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## **PLANNING, DESIGN AND ACCESS STATEMENT IN SUPPORT OF A PLANNING APPLICATION**

BY

**STIRLING MORTIMER NO. 8 FUND UK LAND LTD AND  
CICERO ESTATES**

FOR

**HYBRID APPLICATION FOR 158 DWELLINGS, COMPRISED OF:**

- 1) FULL PLANNING PERMISSION FOR THE ERECTION OF 62 DWELLINGS, ASSOCIATED  
LANDSCAPING AND INFRASTRUCTURE; AND**
- 2) OUTLINE PLANNING PERMISSION FOR THE ERECTION OF APPROXIMATELY 96  
DWELLINGS (SOME MATTERS RESERVED)**

AT

**LAND OFF BATTLEFIELDS LANE SOUTH, HOLBEACH, PE12 7PG**

PREPARED BY

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## **1.0 Introduction**

- 1.1 This statement has been prepared on behalf of Stirling Mortimer No.8 Fund UK Land Ltd and Cicero Estates ('the applicants') in support of a hybrid planning application submitted to South Holland District Council ('the Council') for: 1) full planning permission for the erection of 62 dwellings, including associated landscaping and infrastructure; and 2) outline planning permission for the erection of approximately 96 dwellings (some matters reserved – access only) on land off Battlefields Lane South, Holbeach, PE12 7PG (hereafter referred to as 'the site').
- 1.2 The site has long been allocated for residential development and is cited within the adopted Local Development Plan as site allocation ref. HOB032. Indeed, in June 2023, a renewal application for outline planning permission for the residential development of the site for up to 185 dwellings was granted (application ref. H09-0115-21).
- 1.3 The Council will therefore be well-aware of the site, its planning history and the acceptability of it for housing development.
- 1.4 Following the renewal permission, the applicant now seeks to put forward a scheme to essentially phase the development of the site into two parts.
- 1.5 The first phase, covered by the full application, presents a detailed scheme for 62 dwellings, along with associated landscaping and infrastructure on the north-eastern half of the site. The second phase, covered by the outline application presents a scheme setting out the access, layout and scale of the development for approximately 96 dwellings on the south-western half of the site.
- 1.6 An extract of the Site Layout Plan is provided below (Figure 1).



Figure 1: Site Layout Plan Extract.

- 1.7 The following statement, alongside the submitted supporting plans, documents, reports and assessments demonstrate that the approach taken with regard to this hybrid application is acceptable and that the matters reserved in respect of the Phase 2 development are capable of being dealt with at reserved matters stage to secure an appropriate form of further development.
  
- 1.8 The structure of this statement is as follows. The site context and surrounds are discussed in Section 2. A summary of the relevant planning history for its site and any other relevant neighbouring sites is provided in Section 3. A detailed description of the proposed development is set out in Section 4. A review of the Development Plan is included in Section 5. Relevant material considerations are identified in Section 6. A planning assessment is undertaken at Section 7. Conclusions are drawn in Section 8.

## **2.0 The Site and Surrounding Area**

### The Site

- 2.1 The application site lies on the eastern side of the service centre settlement of Holbeach. The site is surrounded by residential development on all sides, including the construction works presently underway for 81 dwellings on land to the site's north/north-east. As a result, the site sits within a context of urban built form.
- 2.2 The site itself has long been committed for residential development and has benefitted from outline planning permissions, but has yet to formally come forwards for development.
- 2.3 The application site extends to around 6.2 hectares (15.3 acres) and is broadly of a rectangular shape. The site is located between 600m and one kilometre from Holbeach's range of services and facilities in the town centre. It is just south of the primary local highway corridor of the A17 Newark to Kings Lynn road.
- 2.4 The site is principally accessed from Battlefields Lane South, with a secondary access point formed through the existing residential development to the south at Kings Road.
- 2.5 The site predominantly comprises agricultural land, split into two fields and includes a strip of land which addresses Kensington Close, left as grassland. There are no existing buildings on the site and apart from a line of telegraph poles crossing the site, there are no other visible physical built or infrastructure features.
- 2.6 The site is bounded by a range of treatments, comprising domestic style fencing where abutting residential uses and existing native hedging and trees.
- 2.7 The site is not subject to any specific heritage, ecological or other designations.
- 2.8 The site is within Flood Zone 3 and is broadly at 'very low risk' from surface water flooding across the north-eastern half of the site (less than 0.1% chance of surface water flooding annually). Areas of the south-western part of the site

are considered to be at 'low risk' from surface water flooding (between 0.1% and 1% chance of surface water flooding annually). An open drain is present through the centre of the site.

