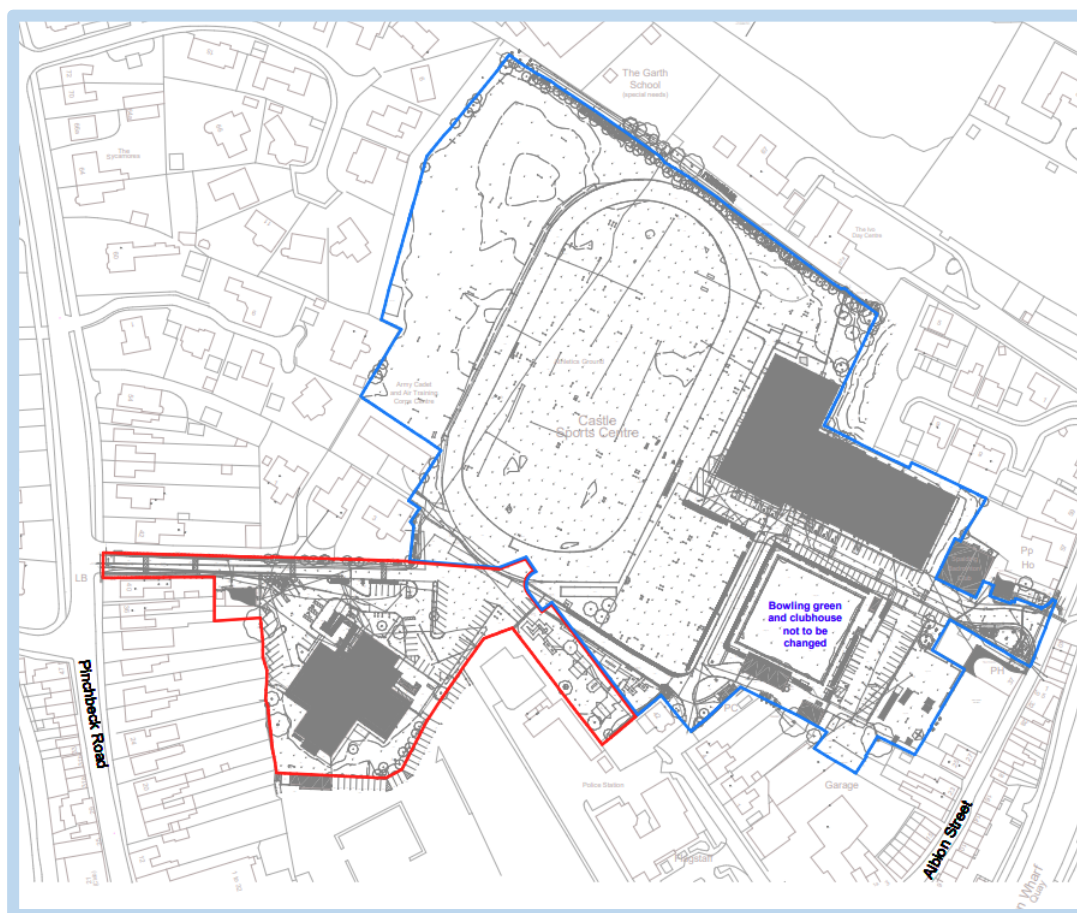


Fig 1 : Site Location Plan

1.2 It has been established that the Site lies within Environment Agency (EA) defined Flood Risk Zone 3. Paragraph 165 of the National Planning Policy Statement (December 2023) ('NPPF') states that:

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'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere'.

- 1.3 The NPPF goes on to make provision for the application of 'sequential' and, where appropriate, 'exception' tests, where development is proposed in areas at risk of flooding. Further details of the applicable policies are given in section 4 of the Planning Statement and section 3 below.

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2.0 Background Context and Site Overview

The Site

- 2.0 The site comprises land and buildings immediately situated to the North of the town centre of the settlement of Spalding, which is a principal town in South Holland District. The site accommodates the existing Castle Swimming Pool building, associated car parking and a children's play area. The site is irregular in shape, covering a total area of approximately 0.94 hectares.
- 2.1 The existing swimming pool and car park are accessed from Pinchbeck Road to the west of the site.

Wider Site Context

- 2.2 The adjoining site area is also controlled by the applicant (see blue line area in figure 1 above) which includes, an old disused cinder running track with one football pitch in the centre of the running track (changing for this facility are provided in existing swimming pool), a leisure centre comprising upstairs gym, and a sports hall including indoor bowls.
- 2.3 It should be noted that the applicant has submitted a separate but related full application for the demolition of the existing Castle Swimming Pool building and the construction of a two storey extension including basement area to the existing Castle Sports Complex building to provide new and upgraded indoor leisure and health related facilities including two new swimming pools, plant area and changing rooms. The proposal also relates to the reconfiguration of the existing leisure building to provide upgraded sports facilities and related supporting services. Within the grounds of the Castle Leisure Centre there will be provision of a new 3G artificial turf pitch (ATP), an Informal Outdoor Games Area (IOGA), other outdoor play areas, an informal running trial/ track, a health and wellbeing garden and an outdoor splash pad relating to the new swimming pool and the remaining facilities are accessed from Albion Street.
- 2.4 The river Welland runs parallel with Albion Street and is located approximately 85 m to the south-east of the existing Leisure Centre buildings, on the opposite side of Albion Street.

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- 2.5 There is a strong relationship between the two applications which is due to the success of achieving a Levelling Up (LUF) Grant issued by the Department of Levelling Up, Housing and Communities (DLUHC) for the package of measures and benefits that form the basis of these proposed developments.

The Proposal

- 2.6 The applicant has submitted an outline application for the following description of development:

“Outline application for the replacement of the existing swimming pool building with the erection of an extra care housing facility of up to 70 units together with related support infrastructure including car parking, landscaping areas and sub station(All matters reserved for future approval).”

Flood Constraint

- 2.7 It is confirmed by the Environment Agency’s online mapping system that the Site is located within Flood Zone 3 (see Figure 1 below), where land is defined as land having a 1 in 100 (1%) or greater annual probability of river flooding or 1 in 200 (0.5%) or greater annual probability of tidal flooding. However, it must be noted that Spalding in its entirety falls within this zone.

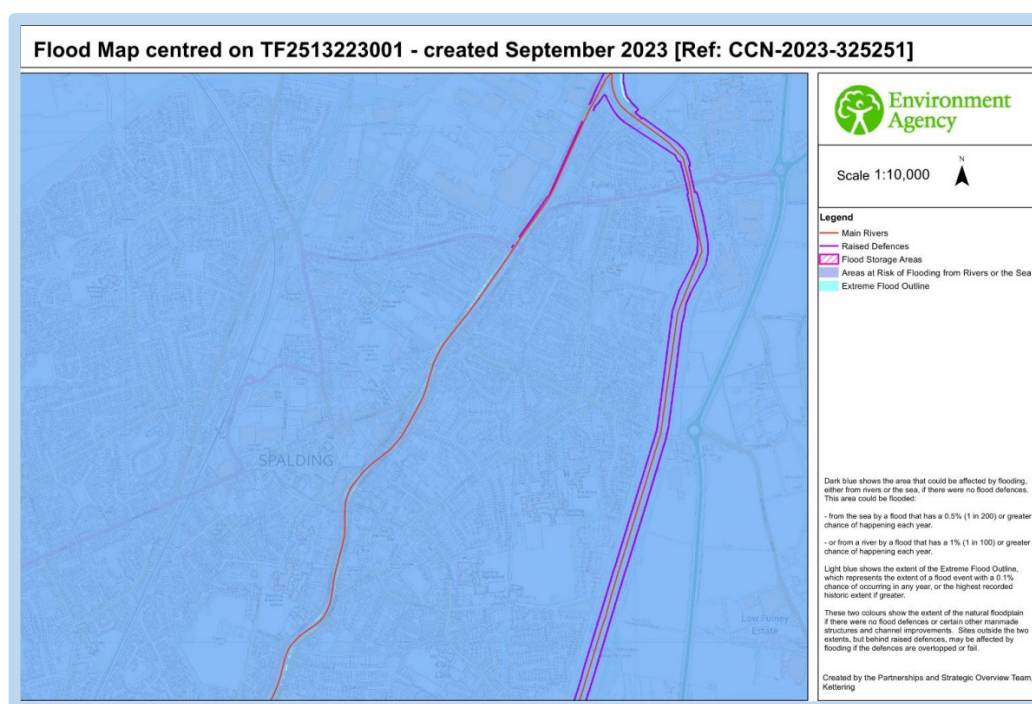


Figure 2: EA Detailed Flood Map

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- 2.8 The South East Lincolnshire Strategic Flood Risk Assessment (SFRA) (March 2017) provides advice on undertaking the Sequential Test for flood risk in South Holland. It identifies that the Site lies outside of the 'Functional Floodplain' and is therefore located within Flood Zone 3a.
- 2.9 Having reviewed the present day flood hazard mapping that features in the SFRA the site lies within green (low hazard) and yellow (danger for some categories) see figure 3 below:

