

Property:	Rolma Saltra, Middle Road, Tydd St Mary, Spalding, Lincolnshire, PE13 5QZ
Proposal:	Change of use of land to allow standing of six residential static caravans ancillary to existing dwelling house residents to provide accommodation for their children that follow the travelling lifestyle on both a temporary and permanent basis and ancillary works
Applicant:	Felix Doran
Local Planning Authority:	South Holland
ReF:	H21-0494-26

SITE SPECIFIC FLOOD RISK ASSESSMENT AMENDED

Introduction

1. The land is within the Environment Agency Flood Zone 3. This is shown at **Tab 14**. The Environment Agency identify that the risk of fluvial / pluvial flooding is low and that the risk of surface water flooding is very low. A copy of the location is shown at **Tab 1** of this document.
2. The most likely source of flooding is from a failure of the South Holland Internal Drainage Board infrastructure.

FLOOD RISK

3. Most of South Holland is either identified as being within the Environment Agency Flood Zone 2 or Flood Zone 3.
4. The main risk of flooding to the land is from either overtopping or collapse of the internal drainage boards infrastructure. Large areas of the district have been drained since the 17th Century, and an extensive infrastructure created to prevent flooding.

5. The land is about 4m AOD.
6. The South Holland Internal Drainage Board (IDB) has an extensive infrastructure. The infrastructure mainly includes drains, sluices, pumps. The existing standard of drainage is 1 in 50 years.
7. The North Level Main Drain drains to the tidal River Nene at the Tydd pumping station. Protection of land from flooding is 1 in 200 years.
8. Current levels of maintenance of both the Environment Agency (tidal flood risk infrastructure) and the IDB are good.
9. The main risk of flooding is from a failure of the IDB infrastructure. The IDB infrastructure is in a good condition or from overtopping of the Environment Agency tidal defences. The Environment Agency maintains this to ensure that this does not occur (1 in 200 year tidal surge).
10. There is a risk of flooding and occupiers of the land need to sign up to the Environment Agency Flood Warning Service, and have a flood evacuation strategy.
11. For the development proposed to be approved it needs to pass both the sequential and exception test.

SEQUENTIAL TEST

12. The sequential test requires comparison of a proposed site with other available sites. Its aim is to steer new development to areas with the lowest risk of flooding.
13. Development in flood risk areas is only exempt from the sequential test if it:
- is a householder development like residential extensions, conservatories or loft conversions
 - is a small non-domestic extensions with a footprint of less than 250 square metres
 - is a change of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)
 - is laid out so that only elements such as public open space, biodiversity and amenity areas are located in areas at risk of any source of current or future flooding
 - is solely at risk from surface water flooding and a site-specific FRA demonstrates it will be safe throughout its lifetime, without increasing flood risk elsewhere – this exemption does not apply to sources of flooding other than surface water
 - is a development on a site allocated in the development plan through the sequential test, and:
 - the proposal is consistent with site's allocated use; and
 - there have been no significant changes to the known level of flood risk to the site, now or in the future, which would have affected the outcome of the test

14. The development proposed is unlikely to flood. Permeable hardstanding is to be used, and water if present will freely drain through infiltration.
15. The applicant is an Irish Traveller who has ceased to follow the travelling lifestyle and has settled in South Holland. The children of the applicant are still following the travelling lifestyle and need a settled base to access services.
16. There are great difficulties encountered by Gypsy / Travellers in being able to obtain land that can be used residentially and the South Holland Council is unable to identify a 5 year supply of Gypsy / Traveller sites. The development is merely an extension to meet a family's existing accommodation needs.
17. The site passes the sequential test.

EXCEPTION TEST

18. The exception test is identified in paragraphs 177 – 178 of the National Planning Policy Framework.
 - 177. Having applied the sequential test, 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. 178. 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. 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.

178. 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. 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.*

19. S179 of the NPPF requires that:

179. Both elements of the exception test should be satisfied for development to be allocated or permitted.

EXCEPTION TEST CONCLUSION

20. Caravans are defined as being highly vulnerable at Annex 3 of the NPPF and if being used for permanent residential use should not be allowed in the Environment Agency Flood Zone 3a or 3b.

21. The Flood Zones of the Environment Agency do not take any account of flood defences. As already shown in the Flood Risk Assessment that takes account of the defences of the IDB and Environment Agency the development proposed can be considered to be safe. It is unlikely that all of the site will be permanently occupied all of the time.

22. There will be significant social benefits:

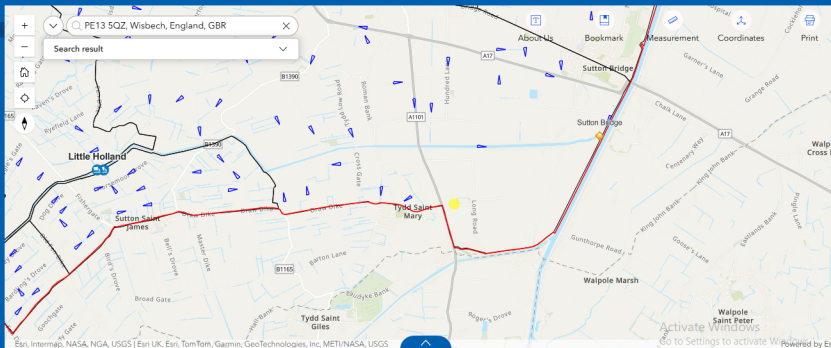
- a. The objective of the application is to provide the applicants children with a settled base on either a temporary or permanent basis. The settled base will most importantly provide access to an address. Addresses are becoming increasingly important to allow access to services of common good. The availability of accommodation will also enable them to avoid living roadside.
- b. The development is safe and does not increase flood risk elsewhere provided that sensible flood risk precautions are adopted.

CONCLUSION

- 23. The proposed development meets the requirements of the Sequential and Exception Test.

Stuart H CARRUTHERS

04 June 2026





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**Max Hazard**

(Flood Risk to People : FD2320)

Less than 0.75
(Low Hazard)Between 0.75 and 1.25
(Danger for Some)Between 1.25 and 2.0
(Danger for Most)Greater than 2.0
(Danger for All)

Functional Floodplain

South Holland District
Boundary

Activate



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