FLOOD RISK SEQUENTIAL AND EXCEPTION TEST

SEA ISLAND DEVELOPMENTS LTD

LAND ADJACENT TO ROMAN BANK, SPALDING



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FLOOD RISK SEQUENTIAL AND EXCEPTION TEST

On behalf of: Sea Island Developments Ltd

In respect of: Land adjacent to Roman Bank, Spalding

Date: November 2022

Reference: DP/LH/4879NE/R002

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1.0 Introduction

1.1 This report has been prepared to support an application for full planning permission for proposed extra care accommodation with associated access, car parking, and landscaping on land adjacent to Roman Bank, Spalding ('the Site').

1.2 The red line area of the site to which the planning application relates is shown in [Location Plan ref: 4238-JDK-DR-A-1001] ('the Site').

1.3 It has been established that the Site lies within Environment Agency (EA) defined Flood Risk Zone 3. Paragraph 159 of the National Planning Policy Statement (July 2021) ('NPPF') states that:

'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'.

1.4 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 4.0 of the Planning Statement and section 3.0 below.

1.5 Due to the location of the Site within Flood Zone 3, it has been considered necessary to apply both the sequential and exception tests in respect of the Development. These have been carried out in accordance with the National Planning Policy Framework ('NPPF') July 2021 and the Planning Practice Guidance ('PPG') March 2014 (updated August 2022).

2.0 Site Location and the Proposed Development

Site Location

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

2.3 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.

2.4 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 the supporting Planning Statement.

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

2.6 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, as illustrated below:

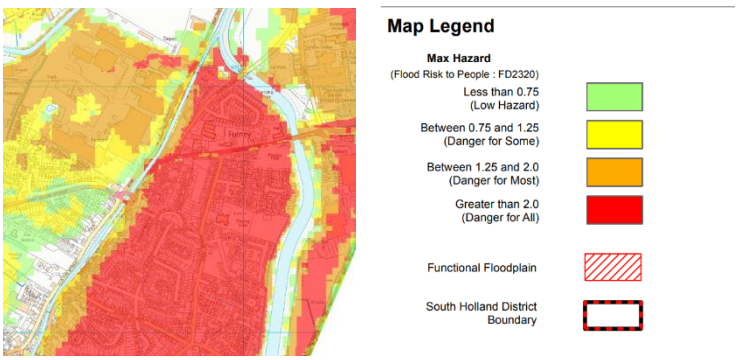


Figure 1- Residual Flood Hazard Spalding- Present Day 0.1% Event Probability

Proposed Development

2.7 The Proposed Development seeks to deliver extra care accommodation (Use Class C2) with associated access, car parking, and landscaping.

2.8 The Proposed Development will comprise a mixture of three to four storeys, with the central area of the building consisting of rooms across four storeys. Parking is proposed within a basement level, with landscaping and communal gardens at street level.

2.9 Full details of the Proposed Development are provided within the accompanying Planning Statement prepared by DPP, and architectural package prepared by JDDK. This statement should be read in conjunction with those documents.

Need for Extra Care Accommodation

2.10 The Applicant has engaged with the LPA'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.

2.11 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 confirmed to be acceptable. Formal pre-application advice was sought from the LPA in October 2022, with the project team engaging in a virtual meeting with the local planning authority on 11th October. During this meeting the LPA 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.

2.12 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.

2.13 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.

3.0 Policy Considerations

National Planning Policy Framework ('NPPF')

3.1 The revised NPPF was published in July 2021 and is the policy basis for this assessment.

3.2 Paragraph 159 of the NPPF states that 'inappropriate development in areas of high flood risk should be avoided by directing development away from areas at highest risk (whether existing or future), and that where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere'.

3.3 Paragraph 161 requires plans to apply a sequential, risk-based approach to the location of development, taking into account the current and future impacts of climate change so as to avoid flood risk to people and property by applying the sequential test and then, if necessary, the exception test as set out below.

3.4 The sequential and exception tests also apply to development control decisions, as explained in paragraphs 162, 163 and 164.

3.5 Paragraph 162 states that "*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*."

3.6 Paragraph 163 states that *"If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3*."

3.7 Paragraph 164 states that 'the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

- *the development would provide wider sustainability benefits to the community that outweigh the flood risk; and*
- *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'.*

3.8 Paragraph 167 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:

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."

3.9 It is clear that the NPPF does not preclude development within high flood risk areas, where no reasonable alternatives are available. The clear policy objective is to ensure that, where such development cannot be avoided, it is safe and does not increase the risk of flooding elsewhere.

Planning Practice Guidance ('PPG')

3.10 The PPG was published on 6th March 2014, and was updated in August 2022, and replaced 155 circular and guidance documents, including the NPPF Technical Guidance. The section on Flood Risk and Coastal Change is relevant to this Assessment.