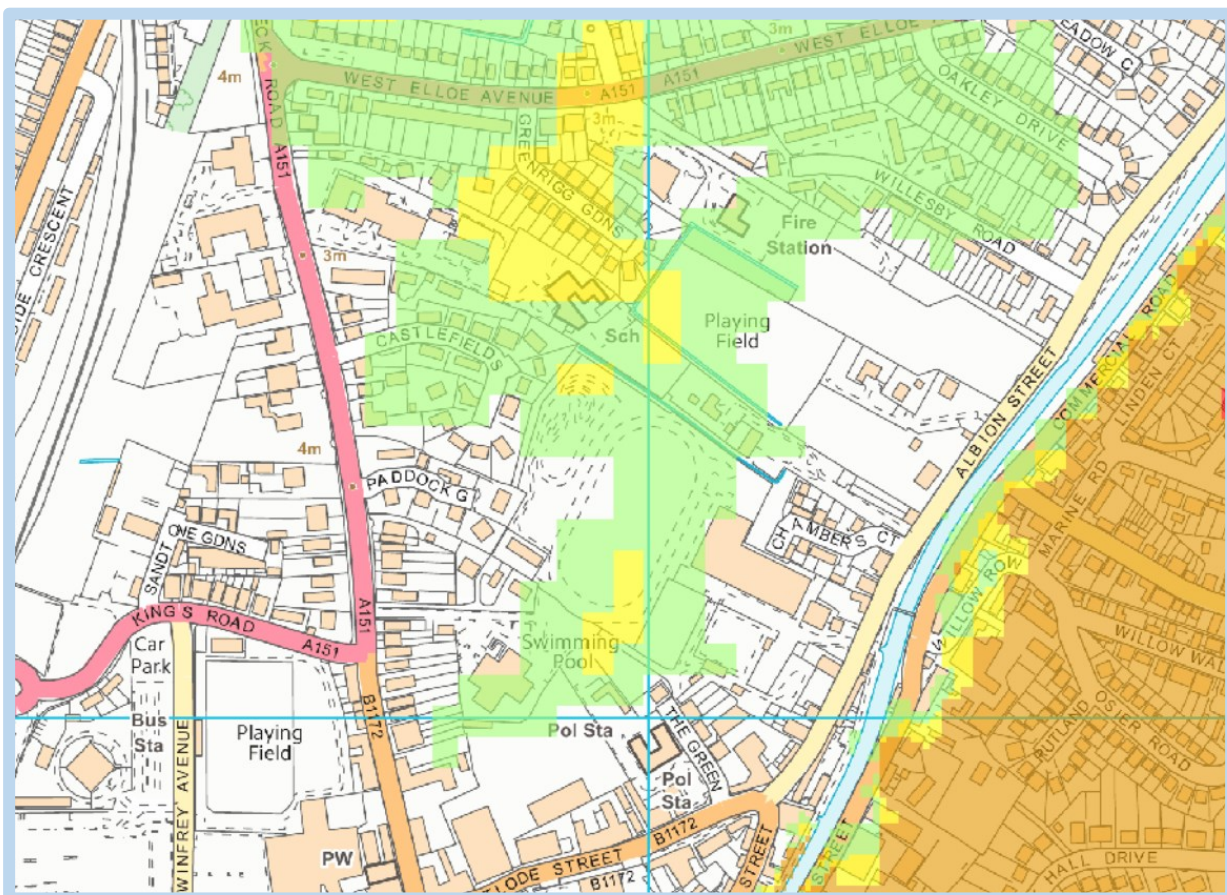


Figure 3: South East Lincolnshire SFRA Flood Hazard Spalding

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2.10 The flood depths in figure 4 below show the site between 0-0.25m (yellow) and 0.25-0.5m (orange).

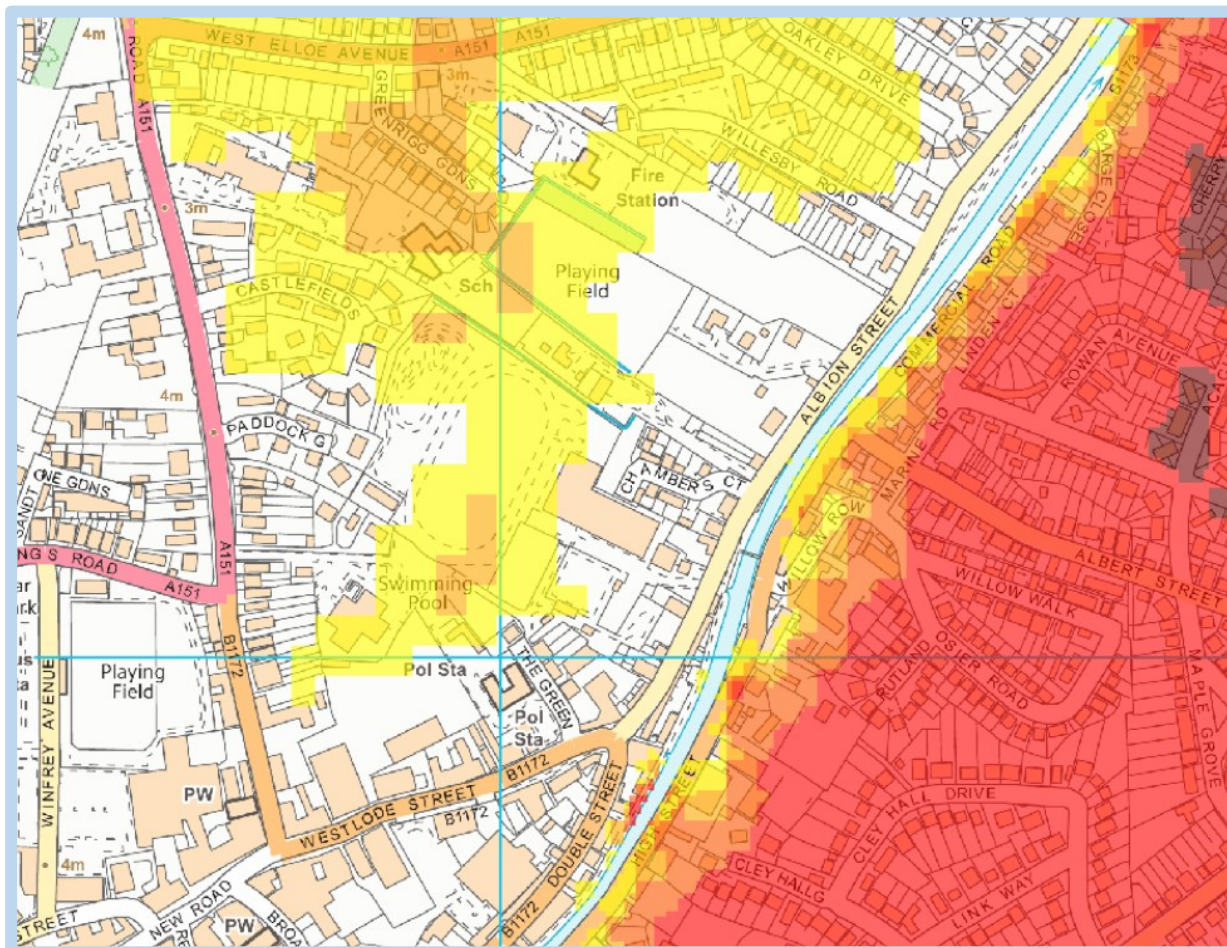


Figure 4: South East Lincolnshire SFRA Flood Depths map.

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2.11 An extract of the surface water flood map is provided in Figure 5 and shows that the risk of surface water flooding is low to high.



Figure 5 EA Extent of Flooding from Surface Water Map

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3.0 Planning Policy Considerations

National Planning Policy Framework (NPPF) 2023

- 3.0 The National Planning Policy Framework ('NPPF') sets out that inappropriate development in areas at risk of flooding should be avoided. Paragraph 168 states that the aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding from any source and that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.
- 3.1 Paragraph 163 continues, stating 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. This depends on the potential vulnerability of the Site and development proposed, in line with the Flood Risk Vulnerability Classification. Residential development, such as that proposed, is classified as 'more vulnerable' development in Annex 3 of the NPPF.
- 3.2 Paragraph 170 states that the application of the Exception Test should be informed by a Flood Risk Assessment. To pass the Exception Test, it must 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
- 3.3 Both elements of the Exception Test should be satisfied for development to be permitted.
- 3.4 Paragraph 173 of the NPPF states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the Sequential and Exception Tests, as applicable) it can be demonstrated that:

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'a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.'

Planning Practice Guidance

- 3.5 Planning Policy Guidance ('PPG') was updated on 25th August 2022 to bring it in line with the changes introduced to the NPPF in 2021. There are now clearer requirements for multifunctional SUDS; the Sequential and Exception Tests have been updated to consider surface water; the definition of functional floodplain (Flood Zone 3b) has been changed; and there is increased promotion of Natural Flood Management (NFM) in new developments.
- 3.6 PPG indicates that where necessary, planning authorities should apply the Sequential Test and, if needed, the Exception Test, to ensure that flood risk is minimised and appropriately addressed.
- 3.7 The sequential approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding, including areas at risk of surface water flooding.
- 3.8 Paragraph 024 states that *"The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:*

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- *Within medium risk areas; and*
 - *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas .”*
- 3.9 Paragraph 024 also states that *“Initially, the presence of existing flood risk management infrastructure should be ignored, as the long-term funding, maintenance and renewal of this infrastructure is uncertain.”*
- 3.10 With respect to planning applications, Paragraph 027 states that the Sequential Test should be applied to major development proposed in areas at risk of flooding, and that *“For individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Plan policies. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives. Equally, a pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing premises (relative to their existing size), where it may be impractical to accommodate the additional space in an alternative location ”*
- 3.11 Paragraph 028 gives a definition of ‘reasonably available sites’ as *“those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development. These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered ‘reasonably available’”.*

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- 3.12 Paragraph 029 states that *“Relevant decision makers need to consider whether the test is passed, with reference to the information it holds on land availability. The planning authority will need to determine an appropriate area of search, based on the development type proposed and relevant spatial policies. The applicant will need to identify whether there are any other ‘reasonably available’ sites within the area of search, that have not already been identified by the planning authority in site allocations or relevant housing and/or economic land availability assessments, such as sites currently available on the open market. The applicant may also need to check on the current status of relevant sites to determine if they can be considered ‘reasonably available’”*
- 3.13 Paragraph 029 concludes that *“Ultimately the local planning authority needs to be satisfied in all cases that the proposed development would be safe throughout its lifetime and not lead to increased flood risk elsewhere ”.*
- 3.14 PPG builds on Paragraph 170 of the NPPF in terms of Exception Testing. Paragraph 031 explains that it *“is not a tool to justify development in flood risk areas when the Sequential Test has already shown that there are reasonably available, lower risk sites, appropriate for the proposed development. It would only be appropriate to move onto the Exception Test in these cases where, accounting for wider sustainable development objectives, application of relevant local and national policies would provide a clear reason for refusing development in any alternative locations identified”.*
- 3.15 PPG sets out the circumstances where the Exception Test will be required. For this application, the proposed development is considered ‘More Vulnerable’ as it is a ‘building used for dwelling house’. Within Flood Zone 3a the types of classification require an Exceptions Test to be undertaken.