- 2.9 The site does not contain any Public Rights of Way (PRoW).

### Surrounds

- 2.10 Being surrounded on four sides by residential development, the site is strongly related to the urban developed/developing area of the settlement and therefore does not possess the rural character typically associated with arable land.
- 2.11 To the site's north east is a development site, currently being built out. To the north/north west, the dwellings comprise former Council owned properties which have over time been taken into private ownership. These are semi-detached pairs set over two storeys to their eaves with typical pitched roofs. Beyond this are further modern housing estates. A section of the site's northern boundary within Battlefield Lane South is open with no formal boundary treatment. A run of low-quality trees extends eastwards here towards the A17.
- 2.12 West of the site is another residential estate, accessed from Marshlands Drive via Stockman's Avenue. Properties along Marshlands Drive, All Saints Close and St Catherine Crescent back onto the site, with their rear garden amenity spaces abutting the fence line forming the site boundary. The properties comprise a mix of single and two storey dwellings, with those addressing the site being primarily two storey semi-detached and terraced dwellings, with modest gardens.
- 2.13 South of the site is another residential estate comprising various roads accessed from Foxes Low Road. Kings Road provides a direct link from Foxes Low Road towards the site. The road is lined on both sides by residential development, with those closest to the site comprising three bungalows. A notable part of the southern site boundary is comprised of interface with Kensington Close, open to the site with residential dwellings facing toward it.
- 2.14 An existing footway runs through the estate, extending up to Kensington Close which the site can provide a link to, improving pedestrian connectivity.

- 2.15 The site is sustainably located, with ease of access to a number of services and facilities by sustainable modes of transport, avoiding over reliance on private vehicles. The site is well located for access to local employment opportunities at nearby industrial estates, along the high street and in the town centre, as well as at the local primary school.

### **3.0 Planning History**

- 3.1 A search of the Council's online planning records reveals a number of applications are associated with the site.
- 3.2 Most recently, application ref. H09-0115-21 granted outline planning permission on 15<sup>th</sup> June 2023 for the residential development of the site for up to 185 dwellings.
- 3.3 Prior to this, two earlier applications for outline planning permission were granted:
- Application ref. H09-0534-12 for residential development, granted 17<sup>th</sup> January 2018
  - Application ref. H09-1325-06 for residential development, granted 7<sup>th</sup> December 2009
- 3.4 The Officer Report to Committee for application ref. H09-0115-21 sets out at paragraph 7.3 that in relation to the principle of the residential development of the site, this has already been established.
- 3.5 In summary of the scheme, at paragraph 7.39, the planning balance is set out. This establishes that it is not considered that the proposal would materially harm the character or appearance of the locality or amenity of nearby residents if an appropriate design is brought forward at Reserved Matters stage. Flood risk and affordable housing/developer contribution matters are considered to have been appropriately addressed. In light of other matter, the Officer considers that there is no justifiable reason to withhold permission.
- 3.6 Paragraph 7.40 concludes that the planning balance is in favour of the proposal.

#### Other Relevant Decisions

- 3.7 It is noteworthy to refer to application ref. H00-0613-21 for the residential development of 81 dwellings, associated garaging, roads and sewers at land to the east of Chaffinch Way, which was granted on 1<sup>st</sup> March 2022 and is now currently being built out.

- 3.8 Additionally, application ref. H09-0288-15 for a proposed residential development comprising 36 dwellings was granted on 21<sup>st</sup> February 2018 and is now also being built out.
- 3.9 Both sites adjoin the site subject of this application to its north/north-east boundary and so, once completed, the site will be enveloped on all sides by residential development, save for a small section of the site along Battlefields Lane South.



## **4.0 The Proposals**

- 4.1 This hybrid application seeks consent for: 1) full planning permission for the erection of 62 dwellings, including associated landscaping and infrastructure; and 2) outline planning permission for the erection of approximately 96 dwellings (some matters reserved – access only).

