PLANNING STATEMENT

SEA ISLAND DEVELOPMENTS (SPALDING) LTD

LAND ADJACENT TO ROMAN BANK, SPALDING



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PLANNING STATEMENT

On behalf of: Sea Island Developments (Spalding) Ltd

In respect of: Land adjacent to Roman Bank, Spalding

Date: November 2022

Reference: DP/LH/4879NE/R001

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1.0 Introduction

1.1 This Planning Statement ('the Statement') has been prepared on behalf of Sea Island Developments (Spalding) Ltd ('the Applicant'), to assist South Holland District Council ('the LPA') in their consideration of a full planning application for proposed extra care accommodation with associated access, car parking, and landscaping on land adjacent to Roman Bank, Spalding ('the Site').

1.2 This Statement provides an assessment of the Proposed Development having regard to relevant national and local planning policy. Section 2 provides a brief description of the application Site and planning history, whilst Section 3 details the application proposal. Section 4 outlines the relevant planning policy at national and local level. Section 5 assesses the proposals having regard to the policies set out in Section 4. An overall conclusion is presented in Section 6.

1.3 This Statement should be read in conjunction with the following supporting documents, submitted as part of the application package:

- Application Forms and Ownership Certificates
- Covering Letter by DPP
- South Holland Planning Checklist
- Statement of Community Involvement (SCI) by DPP
- Flood Risk Sequential and Exceptions Test by DPP
- Design and Access Statement by JDDK
- Plans Pack by JDDK:
  - 4238-JDK-DR-A-1001-Site Location Plan
  - 4238-JDK-DR-A-1002-Existing Site Plan
  - 4238-JDK-DR-A-1003-Rev 4-Proposed Site Plan
  - 4238-JDK-DR-A-2001-Rev3- Basement and Ground Floor Plan
  - 4238-JDK-DR-A-2002-Rev1- First and Second Floor Plan
  - 4238-JDK-DR-A-2003- Third floor and Roof Plan
  - 4238-JDK-DR-A-3010-Rev1- Proposed Elevations
- Landscape Strategy Plan by Glen Kemp
- Flood Risk and Drainage Impact Assessment by Hydrock
- Preliminary Ecological Appraisal by OS Ecology
- BNG Assessment by OS Ecology
- Arboricultural Method Statement including Impact Assessment by Elliott Consultancy Ltd
- Transport Statement by IPRT
- Noise Assessment by Apex Acoustics
- Phase 1 Geo-Environmental Assessment by Hydrock

2.0 Site Description and Planning History

Site Description

2.1 The Site is a previously developed parcel of land located along Roman Bank in Spalding, within the South Holland District of Lincolnshire. The Site is currently vacant and is covered by self-seeded trees and vegetation. It is bound by the River Welland to the west, Roman Bank to the east, residential dwellings to the north, and commercial and leisure uses to the south west.

2.2 The Site is accessed via Roman Bank. It is within a short walking distance of Holbeach Road which contains a number of bus stops and a recently constructed Lidl Supermarket, and is within convenient walking distance of Springfields Outlet Shopping Centre. With good access to local services, facilities and public transport links, the Site is in a sustainable location for development.

2.3 The Site is located within Flood Zone 3, however it must be noted that Spalding in its entirety falls within this flood zone. The northern area of the Site also contains areas ranging from low to high risk of surface water flooding.

2.4 The Site is not allocated in the adopted development plan, however the River Welland which abuts the Site immediately to the west is designated as a Local Wildlife site.

2.5 The Site is not located within a Conservation Area. There are no listed buildings on the Site or within close proximity to it. However, there is a Grade I listed Church of St Paul and Grade II* listed Vicarage located to the east of the Site along Holbeach Road. Given the separation distances and intervening development there are not considered to be any setting issues associated with these designated heritage assets, and as such they are not considered further within this Statement.

Planning History

2.6 The Site has previously benefited from planning permission for residential development, most recently (Sept 2017) planning permission was granted for a self-contained care home and two over 55 years of age apartment blocks ref: H16-0138-17. It is not known whether any element of this consent was implemented.

2.7 Currently there is a live planning application on land to the north of the Site (adjacent to Landsowne Court) for a residential development of 12 one bedroom apartments (ref: H16-0523-22).

2.8 Planning permission has also been granted for the development of up to 36 residential dwellings and associated works adjacent to the Site on Roman Bank (application refs: H16-0853-17 and H16-0459-19).

3.0 Proposed Development

3.1 The Proposed Development seeks to deliver extra care accommodation (Use Class C2) comprising approximately 69 units of accommodation, with associated access, car parking, and landscaping.

3.2 The proposals would provide a specialist form of housing on the site, comprising of residential accommodation with additional care provision for those with increasing care needs. The site has been chosen as it is well-located within the settlement, with convenient access to public transport links, local services and facilities and the wider transport network for occupants of the development. The site is therefore considered to be a sustainable and suitable place in which to provide extra care accommodation, with residents able to access facilities nearby through various means.

3.3 The Proposed Development comprises of a single block which is roughly T-shaped and set over three to four storeys, with the central area of the building consisting of rooms across four floors. The main entrances into the building would be provided at street level on the east elevation and from within the underground parking area proposed at basement level, making for an appealing external area which would feature sensitive landscaping at street level.

3.4 The proposed materials palette will comprise grey tiling for the roof, and a mixture of red multi-brick, red brick soldier course, timber effect cladding and off-white through coloured render.

3.5 Parking would be provided within the basement for 24 vehicles, including two disabled bays. Access into the building would be provided through a lobby area, with lifts and stairs leading to upper floors.

3.6 69 units of accommodation would be spread throughout the building across all floors, with ancillary spaces and communal areas spread throughout the building. The ground floor would feature a lobby area and entrance foyer serving a buggy store, activity room, laundry room, plant room, office space and WC facilities. Corridors would lead to individual apartments, with rest areas and breakout spaces spread throughout. The external area would lead from the activity room at ground floor level through a series of bi-fold glazing. Elsewhere, the central lift shaft would be support by three staircases, one at either end of the building in addition to the main staircase adjacent to the lift shaft.

3.7 Further units of accommodation would be spread across the first, second and third floor levels, with access to roof terraces available from the second and third floors. All units would feature spacious bedrooms, bathrooms and open plan kitchen, living and dining spaces with access to small external balconies.

