

FAO: Oscar Patman
South Holland District Council
Planning & Development
Council Offices Priory Road
Spalding
Lincolnshire
PE11 2XE

Our ref: AN/2025/136678/02-L02
LPA ref: H02-0511-25
Date: 05 November 2025

Dear Oscar

**Proposed development of 9 Dwellings
Land off Postland Road, Crowland**

Thank you for speaking to us regarding our flood risk advice for this site, as outlined in our letter dated 18 June 2025.

To summarise our discussion, you expressed concern that the advice we provided for this site, when compared with the adjacent allocated site (currently under consideration as reference H02-0759-25 for 80 dwellings), could lead to inconsistent decision-making and an irrational outcome if the Council follows that advice.

When providing our response to you on 18 June 2025, we followed the guidance set out in the Standing Advice, contained within Appendix C of the South East Lincolnshire Strategic Flood Risk Assessment (SFRA). When the SFRA was produced, many developers raised concerns that in areas with potential flood depths of 1-2m, requiring finished floor levels to be raised above predicted flood levels (particularly through ground raising) would make most proposals financially unviable. It was therefore necessary to reach a compromise on mitigation measures that would be acceptable and satisfy the flood risk exception test. This included the use of demountable defences where predicted depth were below 1.6m. The Planning Practice Guidance published in 2025, at Paragraph 068 Reference ID: 7-068-20220825, is now clear that demountable defences are not appropriate for new-build developments.

However, when the SFRA was produced the decision to accept demountable defences was taken against the backdrop of an overriding need for some continued development to sustain existing communities, but not promoting unnecessary growth in areas at a high risk of flooding i.e. this would only apply to those proposals that have first passed the flood risk sequential test - as required by the National Planning Policy Framework.

Given the circumstances of this application and that of the adjacent site, the Environment Agency supports the use of consistent mitigation measures being applied to both sites, should the Council decide that this site passes the sequential test. Accordingly, the mitigation incorporated into this proposal should not follow the Standing Advice but should be secured via a condition as follows:

Condition

Notwithstanding the mitigation measures set out in the submitted flood risk assessment dated March 2025, ref: 'ECL1487/SEAGATE HOMES', prepared by Ellingham Consulting Ltd, the dwellings shall:

- Have a minimum of 2 storeys
- Set finished floor levels a minimum of 1.5m above the existing ground levels (equivalent to 2.6mAOD)
- Incorporate flood resilient construction to 2.9mAOD

These mitigation measures shall be fully implemented prior to occupation and subsequently retained and maintained thereafter throughout the lifetime of the development.

Reason

To reduce the risk of flooding to the proposed development and future occupants in accordance with Policy 4 of the South East Lincolnshire Local Plan 2011-2036.

Our objection to the proposed development regarding foul drainage still needs to be resolved.

If you require any further assistance, please do not hesitate to contact me using the details below.

Yours sincerely

Danielle Maclean-Spencer
Sustainable Places Planning Adviser

Direct dial: 07826 875888

Direct e-mail: danielle.maclean-spencer@environment-agency.gov.uk

Team e-mail: LNplanning@environment-agency.gov.uk