The Development Plan

- 3.16 The Development Plan for the Site Comprises the South East Lincolnshire Local Plan (adopted in 2019). The following adopted policies are considered within the context of assessing Flood Risk:

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Strategic Policy 4: Approach to Flood Risk (Extract)

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 development¹ 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 infrastructure in FZ3a & FZ3b, highly vulnerable development in FZ2 and more vulnerable development in FZ3 provide wider sustainability benefits to the community that outweigh flood risk.

3. The application is supported with a site-specific flood risk assessment, covering risk from all sources of flooding including the impacts of climate change and which:

a. demonstrate that the vulnerability of the proposed use is compatible with the flood zone;

b. identify the relevant predicted flood risk (breach/overtopping) level, and mitigation measures that demonstrate how the development will be made safe and that occupants will be protected from flooding from any source;

c. propose appropriate flood resistance and resilience measures (following the guidance outlined in the Strategic Flood Risk Assessment), maximising the use of passive resistance measures (measures that do not require human intervention to be deployed), to ensure the development maintains an appropriate level of safety for its lifetime;

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d. include appropriate flood warning and evacuation procedures where necessary (referring to the County's evacuation routes plan), which have been undertaken in consultation with the authority's emergency planning staff;

e. incorporates the use of Sustainable Drainage Systems (SuDS) (unless it is demonstrated that this is not technically feasible) and confirms how these will be maintained/managed for the lifetime of development (surface water connections to the public sewerage network will only be permitted in exceptional circumstances where it is demonstrated that there are no feasible alternatives);

f. demonstrates that the proposal will not increase risk elsewhere and that opportunities through layout, form of development and green infrastructure have been considered as a way of providing flood betterment and reducing flood risk overall;

g. demonstrates that adequate foul water treatment and disposal already exists or can be provided in time to serve the development;

h. ensures suitable access is safeguarded for the maintenance of water resources, drainage and flood risk management infrastructure.

Development in all flood zones, and development over 1 hectare in size in Flood Zone 1, will need to demonstrate that surface water from the development can be managed and will not increase the risk of flooding to third parties.

Change of use of existing buildings will be supported providing they do not pose an increase in risk to people. Change of use that would result in self-contained ground floor residential accommodation in areas of hazard rating 'danger for some', 'danger for most' and 'danger for all' will not be supported. In these areas unrestricted access to a habitable room above the flood level and an emergency evacuation plan will be required.

Caravans, mobile homes and park homes intended for permanent residential use will not be permitted in areas at risk of flooding. Caravan, chalet, log cabin, camping and touring sites at risk of fluvial flooding where there is a 'danger for most' and 'danger for all' will not be permitted. Occupancy of caravan, chalet, log cabin, camping and touring sites at risk of tidal flooding will not be permitted to open between 1st November in any one year and the 14th March in the succeeding year.

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No development will be permitted within a 50m buffer from the toe of the raised Witham Haven Banks (flood defences), as shown on the indicative Plan contained in Appendix 10, to allow access for construction and maintenance.

Flood risk management infrastructure shall be provided at the strategic level, where development opportunities allow, to reduce the hazard and probability of flooding.'

Other Material Considerations

The South East Lincolnshire Strategic Flood Risk Assessment ('SFRA')

- 3.17 The South East Lincolnshire Strategic Flood Risk Assessment (SFRA) (March 2017) provides advice on undertaking the Sequential Test for flood risk in South Holland. It identifies that the Site lies outside of the 'Functional Floodplain' and is therefore located within Flood Zone 3a.
- 3.18 The SFRA also confirms that a large part of the South Holland District is a high probability of flooding – approximately 74% lies within the floodplain. Paragraph 8.1.4 confirms it is for this reason that it is necessary to use the refined flood risk information (hazard map and depth map in that order) to assist with the application of the sequential test. Nevertheless paragraph 8.3.6 of the SFRA confirms that where there are functional requirements of the development then a reduced area of search can be agreed.

Planning Policy Summary

- 3.19 The above shows that there are range of national and local policy and guidance documents which consider the flood risk Sequential Test. These have been used to inform the methodology of the Flood Risk Sequential Test, set out in Section 4. It shows that there is not a clearly consistent approach to the key components of the Sequential Test which heavily impact on the methodology and quantum of analysis required.

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4.0 Methodology

4.0 Considering the policy and guidance outlined in Section 3 of this report, we have defined the parameters of the Sequential Test in discussion with the LPA.

4.1 We submitted a Methodology Statement to the LPA on 1st May 2024 which can be found in Appendix 1. The case officer responded in an email dated 13th May confirming the following:

'Sequential test extra care – I agree with the general approach as proposed however like the above, justification needs to be made on the site location within the site taking into account TOPO impacts etc. Again, the onus is on the Application to ensure a robust submission and this will be subject to the consultation process where objections may be received.'

4.2 Within the case officer's response there is also reference to seeking to clarify the approach to dealing with affordable housing provision with the context of the sequential test. The case officer confirms that should the applicant be unwilling to agree to an Extra Care home proposal that would deliver 100% Affordable Housing, then a district wide search of sites may be required rather than the more focused Spalding Town area of search. As we have confirmed in the Planning Statement, the underlying intention of the applicant is for the proposal to be delivered and managed by a specialist Registered Provider with all the units being available for Affordable Housing purposes. Therefore, it is not necessary to extend the catchment area to a district wide search.

4.3 Prior to submitting this planning application, we have also submitted our methodology to the Local Lead Flood Authority for review as advised by the case officer, but to date no response has been received.

Needs Case

4.4 As outlined in both the methodology statement that can be found in Appendix 1 and the Planning Statement that accompanies this outline planning application, the evidence suggests there is a specific housing need for extra care facilities to be accommodated in Spalding.

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Relationship with the Health and Wellbeing Hub Proposal

- 4.5 There is a strong inter relationship between the proposed extra care facility and the neighbouring Health and Wellbeing Hub on the basis of the following circumstances.
- 4.6 The Levelling Up Funding was successfully awarded by the Government for a development proposal that relates to the provision of an Extra Care Home facility and the proposals relating to the Health and Wellbeing application.
- 4.7 The LUF Funding recognises the importance and benefits to the community in overall terms of delivering the vision associated with creating a new and improved offer for the district focused on health, wellbeing, leisure, sport, recreation and community spaces, and the extra care facility.
- 4.8 The proximity of the proposed Extra Care Housing facility to the Health & Wellbeing Hub provides an 'on the doorstep' readily accessible range of health and wellbeing facilities and services that will be of direct benefit to the residents of the Extra Care Centre.
- 4.9 The applicant has entered into a Memorandum of Understanding with Department for Levelling Up, Housing and Communities (DLUHC). There is acknowledgment that the Extra Care facility will be complete and delivered in the financial year 2028/29.
- 4.10 To create as much certainty as possible in the development process, the LUF funding and related strategy allows the applicant to adopt a facilitating role to actively promote the extra care facility.
- 4.11 The enabling costs and works associated with the wider initiatives will ultimately provide an unconstrained serviced site as a result of undertaking the proposed demolition of the existing swimming pool site, its subsequent remediation and also proactively preparing of this outline planning application to secure planning consent for this use.
- 4.12 Making the site readily available and attractive to the market is important to maximise the chances of achieving best value whilst at the same time meeting the needs of the local community and delivering the benefits associated with the Health and Wellbeing masterplan envisaged within the LUF bid.

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- 4.13 Given the unique benefits and set of circumstances offered by the two applications that form part of the LUF bid, we consider it is impractical to assess alternative sites as part of the sequential test for this proposed development. Nevertheless, the next section provides a sequential test on the assumption that the two applications could in theory be delivered independently of each other.

Catchment Area and Size of Site

- 4.14 In terms of an area of search, the Applicant considered sites contained within Spalding and Pinchbeck. This area of search is due to the proposed development seeking to address an identified need for extra care housing in Spalding (as detailed in the planning statement), an approach which has been agreed by the local planning authority through pre-application discussions.
- 4.15 In particular, it was considered reasonable for the assessment to only consider sites which are located within a suitable walking distance of local amenities (i.e. grocery shops, hairdressers, green space etc) for an older person, and within easy walking reach of public transport links.
- 4.16 Given the size of the proposed development would be between 60 – 70 unit extra care facility set over 3 to 4 storeys, the search focuses on sites between 0.78 and 1.1ha.
- 4.17 We confirm that the operation cannot be split between a number of smaller sites as the support services offered as part of the development relies on a critical mass of people generated by a 60-70 unit scheme.
- 4.18 For the site to be considered available, it needs to be in a suitable location, not currently in use and with a reasonable prospect of being available now to the applicant for development of the proposed development.

Site Identification

- 4.19 A review of potentially available sites has been undertaken having regard to the following sources:
- Housing allocations within the South East Lincolnshire Local Plan in Spalding
 - Online search of Commercial agents' website for Spalding who operate in the local area.

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- General Google Search
- Review of the Council's Brownfield Sites Register and SHLAA for Spalding.

4.20 As a starting point, the sites identified and assessment by the sequential test undertaken for the full planning application for an extra care facility at Roman Bank, Spalding (LPA Ref No H16-1203-22) has been agreed with the Local Authority.

Flood Risk Discounting

4.21 Sites have been considered on the basis on their flood risk from any sources, as required by the PPG . Sites have also been assessed against the comparative flooding risk at the application Site and any risks have been considered in terms of the preferability to the application Site in conjunction with other planning constraints.

Site Availability and Deliverability

- 4.22 For the purpose of this assessment, we are looking for sites which are available to come forward for development immediately in order to achieve the intended timescales for development set out within the LUF Grant MoU and to contribute towards the housing need in Spalding which has been demonstrated and presented elsewhere as part of the formal application submission.
- 4.23 Sites which are available for development but not able to come forward in the intended timeframes are therefore not available at the point in time envisaged for the development. Such sites are therefore not reasonably available to the applicant, in accordance with Paragraph 028 of the PPG.
- 4.24 The following section explains how the proposed development is one of the most sequentially preferable sites for an Extra Care Home facility to come forward to fill the 'headroom' between the supply and requirement in Spalding and that the Site is the most sequentially preferable site for the proposal of up to 70 units with affordable housing (100%) at the timescale envisaged for the development.