### Full Application

#### *Proposed Housing Density, Mix and Size*

- 4.2 A total of 62 dwellings are proposed across Phase 1. A mix of 2-bed, 3-bed and 4-bed units is proposed in order to help meet the area's need for family housing. No affordable homes are proposed due to viability matters. These have been appropriately integrated with the general market housing proposed throughout the estate. All dwellings range in size from 79 m<sup>2</sup> to 116 m<sup>2</sup> and are therefore above the nationally described space standards.

#### *Design and Layout*

- 4.3 The site has been designed and laid out to make efficient use of the space and take account of the site's topography. The layout of the site comprises four notable 'blocks' of residential development, with a large area of public open space and an attenuation pond proposed as a focal point for the development on the south-eastern boundary of the site. The 'blocks' of units and roads are then broadly arranged around this.
- 4.4 The blocks form two areas of high-density dwellings (36-40 dph) and two areas of medium density dwellings (30-35 dph).
- 4.5 The dwellings themselves comprise of a mix of detached, semi-detached and short terraces of three or four units. All units include generously sized private garden spaces with dedicated parking, either on-plot or in designated parking bays.

#### *Access, Parking and Highways*

- 4.6 Phase 1 has been designed to ensure permeability and connectivity for vehicles, cyclists and pedestrian movements through the site. The site will be

accessed from new junctions onto Battlefield Land South and from Kings Road. The Battlefield Lane South access will provide the primary access for dwellings, with the Kings Road access functioning as a secondary access through an existing residential estate.

- 4.7 All dwelling units will be accessed from within the Phase 1 estate.
- 4.8 Roads within the estate will range from 5.5 metres to 5.65 metres, enabling road users to manoeuvre with ease. Private driveways are proposed, with turning heads. A total of 124 parking spaces are proposed, including dedicated visitor spaces. This ensures the roads will remain clear of parked vehicles.
- 4.9 Pavements and pedestrian crossings are proposed throughout to enhance connectivity and safety for pedestrians. A cycle/footpath connection is proposed with Chaffinch Way to further improve connectivity.

#### *Landscaping, Trees and Biodiversity*

- 4.10 The site is considered capable of supporting a variety of species and will provide significant areas for wildlife onsite. The proposal includes a large area of open green space with an attenuation pond, an area of retained habitat on the south-eastern border which contains a number of established trees, hedging and grassland which will be enhanced and maintained.
- 4.11 The remainder of Phase 1 will be set within an attractive landscape setting, with native trees and hedges to be planted throughout to enhance the estate and encourage biodiversity by providing linkages for ecology across the site and beyond its boundaries.

#### *Sustainable Drainage*

- 4.12 A large attenuation pond is proposed along the south-east border of the site, adjoining an existing nature rich glassed area.

#### Outline Application

- 4.13 An indicative masterplan for Phase 2 is provided in support of the proposal, demonstrating how the site can be arranged in order to achieve an appropriate

mix of units, public open space provision and both vehicular and pedestrian permeability through the development.

- 4.14 The indicative masterplan is not for determination at this stage, but confirms one possible arrange of the development which would complement Phase 1 and meet the allocated number of dwellings and other provisions within the Local Plan.
- 4.15 In total, 62 dwellings are proposed for Phase 1, while around 96 dwellings are proposed across Phase 2. The reserved matters for Phase 2 will be capable of altering this number, if necessary, although it is not expected that a reduction in unit numbers will be required given the extant outline consent granted permission for 185 residential dwellings.
- 4.16 Indicatively, around 96 dwellings are proposed across Phase 2, equating to a density of 24 dwellings per hectare. An appropriate mix is proposed in order to help meet the area's need for family housing. No affordable homes are included due to viability matters. An approximate mix comprises 2-bed, 3-bed and 4-bed dwellings. All dwellings will range in size from 79 m<sup>2</sup> to 116 m<sup>2</sup> and will therefore be above the nationally described space standards.
- 4.17 The indicative scheme for Phase 2 provides a suggested arrangement of the roads through the estate, in addition to confirming the orientation of the dwellings and from where they will be accessed. This will be from a junction which emerges onto the new road link between Battlefield Lane South and Kings Road. The road layout seeks to ensure low vehicle speeds, with a raised table proposed to further reduce speeds and control the flow of vehicles across the site.
- 4.18 Indicative pedestrian links between Phase 1 and Phase 2 are proposed, alongside pedestrian links between Phase 2 and Kensington Close. Pedestrian footways are proposed along all roads.
- 4.19 On-plot and designated parking bays, as well as dedicated visitor parking spaces are proposed to ensure roads remain free from parked vehicles. Private driveways are proposed with turning heads.