3.11 Paragraph 19 of the PPG clarifies that the first preference should be given to locating new development in Flood Zone 1, followed by Flood Zone 2, and then Flood Zone 3, and the Sequential Test should be carried out on this basis. The intention is to demonstrate that there are no 'reasonably available sites' in areas with a lower probability of flooding. It also states that only where there are 'no reasonably available sites' in Flood Zone 1 or 2 should the suitability of sites in Flood Zone 3 be considered through a sequential and exception test if required.

3.12 Paragraph 33 of the PPG provides guidance on the application of the Sequential Test to individual planning applications. The Guidance makes reference to the requirement for Local Authorities to produce Strategic Flood Risk Assessment (SFRAs) which will provide the basis for applying the Sequential Test.

3.13 The Guidance states that where a site has not yet been sequentially tested through a development plan, the sequential test must be applied. The Guidance makes it clear that the area in which to apply the Sequential Test will be defined by local circumstances relating to the catchment area, including a specific area identified for regeneration. The Guidance highlights that a pragmatic approach should be taken when considering the availability of alternatives. At Paragraph 33 the Guidance specifically states *'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'.

3.14 If 'no reasonably available alternative site' is found, then the exception test will be applied in the circumstances described in Table 3 of the Guidance. In relation to Flood Zone 2, this is only where the development proposed is 'Highly vulnerable', all other forms of development being accepted as appropriate. In relation to Flood Zone 3a, this is where the development proposed is 'More vulnerable' or 'Essential infrastructure'; and in relation to Flood Zone 3b, where the development proposed in Essential Infrastructure alone.

3.15 It is to be noted that Table 3 does not recommend the application of the Exception Test in Flood Zone 3a or 3b in the case of Highly Vulnerable development (3a) or Highly, More or Less Vulnerable development (3b), instead suggesting that development should not be permitted. However, it must be recalled that this is guidance rather than policy, and the overarching policy objectives set out in the NPPF continue to be relevant.

3.16 Further information on the vulnerability classifications is given in section 4.0 below.

3.17 Paragraph 23 of the Guidance explains that the purpose of the exception test is to help ensure that flood risk to people and property is managed. In order to satisfy the exception test, it must be demonstrated both that the proposed development will deliver wider *'sustainability benefits to the community that outweigh the flood risk'* and that it *'will be safe for its lifetime, without increasing flood risk elsewhere'*.

Development Plan

3.18 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:

3.19 Policy 4 Approach to Flood Risk states:

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;

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.

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.

3.20 Policy 31 Climate Change and Renewable and Low Carbon Energy states:

A. Climate Change

All development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated by:

1. employing a high-quality design;

2. the adoption of the sequential approach and Exception Test to flood-risk and the incorporation of flood-mitigation measures in design and construction to reduce the effects of flooding, including SuDS schemes for all 'Major' applications;

3. the protection of the quality, quantity and availability of water resources, including for residential developments, complying with the Building Regulation water efficiency standard of 110 litres per person per day;

4. reducing the need to travel through locational decisions and, where appropriate, providing a mix of uses;

5. incorporating measures which promote and enhance green infrastructure and provide an overall net gain in biodiversity as required by Policy 28 to improve the resilience of ecosystems within and beyond the site.

Other Material Considerations

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

3.21 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.

4.0 Application of the Sequential Test

4.1 This section sets out the evidence required to apply the sequential test as required by Paragraph 159 and 161 of the NPPF and the PPG.

Site Flood Risk

4.2 As detailed in Section 2.0 above, the Site lies within flood zone 3, alongside the entirety of Spalding. The South East Lincolnshire Strategic Flood Risk Assessment (SFRA) was published in 2017 and identifies that the Site lies outside of the 'Functional Floodplain', and is therefore located within Flood Zone 3a, as illustrated below:

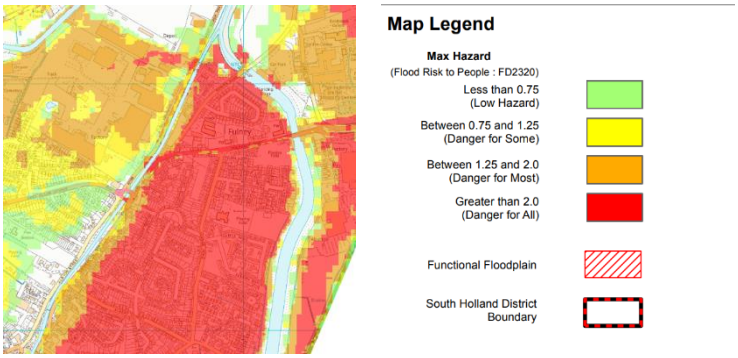


Figure 1- Residual Flood Hazard Spalding- Present Day 0.1% Event Probability

4.3 As such, it is necessary to apply the sequential test to consider whether the Development could be located on an alternative, reasonably available site within an area at lower risk of flooding (i.e. in Flood Zone 1 or 2).