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Adjoining Castle Sport Centre Site Options

- 4.25 The assessment of the site options immediately adjacent to the application site as part of the Health and Wellbeing Hub proposal have also been considered to demonstrate that the proposed location is the most preferable having regard to flood risk and other planning and technical constraints.
- 4.26 As set out above, the Extra Care proposal would have a close functional relationship with the Health and Wellbeing Hub proposal on the adjoining Castle Sports Centre site, which is also owned by the applicant. We have considered three areas of a similar size to the existing swimming pool site within the grounds of the Castle Sport Centre to assess these in the context of the sequential test.
- 4.27 These theoretical site areas have not only been assessed in terms of their risk of flooding but also in the context of their suitability having regard to planning constraints as well as securing operational efficiency and cost-effective measures as well as delivering best value outcomes. These elements are important considerations given the obligations associated with the release of LUF grant funding in terms of delivering local community services as well as seeking to maximising the use of the whole site to deliver enhanced facilities for the wider district.

Exceptions Test

- 4.28 Notwithstanding the outcome of the Sequential Test, 'more vulnerable' developments proposed within Flood Zone 3 should be the subject of the Exception Test.
- 4.29 We therefore set out the following in the next section of this report:
- A justification that the proposal would address wider sustainability benefits to the community that outweigh the flood risk.
 - Demonstrate safety of the proposed development for its lifetime taking account of the vulnerability of its users.
 - Demonstrate the development wouldn't increase flood risk elsewhere, and, where possible, will reduce flood risk overall. This work draws upon the flood risk assessment and drainage strategy.

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5.0 The Sequential Test

5.0 This Flood Risk Sequential Test work has considered a total of 24 site entries across Spalding and Pinchbeck, using information from sources set out in Paragraph 4.20. This data provides a thorough review of potential sites for development and sets out how the sites have been analysed and the findings of the assessments.

5.1 This Section sets out how the site options have been analysed and the findings of the assessments.

Detailed Assessments

5.2 The following tables shows an overview of the sites initially examined and sieved with regards to their suitability and/or availability:

Ref No/ Source	Address	Area (Ha)	Taken Forward (Y/N)
BLR Pin001	Land West of Bear Lane, Pinchbeck	0.26	N – Too small
BLR Pin004 / Pin002	Land North of Market Way, Pinchbeck	1.32	Y
BLR Pin003 / Pin065	Birchgrove garden Centre, Pinchbeck	2.44	Y
BLR Pin 005	Former Abattoir, Knight St, Pinchbeck	0.62	Y
Pin19	Land east of Surfleet Road	1.69	Y
Pin024	Land north of the Vernatts Drain (SUE with Pin 045)	11.47	Y
Pin025	Land East of Spalding Road	0.37	N
Pin045	Land west of Spalding Road (SUE with Pin 024)	22.53	Y
Pin050	Spalding Lifestyle, Spalding Road	1.68	N-Development Completed
Stm004	Land East of Spalding Common	4.66	N- Under Construction
Stm010	Land West of Spalding Common	2.09	Y
Stm028	The Elders	3.6	Y
Mon005	Land south of Horseshoe Road	2.93	Y
Mon008	Land north of Bourne Road	14.47	Y
SPA001 BLR	Land of Spalding Rd, Pinchbeck	0.37	N – Too Small
SPA002 BLR	Business Centre, Broad St, Spalding	0.11	N- Too small
Right Move	Building Site, Spalding Road, Pinchbeck, PE11 3UE	0.89	Y
Savills	Land at Holbeach Road, Spalding PE12 6JP	1.54	Y
Rapleys	Pinchbrook Brunel Road Spalding PE11 3YY	8.52	Y

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Stp003 SHLAA	Former Jewsons premises, Roman Bank, Spalding	0.49	Y
H16-0136-23	Ivanda Nursery Monks House Lane Spalding PE11 3LH	2.26	Y
Area 1	Castle Sport Centre Spalding	0.74	Y
Area 2	Castle Sport Centre Spalding	0.79	Y
Area 3	Castle Sport Centre Spalding	0.58	Y

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- 5.3 Six of these sites have been initially discounted on the basis of being too small or development of the sites had either been completed or was underway.
- 5.4 The eighteen remaining sites were then assessed for their suitability and/or availability and schedules can be found in Appendix 2 of each site assessed.

Conclusions on the Sequential Test

- 5.5 None of the eighteen sites analysed in this assessment have no risk of flooding: all sites have some risk. As such, regardless of the other issues raised relating to availability, planning constraints and operational requirements, it would not be possible to locate the development on the site with no risk of flooding.
- 5.6 It is evident that no reasonable alternative or available site for the Proposed Development exists. Sites which would be suitable are not available, and our search indicates that there is little prospect of anything suitable becoming available within the timescales the Applicants are seeking to deliver their scheme.
- 5.7 There is not a site location which is sequentially preferable to the preferred application site for the proposed development on the basis that the whole site does not have any risk of flooding from any source within the given parameters.
- 5.8 As set out in the Exception Test below, the proposal at the existing Castle Swimming Pool site would provide wider sustainability benefits to the community that outweigh flood risk and the development will be safe for its lifetime, with the measures proposed as part of the application. As such, flooding does not present a constraint or barrier to the development of the application site.
- 5.9 The detailed site assessment shows that the application site is the only site which is in a suitable location for the type of development proposed, with a reasonable prospect of being available to be developed at the point in time envisaged for the development.
- 5.10 The development of the application site for the development proposal presents significant community benefits, is in a sustainable location and can support the delivery of much needed specialist affordable housing. It is therefore the sequentially preferable site for development.

Sequential and Exceptions Test Statement

6.0 The Exceptions Test

6.0 Planning Policy Guidance sets out that, notwithstanding the outcome of the Sequential Test, 'more vulnerable' developments proposed within Flood Zone 3 should be the subject of the Exception Test. For a development proposal to pass the Exception Test, it must 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.

Criterion A: the development would provide wider sustainability benefits to the community that outweigh the flood risk

6.1 The proposed development will deliver considerable wider sustainability benefits to the community. These are assessed in detail within the Planning Statement and are summarised as the following:

6.2 Provision of up to 70 Extra Care affordable apartments. There is an established and identified need for housing in South Holland and the provision of extra care housing has been identified as a fundamental priority within the district. By prioritising the delivery of Extra Care Housing, the council aims to proactively address this demand and ensure the availability of suitable accommodation options for local residents. There is currently no extra care housing available in Spalding, and as such the Proposed Development will contribute towards meeting this need.

6.3 Affordability: The applicant is willing to commit to the likely operator being either a Housing Association Company or Registered Provider both of which would offer either to low-cost rental, shared equity, or shared ownership arrangements. This would satisfy the acute need for affordable housing in the district.

Sequential and Exceptions Test Statement

- 6.4 Economic Benefits: The Economic Benefits Statement appended to the Planning Statement demonstrates the direct and indirect benefits of the proposal, which include supporting construction jobs; supporting jobs indirectly related to the development and that the provision of up to 70 apartments will generate additional convenience, comparison and leisure services expenditure in the local economy which will help bolster and sustain the health of local businesses.
- 6.5 More specifically the extra care facility would make an important contribution to managing the balance between increasing demand on public healthcare services and economic pressures placed on public finance to deliver those services.
- 6.6 Delivering Improved Social Care, Health and Wellbeing: A study carried out by Lancaster University, commissioned for Aston Research Centre for Healthy Ageing (ARCHA) and the Extra Care Charitable Trust, considered the benefits to residents of Extra Care villages and schemes across a 5-year period. During this period, improvements were seen in resident's health and well-being; notably residents exercising more and showing signs of improved memory and cognitive abilities. The Proposed Development will therefore generate vast social benefits for future residents by allowing them to live independently yet will have access to 24-hour support if needed, and to socialise with other residents via communal areas, outdoor areas and through organised social activities which will contribute towards their physical and mental health and wellbeing.
- 6.7 Promoting Inclusive Accessibility by Sustainable Modes of Travel: With good access to local services, facilities and public transport links, the Site is considered to be within a sustainable location. Improved sustainable transport options will be delivered where appropriate through a Travel Plan.
- 6.8 Community Facilities and Open Space: The proposed development will also provide outdoor communal areas to allow future residents to enjoy nature and the environment which will be created through the soft/hard landscaping scheme. The proposed development relates specifically to delivering a key component of the successful Levelling Up bid where grant funding has been awarded to the applicant to address and improve health and wellbeing outcomes in South Holland, through the provision of upgraded sport, recreation and leisure facilities, alongside the close integration of this specialist housing facility. It is recognised that there is synergy between the Extra Care Housing and uses that can help support both mental and physical fitness.

Sequential and Exceptions Test Statement

- 6.9 Biodiversity Net Gain benefits. The proposal will deliver ecological enhancements, as outlined in the Ecological Assessment provided by Estrade Ecology.
- 6.10 Sustainable Construction: The proposed development will result in the creation of a high-quality sustainable development in terms of energy efficiency and sustainable construction. The development will incorporate high standards of building materials and fabric and will seek to optimise the use of low carbon energy.
- 6.11 Sustainable Drainage: Sustainable Urban Drainage (SuDS) techniques have been integrated into the scheme to improve the water quality of the discharge of surface water flows from the development. These SuDS will be in the form of porous paving and water attenuation tanks below ground to limit the flow of surface water through the site.

Part A Summary

- 6.12 The social, economic, and environmental public benefits set out above and provided in detail within the supporting Planning Statement are demonstrable, wide-ranging and persuasive. These benefits justifiably outweigh the flood risks.
- 6.13 The Proposed Development will bring substantial and undeniable benefits to Spalding and the wider South Holland District of Lincolnshire, particularly through the development of extra care accommodation which would contribute significantly towards meeting unmet accommodation needs of residents within the District.
- 6.14 On the basis of the above assessment, the proposed development is considered to pass Criterion A of the Exception Test

Criterion 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.