- 4.20 The Phase 2 scheme allows for a significant amount of public open space to be provided within the central part of the site, with a pond proposed as well. Its positioning is strategic, taking into account known surface water issues on this part of the site. Meaningful areas are to be accommodated within the POS to accommodate recreational activities.
- 4.21 The indicative scheme incorporates landscaping features to soften the appearance of the built form and to enhance the environment and biodiversity by providing native species trees and hedging.
- 4.22 The indicative masterplan is considered to provide sufficient detail at this stage for the Council to understand this phase of the development and is supported by the appropriate technical reports dealing with highways, ecology, trees and flood risk and drainage.

## 5.0 The Development Plan

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 advises Local Planning Authorities to determine planning applications in accordance with the policies of the Development Plan unless material considerations indicate otherwise.

5.2 In this instance, the relevant policies of the Council's Development Plan are contained within the South East Lincolnshire Local Plan 2011-2036 (2019).

### South East Lincolnshire Local Plan (2019)

5.3 An extract from Policy Inset Map No. 5 for Holbeach identifies the site as being a 'Housing Commitment' under Policy 11 (Figure 2).

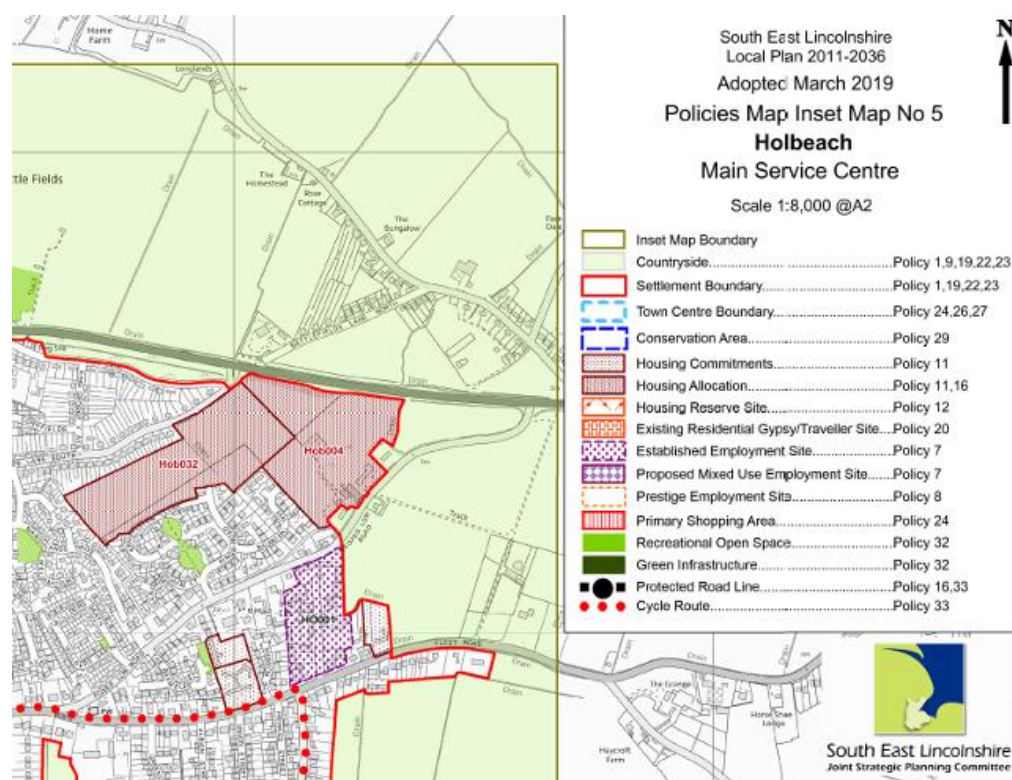


Figure 2: Extract of Policy Inset Map No. 5 for Holbeach.