Availability of 'Reasonably Available' Sites

4.4 In order to identify sites for sequential assessment, an appropriate catchment area for the sequential test must be prepared. Paragraph 162 of the NPPF states that:

'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'

4.5 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 section 2 of this report), an approach which has been agreed by the local planning authority through pre-application discussions.

4.6 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.

4.7 The site search area in Spalding was agreed upon with South Holland District Council (pre-app correspondence dated 16.11.2022 (ref: PE-00343-22)) and included sites within various

ownerships, provided that they were not too small and/or were not located beyond a suitable distance from local amenities.

4.8 A review of sites allocated for housing within the South East Lincolnshire Local Plan in Spalding and Pinchbeck were undertaken, alongside an online search via the following agent websites:

- Estates Gazette
- Rightmove
- Prime Location
- Knight Frank
- General google search
- Nova Loca

Criteria for determining whether Sites are 'Reasonably Available' Alternatives

4.9 Once the area of search had been set, whether sites were reasonable alternatives to the Site was assessed with regard to whether they are suitable and/or available for the development proposed.

4.10 For the purposes of assessing suitability, the assessed sites needed to provide an area of at least c4,046 sqm (1 acre) in order to be able to provide the amount of development required for the proposed extra care accommodation. Additionally, the Site needs to provide a sustainable location 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.

4.11 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.

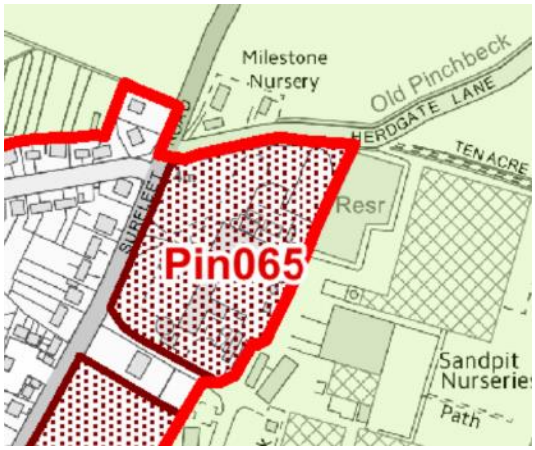
4.12 A total of twenty four sites were ultimately considered with regards to their suitability and/or availability. Ten sites were initially discounted on the basis of being too small, which were as follows:

- Development Plan Allocation PIN025- Land East of Spalding Road- 3,700 sqm
- 1 Edison Court, Enterprise Way, Pinchbeck, Spalding, Lincolnshire, PE11- 284 sqm
- Former department store 7 Market Place Spalding PE11 1SL- 2,484 sqm
- Land adjacent to 51 Cowbit Road, PE11 2RJ- 825 sqm
- Cover House, Wardentree Park, Spalding- 788 sqm
- 5 building plots, Cradge Bank, Spalding, PE11- 2,385 sqm
- Leisure/hospitality for sale in Red Lion Street, Spalding PE11- 650 sqm
- Restaurant/cafe for sale in Francis Street, Spalding PE11- 148 sqm
- Restaurant/cafe for sale in The Crescent, Spalding PE11- 83 sqm
- Pub/bar for sale in Austendyke Road, Spalding PE12- 28 sqm

4.13 The fourteen remaining sites were assessed for their suitability and/or availability, as follows;

Development Plan Allocations

Pin 065- Birchgrove Garden Centre, Surfleet Road



Site Description

4.14 The site is located to the north-west of Spalding, in the north-eastern most part of Pinchbeck. The Site measures 24,400 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 49 dwellings.

4.15 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.16 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.

Suitability

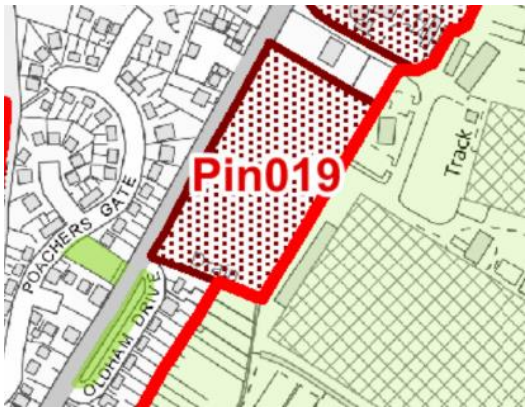
4.17 The Applicant's programme of obtaining planning permission and start of works on site could not accommodate the additional time required for the existing business to close on the site, and for the existing buildings to be demolished. There is a need for Extra Care accommodation in Spalding now. 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.

4.18 Furthermore, the site is allocated for the development of 49 residential dwellings and, as such, if the Proposed Development were to be delivered on this site, this would jeopardise the delivery of use class C3 residential dwellings envisaged during the plan period.

Summary

4.19 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 on Roman Bank.