- 6.15 The Flood Risk Assessment supporting the planning application provides an in-depth assessment of the flood risks to the development, the mitigation measures to ensure the safety of occupants and the measures proposed to ensure there is no increase in flood risk elsewhere. The FRA should be read in conjunction with this Exception Test. A summary of the proposed flood strategy and mitigation is set out below.

Sequential and Exceptions Test Statement

- Following consultation with the EA it was agreed that Finish Floor Levels (FFL) should be set 1m above existing ground level with flood resilient construction to a height of 300mm above the predicted flood level. It was agreed that the existing ground level should be taken from the lowest point of 2.9mAOD. This requires the FFL of the proposed building to be set at 3.9m AOD.
- For design water depths of up to 0.3m, a 'Water Exclusion Strategy' is recommended, as noted in the EA's 'Improving Flood Performance of New Buildings' guidance. An emphasis is placed on minimising water entry whilst maintaining structural integrity, and on using materials and construction techniques to facilitate drying and cleaning. For example, the use of flood barriers across doorways and air brick covers and/or materials and construction with low permeability.
- It was also agreed by the EA that due to the size of the development and the existing flood defenses for the area no flood compensation will be required for the proposed development.
- In terms of securing a safe means of escape both the EA and the Emergency Planner at the LLFA it was agreed that an appropriate strategy would be to provide an access route from the building to the highest point of the site at the junction with Forge Close in the north west. This area has the lowest modelled flood depth within the site boundary.
- The proposed extra care scheme would be registered to the EA flood warning service so that if a warning is issued a call, email or text will be sent to the business. Additionally, live river, sea and groundwater levels would be accessed via the on line check for flooding service and would be checked during high rainfall periods.
- A flood warning and evacuation plan would be prepared for the proposed development and provided to the onsite management team in order that they can make the plans for appropriate action in the event of a severe flood warning. The plan would be updated as required as conditions change in the future.
- In terms of addressing and mitigating against surface water flooding, the raising of the building level will also aim to grade external levels to fall away from building thresholds ensuring exceedance routes channel surface water away

Sequential and Exceptions Test Statement

from the buildings. A site specific surface water drainage strategy will be developed for the site to collect surface water and discharge it following the SuDS Hierarchy to mitigate the risk of surface water flooding. Where feasible SuDS features would be used to capture runoff at source and provide both water treatment and attenuation to ensure surface water runoff is maintained at the greenfield rate for the site.

- To mitigate the risk of surcharge from the sewer system flooding the proposed building the proposed foul water drainage system would be suitably designed and if required, this shall include anti-backflow measures.

Part B Summary

6.16 In summary and in relation to Part B of the Exception Test, it is clear that the Development:

- Will be safe for its lifetime;
- Takes account of the vulnerability of its users (primarily those with additional care needs);
- Will not increase flood risk elsewhere;
- Reduces surface water run-off from the development; and,
- Will reduce flood risk overall.

6.17 On the basis of the above assessment, the proposed development is considered to pass Criterion B of the Exception Test.

Sequential and Exceptions Test Statement

7.0 Conclusions

- 7.0 This Flood Risk Sequential Test and Exception Test has been prepared by JEH Planning on behalf of South Holland District Council (the 'Applicant') in support of an application for the proposed Extra Care facility which is closely linked to the Health and Wellbeing Leisure Hub proposal.
- 7.1 In conclusion, we have reached agreement with the LPA that the area of search can be limited to consider locations within the Spalding and Pinchbeck area due to the nature of the proposal and its unique set of circumstances regarding the needs case, funding arrangements and operational activities.
- 7.2 It is evident that no reasonable alternative or available site options for the proposed development exists. The sites have been assessed in terms of their suitability having regard to flood risk considerations, other planning, technical, infrastructure and environmental constraints, as well as landowner and operational considerations.
- 7.3 It is demonstrated by application of the Sequential Test that there is no reasonably available alternative site for the application proposal. It is evident that no alternative sites exist to accommodate the development proposals in a location that meets the Applicant's criteria, or which would be more suitable for its uses, can replicate the sustainability benefits to Spalding, and that presents any lesser risk than the application site.
- 7.4 In addition to the above, there are clear public benefits to the proposals, which would contribute towards meeting an identified housing need across South Holland. These wider public benefits weigh heavily in favour of bringing the site forward for residential use as dedicated extra care accommodation. In being sequentially preferable it can help fill the 'headroom' between South Holland District Council's current supply of housing and its requirement.
- 7.5 The proposal will deliver a high quality specialist residential development in a sustainable location with significant community, social, environmental and economic benefits, including affordable housing.
- 7.6 The development is considered to be acceptable in flood risk terms and passes both the sequential and exception tests established in local and national planning policies.

Sequential and Exceptions Test Statement

- 7.7 We therefore conclude that the application site is the sequentially preferable site for the development.

Sequential and Exceptions Test Statement

Appendices

Appendix 1 Methodology Statement 1st May 2024

Appendix 2 Detailed Site Assessment Schedules

Sequential and Exceptions Test Statement

Appendix 1 Methodology Statement 1 May 2024

Introduction

Flood risk is a material planning consideration in the determination of planning application. As set out in national policy, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

This paper sets out a Sequential Test Exceptions Test Methodology for the forthcoming application for a proposed extra care facility as part of our ongoing pre application discussions with the Council so that key assumptions and the approach can be agreed to allow the applicant to proceed with confidence regarding undertaking the assessment required.

The Proposal

The existing swimming pool and related car park cover 0.95 hectares that would relate to the extent of the proposed development for the extra care facility.

The description of development for the planning applications will be as follows:

'Outline application for the replacement of the existing swimming pool building with the erection of an extra care housing facility together with related support infrastructure comprising car parking and landscaping areas (All matters reserved for future approval).'

Planning Policy Position

The relevant policies in the South East Lincolnshire Local Plan 2011-36 adopted in March 2019 are as follows:

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.' (Our emphasis)

Therefore, if a specific need in a certain location can be demonstrated, then the area of search for the catchment area can be reduced accordingly.

Policy 17: Providing a Mix of Housing

‘With a decreasing ability to access everyday facilities independently and an increasing need for healthcare, specialist care home provision should be located in the most sustainable settlements e.g. Sub-Regional Centres and Main Service Centres.’ (our emphasis)

When considering planning applications for sheltered and specialist housing schemes for older and disabled people Policy 17 favour schemes where: the site is well served by passenger transport; there is good access to local services and facilities; and the proposal is appropriate to its locality e.g. Sub-Regional Centres and Main Service Centres. This strategy favours focusing new extra care facilities in Spalding which is categorised as a Sub Regional Centre within Policy 1.

The SE Lincolnshire Strategic Flood Risk Assessment March 2017 confirms that a large part of the South Holland District is a high probability of flooding – approximately 74% lies within the floodplain. Paragraph 8.1.4 confirms it is for this reason it is necessary to use the refined flood risk information (hazard map and depth map in that order) to assist with the application of the sequential test. Nevertheless paragraph 8.3.6 of the SFRA confirms that where there are functional requirements of the development then a reduced area of search can be agreed.

Needs Case

The Housing Needs Assessment (HNA) provides an overview of the demand for specialized housing options, such as Housing with Care (e.g., Extra-care housing), revealing a projected shortfall of 700 units by the year 2036 for the district as a whole.

To break down the data specifically to Spalding: In 2019, the older persons' age group (65+) comprised 19.6% of the area's population. Additionally, individuals facing long-term health challenges or disabilities constitute 50.8% of the population, which totals more than half of the population.

For the period from 2020 to 2036, the estimated demand for accommodation tailored for older individuals (encompassing housing with support and housing with care) in the sub-area of Spalding is 453 units. This figure represents 15.5% of the total housing requirement for the area. The detailed breakdown is as follows:

Estimated need for older persons' accommodation (housing with support and housing with care) by sub-area (2020-36)					
Housing with support		Housing with care		Need for older persons' housing	% of All Housing
Market	Affordable	Market	Affordable		
298	-53	120	88	453	15.5%

As of March 2024, the Housing Register indicates that there are 918 individuals aged 55 and above who need one-bedroom accommodations for one person. Among these individuals, 155 have specified their preference for accommodations in Spalding.

In conclusion the evidence suggests that there is a specific housing need for extra care facilities to be accommodated in Spalding.

Defining the Catchment Area

Based on both the policy position set out within Policy 4 and 17 as well as the strong evidence of need for extra care facilities in Spalding, it is considered that the area of search for applying the sequential test can be reduced to consider alternative sites in Spalding town only rather than undertaken a districtwide search.

We note that a full planning application for an extra care facility at Roman Bank, Spalding (LPA Ref NoH16-1203-22) agreed with the Local Authority an area of search that included both Spalding and Pinchbeck. Whilst we consider that a catchment area that includes Spalding town only is sufficient, we would be willing to discuss this matter further with the LPA in the context of this application.

Identify Appropriate and Available Sites

- It is considered reasonable for the assessment to only consider sites which are located within a suitable walking distance of local amenities (i.e. grocery shops, hairdressers, green space, cultural and leisure activities etc) for an older person, and within easy walking reach of public transport links.
- Given the size of the proposed development would be between 60 – 70 unit extra care facility set over 3 to 4 storeys we recommend that the size of site range for the search should be between 0.78 and 1.1ha.
- We confirm that the operation cannot be split between a number of smaller sites as the support services offered as part of the development relies on a critical mass of people generated by a 60-70 unit scheme.
- For the site to be considered available, it needs to be in a suitable location, not currently in use and with a reasonable prospect of being available now to the Applicant for development of the proposed development.
- A review of potentially available sites having regard to the following sources:
 - Housing allocations within the South East Lincolnshire Local Plan in Spalding
 - Online search of Commercial agents' website for Spalding who operate in the local area.
 - General Google Search
 - Review of the Council's Brownfield Sites Register and SHLAA for Spalding.

Site Assessment

For each site identified in the defined catchment area the following information would be provided:

- Site address and description
- Size and estimate development capacity.
- Flood Risk Considerations
- Availability / Deliverability
- Planning Context/constraints
- Overall suitability assessment

Exceptions Test

Notwithstanding the outcome of the Sequential Test, 'more vulnerable' developments proposed within Flood Zone 3 should be the subject of the Exception Test.