5.4 Policy 1: Spatial Strategy – Holbeach is identified as a 'Main Service Centre' where development will be permitted that supports the service centre role of the settlement by helping to sustain existing facilities or helping to meet the service needs of other local communities.

5.5 Policy 2: Development Management – proposals will be permitted provided that sustainable development considerations are met in relation to:

- 1) Size, scale, layout, density and impact on amenity, trees, character and appearance of the area and the relationship to existing development and land uses;
- 2) Quality of design and orientation;
- 3) Maximising the use of sustainable materials and resources;
- 4) Access and vehicle generation levels;
- 5) The capacity of existing community services and infrastructure;
- 6) Impact upon neighbouring land uses by reason of noise, odour, disturbance or visual intrusion;
- 7) Sustainable drainage and flood risk;
- 8) Impact or enhancement for areas of natural habitats and historical buildings and heritage assets; and
- 9) Impact on the potential loss of sand and gravel mineral resources.

5.6 Policy 3: Design of New Development – all development will create distinctive places through the use of high quality and inclusive design and layout and make innovative use of local traditional styles and materials. Development proposals will demonstrate how the following issues will be secured:

- Creating a sense of place;
- Distinguishing between private and public space;
- The landscape character of the location
- Accessibility by a choice of travel modes;
- The provision of storage for refuse/recycling bins, storage and/or parking for bicycles and layout of car parking;

- The lighting of public spaces;
- Ensuring public spaces are accessible to all;
- Crime prevention and community safety;
- Orientation of buildings to achieve sustainability;
- Residential amenity;
- Mitigation of flood risk through flood-resistant and flood reliant design and sustainable drainage systems;
- The use of locally sourced building materials; minimising water use and land take; and
- Incorporating existing hedgerows and trees and the provision of appropriate new landscaping.

5.7 Policy 4: Approach to Flood Risk – development proposed within an area at risk of flooding will be permitted where it can be demonstrated that there are no other sites available at lower risk of flooding through the application of the sequential test. The sequential test is not required for sites allocated in the Local Plan. Applications are to be supported by a site-specific flood risk assessment, covering risk from all sources of flooding, including the impacts of climate change. Sites which are greater than 1 hectare will need to demonstrate that surface water from the development site will be managed and will not increase the risk of flooding to third parties.

5.8 Policy 5; Meeting Physical Infrastructure and Service Needs – planning permission will be granted for new development provided that it can be demonstrated that there is or will be sufficient physical infrastructure and service needs capacity to support and meet the needs of the proposed development. For development in Holbeach, contributions towards extended primary school provision will be sought.

5.9 Policy 6: Developer Contributions – developments of 11 or more dwellings or more than 1,000 sqm of floorspace will be expected to mitigate their impacts upon infrastructure, services and the environment. Contributions will be sought



toward the provision of local and strategic infrastructure and services required by the development, having regard to the identified needs generated by the proposed development; the viability of the proposed development; and the local and strategic priorities.

- 5.10 Policy 10: Meeting Assessed Housing Requirements – provision will be made for a net increase of at least 19,425 dwellings in South East Lincolnshire. In South Holland, this equates to 11,681 dwellings at 467 per annum over the local plan period to 2036.
- 5.11 Policy 11: Distribution of New Housing – within the Main Service Centre of Holbeach, approximately 2,202 dwellings are proposed on housing site allocations. The application site ('Hob032 – Land off Battlefields Lane') is specifically listed within the policy.
- 5.12 Policy 17: Providing a Mix of Housing – the provision of new houses seeks to meet the long-term needs of the Plan area to maintain and provide mixed, inclusive and sustainable communities. A high demand for two- or three-bedroom houses in the market housing sector is present.
- 5.13 Policy 18: Affordable Housing – in South Holland about 282 new affordable dwellings per annum, equating to about 60% of the overall annual housing need has been identified. Affordable housing at 25% will be sought on market housing sites of 11 or more dwellings. The proportion of affordable housing on market sites may vary according to site-specific considerations such as viability, infrastructure and the type of affordable housing needed. In South Holland, a mix of about 70% affordable rent and 30% intermediate housing for sale is required.
- 5.14 Policy 28: The Natural Environment – a high quality, comprehensive ecological network of interconnected sites will be achieved by protecting, enhancing and managing natural assets. This includes ensuring that designates sites are protected and the impacts of development being appropriately mitigated. Proposals which directly or indirectly affect protected sites will not be permitted unless the benefits of development outweigh the impacts and that suitable mitigation, or compensation can be achieved.