3.8 Externally, communal gardens will be created fronting onto Roman Bank, which will contain seating areas and a water feature, and will provide outdoor space for residents and contribute towards maintaining the emotional and physical wellbeing of residents. A small outdoor area is proposed at the rear of the building, providing an area for residents to enjoy views of the River Welland. The

planting mix proposed will comprise wildflower turf, swathes of bulb planting, native structure and hedge planting, and ornamental hedge and shrub planting.

3.9 Cycle parking is proposed adjacent to the main entrance, with additional provision in the underground car parking area. An external refuse storage area is proposed in the western area of the site, with drop off bays enabling refuse vehicles to pull off the highway whilst servicing the site.

Need for Extra Care Accommodation

3.10 The Applicant has engaged with the Council's Housing Strategy and Enabling Officer through discussions since January 2019, through which the Officer has confirmed that there is a need for extra care accommodation across the district and that a proposal for extra care housing in this location would be supported. We understand from these discussions that there is currently no housing of this type anywhere in the district of South Holland.

3.11 The Applicant has also engaged in initial discussions with the Local Planning Authority (LPA) in October 2021, during which the principle of providing extra care accommodation was considered acceptable. Formal pre-application advice was sought from the LPA in October 2022, with the project team engaging in a virtual meeting with the LPA on 11th October. During this meeting the authority reconfirmed that the principle of development was acceptable. Further discussion was had with Officers regarding flood risk, housing need and design, with Officers raising no initial concerns with regard to scale and massing of the proposed development. Formal pre-application advice was provided by the LPA on 16th November 2022.

3.12 During pre-application discussions, the Applicants have sought to initiate further dialogue with the Environment Agency and have submitted initial enquiries to understand potential flooding risks. Separate enquiries have also been made with statutory undertakers to understand capacity on the local infrastructure network, particularly in respect of drainage matters.

3.13 The application is supported by a Business Case for Extra Care Housing in Spalding which has been prepared by Social Care Strategies, which demonstrates that, using ONS mid-year estimates and projections, the extra care housing methodology establishes an immediate requirement for 121 places in 2017 and 136 places in 2039. It also confirms that currently there is no extra care housing available in Spalding.

4.0 Planning Policy Context

National Planning Policy Framework ('NPPF')

4.1 A revised version of the NPPF was published in July 2021 and sets out the Government's proposed economic, environmental and social planning policies for England.

4.2 The following NPPF sections are relevant to the Proposed Development:

Section 2 – Achieving Sustainable Development

4.3 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, these should be pursued in mutually supportive ways:

- *An economic objective – to help build a strong and competitive economy*
- *A social objective – to support strong, vibrant and healthy communities*
- *An environmental objective – to contribute to protecting and enhancing the natural, built and historic environment*

4.4 Paragraph 10 of the NPPF states that at the heart of the Framework is a presumption in favour of sustainable development and, in applying this principles, Paragraph 11 goes on to require that plans and decision taking should apply this presumption in favour of sustainable development.

Section 5 – Delivering a Sufficient Supply of Homes

4.5 Paragraph 60 states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

4.6 Paragraph 62 underlines within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

Section 6 – Building a Strong, Competitive Economy

4.7 The NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Section 8 – Promoting healthy and safe communities

4.8 Paragraph 92 states that 'planning policies and decisions should aim to achieve healthy, inclusive and safe places' which:

- Promote social interaction
- Are safe and accessible; and
- Enable and support healthy lifestyles

Section 9 – Promoting Sustainable Transport

4.9 Paragraph 104 of the NPPF states that opportunities to promote walking, cycling and public transport use should be pursued by development proposals. Paragraph 105 adds to this by encouraging development in locations which are or can be made sustainable, through limiting the need to travel whilst offering a genuine choice of transport modes.

Section 11 – Making Effective Use of Land

4.10 Paragraph 119 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Section 12 – Achieving Well-Designed Places

4.11 Paragraph 130 states that planning decisions should ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

4.12 Chapter 14 of the NPPF states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

4.13 Paragraph 159 states 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.

4.14 Paragraph 161 underlines that 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.

4.15 Paragraph 162 states the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.

4.16 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, in line with the Flood Risk Vulnerability Classification.

4.17 Paragraph 164 sets out 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 of at the 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.

4.18 Paragraph 165 of the NPPF underlines that both elements of the exception test should be satisfied for development to be allocated or permitted.

4.19 Furthermore, paragraph 167 underlines 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:

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 par of an agreed emergency plan

Section 15 – Conserving and Enhancing the Natural Environment

4.20 Paragraph 174 of the NPPF asserts that new and existing development should not contribute to, be put at unacceptable risk from, or be adversely affect by, unacceptable levels of soil, air, water or noise pollution or land instability.

4.21 Paragraph 179 states that in order to protect and enhance biodiversity and geodiversity, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Section 16 – Conserving and Enhancing the Historic Environment

4.22 Paragraph 189 of the NPPF sets out heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value66. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

4.23 Paragraph 194 sets out the strategy to take towards proposals affecting heritage assets. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes,

or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Development Plan

4.24 The Development Plan for the Site is the South East Lincolnshire Local Plan (adopted in 2019).

4.25 The following adopted policies are considered to be relevant to the Proposed Development on the Site:

4.26 Policy 1: Spatial Strategy, sets out the hierarchy and preference of areas as to where development is to be directed. Within this policy, Spalding is defined as a Sub-regional centre, and is a highly preferable location for development

4.27 Policy 2: Development Management, underlines that development proposals will be permitted where sustainable development considerations are met, specifically in relation to size, scale, layout, density and impact on the amenity, trees, character and appearance of the area and the relationship to existing development and land uses, design quality, access and vehicle generation levels and the capacity of existing community services and infrastructure.

4.28 Policy 3: Design of New Development, lays out design criteria for new development proposals. The policy states consideration must be given to relevant criteria, which would include creating a sense of place, the landscape character of the location, accessibility by a choice of travel modes, provision of facilities for the storage of refuse/recycling bins, storage and/or parking of bicycles and layout of car parking, the orientation of buildings, residential amenity and others.

4.29 Policy 4: Approach to Flood Risk, states that proposals within an area at risk of flooding will be permitted where it can be demonstrated that there are no other sites available at a lower risk of flooding, essential infrastructure, highly vulnerable development and more vulnerable development can provide wider sustainability benefits to the community that outweigh flood risk and where the application is supported with a site-specific flood risk assessment.