We will therefore set out the following:

- A justification that the proposal would address wider sustainability benefits to the community that outweigh the flood risk.
- Our flood risk consultant will demonstrate safety of the proposed development for its lifetime taking account of the vulnerability of its users.
- We will demonstrate the development wouldn't increase flood risk elsewhere, and, where possible, will reduce flood risk overall. Drawing upon Flood risk assessment and drainage strategy

1 May 2024

Sequential and Exceptions Test Statement

Appendix 2 - Detail Site Assessment Schedules

Detailed Site Assessments

Site Address: Land North of Market Way, Pinchbeck



Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
Pin004 BLR	Pin002		
Site Area Ha	1.32		
Flood Risk	Zone 1 Zone 2 Zone 3a Zone 3b	No hazard Low hazard Danger for some Danger for most Danger for all	No Depth 0m to 0.25m 0.25m to 0.50m 0.50m to 1.0m 1.0m to 2.0m >2.0m
Suitability	XXX The Applicant's programme of obtaining planning permission and start of works on site could not accommodate the additional time required for the existing business to close on the site, and for the existing buildings to be demolished. There is a need for Extra Care accommodation in Spalding now. Demolition of the existing buildings on site would also need to be factored into the viability assessment of the site, again delaying the Applicant's proposed construction programme.		
Availability	XXX The site currently comprises a Horticultural Nursery (D&R Simmons Ltd) which is understood to still be operating on the site, and there is no evidence to suggest that the business is due to vacate the site anytime soon. The site is therefore not considered to be available for the Proposed Development.		
Conclusion	XXX In view of the above, the site is not suitable and or available to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development Site		

Site Address: Birchgrove Garden Centre Pinchbeck



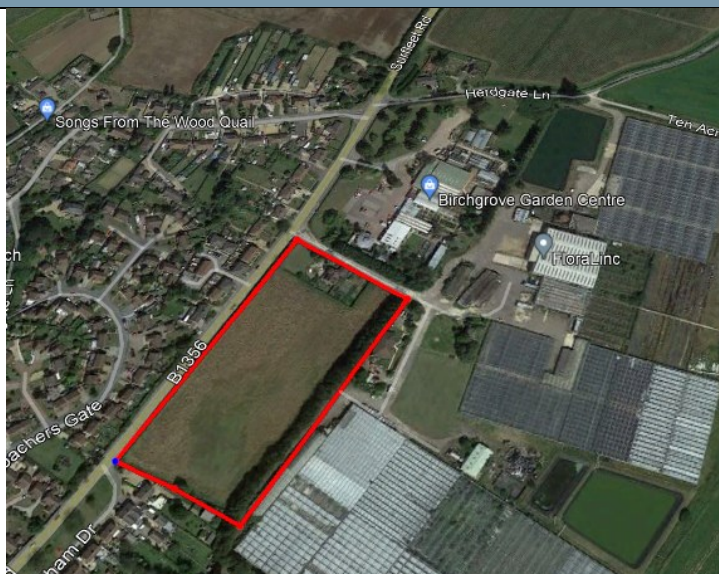
Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
Pin003 BLR	Pin065		
Site Area Ha	2.44		
Flood Risk	Zone 1 Zone 2 Zone 3a Zone 3b	No hazard Low hazard Danger for some Danger for most Danger for all	No Depth 0m to 0.25m 0.25m to 0.50m 0.50m to 1.0m 1.0m to 2.0m >2.0m
Suitability	The site is allocated for housing development within the adopted Development Plan, proposing a yield of 49 dwellings. The Applicant's programme of obtaining planning permission and start of works on site could not accommodate the additional time required for the existing business to close on the site, and for the existing buildings to be demolished. There is a need for Extra Care accommodation in Spalding now. Demolition of the existing buildings on site would also need to be factored into the viability assessment of the site, again delaying the Applicant's proposed construction programme.		
Availability	The site currently contains a Garden Centre (Birchgrove Garden Centre) which is understood to still be operating on the site, and there is no evidence to suggest that the Garden Centre is due to vacate the site anytime soon. The site is therefore not considered to be available for the Proposed Development.		
Conclusion	In view of the above, the site is not suitable and or available to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development		

Site Address: Former Abattoir, Knight St, Pinchbeck



Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
Pin 005 BLR			
Site Area Ha			0.62
Flood Risk	Flood Zone 3a Max Hazard: Low Hazard (Less than 0.75) Peak Depth: 0m – 0.25m		
Suitability	The site is also located on the outskirts of Spalding. There is a requirement for the site to be more centrally located within a suitable distance of existing services and amenities, given that the proposed future residents will be elderly. The site is approximately half a Kilometer from the nearest convenience store. The area is predominantly residential and is lacking local services and facilities necessary to meet day to day need, and is less preferable in this respect. The irregular shape of this modest site would also make it too awkward to facilitate the size of the extra care development being proposed.		
Availability	The site does not contain any planning application history but it does feature on the Council's Brownfield Registers so it does therefore appear to be available. .		
Conclusion	In view of the above, the site is not suitable to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development Site.		

Site Address: Land east of Surfleet Road Pinchbeck



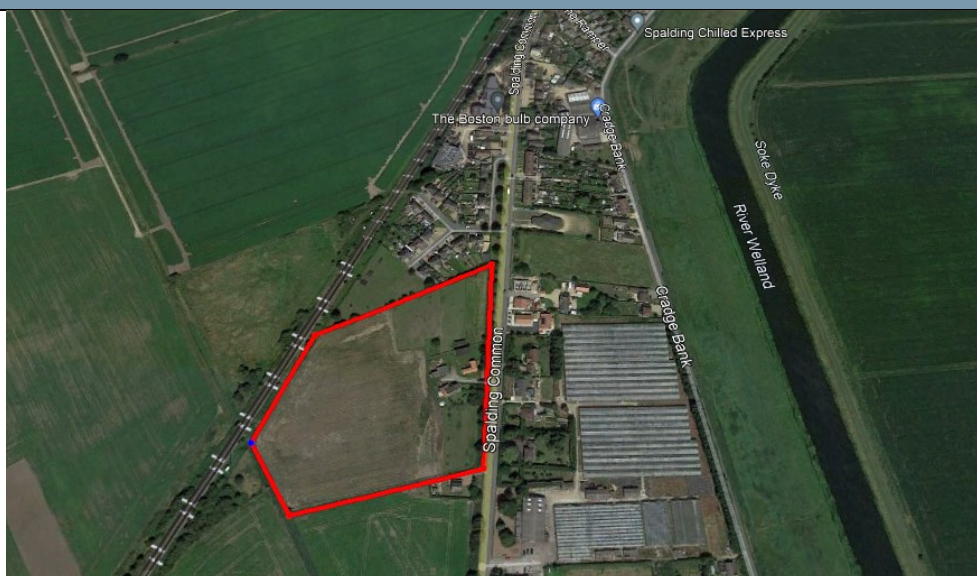
Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
	Pin19	H14-0117-22	
Site Area	1.69		
Flood Risk	Zone 1 Zone 2 Zone 3a Zone 3b	No hazard Low hazard Danger for some Danger for most Danger for all	No Depth 0m to 0.25m 0.25m to 0.50m 0.50m to 1.0m 1.0m to 2.0m >2.0m
Suitability	The site is allocated for housing development within the adopted Development Plan, proposing a yield of 34 dwellings. Whilst the site is large enough to accommodate the Proposed Development, it would jeopardise the proposed delivery of 37 affordable dwellings that have been approved.		
Availability	The site currently comprises Greenfield land, however there is an approved planning application on the site for the proposed development of 37 no. affordable dwellings (ref: H14-0117-22). The decision was made on 21st December 2022 and therefore suggests that the site is not available for the development of Extra Care accommodation.		
Conclusion	In view of the above, the site is not suitable and or available to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development Site		

Site Address: Land West of Spalding Common



Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
	Stm010		
Site Area	2.09		
Flood Risk	Zone 1 Zone 2 Zone 3a Zone3b	No hazard Low hazard Danger for some Danger for most Danger for all	No Depth 0m to 0.25m 0.25m to 0.50m 0.50m to 1.0m 1.0m to 2.0m >2.0m
Suitability	The site is allocated for housing development within the adopted Development Plan, proposing a yield of 63 dwellings. The site is not suitable as it is located on the outskirts of Spalding. The Proposed Development is required to be located in a more central location within suitable distance of existing services and amenities for future residents. Furthermore, the site is allocated for c.63 dwellings and therefore, whilst the site is large enough to accommodate the Proposed Development, the Proposed Development would jeopardise the site's contribution towards the Council's housing delivery objectives.		
Availability	The site does not have any planning application history and therefore appears to be available.		
Conclusion	In view of the above, the site is not suitable to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development Site		

Site Address: The Elders



Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
	Stm028		
Site Area Ha	3.6		
Flood Risk	Zone 1 Zone 2 Zone 3a Zone3b	No hazard Low hazard Danger for some Danger for most Danger for all	No Depth 0m to 0.25m 0.25m to 0.50m 0.50m to 1.0m 1.0m to 2.0m >2.0m
Suitability	The site is allocated for housing development within the adopted Development Plan, proposing a yield of 108 dwellings. The site is not suitable as it is located on the outskirts of Spalding. The Proposed Development is required to be located in a more central location within suitable distance of existing services and amenities for future residents. Furthermore, the site is allocated for c.108 dwellings and therefore, whilst the site is large enough to accommodate the Proposed Development, the Proposed Development would jeopardise the site's contribution towards the Council's housing delivery objectives.		
Availability	The site does not contain any planning application history and therefore appears to be available.		
Conclusion	In view of the above, the site is not suitable to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development Site..		