- 5.15 Policy 30: Pollution – development proposals will only be permitted where they would not lead to unacceptable adverse impacts upon health and safety, amenity, natural or built environment by way of air quality, noise, light levels, land quality or surface and groundwater quality. Proposals will need to consider their impact on air quality and impact on amenity from existing uses.
- 5.16 Policy 31: Climate Change and Renewable and Low Carbon Energy – all development proposals will be required to demonstrate that climate change has been addressed, minimised and mitigated through the use of a high-quality design, appropriate use of resources, flood mitigation and drainage strategies, reducing the need to travel and incorporating opportunities to promote and enhance green infrastructure and provide an overall net gain in biodiversity.
- 5.17 Policy 32: Community, Health and Well-being – development shall contribute to the achievement of socially cohesive and inclusive communities which reduce health inequalities and improve the community’s health and well-being. Existing public rights of way or new links should be protected and enhanced. Opportunities for crime and the fear of crime should be reduced, whilst proposals should seek to facilitate walking, cycling and public transport use and promote healthy lifestyles.
- 5.18 Policy 33: Delivering a More Sustainable Transport Network – proposals should seek to enhance connectivity and deliver a more sustainable and accessible transport network. All new major developments should provide for walking and cycling routes and/or links to existing networks, key public transport corridors and to transport interchanges.
- 5.19 Policy 36: Vehicle and Cycle Parking – all new developments should provide vehicle and cycling parking in accordance with adopted standards. Residents parking should be integral to the design and form of all new development and should ensure that parking spaces are fit for their intended use in terms of size and design. A balanced provision of allocated and communal parking should be provided for major residential development. Secure, covered, convenient spaces to store at least two bicycles is to be provided within each residential plot. Parking should be well-integrated within the townscape and use appropriate materials and landscaping.

5.20 Appendix 6: Parking Standards sets out that houses and flats (Use Class C3a) should provide the following as a minimum within the curtilage:

- 2 spaces for dwellings with up to 3 bedrooms
- 3 spaces for dwellings with 4 or more bedrooms
- 1 cycle parking space within each residential plot or 1 space per unit within flatted development

5.21 A garage can count as one space if it is 2.6m x 5.6m internal width, with an additional 1m at the end to park cycles. Where it can be justified by the character and location of the site, the standards may be relaxed for one-bedroom dwellings, including flats to one garage or parking space per unit and 1 additional space per 3 units for visitors.

## **6.0 Other Relevant Material Considerations**

6.1 Section 70(2) of the Town and Country Planning Act 1990 requires that planning decision should have regard to material considerations. In the instance, the following are considered to be relevant material considerations:

- National Planning Policy Framework (NPPF) (December 2024)
- South East Lincolnshire Strategic Flood Risk Assessment (DFRA) (March 2017)
- South Holland District Council Authority Monitoring Report March 2023 (October 2023)

### National Planning Policy Framework (NPPF) (2024)

6.2 At paragraph 7, the NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 identified three overlapping dimensions to achieving sustainable development, comprising of economic, social and environmental objectives.

6.3 Paragraph 11 clearly states that planning decisions should apply a presumption in favour of sustainable development and that Local Planning Authorities (LPAs) should seek to approve proposals which accord with an up-to-date development plan without delay; or where there are no relevant development plan policies or the policies of most importance are out-of-date, granting permission unless:

i) the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 6.4 Paragraph 39 states that LPAs should approach decisions on proposed development in a positive and creative way, using the full range of planning tools available. LPAs should work proactively with applicants to secure development which will improve the economic, social and environmental conditions of the area.
- 6.5 Paragraph 61 requires that, in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward where it is needed so that specific housing requirements are addressed and that land which has permission is developed without delay. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.
- 6.6 Paragraph 63 identifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- 6.7 Paragraph 72 sets out that Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. Planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 6.8 Paragraph 77 recognises that the supply of large number of new homes can often be best achieved through significant extensions to existing towns, provided they are well located and designed and supported by the necessary infrastructure and facilities.
- 6.9 Paragraph 96 sets out that planning decisions should aim to achieve healthy, inclusive communities and safe spaces, including promoting social interaction through good design and layout, enabling and supporting healthy lifestyles and ensuring that developments are safe and accessible.
- 6.10 Paragraph 105 states that planning decisions should seek to enhance public rights of way and access, including taking opportunities to provide better

facilities for users by adding links to existing rights of way networks, for example.