4.30 Policy 5: Meeting Physical Infrastructure and Service Needs, states that planning permission will be granted for new development provided that developers can demonstrate that there is, or will be sufficient physical infrastructure and service needs capacity to support and meet the needs of the proposed development. The policy underlines the Infrastructure Delivery Plan, which deems that health care infrastructure is essential.

4.31 Policy 6: Developer Contributions, sets out that developments with a combined gross floorspace of more than 1,000sqm or more will be expected to mitigate their impacts upon infrastructure, services and the environment to ensure that such developments are acceptable in planning terms. Developer contributions relating to the provision of education facilities will be made in accordance with the requirements set out in Appendix 9: Developer Contributions for Health Facilities, of the Local Plan. These should also be in accordance with the proposed Developer contributions Supplementary Planning Document (SPD).

4.32 Policy 10: Meeting Assessed Housing Requirements, confirms provision will be made for a net increase of at least 19,425 dwellings in South East Lincolnshire. 11,681 at 467 per annum, are proposed for South Holland Local Authority area.

4.33 Policy 11: Distribution of New Housing, details new housing site allocations to meet approximate housing numbers. This is set at 5,510 in the sub-regional centre of Spalding.

4.34 Policy 17: Providing a Mix of Housing, seeks to meet the long term needs of the plan area in order to maintain and provide mixed, inclusive and sustainable communities. Policy 17 underlines there is a growing ageing population with the increasing likelihood of mobility and disability needs to be met also make up over 10% of housing needs over the Plan period. These should be met through provision of homes capable of adaption and also through specialist care home provision, and should be provided in the most sustainable settlements, in Sub-Regional Centres and Main Service Centres.

4.35 Policy 18: Affordable Housing, highlights there is a need for affordable housing in the borough, including in South Holland, where there is a need of 282 new affordable dwellings per annum across the plan period. Affordable housing is sought on housing sites of 11 or more dwellings, sites proposed by developers specifically for affordable housing and rural exception sites.

4.36 Policy 28: The Natural Environment, promotes the protection, maintenance and enhancement of a high quality, comprehensive ecological network of interconnected designated sites, sites of nature conservation importance and wildlife-friendly greenspace. Development on locally-designated sites and on sites with protected or priority habitats and species will not be permitted unless there are no alternative sites that would cause less or no harm, the benefits of development outweigh the adverse impacts and unless suitable prevention, mitigation and compensation measures are provided.

4.37 Policy 29: The Historic Environment, places great emphasis on the conservation, protection and enhancement of distinctive elements of the South East Lincolnshire historic environment.

4.38 Policy 30: Pollution, underlines proposals resulting in unacceptable pollution impacts, taking into account mitigation measures, on health, amenity and the natural, historic and built environment will not be accepted.

4.39 Policy 31: Climate Change and Renewable and Low Carbon Energy, requires all proposals to demonstrate the consequences of climate change have been addressed, minimised and mitigated for. This includes the adoption of a sequential approach and Exception Test where necessary, and the incorporation of flood-mitigation measures in design and construction to reduce the effects of flooding, including SuDS schemes for all 'Major' applications. The integration of decentralised technologies on existing or proposed structures will be supported in principles, provided there is no significant harm.

4.40 Policy 32: Community, Health and Well-being, emphasises the important contribution development has to the creation of socially-cohesive and inclusive communities, reducing health inequalities; and improving the community's health and well-being.

4.41 Policy 33: Delivering a More Sustainable Transport Network, sets out priorities and actions for achieving a better transport network. These relate to road-based transport, rail-based transport and cycling, walking and other sustainable transport.

4.42 Policy 36: Vehicle and Cycle Parking, sets out the requirements for vehicle and cycle parking for new developments, in line with the minimum Parking Standards adopted by the Local Planning Authorities set out in Appendix 6 of the Local Plan. For residential development, this means planning for a balanced provision of allocated and communal parking, overlooking and accessible to the development it serves making sure off-curtilage parking is designed to maximise levels of security and safety for vehicles, drivers and pedestrians and providing spaces to store at least two bicycles within each residential plot.

Other Material Considerations

Flood Risk and Coastal Change PPG

4.43 This National Planning Practice Guidance (PPG) sets out the specific requirements regarding Flood Risk Sequential Assessments and the Exceptions Test. Please see the planning assessment section for further details regarding the applicability of this guidance to the Proposed Development at the Site.

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

4.44 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.

5.0 Planning Assessment

5.1 The planning policy review provided at Section 5 has established the local and national planning policy considerations which are relevant to the consideration of the planning application. This section will go on to assess the Proposed Development against the Development Plan Policies and the following relevant material planning considerations:

- Principle of Development
- Flood Risk and Drainage
- Sustainable Development- Social, Economic and Environmental Benefits
- Design and Layout
- Residential Amenity
- Access, Parking and Highways
- Landscaping and Trees
- Noise
- Ground Conditions
- Ecology

Principle of Development

5.2 The starting point for the assessment of planning applications as set out by S38 (6) of the Planning and Compulsory Purchase Act 2004, is the adopted Development Plan, unless material considerations indicate otherwise. In this instance the adopted Development Plan is the South East Lincolnshire Local Plan (adopted in 2019).

5.3 The proposals seek to provide a specialist form of housing known as 'extra care' accommodation for those with increasing care needs. The site is previously developed land which is well-located within the settlement of Spalding, identified within the development plan as a Sub-Regional Centre, with convenient access to public transport links, local services and facilities and the wider transport network.

5.4 As a Sub-Regional Centre, and one of the main towns within South Holland District, Spalding is a focus for future growth and housing delivery and through Policy 1 the Council are seeking to direct development to it which supports its role as a centre. The Site is therefore sustainably located and a suitable place in which to provide residential accommodation in accordance with Policy 1 of the Local Plan.

5.5 With regard to housing need, Policy 10 seeks to secure the provision of a net increase of at least 19,425 dwellings in South East Lincolnshire, of which 11,681 are proposed for the District of South Holland. Policy 17 of the Local Plan acknowledges the need for specialist forms of accommodation to be brought forward within that total, and states:

"A growing ageing population with the increasing likelihood of mobility and disability needs to be met also make up over 10% of housing needs over the Plan period and these should be met through

provision of homes capable of adaption and also through specialist care home provision. 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."