Site Address: Land south of Horseshoe Road



Source

SHLAA Ref	Local Plan Ref	Planning App Ref	Market
	Mon005		

Site Area Ha	2.93
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Flood Risk	Zone 1 Zone 2 Zone 3a Zone3b	No hazard Low hazard Danger for some Danger for most Danger for all	No Depth 0m to 0.25m 0.25m to 0.50m 0.50m to 1.0m 1.0m to 2.0m >2.0m
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Suitability	The site is allocated for housing development within the adopted Development Plan, proposing a yield of 88 dwellings. The site is not suitable as it is located on the outskirts of Spalding. The Proposed Development is required to be located in a more central location within suitable distance of existing services and amenities for future residents. Furthermore, the site is allocated for c.88 dwellings and therefore, whilst the site is large enough to accommodate the Proposed Development, the Proposed Development would jeopardise the site's contribution towards the Council's housing delivery objectives.
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Availability	The site does not contain any planning application history and therefore appears to be available.
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Conclusion	In view of the above, the site is not suitable to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development site.
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Site Address: Land north of Bourne Road



Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
	Mon008		
Site Area Ha	14.47		
Flood Risk	Zone 1 Zone 2 Zone 3a Zone 3b	No hazard Low hazard Danger for some Danger for most Danger for all	No Depth 0m to 0.25m 0.25m to 0.50m 0.50m to 1.0m 1.0m to 2.0m >2.0m
Suitability	The site is allocated for housing development within the adopted Development Plan, proposing a yield of 434 dwellings. The site is also located on the outskirts of Spalding. There is a requirement for the site to be more centrally located within a suitable distance of existing services and amenities, given that the proposed future residents will be elderly. The site is approximately half a mile from the nearest convenience store located on Bourne Road. The area is predominantly residential and is lacking and local services and facilities necessary to meet day to day need, and is less preferable in this respect. Furthermore, the site is allocated for c.434 dwellings and therefore, whilst the site is large enough to accommodate the Proposed Development, the Proposed Development would jeopardise the site's contribution towards the Council's housing delivery objectives.		
Availability	The site does not contain any planning application history and therefore appears to be available.		
Conclusion	In view of the above, the site is not suitable to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development site.		

Site Address: Building Site, Spalding Road, Pinchbeck, PE11 3UE



Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
Pin13/Pin025	Pi025	H14-0633-21	Right Move
Site Area Ha			0.89
Flood Risk	Zone 1 Zone 2 Zone 3a Zone3b	No hazard Low hazard Danger for some Danger for most Danger for all	
Suitability	The site is identified as a housing allocation in the Local Plan - Pin025 with a capacity of 11 dwellings. Given the sites' irregular shape and small scale nature it would be unsuitable to accommodate the size of extra care facility required. It would jeopardise the proposed delivery of 5 dwellings that have been approved.		
Availability	Planning consent for 5 dwellings has been approved on 14 December 2021 and therefore suggests that the site is not available for the development of Extra Care accommodation.		
Conclusion	In view of the above, the site is not suitable to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development site.		

Site Address: Land west of Spalding Road (SUE with Pin 024)

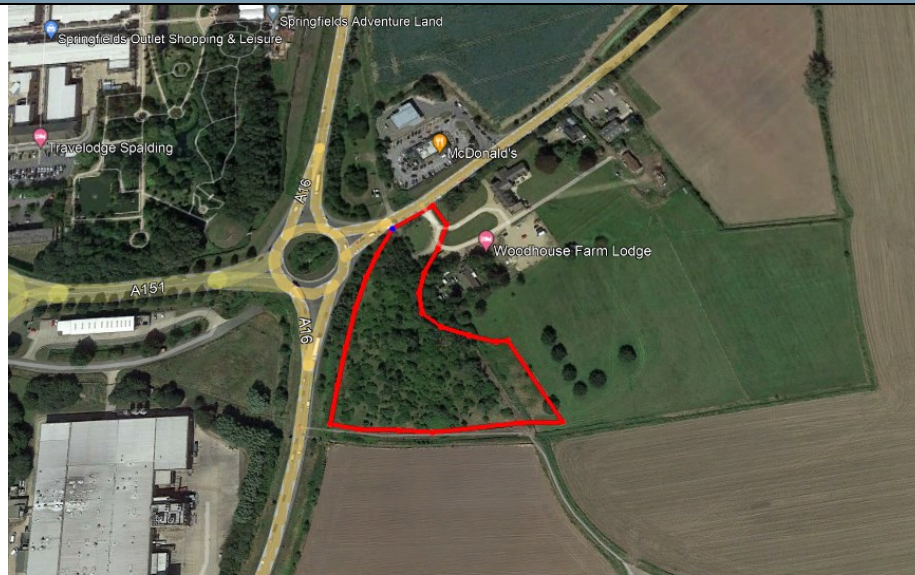


Source

SHLAA Ref	Local Plan Ref	Planning App Ref	Market
	Pin045 Phase 1	H14-1218- 21	
Site Area Ha	22.53		
Flood Risk	Zone 1 Zone 2 Zone 3a Zone3b	No hazard Low hazard Danger for some Danger for most Danger for all	No Depth 0m to 0.25m 0.25m to 0.50m 0.50m to 1.0m 1.0m to 2.0m >2.0m
Suitability	The site is allocated for housing development within the adopted Development Plan, proposing a yield of 676 dwellings. The site constitutes Phase 1 of 'Vernatts Sustainable Urban Extension' ('SUE'). Vernatts SUE will provide approximately 4,000 dwellings and supporting community infrastructure, Sections 4 and 5 of the Spalding Western Relief Road (SWRR) and significant open space. The Vernatts SUE will be delivered in several phases, the completion of approximately 3,000 dwellings is expected to extend beyond the Local Plan period. The majority of the site is not available (see below) and suitability has therefore not been considered across these parts.		
Availability	The site comprises Greenfield land, however the majority of this site is not available as a hybrid planning application on the majority of the allocation was approved on 13 October 2023 and is now under construction for full planning permission for 100 new homes, landscaping and infrastructure and outline planning permission (all matters reserved except access) for up to 300 new homes, landscaping and infrastructure (ref: H14-1218- 21). The remaining part of the phase 1 site, to the west of the railway line, has no planning application submitted to date. This area would be difficult to access as there is inadequate road infrastructure around it at present. Blue Gowt Lane is a small narrow track which appears to be inadequate for vehicles to access. The presence of a railway line running through the allocation is also considered to		

	be a constraint in terms of both the cost of a bridge crossing and potential noise impacts which would need to be factored into the design of the Proposed Development. Construction of infrastructure would be likely to give rise to viability issues, and the lack of connection would impact on timescales for deliverability.
Conclusion	In view of the above, the site is not available to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development site.

Site Address: Land at Holbeach Road, Spalding PE12 6JP



Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
			Savills
Site Area Ha	1.54		
Flood Risk	Flood Zone 3a Max Hazard: Low Hazard (Less than 0.75) Peak Depth: 0m - 0.25m		
Suitability	The site is not suitable as it is located in the countryside, outside of the settlement boundary, and is therefore not sequentially preferable to the proposed development site, within the settlement boundary.		
Availability	The site is understood to be available as it is currently being advertised for sale on Savills websites.		
Conclusion	In view of the above, the site is not suitable to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development Site		

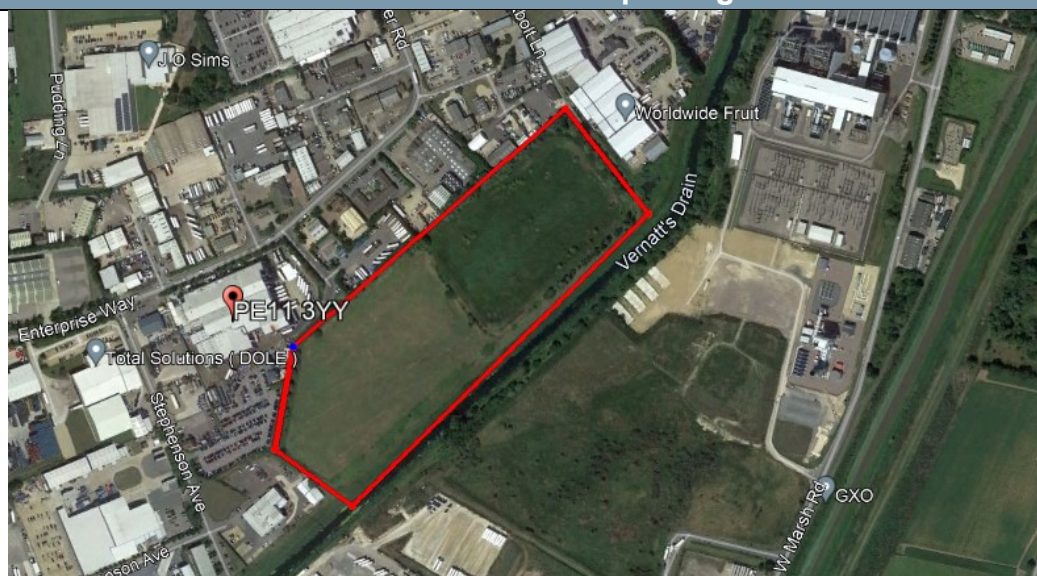
Site Address: Land north of the Vernatts Drain (SUE with Pin 045)