Pin 019- Land east of Surfleet Road



Site Description

4.20 The site is located to the north-west of Spalding, in the north-eastern most part of Pinchbeck. The Site measures 16,900 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 34 dwellings.

4.21 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.22 The site currently comprises Greenfield land, however there is a live planning application on the site for the proposed development of 37 no. affordable dwellings (ref: H14-0117-22). A decision is due by 16th December 2022, after an amended scheme was submitted in July 2022. This therefore suggests that the site is not available for the development of Extra Care accommodation.

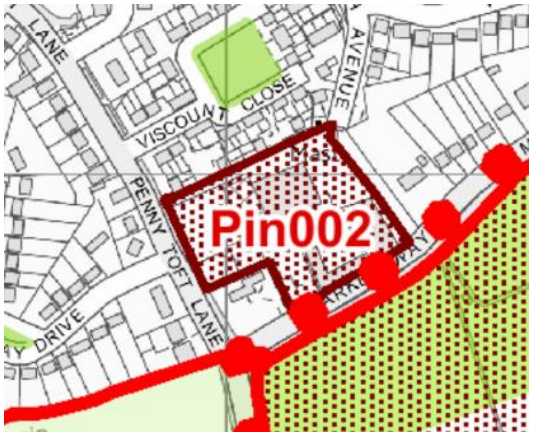
Suitability

4.23 Whilst the site is large enough to accommodate the Proposed Development, it would be likely to jeopardise the proposed delivery of 37 affordable 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.

Summary

4.24 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 on Roman Bank.

Pin 002- Land North of Market Way



Site Description

4.25 The site is located to the north-east of Spalding, in the south-east of Pinchbeck. The Site measures 13,200 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 26 dwellings.

4.26 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.27 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.

Suitability

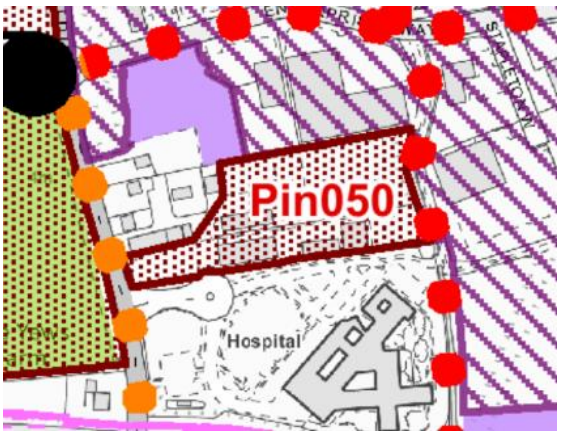
4.28 The Applicant's programme of obtaining planning permission and start of works on site could not accommodate the additional time required for the existing business to close on the site, and for the existing buildings to be demolished. There is a need for Extra Care accommodation in Spalding now. 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.

4.29 Furthermore, the site is allocated for the development of 26 residential dwellings and, as such, if the Proposed Development were to be delivered on this site, this would jeopardise the delivery of use class C3 residential dwellings, thus reducing the contribution of the site towards the Council's housing delivery objectives.

Summary

4.30 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 on Roman Bank.

Pin 050- Spalding Lifestyle, Spalding Road



Site Description

4.31 The site is located in the northern area of Spalding. The Site measures 16,800 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 50 dwellings.

4.32 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk). Grade II listed Yew Tree Farmhouse with attached garage is located to the south-west of the site.

Availability

4.33 The site is not available, as planning permission was granted in December 2019 for the development of 72 new homes. Construction works commenced in January 2020[1].

Suitability

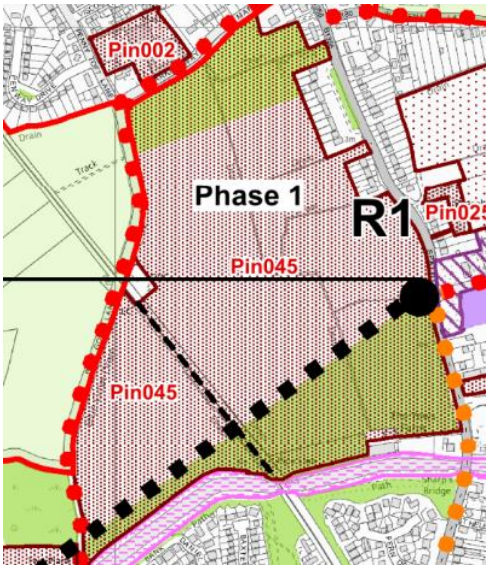
4.34 The suitability has not been considered as the site is not available.

[1] https://www.accentgroup.org/about-us/our-developments/completed-developments/pinchbeck-spalding/

Summary

4.35 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 on Roman Bank.

Pin 045- Land west of Spalding Road (SUE with Pin 024)



Site Description

4.36 The site is located to the north-west of Spalding. The Site measures 225,300 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 676 dwellings.