5.6 Spalding has a larger than average number of over 65s and projections would indicate an immediate need for 121 extra care accommodation places, rising to 136 by 2039. Discussions with the local authority reveal that there is no extra care housing available in Spalding, and as such the need is currently unmet.

5.7 Planning permission has previously granted (reference H16-0138-17) for the development of a self-contained care home and over 55's accommodation on the site. This development was not brought forward and as such there remains a need for extra care accommodation within the settlement.

5.8 Policy 32 of the Local Plan seeks to ensure development contributes to the creation of socially-cohesive and inclusive communities, and improving the community's health and well-being. The focus of this policy is to ensure that the impacts of development proposals on people's health and well-being are considered, and that proposals contribute towards ensuring access to services and facilities to support active and healthy lifestyles.

5.9 An element of this seeks to provide for socially cohesive and inclusive communities. The provision of extra care accommodation within this location would contribute towards achieving this aim, through the introduction of a specialist form of housing within an area where there are a range of uses, services and facilities within convenient reach.

5.10 In view of the above, and alongside the pre-application discussions which have taken place with the LPA's Housing Officer to-date, the principle of the Proposed Development is considered acceptable in accordance with adopted planning policies 1, 17 and 32 of the South East Lincolnshire Local Plan (2019).

5.11 In addition, the proposals would contribute towards the provision of specialist accommodation to meet the needs of residents within the District. The Proposed Development would contribute towards ensuring a five year supply of deliverable housing across South Holland and more widely across South Lincolnshire. Although the Council can currently demonstrate a deliverable supply equivalent to 5.9 years, the need for housing within the Local Plan does not impose a ceiling on development and importantly the construction of new extra care accommodation in the settlement would contribute to addressing the currently unmet need.

5.12 For these reasons, the Proposed Development is considered to be acceptable as a matter of principle.

Flood Risk and Drainage

Flood Risk

5.13 The Site is located in Flood Zone 3, with the entirety of Spalding falling within this zone. The South East Lincolnshire SFRA identifies that the Site lies outside of the 'Functional Floodplain', and is therefore located within Flood Zone 3a. In terms of applying the Flood Risk PPG to this scenario, the Proposed Development is categorised as 'More Vulnerable' and, as such, the Exception Test is required to support this application.

5.14 In accordance with national and local planning policy (policy 4), this application is supported by a Flood Risk Sequential Assessment and Exceptions Test, alongside a Flood Risk Assessment and comprehensive Drainage Strategy.

5.15 The supporting Flood Risk and Drainage Impact Assessment has been prepared by Hydrock 3E. It confirms that the Site is located in Flood Zone 3a 'High probability', and therefore as the Proposed Development is categorised as 'more vulnerable', the exceptions test is required to be undertaken.

5.16 The FRA indicates that the EA have confirmed that the tidal limit of the River Welland is located 270m north east of the site, at the Fulney Lock. However, the South Holland Council SFRA contains details of potential flood depths for the entire Spalding area during an extreme tidal event from the Coronation Channel. The extent of this includes the proposed site boundary and indicates that the site would be subject to flood depths of between 1- 2m.

5.17 A proposed flood depth plan has therefore been provided which is based on a maximum flood level of 5.35mAOD, and which has been set by taking the maximum 2m depth from the SFRA information and adding this to the lowest existing ground level of 3.35mAOD. The plan demonstrates that the ground floor level has been set at 5.35mAOD and will therefore, in the event of an extreme tidal event from the Coronation Channel, provide a safe haven for residents should flood depths reach the maximum 2m depth. Residents would reside here until the flood water drained and a safe evacuation route was available.

5.18 The Flood Risk Sequential Assessment and Exceptions Test has been undertaken by DPP (ref: 4879NE/R002), and concludes that there are no reasonably suitable and/or available sites which are sequentially preferable to the Site along Roman Bank and, as such, the sequential test is passed. The Exceptions Test concludes that, in consideration of the wide-ranging and substantial sustainability benefits brought as a result of the development (meeting part A of the exception test), together with the fact that the scheme incorporates flood mitigation and management that ensures the development will be safe for its lifetime taking into account the vulnerability of its users, will not increase flood risk elsewhere and in fact reduces flood risk overall (meeting part B of the exception test), the Proposed Development passes both elements of the Exception Test.

5.19 The development of the site is considered acceptable in terms of flooding risk, and fulfils the requirements of policy 4 of the South East Lincolnshire Local Plan. Amongst these requirements is a need to provide for appropriate flood warning and evacuation procedures, details of which can be controlled by a suitable worded condition. Subject to accordance with such a condition, the Proposed Development would be acceptable in terms of flood risk in accordance with policies 2 and 4 of the South East Lincolnshire Local Plan.

Surface and Foul Water Drainage

5.20 The FRA confirms that the north section of the site is subject to medium-high risk of surface water flooding. This is expected due to the existing low-lying areas with an absence of surface water drainage.

5.21 The Proposed Development is supported by a Drainage Plan, informed by a comprehensive Drainage Strategy. It indicates that impermeable surfaces within this area that will be positively drained and attenuated, with a need for SuDS to be incorporated as part of the development. It is therefore considered that the site is at low risk of surface water flooding. The proposals have been informed by a Phase I Geo-environmental Assessment undertaken by Hydrock 3E which notes that based on the likely presence of a shallow continuous groundwater table below the site, it is unlikely that the use of soakaways for surface water discharge will be feasible.

5.22 The drainage strategy for the site considers current known ground conditions and takes into account the site's location adjacent to the River Welland. Due to the close proximity to the River Welland, only 7m off the western site boundary, it is proposed to discharge surface water flows to the river via a newly constructed headwall. This is subject to the receipt of a flood risk activity permit from the EA. Following approval of the flood risk activity permit, a separate agreement will be discussed with the EA Estates team to allow access into EA owned land to construct the new headwall.

5.23 Surface water will be attenuated through a SuDS system, located below the access road into the site. Based on a maximum discharge rate of 5l/s, a volume of 73m3 will be required within the drainage system to attenuate excess flows. This will be provided in the form of a cellular storage tank with pumping system to discharge water into the watercourse at the restricted rate. Based on information provided by the EA, the FRA and Drainage Strategy conclude that flooding risks up to the 1in100+40%CC event are accounted for.