Source

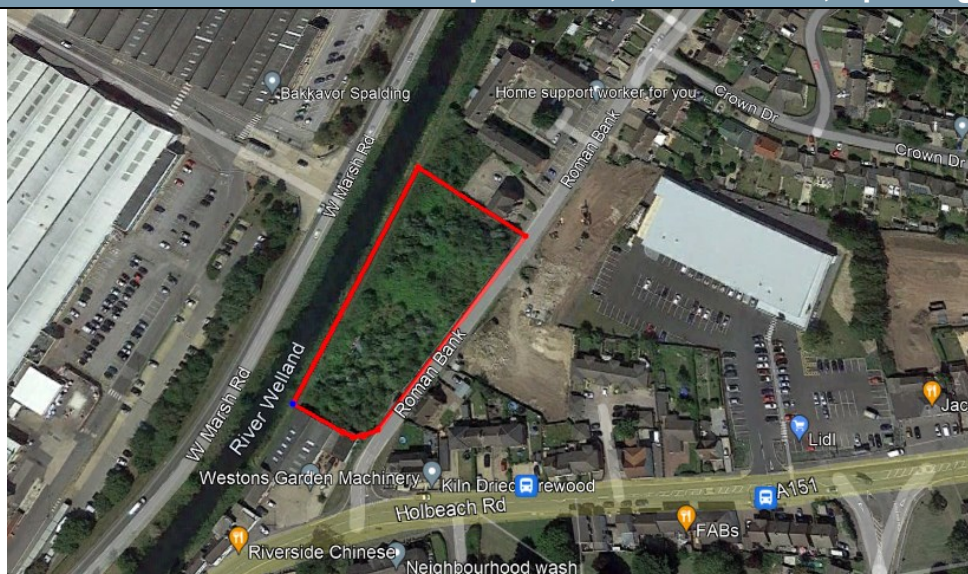
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
	Pin024 Phases 2 and 3		
Site Area Ha	11.47		
Flood Risk	Zone 1 Zone 2 Zone 3a Zone 3b	No hazard Low hazard Danger for some Danger for most Danger for all	No Depth 0m to 0.25m 0.25m to 0.50m 0.50m to 1.0m 1.0m to 2.0m >2.0m
Suitability	The site is allocated for housing development within the adopted Development Plan as part of the 'Vernatts Sustainable Urban Extension' ('SUE') with a proposed yield of 500 dwelling for phase 2 and 3,000 dwellings for phase 3. Due to problems with road infrastructure access discussed below, this site is not available and suitability has therefore not been considered across these parts. Construction of infrastructure would likely give rise to viability issues, and the lack of connection would impact on timescales for deliverability.		
Availability	The site comprises Greenfield land, however the site is not available as access to it is reliant upon the delivery of the Spalding Western Relief Road. The Vernatts SUE will be delivered in several phases, the completion of approximately 3,000 dwellings are expected to extend beyond the Local Plan period. Access to the site is reliant upon the delivery on the Spalding Western Relief Road. Only the north section of this road has commenced. No funding has been identified for the southern or middle sections of the relief road. Therefore, the further phases associated with this site are not currently available until the programme and funding of the road infrastructure is agreed.		
Conclusion	In view of the above, the site is not suitable and or available to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development Site.		

Site Address: Pinchbrook Brunel Road Spalding PE11 3YY



Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
			Rapleys
Site Area Ha			8.52
Flood Risk	Flood Zone 3a Max Hazard: No Hazard Peak Depth: No Peak Depth		
Suitability	The site is not suitable as it is located in a main employment area within the adopted development plan, which safeguards the site for B1, B2 and B8 employment uses (under Policy 7). As such, the industrial nature of the site would not be suitable for the proposed extra care accommodation.		
Availability	The site is understood to be available as it is currently being advertised for sale on Proplis agent website although the closing date to submit offers was 23 rd September (no year mentioned) so it is more than likely to have been sold and not available.		
Conclusion	In view of the above, the site is not suitable and or available to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development.		

Site Address: Former Jewsons premises, Roman Bank, Spalding



Source

SHLAA Ref	Local Plan Ref	Planning App Ref	Market
Stp003 SHLAA		H16-1203-22	

Site Area Ha

0.49

Flood Risk

Zone 1	No hazard	No Depth
Zone 2	Low hazard	0m to 0.25m
Zone 3a	Danger for some	0.25m to 0.50m
Zone 3b	Danger for most	0.50m to 1.0m
	Danger for all	1.0m to 2.0m
		>2.0m

Suitability

A live full planning application for a proposed extra care facility for approx... 69 bedroom by Sea Island Developments (Spalding) Ltd is being assessed that was received on 20 December 2022..

As the outcome of the decision remains undecided it is unclear as to the sites suitability for an extra care facility
Assuming the planning and technical issues can be agreed, the site is large enough to accommodate the Proposed Development. However given the overriding need for specialist housing exceeds the combined capacity of each site so both proposed extra care developments are considered necessary. Therefore, it would be unreasonable to choose between either site as both are required in order to contribute towards the Council's housing delivery objectives.

Availability	The site currently comprises a cleared site, however there is a live planning application on the site for the proposed development of an extra care facility and therefore it is not available to deliver a similar type of development.
Conclusion	In view of the above, the site may be suitable, but it is not available to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development Site..

Site Address: Ivanda Nursery Monks House Lane Spalding PE11 3LH



Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
		H16-0136-23	
Site Area Ha			2.26
Flood Risk		Flood Zone 3a Max Hazard: Low Hazard (Less than 0.75) Peak Depth: 0m – 0.25m	
Suitability		Proposed residential development of 70 dwellings, including demolition of existing glass houses was received on 9 February 2023 whilst no planning permission has been issued the application was considered at Planning committee with a recommendation of approval. Council members have issued a minded to approval decision subject to a S106 Agreement. Whilst the site is large enough to accommodate the Proposed Development, it would jeopardise the proposed delivery of 70 dwellings as the site would not be large enough to accommodate the Proposed Development alongside this, thus reducing the contribution of the site towards the Council's housing delivery objectives.	
Availability		The site currently comprises building and structures relating to the former nursely that will need to be demolished. There is a live planning application on the site for the proposed development of 70 no. dwellings which has been granted by Planning Committee this therefore suggests the site is not avialbe for development of Extra Care accommodation.	

Conclusion	In view of the above, the site is not available to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development Site.
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Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
Site Area Ha			0.74
Flood Risk	Flood Zone 3a Max Hazard: Danger for Some (Between 0.75 and 1.25) Peak Depth: 0.25m – 0.5m Existing Levels 3.75m AOD		
Suitability	Area 1 includes the former BMX track, part of the athletic track and an existing playing field. The site is designated as open space within Policy 32 of the Local Plan which seeks to guard against the loss of existing, valued community facilities. Such losses will be permitted only if it can be demonstrated that the facility is no longer needed or will be replaced elsewhere nearby, or (in the case of sport or recreational facilities) the redevelopment or change of use will retain the facility in sport or recreational use, albeit of a different type. The masterplan for the whole site has carefully evolved, taking into account a range of operation requirements, and the planning and technical constraints. Accommodation of the Extra Care facility on this area of the site would impact on the overall loss of the playing field which is likely to attract a statutory objection for Sport England. The loss of this area for the proposed development would also not satisfy the wider aims and objectives associated with the LUF funding requirements to secure and maximise the range of upgraded sporting and community facilities proposed for the district on the whole site. For example, developing the Extra Care proposal on this area would spatially comprise the ability of the scheme to deliver an adult sized 3G Artificial Turf Pitch as well as the benefits associated with extending the existing indoor leisure facilities to accommodate the new swimming pool.		
Availability	The existing Leisure Centre site is council-owned land, and it is coming forward as part of the Health and Wellbeing Hub proposal so it is available as part of considering a comprehensive approach to the whole site.		

Conclusion	In view of the above, the site may be available but it is not suitable to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development site..
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Site Address: Area 2 Castle Sports Centre Spalding



Source			
SHLAA Ref	Local Plan Ref	Planning App Ref	Market
Site Area Ha	0.79		
Flood Risk	Flood Zone 3a Max Hazard: Low Hazard (Less than 0.75) Peak Depth: 0m – 0.25m Existing Levels 3.29m AOD		
Suitability	Area 2 includes part of the existing adult football pitch and the athletics track. The site is designated as open space within Policy 32 of the Local Plan which seeks to guard against the loss of existing, valued community facilities. Such losses will be permitted only if it can be demonstrated that the facility is no longer needed or will be replaced elsewhere nearby, or (in the case of sport or recreational facilities) the redevelopment or change of use will retain the facility in sport or recreational use, albeit of a different type. The masterplan for the whole site has carefully evolved, taking into account a range of operation requirements, and the planning and technical constraints. Accommodation of the Extra Care facility on this area of the site would impact on the overall loss of the playing field which is likely to attract a statutory objection for Sport England. The loss of this area for the proposed development would also not satisfy the wider aims and objectives associated with the LUF funding requirements to secure and maximise the range of upgraded sporting and community facilities proposed for the district on the whole site. For example, developing the Extra Care proposal on this area would spatially comprise the ability of the scheme to deliver an adult sized 3G Artificial Turf Pitch as well as the benefits associated with extending the existing indoor leisure facilities to accommodate the new swimming pool.		

Availability	The existing Leisure Centre site is council-owned land, and it is coming forward as part of the Health and Wellbeing Hub proposal so it is available as part of considering a comprehensive approach to the whole site.
Conclusion	In view of the above, the site may be available but it is not suitable to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development site

Site Address: Area 3 Castle Sports Centre Spalding



Source

SHLAA Ref	Local Plan Ref	Planning App Ref	Market
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Site Area Ha		0.58
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Flood Risk	Flood Zone 3a Max Hazard: Danger for Some (Between 0.75m and 1.25m) Peak Depth: 0.25m – 0.5m Existing levels 3.34m AOD
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Suitability	Area 3 includes part of the existing adult football pitch and the athletics track. The site is designated as open space within Policy 32 of the Local Plan which seeks to guard against the loss of existing, valued community facilities. Such losses will be permitted only if it can be demonstrated that the facility is no longer needed or will be replaced elsewhere nearby, or (in the case of sport or recreational facilities) the redevelopment or change of use will retain the facility in sport or recreational use, albeit of a different type. The masterplan for the whole site has carefully evolved, taking into account a range of operational requirements, and the planning and technical constraints. Accommodation of the Extra Care facility on this area of the site would impact on the overall loss of the playing field which is likely to attract a statutory objection for Sport England. The loss of this area for the proposed development would also not satisfy the wider aims and objectives associated with the LUF funding requirements to secure and maximise the range of upgraded sporting and community facilities proposed for the district on the whole site. For example, developing the Extra Care proposal on this area would spatially comprise the ability of the scheme to deliver an adult sized 3G Artificial Turf Pitch as well as the benefits associated with extending the existing indoor leisure facilities to accommodate the new swimming pool.
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Availability	The existing Leisure Centre site is council-owned land, and it is coming forward as part of the Health and Wellbeing Hub proposal so it is available as part of considering a comprehensive approach to the whole site.
Conclusion	In view of the above, the site may be available but it is not suitable to deliver the Proposed Development and is therefore not sequentially preferable to the Proposed Development site