4.37 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk). Grade II listed Yew Tree Farmhouse with attached garage is located to the south-east of the site.

Availability

4.38 The site comprises Greenfield land, however the majority of this site is not available as there is a live hybrid planning application on the majority of the allocation 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 hybrid application was submitted in November 2021, with a decision due by December 2022.

4.39 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 which is expected to extend beyond the Local Plan period.

Suitability

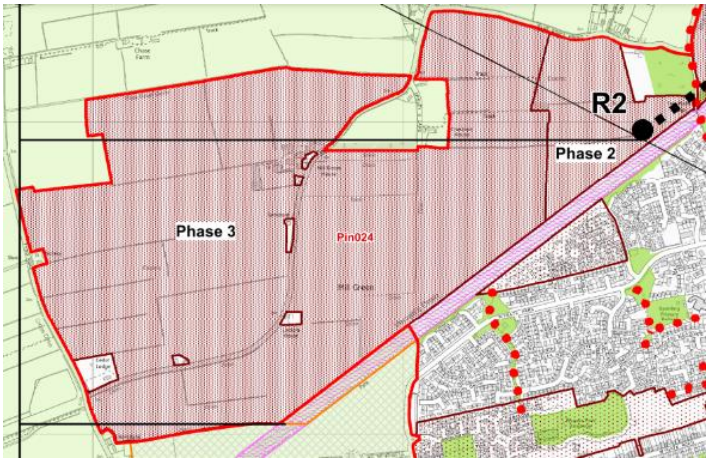
4.40 The majority of the site is not available and suitability has therefore not been considered across these parts.

4.41 The remaining part of the site, to the west of the railway line, on which it is understood there has been no planning application submitted on to-date, 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 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.

Summary

4.42 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 on Roman Bank.

Pin 024- Land north of the Vernatts Drain (SUE with Pin 045)



Site Description

4.43 The site is located to the north-west of Spalding. The Site measures 116,700 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 350 dwellings.

4.44 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.45 Whilst this site appears to be available as it does not contain any recent planning application history, this allocation is proposed to be phase 2 and 3 of housing development in conjunction with Phase 1 on site allocation Pin 045 as part of the Vernatts Sustainable Urban Extension (SUE), and will be delivered in several phases, the completion of which is expected to extend beyond the Local Plan period. As such, the site is not available for the Proposed Development now.

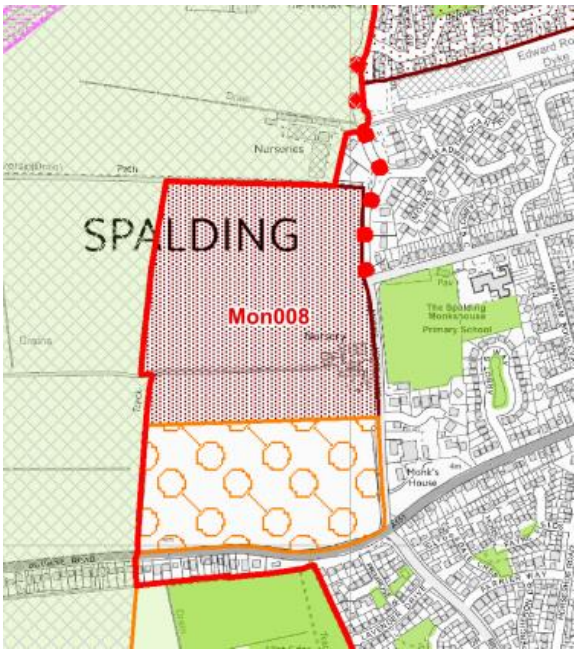
Suitability

4.46 The site is not suitable as it is not currently available. Furthermore, the existing road infrastructure is not suitable to deliver an Extra Care Housing scheme at present in line with the applicant's construction programme.

Summary

4.47 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 on Roman Bank.

Mon 008- Land north of Bourne Road



Site Description

4.48 The site is located to the west of Spalding. The Site measures 144,700 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 434 dwellings.

4.49 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk). Grade II* listed Monks House is located adjacent to the site (east) on Monks House Lane.

Availability

4.50 The site does not contain any planning application history and therefore appears to be available.

Suitability

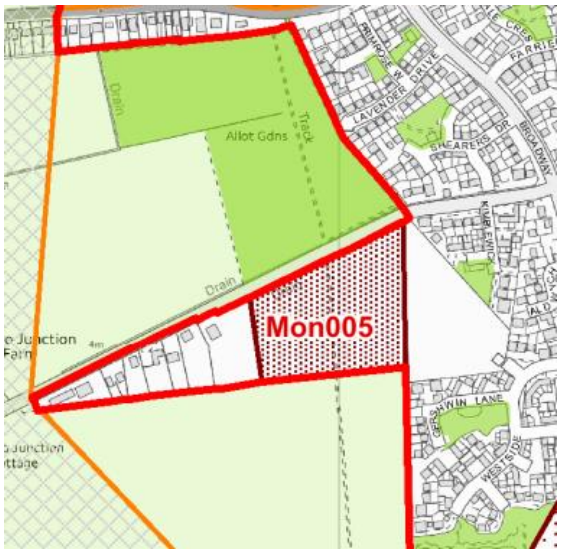
4.51 The site is located within close proximity of a Grade II* listed heritage asset, and is therefore not considered to be sequentially preferable in terms of heritage impact. The site is also located on the outskirts of Spalding. There is a requirement for the site to be more centrally located within 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.