5.24 It is proposed that foul water flows generated by the proposed development will utilise the existing connection into the public sewer within Roman Bank located within the south east of the site.

Summary

5.25 In summary, the site has been reviewed in relation to all potential sources of flooding. The proposed development will deal with surface water run-off through a sustainable urban drainage system, and will not exacerbate flooding elsewhere.

5.26 The implications of an extreme tidal event from the Coronation Channel have been considered and mitigation in the form of a raised FFL to suit the maximum flood depth and undercroft flood storage in the form of the basement car park is proposed. Treatment of surface water flows will fully satisfy the required treatment indices as per Ciria guidance, this will be in the form of filter trenches and ESR stormceptor treatment system from SPEL. Foul drainage will be discharged to the public sewer within Roman Bank, via an existing connection located within the south east of the site.

5.27 In view of all of the above, and in conjunction with the findings of the supporting Flood Risk Assessment and Drainage Strategy and Flood Risk Sequential Assessment and Exceptions Test, alongside the previous planning permission granted on the Site, the Proposed Development is in accordance with adopted local plan policies 2, 4 and 31, NPPF paragraphs 161-164 and the Flood Risk and Coastal Change PPG, and therefore there are no reasons as to why the LPA should not support the Proposed Development.

Sustainable Development- Social Economic and Environmental Benefits

5.28 The Proposed Development contributes to all three strands of sustainable development; economic, social and environmental. This is explained below.

Social

5.29 Extra-Care Housing is defined by Social Care Strategies[1] as:

"purpose-built specialised supported housing with integral assistive technology and 24- hour support for older people.

Specialised Supported housing is defined by statutory regulation as supported housing:

(a) which is designed, structurally altered, refurbished or designated for occupation by, and made available to, residents who require specialised services or support to enable them to live, or to adjust to living, independently within the community,

(b) which offers a high level of support, which approximates to the services or support which would be provided in a care home, for residents for whom the only acceptable alternative would be a care home,

(c) which is provided by a private registered provider under an agreement or arrangement with—

(i) a local authority, or

(ii) the health service within the meaning of the National Health Service Act 2006(11),

(d) in respect of which the rent charged or to be charged complies with the agreement or arrangement mentioned in paragraph (c), and

(e) in respect of which either

(i) there was no public assistance, or

(ii) if there was public assistance, it was by means of a loan secured by means of a charge or a mortgage against a property."

[1] The Business Case for Extra Care Housing in Spalding, Lincolnshire by dated March 2019 by Social Care Strategies

5.30 Spalding has a larger than average number of over 65s, and the Proposed Development will contribute towards meeting an identified need for 121 extra care accommodation places, rising to 136 by 2039. There are currently no extra care housing available in Spalding, and as such the Proposed Development will contribute towards meeting this need.

5.31 The Proposed Development will deliver 69 no. extra-care apartments (also known as assisted living), which offer support whilst allowing residents to live independently. The services provided by extra-care apartments are tailored to each resident, and include a self-contained flat to enable independence, support from staff, 24-hour emergency help alarm system, community and social activities, and communal areas to encourage socialising.

5.32 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 landscaping scheme includes feature planting to stimulate biodiversity and provide an attractive environment for residents, which will generate benefits for future occupants' physical and mental wellbeing.

5.33 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.

5.34 Various studies have been carried out to understand the social impacts of extra care housing. A report published by The Joseph Rowntree Foundation[2] explored the social well-being of those living in extra care housing through a series of interviews. Most participants reported a high level of satisfaction with their social well-being and overall quality of life. Maintaining their own independence was an important part of this, as was the overall extra care housing environment, the friends they were able to make within it and the contact they had with the wider community.

5.35 A more recent study carried out by Lancaster University[3], commissioned for Aston Research Centre for Healthy Ageing (ARCHA) and the ExtraCare Charitable Trust, considered the benefits to residents of ExtraCare villages and schemes across a 5-year period. Across the 5-year 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 key findings from the study are summarised below:

- Significant improvements in the level of exercise done by residents.
- Improvements in resident's perceived health.
- No change (either improved or deterioration) in residents' level of independence or functional limitations over the 5-year period.
- Low levels of depression and depressive symptoms in residents.

[2] The Joseph Rowntree Foundation – Social well-being in extra care housing, 2007
[3] The ExtraCare Charitable Trust Research Report - Integrated Homes, Care and Support – Measurable Outcomes for Healthy Ageing, March 2019

- Decrease in anxiety symptoms.
- Improvements in memory and cognitive skills.
- Improvements in physical fitness.
- Levels of loneliness were lower in residents than the national averages.
- Residents made more effective use of healthcare resources, reducing visits to GP's but increasing visits to practice nurses.
- Residents average 3 days less per year in hospital than previously.
- Costs savings to the NHS of on average £1,994 per person over 5 years.

5.36 Extra care facilities are specifically designed to meet the needs of older residents and help to facilitate independent living which standard housing cannot accommodate for. This can also have wider benefits for the locality in terms of freeing up standard accommodation for the younger population and helping to reduce pressure on GP's.

Economic

5.37 The Proposed Development will deliver extra-care accommodation, which makes 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.

5.38 The King's Fund[4] explains that "*people are living longer with multiple, complex, long-term conditions and increasingly require long-term support from many different services and professionals. As a consequence, people too often receive fragmented care from services that are not effectively co-ordinated around their needs. This can negatively impact their experiences, lead to poorer outcomes and create duplication and inefficiency.*"

5.39 ADASS[5] further explains that "*there is an abundance of evidence that people want and prefer care to be as close to home as possible…this means providing the conditions for person-centred joined-up care, in which responses to are designed around the unique needs of individuals and populations rather than the other way round. It is therefore self-evident that care and support must be co-produced with people and communities.*"

5.40 The Proposed Development will regenerate a previously developed site, bringing it back into viable use which will result in a number of far reaching economic benefits to the area.

5.41 The development will result in a significant investment to deliver assisted living and housing on the site. The construction phase of the development will provide direct employment for construction workers and will also create indirect jobs during the construction phase through supply chains for the purchase of building materials and equipment.

