

FAO: Gillian Pinna-Morell
South Holland District Council
Planning & Development
Council Offices Priory Road
Spalding
Lincolnshire
PE11 2XE

Our ref: AN/2025/136678/01-L01
Your ref: H02-0511-25
Date: 18 June 2025

Dear Gillian Pinna-Morell

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

Thank you for consulting us on the above application, on 29 May 2025.

Environment Agency position

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning condition is included.

Condition

The development shall be carried out in accordance with the submitted flood risk assessment dated March 2025, ref: 'ECL1487/SEAGATE HOMES', prepared by Ellingham Consulting Ltd and the following mitigation measures it details:

- The dwellings shall have a minimum of 2 storeys
- Finished floor levels shall be set 1.0m above the existing ground level, equivalent to 2.1m above Ordnance Datum (AOD)
- Flood resilient construction shall be incorporated to 2.9m AOD
- Demountable defenses shall be included to 0.6m above finished floor levels

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/ phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reasons

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.

Informatives

Ceres House, Searby Road, Lincoln, LN2 4DW
Customer services line: 03708 506 506
Email: LNplanning@environment-agency.gov.uk
www.gov.uk/environment-agency

Calls to 03 numbers cost no more than national rate calls to 01 or 02 numbers and count towards any inclusive minutes in the same way. This applies to calls from any type of line including mobile.

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Finished floor levels

We note that the submitted FRA does not explain how the finished floor levels of the dwellings are intended to be achieved. The submitted elevation drawings do not suggest that the floor levels will be achieved through the building design, nor do they denote that the ground levels across the site will be raised.

We encourage your Local Planning Authority to be satisfied that the recommendations of the submitted FRA can be fully implemented, and that there are no wider planning implications on matters such as surface water flooding or design.

Sequential Test

As you will be aware, in accordance with Paragraph 173-175 of the National Planning Policy Framework, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding and the sequential test establishes if this is the case.

Where the sequential test has to be applied, it is for you as Local Planning Authority to determine an appropriate area of search and whether the test is passed.

Further advice on how to do this is found in Paragraphs 27 to 30 of the Government's Planning Practice Guidance on Flood Risk and Coastal Change [here](#).

Exception test

In accordance with the National Planning Policy Framework (paragraphs 178 and 179), the proposed development is appropriate provided that the site meets the requirements of the exception test. Our comments on the proposals relate to part b) of the exception test which requires demonstration that the development will be safe for its lifetime, without increasing flood risk elsewhere. Your Authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk.

Flood warning and emergency response

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/ users covered by our flood warning network.

Planning practice guidance (PPG) to the National Planning Policy Framework (NPPF) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 of the NPPF and the guiding principles of the PPG.

We have considered the findings of the flood risk assessment in relation to the likely duration, depths, velocities and flood hazard rating against the design flood for the

proposal. We agree that this indicates that there will be a danger to most people (e.g. there will be danger of loss of life for the general public).

This does not mean we consider that the access is safe, or the proposals acceptable in this regard. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuation proposals.

Flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.

For advice on what do after a flood, visit <https://www.gov.uk/after-flood>.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Danielle Maclean-Spencer
Sustainable Places Planning Advisor

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