4.52 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.

Summary

4.53 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 on Roman Bank.

Mon 005- Land south of Horseshoe Road



Site Description

4.54 The site is located to the south-west of Spalding. The Site measures 29,300 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 88 dwellings.

4.55 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.56 The site does not contain any planning application history and therefore appears to be available.

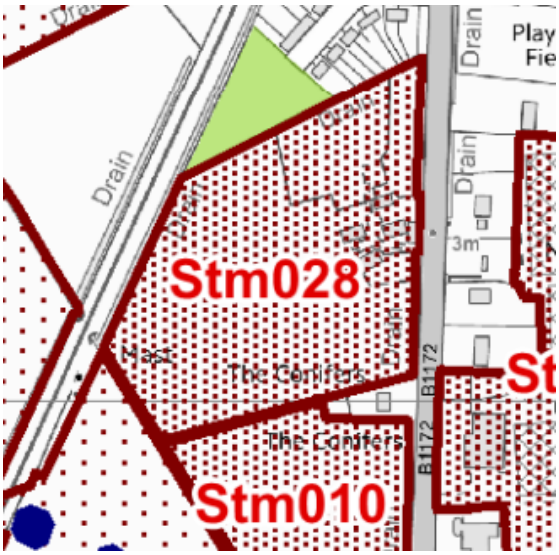
Suitability

4.57 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.

Summary

4.58 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 on Roman Bank.

STM 028- The Elders



Site Description

4.59 The site is located to the south-west of Spalding. The Site measures 36,000 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 108 dwellings.

4.60 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.61 The site does not contain any planning application history and therefore appears to be available.

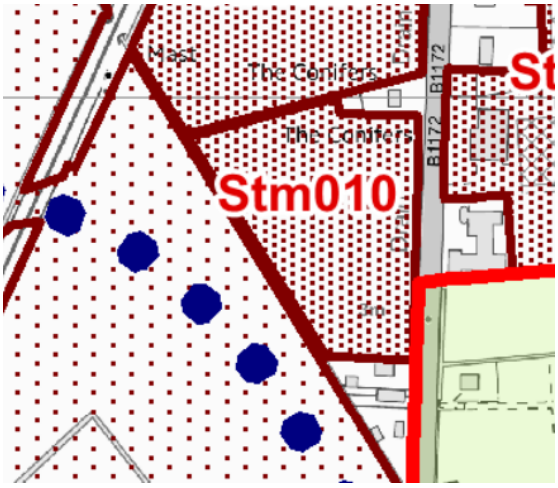
Suitability

4.62 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.

Summary

4.63 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 on Roman Bank.

STM 010- Land West of Spalding Common



Site Description

4.64 The site is located to the south-west of Spalding. The Site measures 20,900 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 63 dwellings.

4.65 The site is located in mostly Flood Zone 3 (with some patches in Flood Zone 2) (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.66 The site does not have any planning application history and therefore appears to be available.

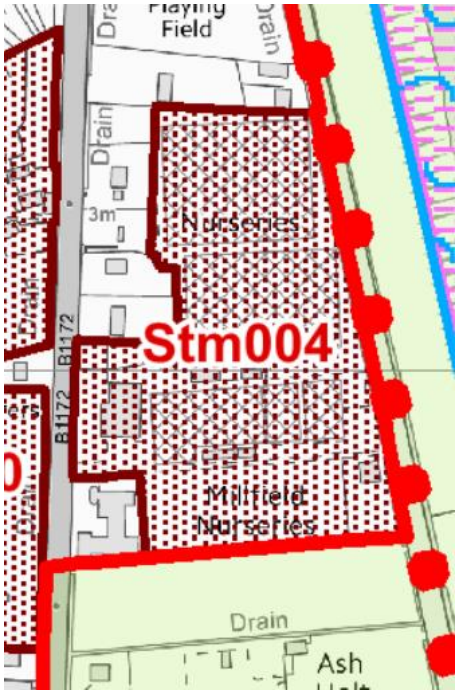
Suitability

4.67 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.

Summary

4.68 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 on Roman Bank.

STM 004- Land East of Spalding Common



Site Description

4.69 The site is located to the south-west of Spalding. The Site measures 46,600 sqm and is allocated for housing development within the adopted Development Plan, proposing a yield of 140 dwellings.