[4] The King's Fund- Integrated Care Systems Explained: Making sense of systems, places and neighbourhoods, published 19th August 2022 [Available at: https://www.kingsfund.org.uk/publications/integrated-care-systems-explained#what-are-ICSs]
[5] ADASS- Re-imagining integrated care- a shift to home and community, published 1st July 2022 [Available at: https://www.adass.org.uk/re-imagining-integrated-care-a-shift-to-home-and-community]

5.42 Upon completion, the provision of accommodation will provide employment opportunities for staff based on site, as well as those providing to specialist care needs of residents. The introduction of additional residents to the area would also have economic benefits through general expenditure, helping to support Spalding's role as a Sub-Regional Centre and hub of economic activity.

5.43 Using the tables setting out the impact of development on employment and expenditure in an economy developed by the Scottish Government called Input-Output tables, the full economic impact of the investment from the Proposed Development can be calculated as the generation of 30 jobs and £900,000 of Gross Value Added annually[6].

Environmental

5.44 The Site is previously developed land, and is in a sustainable and accessible location and within walking distance of local shops and services. The Proposed Development represents a new, long-term and sustainable use for the Site.

5.45 The Proposed Development incorporates flood mitigation and management that ensures the development will be safe for its lifetime taking into account the vulnerability of its users, will not increase flood risk elsewhere and will reduce flood risk overall.

5.46 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.

5.47 Furthermore, the Proposed Development will adopt a fabric first approach, in which the external envelope of the building is designed with high levels of thermal insulation which will reduce overall energy demand in conjunction with stabilising internal temperatures for future occupants.

5.48 The Proposed Development will generate benefits for the environment through the provision of a hard/soft landscaping scheme which includes the planting of trees; specimen shrub/climbers; ornamental shrubs; new hedges; rain gardens; and wildflower turf to enhance the existing natural environment on the Site whilst also encouraging biodiversity. The Proposed Development will provide bat and bird boxes to encourage wildlife.

5.49 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

[6] The Business Case for Extra Care Housing in Spalding, Lincolnshire by dated March 2019 by Social Care Strategies

Design and Layout

5.50 The design of the Proposed Development has undergone an iterative design process which sought to take account of the site specific constraints, namely flood risk and drainage requirements, amongst others.

5.51 The Proposed Development extends across a mixture of three to four storeys, with the central area of the building consisting of apartments across four storeys. Parking is proposed within a basement level, making for an appealing external area which would feature sensitive landscaping at street level.

5.52 The design of the Proposed Development seeks to be in keeping with the surrounding character of the area. Design features and a material palette will be drawn from and will seek to complement the surrounding properties, and have been changed to address comments provided by the LPA during pre-application discussions.

5.53 These changes see the introduction of less regular fenestration and balcony patterns across the riverside frontage, and improved palette of external materials which are now more in keeping with local vernacular. The proposed materials palette will comprise grey tiling for the roof, and a mixture of red multi-brick, red brick soldier course, timber effect cladding and off-white through coloured render.

5.54 The overall scale, design and massing takes account of neighbouring land uses and ensures that the building will sit comfortably within its surroundings. It is considered material that a three-storey residential care home comprising under-croft car parking has previously been approved on the Site, which establishes the acceptability of the design approach being proposed. Additionally, the property directly north of the site also extends to three-storeys, with this scale previously deemed acceptable by the LPA in terms of design response to the challenges posed by flooding risk at the site.

5.55 In design terms, it is considered that the Proposed Development is acceptable in accordance with adopted policies 2 and 3 of the South East Lincolnshire Local Plan (2019).

Residential Amenity

5.56 The iterative design process referenced above also sought to take account of the neighbouring properties, including ensuring no adverse impacts on residential amenity of the property to the north and proposed apartments to the north (which are currently the subject of a pending planning application) in terms of overlooking. A Design and Access Statement by JDDK supports the planning application, which explains the design development process in further detail.

5.57 It is acknowledged that the Site is located adjacent to industrial units across the river, which may have an impact on the Proposed Development in relation to noise. Additionally, there may also be impacts on the neighbouring properties from vent/extract plant and servicing and delivery noise associated with the Proposed Development. As such, a noise impact assessment has been prepared by Apex Acoustics and supports the planning application.

5.58 The findings of the noise assessment demonstrate that the noise risks identified are mitigated and minimised, and the site is considered suitable for the proposed extra care housing. This assessment is considered in more detail within this Statement.

5.59 In view of the above, the Proposed Development is considered to be acceptable in accordance with adopted local plan policies 3 and 30, and would provide for suitable living standards for occupants of the Site.

5.60 The impact on existing residents has been considered, with the scale and massing of the scheme designed to ensure that the buildings would not appear overbearing or result in loss of sunlight or daylight for occupants of neighbouring buildings.

5.61 The positioning of the building ensures adequate separation distances are maintained between existing dwellings, with these distances also ensuring that issues of overlooking are not of concern. Gable elevations are devoid of window openings, with proposed openings serving stairwells.

5.62 During the design process, public consultation was undertaken with residents to ensure that any comments, concerns or suggestions could be considered ahead of finalising detailed plans. The intention of this was to ensure that the views of the wider community were incorporated into the Proposed Development.

5.63 A Statement of Community Involvement accompanies this application, which concludes that no responses were received as part of the consultation process, and that no concerns from residents were raised.

5.64 In view of the above, it is considered that the proposed development would protect the amenity of existing residents and would provide for suitable living standards for occupants of the Proposed Development in accordance with policies 3 and 30 of the Local Plan.

Access, Parking and Highways

5.65 Access will continue to be provided via Roman Bank. Car parking is proposed within the basement for 24 vehicles, including two disabled bays. Access into the building would be provided through a lobby area, with lifts and stairs leading to upper floors.

5.66 Cycle parking is proposed adjacent to the main entrance, with additional provision in the underground car parking area. A total of 6 covered and secured cycle spaces will be provided. An external refuse storage area is proposed adjacent to the site entrance from Roman Bank, with drop off bays enabling refuse vehicles to pull off the highway whilst servicing the site.

5.67 A Transport Statement ('TS') has been prepared in support of the planning application, which should be read in conjunction with the following section:

5.68 The TS confirms that the application site is located in a well-established residential area with local amenities and public transport available on foot, by cycle and public transport. Therefore, the

development proposals are in line with the relevant national, regional and local transport policies where, at the heart of the NPPF, is a presumption in favour of sustainable development.