4.70 The site is located in mostly Flood Zone 3 (with some patches in Flood Zone 2) (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.71 The site is not available as it benefits from planning permission for residential development of 40 dwellings under reserved matters approval H16-0021-21 and outline planning permission ref: H16-0668-16. The outline planning permission is understood that have been implemented through subsequent discharge of conditions.

Suitability

4.72 The site is not suitable as it is not available. Furthermore, 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. Additionally, the site is allocated for c.140 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.

Summary

4.73 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 on Roman Bank.

Agent Website Search

Site and Premises occupied by Karsten UK, Enterprise Way, Pinchbeck, Spalding, PE11 3YR





Site Description

4.74 The site is located in the northern area of Spalding. The Site measures 6,359 sqm and comprises an employment premises occupied by Karsten UK.

4.75 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.76 The site is understood to be available as it is currently being advertised for sale on various agent websites.

Suitability

4.77 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).

4.78 Furthermore, the Applicant's programme of obtaining planning permission and start of works on site could not accommodate the additional time required for the existing building to be demolished. Demolition of the existing buildings on site would also need to be factored into the viability assessment of the site, again delaying programme.

Summary

4.79 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 on Roman Bank.

Pinchbrook, Brunel Road, Spalding PE11 3YY



Site Description

4.80 The site is located in the northern area of Spalding. The Site measures 85,200 sqm and comprises Greenfield land.

4.81 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.82 The site is understood to be available as it is currently being advertised for sale on various agent websites.

Suitability

4.83 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.

Summary

4.84 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 on Roman Bank.

Land at Holbeach Road, Holbeach Road PE12 6JP



Site Description

4.85 The site is located in the north-eastern area of Spalding. The Site measures 15,378 sqm and comprises Greenfield land.

4.86 The site is located in Flood Zone 3 (and is therefore not sequentially preferable in terms of flood risk), and contains no designated heritage assets.

Availability

4.87 The site is understood to be available as it is currently being advertised for sale on various agent websites.

Suitability

4.88 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 on Roman Bank, within the settlement boundary.

Summary

4.89 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 on Roman Bank.

Summary of the Sequential Test

4.90 In summary of the above, 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 within.

Benefits of the Selected Site

4.91 There are a number of benefits to developing the site for extra care accommodation. These are addressed in detail within the accompanying Planning Statement, however they can be summarised as follows:

- The site is a, currently vacant, previously developed brownfield site located within an existing residential area.
- The site is located in a sustainable location within Spalding within walking distance of key amenities and services including a supermarket and green open spaces.
- The site is located within walking distance of public bus links along Holbeach Road which provide 15-minute links into Spalding Town Centre and Railway Station.
- The proposed development for extra care accommodation would go some way to addressing an identified shortfall in this type of accommodation across the District
- The proposals would contribute towards housing land supply, ensuring that the Council are able to demonstrate a five year supply of deliverable housing sites for a range of suitable types of accommodation

4.92 Finally, the site at Roman Bank in Spalding is suitable and available to develop now.

5.0 Application of the Exception Test

Circumstances in which the exception test should be applied

5.1 The application of the sequential test has demonstrated that it is not possible for the Proposed Development to be located in zones with a lower risk of flooding. Paragraph 163 of the NPPF therefore states that '*if it is not possible for development to be located in zones 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 set out in Annex 3'*.

5.2 Annex 3 ranks vulnerability to flooding from high to low as follows:

- Essential infrastructure;
- Highly vulnerable;
- More vulnerable;
- Less vulnerable; and
- Water-compatible development.

5.3 It further indicates the nature of development falling within each of these categories.

5.4 Taken overall, the Development is an educational establishment and would therefore be classified as 'More Vulnerable'.

5.5 Table 3 of the PPG 'Flood Risk and Coastal Change' Chapter (reference ID 7-067-20140306) sets out the flood zone compatibility for the vulnerability classifications and indicates the circumstances in which the exception test is required to be applied.

5.6 To the extent that the Development falls within Flood Zone 3a, Table 3 confirms that provided that the sequential test and exceptions test is satisfied, 'More Vulnerable' development is permissible within Flood Zone 3a.

Figure 5- Flood Risk Vulnerability Classification

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	✗	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	✗	✗	✗	✓*

5.7 Given that the More Vulnerable development is located within Flood Zone 3a, the Exception Test has therefore been applied, as set out below.

Application of the Exception Test

5.8 In relation to the exception test, paragraph 163 of the NPPF stipulates that 'the application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. For the exception test to be passed 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'.

5.9 Paragraph 164 requires that 'both elements of the exception test should be satisfied for development to be allocated or permitted'.

5.10 Limbs A and B of the Exception Test are addressed in turn below.

Part A - Would the development provide wider sustainability benefits to the community that outweigh the flood risk?