5.69 The TS goes on to demonstrate that the Proposed Development may result in a maximum of 10 vehicular movements (arrival + departure) in the peak hours, one every c. 6 minutes which is negligible. Since the 30 movements per hour is not exceeded in any one direction, no highway or junction capacity assessment is required and the proposed development would, in highway terms, have no material impact on the highway network in terms of its capacity and safety.

5.70 In conclusion the TS demonstrates the following:

- Total person trips can be accommodated within the existing infrastructure.
- 1.8m paved footway will be provided along the site frontage; no other mitigation proposals are required; and
- The development proposal does not result in an unacceptable impact on highway safety or a residual cumulative impact on the road network that is severe and thus should not be refused on transport grounds, as set out in paragraph 111 of the Revised NPPF.

5.71 It is therefore concluded overall that the Proposed Development meets all highway safety and planning policy requirements and will have no material impact onto the highway network, in accordance with local plan policies 33 and 36.

Landscaping and Trees

5.72 A hard and soft landscaping scheme has been developed to ensure that the Proposed Development integrates seamlessly into the surrounding area. Externally, communal gardens will be created fronting onto Roman Bank, which will contain seating areas and a water feature, and will provide outdoor space for residents and contribute towards maintaining the emotional and physical wellbeing of residents. A small outdoor area is proposed at the rear of the building, providing an area for residents to enjoy views of the River Welland. The planting mix proposed will comprise wildflower turf, swathes of bulb planting, native structure and hedge planting, and ornamental hedge and shrub planting.

5.73 Cycle parking is proposed adjacent to the main entrance, with additional provision in the underground car parking area. An external refuse storage area is proposed adjacent to the site entrance from Roman Bank, with drop off bays enabling refuse vehicles to pull off the highway whilst servicing the site.

5.74 An Arboricultural Impact Assessment ('AIA') has been prepared by Elliott Consultancy Ltd which supports the planning application submission and should be read in conjunction with the following section:

5.75 The AIA categorises the existing trees on site into Group 1 and Group 2, which consist of Category C (low quality) trees. Group 1 is proposed for removal to accommodate the Proposed Development, however this comprises young self-seeded trees and shrubs which have grown to

cover almost the entire site and from an arboricultural perspective the magnitude of impact from the losses required is deemed to be relatively low. The Proposed Development is supported by a comprehensive hard and soft landscaping scheme which includes the proposed planting of new trees, shrubs and hedges which will mitigate the loss of the existing trees which are required to be removed.

5.76 The AIA also provides tree protection measures for during the development at section 6, which will ensure that trees which are to be retained will not be damaged during construction of the Proposed Development.

5.77 In view of all of the above, the Proposed Development is considered to accord with adopted local plan policy 28.

Noise

5.78 A noise impact assessment has been prepared by Apex Acoustics which supports the planning application and should be read in conjunction with the following section.

5.79 The assessment states that noise levels affecting the proposed development from road traffic and other sources have been measured during the day and night, and the façade noise impact calculated.

5.80 The potential implications for the design of the façade sound insulation under whole dwelling conditions as described by AD-F is discussed, and the glazing and ventilator acoustic performance requirements to achieve the indoor noise level targets are identified.

5.81 Plant noise limits have been determined in line with BS4142 to ensure that there will be no adverse noise impact upon nearby residential dwellings as a result of the Proposed Development.

5.82 The noise impact assessment concludes that, based on the existing noise risks, the site is considered suitable for the Proposed Development. As such, the Proposed Development is acceptable in accordance with adopted local plan policies 3 and 30.

Ground Conditions

5.83 A Phase 1 Geo-environmental Assessment has been prepared by Hydrock which supports the planning application and should be read in conjunction with the following section.

5.84 The report confirms that the ground gas risk assessment identifies a low to moderate risk to the Proposed Development from ground gas arising primarily from the potential for degradable organic material within the Tidal Flat Deposits underlying the site.

5.85 The report goes on to recommend an intrusive site investigation, the scope of which should include the following:

- A series of mini percussive boreholes to maximum depth of 5m in order to confirm shallow ground conditions below the site and allow for in-situ testing and sampling to be carried out, together with installation of gas /water monitoring wells.
- Should variable ground conditions be identified within the mini percussive boreholes, deeper cable percussive boreholes may be required to aid in confirming foundations options and detailed design.
- Chemical laboratory testing of soil with allowance for screening for metals, metalloids, polycyclic aromatic hydrocarbons (USEPA 16), asbestos (presence), total petroleum hydrocarbons (TPH's) and potentially BTEX, MTBE (Methyl-tert-butyl ether), SVOC (semi-volatile organic compounds) and VOC's (volatile organic compounds) (subject to the findings of the investigation and detection of VOC's using a photo-ionisation detector.
- Use of a photo-ionisation detector (PID) to assess the potential risk from VOC's and SVOC's on the site.
- Geotechnical testing to inform foundation and pavement design.
- Ground gas and water monitoring to confirm the level of potential risk to the proposed development, with monitoring completed over a period of at least 3 months for a moderate sensitivity development in accordance with CIRIA C665.
- The site is currently heavily overgrown and in order to obtain suitable coverage of the site during the investigation works, significant removal of the vegetation will be required.

5.86 As such, subjection to a suitably-scoped intrusive ground investigation and the identification of any required remediation measures, the Proposed Development is considered to be acceptable in accordance with adopted local plan policy 30.

Ecology

5.87 An Ecological Appraisal and Biodiversity Net Gain Assessment have been prepared in support of the application and should be read in conjunction with the following section.

5.88 The Ecological Appraisal confirms that no impacts on statutory designated sites are anticipated as a result of the Proposed Development. However any lighting scheme has the potential spill onto the River Welland Local Wildlife Site, which may degrade the quality of this habitat for nocturnal species using it.

5.89 Based on the low suitability of habitats on-site for bats and on the basis a detailed lighting scheme and landscaped buffer will avoid degradation of the River Welland LWS habitats, no further survey work is recommended in relation to bats.

5.90 A pre-commencement checking survey for otter and water vole is also recommended within 90 days of site clearance, due to the transient nature of the riparian species. It is considered that this additional survey could be secured by way of a suitably-worded planning condition.

5.91 The initial impact assessment, pending further survey work, concludes:

- Loss of habitats considered to be of local ecological value.

- Loss of bat foraging habitat considered to be of low suitability.
- Degradation of adjacent habitats through light spill and in particular light spill onto the River Welland LWS.
- Loss of habitats considered to be of local ornithological value
- A low residual risk of impact on water vole should the species be present within the watercourse or utilising the banks adjacent to the site.
- A low residual risk of impact on otter should the species be using the dense scrub on site or the adjacent banks of the watercourse as a resting or breeding site.
- A low risk of harm to grass snake during site clearance, should this species be present.
- Risk of harm and loss of habitat suitable for the priority species hedgehog and common toad.
- Degradation and/or pollution of the River Welland LWS through the discharge of surface water without a filtration system.

5.92 The following mitigation measures are therefore proposed:

- External lighting that may affect the site's suitability for wildlife will be avoided. If required this will be limited to low level, avoiding use of high intensity security lighting.
- External lighting that may affect the value of the adjacent watercourse to wildlife, and in particular bats, will be avoided with a landscaped buffer incorporated into the development where possible and light spill avoided on this feature.
- Works will not be undertaken during the nesting bird season (March to August inclusive) unless the site is checked by an appropriately experienced ecologist and nests are confirmed to be absent.
- Any excavations left open overnight will have a means of escape for mammals that may become trapped in the form of a ramp at least 300mm in width and angled no greater than 45°.
- Retained trees will be protected from damage in line with the recommendations in BS5837:2012.
- Vegetation clearance will not be undertaken during the nesting bird season (March to August inclusive) unless the site is checked by an appropriately experienced ecologist and nests are confirmed to be absent.
- Should the pre-commencement checks record water vole or otter within the watercourse adjacent to the site, the design of the site will establish an appropriate buffer to burrows and/or resting places to avoid disturbance and works will not be undertaken until a mitigation licence has been obtained from Natural England.
- Works should be undertaken to a working method statement for grass snake to address the low risk of this species being present on-site during site clearance.
- The discharge of surface water from the development into the River Welland will follow current best practice and standards.
- Landscape planting shall include berry and fruit bearing species to provide increased foraging opportunities in the local area for wildlife including bats.
- Integrated bat and bird boxes in the development as a biodiversity enhancement.
- Biodiversity net gain should be achieved on site through habitat enhancement and creation.

5.93 The BNG report confirms that the Proposed Development will result in a net loss of 0.83 units (-49.06%) in the habitats category. However, within the linear habitats there is a gain of 0.16 units (100%).

5.94 The proposals do not satisfy the trading rules of the metric within the medium distinctiveness habitat category due to the loss of the bramble scrub. Loss of the bramble scrub habitat must either be off-set through the provision of habitats within the same broad habitat category or through the provision of habitats of higher distinctives to satisfy the trading rules.

5.95 Further recommendations are made within the report, however given the overall size of the site and the additional care needs of the intended occupants, it is not feasible to include these within the development. Additional measures have been incorporated within the scheme, including additional planting and an amphibian scrape to further encourage biodiversity on site.

5.96 However, due to the small size of the site and available greenspace, achieving biodiversity net gain not considered to be feasible with on-site habitat creation alone. The landscaping scheme has sought to deliver as much onsite habitat creation as possible to minimise the level of offsetting required to make the development acceptable in planning terms.

5.97 It is therefore anticipated that biodiversity enhancement measures will need to be secured elsewhere, most likely through Section 106 agreement in discussion with the Council's Ecologists.

6.0 Summary and Conclusions

6.1 This Planning Statement ('the Statement') has been prepared on behalf of Sea Island Developments (Spalding) Ltd ('the Applicant'), to assist South Holland District Council ('the LPA') in their consideration of a full planning application for proposed extra care accommodation with associated access, car parking, and landscaping on land adjacent to Roman Bank, Spalding ('the Site').

6.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that:

'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'

6.3 This Statement sets out that the Proposed Development is acceptable as a matter of principle and would deliver specialist housing accommodation to meet unmet demand for extra care accommodation in South Holland.

6.4 This Planning Statement has demonstrated that:

- All planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- The Development Plan for the site is the South East Lincolnshire Local Plan (adopted in 2019).
- The proposed development comprises the construction of extra care housing comprising of 69 units of accommodation with associated access, car parking, and landscaping which will enhance the provision of specialist housing in Spalding and the district of South Holland, of which there is currently none.
- The proposed development fulfils all three strands of sustainable development (social, economic and environmental) in accordance with the NPPF and Local Plan Policy 1.
- The proposals are of a high-quality design and in-keeping with the locality in accordance with NPPF Section 12 and Local Plan Policies 2 and 3.
- The Flood Risk Sequential Assessment and Exceptions Test has been undertaken by DPP (ref: 4879NE/R002), and concludes that there are no reasonably suitable and/or available sites which are sequentially preferable to the Site along Roman Bank and, as such, the sequential test is passed. The Exceptions Test concludes that, in consideration of the wide-ranging and substantial sustainability benefits brought as a result of the development (meeting part A of the exception test), together with the fact that the scheme incorporates flood mitigation and management that ensures the development will be safe for its lifetime taking into account the vulnerability of its users, will not increase flood risk elsewhere and in fact reduces flood risk overall (meeting part B of the exception test), the Proposed Development passes both elements of the Exception Test.

- The Proposed Development is supported by a comprehensive flood risk assessment and drainage strategy which will deal with surface water run-off through a sustainable urban drainage system, and will not exacerbate flooding elsewhere.
- The proposals will not result in any adverse impacts on amenity and appropriate mitigation will be implemented in relation to noise, in accordance with the NPPF and Local Plan Policies 3 and 30.
- Any further requirements for ground investigation and subsequent mitigation measures can be secured by planning condition and therefore the proposals accord with the NPPF Local Plan Policy 30.
- The site is well located and accessible to users and the proposals will not adversely impact on the highways network in accordance with NPPF section 9 and Local Plan Policies 33 and 36.
- The proposed development will not adversely impact on trees or ecology and will achieve biodiversity net gain through a combination of on site and off site measures in accordance with NPPF section 15 and Local Plan Policy 28.

6.5 Overall, the proposed development is considered to be acceptable when assessed against local and national planning policy and therefore. The Council are invited to respond positively to this application and grant planning permission without delay.