5.11 It is clear that the proposed extra care accommodation being delivered in this location would provide significant wider sustainability benefits to the community that would demonstrably outweigh the flood risk. The sustainability benefits brought by the development form the basis of the test against Part A of the Exception Test, and are set out below as follows:

Economic

5.12 The Proposed Development will deliver extra-care accommodation, which makes an important contribution to managing the balance between increasing demand on health care services and the pressures on public finances to deliver them.

5.13 The King's Fund[2] 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."

[2] 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]

5.14 ADASS[3] 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."

5.15 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.

5.16 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.

5.17 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.

5.18 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[4].

Social

5.19 The provision of purpose-built specialised supportive housing will address a demonstrable need for such housing in Spalding, of which there is currently none, which will allow residents who require specialised services or support to enable them to live, or to adjust to living, to live independently within the community.

5.20 Extra-Care Housing is defined by Social Care Strategies[5] 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:

[3] 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]

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

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

(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."

1.1 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.

5.21 Extra Care Accommodation 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.

5.22 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.

5.23 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.

5.24 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.

5.25 Various studies have been carried out to understand the social impacts of extra care housing. A report published by The Joseph Rowntree Foundation[6] 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.

5.26 A more recent study carried out by Lancaster University[7], 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.
- 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.

5.27 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.

[6] The Joseph Rowntree Foundation – Social well-being in extra care housing, 2007

[7] The ExtraCare Charitable Trust Research Report - Integrated Homes, Care and Support – Measurable Outcomes for Healthy Ageing, March 2019

Environmental

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

5.29 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.

5.30 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.

5.31 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, and ensure that lighting protects foraging areas and routes around the site.

5.32 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.

Summary – Part A

5.33 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. 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.

Part B - Would the development be safe for its lifetime, taking account of the vulnerability of its users without increasing flood risk elsewhere and, will the development reduce flood risk overall?

5.34 A site specific Flood Risk and Drainage Impact Assessment has been prepared by Hydrock 3E to accompany the planning application for the Site, which clearly demonstrates that a safe development will ensue, and that no adverse risk will be created elsewhere through development. A summary of the proposed flood strategy and mitigation is set out below.

5.35 In order to ensure a safe development ensues, the proposed development therefore incorporates the following flood mitigation and management strategy:

- The proposed development will not exacerbate flooding elsewhere. It is proposed to discharge flows into the River Welland adjacent to the western boundary of the site. Surface water flows will be restricted to 5l/s, flows will be restricted through the use of a package pumping station due to the level difference from the site access road to the River Welland.
- Restricting flows to 5l/s will require a total attenuation volume 73m3, provided in the form of a cellular storage tank. No flooding will occur to the surface for all rainfall events up to and including the 1in100yr+40%CC event.
- A proposed flood depth plan has been prepared, which is based on a maximum flood level of 5.35mAOD, 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.
- 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.

5.36 The site specific Flood Risk Assessment and separate Drainage Strategy therefore confirm that Part B of the Exception Test is met, based on the following key principles:

- The implications of an extreme tidal event from the Coronation Channel have been described and mitigated against in the form of a raised FFL to suit the maximum flood depth and under-croft flood storage in the form of the basement car park. This would 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.
- It is proposed to discharge flows into the River Welland adjacent to the western boundary of the site. Surface water flows will be restricted to 5l/s, flows will be restricted through the use of a package pumping station, with a total attenuation volume of 73m3 provided in the form of a cellular storage tank. No flooding will occur to the surface for all rainfall events up to and including the 1in100yr+40%CC event.
- Surface water treatment will be provided 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.
- The proposed development will not exacerbate flooding elsewhere.

Summary - Part B

5.37 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.

Exception Test Summary

5.38 In consideration of the wide-ranging and substantial sustainability benefits to be delivered through the development (thereby 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 by taking into account the vulnerability of its users, will not increase flood risk elsewhere and in fact reduces flood risk overall (thereby meeting part B of the exception test), the Proposed Development passes both elements of the Exception Test.

6.0 Conclusions

6.1 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 occupants, can replicate the sustainability benefits to Spalding, and that presents any lesser risk than the application site.

6.2 It is also demonstrated by the Exception Test and accompanying Flood Risk and Drainage Impact Assessment (by Hydrock 3E) that the proposed development passes both elements of the exception test. This document demonstrates that the development will be safe for its lifetime, will not increase flood risk on the site or elsewhere, and mitigates against impacts from surface water run-off.

6.3 In addition to the above, there are clear public benefits to the proposals, which would contribute towards meeting an identified shortfall in extra care accommodation across South Holland. Wider public benefits exist which weigh heavily in favour of bring the site forward for residential use as dedicated extra care accommodation.

6.4 In summary, the development is considered to be acceptable in flood risk terms and passes the sequential and exception tests established in local and national planning policies.