- 6.11 Paragraph 115 notes that applications for development should ensure that appropriate measures to promote sustainable transport modes can be incorporated, given the type of development and its location and that safe and suitable access to the site can be achieved for all users.
- 6.12 Paragraph 117 states that development should create places which are safe, secure and attractive, which minimises the scope for conflict between pedestrians, cyclists and vehicles. Proposals should respond to local character and design standards and be designed to enable the charging of plug-in or other ultra-low emission vehicles in safe, accessible and convenient locations.
- 6.13 Paragraph 118 requires that all developments generating significant amounts of movement should provide a travel plan and be supported by a transport assessment to address the impacts of the proposal.
- 6.14 Paragraph 124 recognises that planning decisions should promote an effective use of land in meeting the need for house and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 6.15 Paragraph 125 encourages planning decisions to promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing.
- 6.16 Paragraph 129 supports planning decisions which make efficient use of land, taking account of the identified need for different types of housing, local market conditions and viability and the importance of securing well-designed, beautiful, attractive and healthy places.
- 6.17 Paragraph 131 emphasises the creation of high quality, beautiful and sustainable buildings and places as being fundamental to what the planning and development process should achieve, whereby good design is a key aspect of sustainable development, which creates better places in which to live and work, helping to make development more acceptable to communities.

- 6.18 Paragraph 135 sets out that planning decisions should secure developments will function well and add to the overall quality of an area over the lifetime of the development; should be visually attractive and sympathetic to local character and history; should establish a strong sense of place; optimise the potential of the site and create places that are safe, inclusive and accessible.
- 6.19 Paragraph 136 recognises the importance of trees and their contribution to the character and quality of urban environments. Planning decisions should ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in developments are encouraged. Existing trees should be retained wherever possible.
- 6.20 Paragraph 164 highlights that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
- 6.21 Paragraph 170 sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 6.22 Paragraph 180 notes that where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.
- 6.23 Paragraph 181 states that LPAs should ensure that flood risk is not increased elsewhere as a result of the development when determining an application. where appropriate, application should be supported by a site-specific flood risk assessment. Development should only be allowed in areas at risk of flooding where it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk;
- b) the development is appropriately flood resistant and resilient;
- c) it incorporates sustainable drainage systems;
- 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.

6.24 Paragraph 182 requires major developments to incorporate sustainable drainage systems.

6.25 Paragraph 187 sets out that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity and preventing new development from contributing to or being put at an unacceptable risk from soil, air, water or noise pollution.

#### Strategic Flood Risk Assessment (SFRA) (2017)

6.26 The South East Lincolnshire Joint Planning Unit (SELJPU) area lies to the west and southwest of the Wash estuary. The low-lying nature of the area makes it vulnerable to flooding from both rivers and the sea. The main watercourses, such as the River Witham, River Well and, River Nene and connected drainage channels have tidal influences.

6.27 The area is protected from flooding by an extensive network of raised engineered defences, which provide varying standards of defence. Climate change, particularly associated with the predicted effects on sea level rise, brings an increased likelihood of flooding that could be a danger to life affecting whole settlements.

6.28 The Environment Agency's Flood Map shows that almost the whole of the Borough of Boston and a large part of the South Holland District are at a high probability of flooding. Approximately 74% of South Holland lies within the

floodplain (68% in Flood Zone 3, 6% in Flood Zone 2) resulting in 29,922 residential and 1,296 commercial properties being at risk.

- 6.29 The NPPF requires those proposing development in a location which is vulnerable to flood risk to present evidence to demonstrate that there are no other locations at a lower risk of flooding that could be suitable to accommodate the proposal. In line with this requirement, the Local Planning Authority will expect planning applications to be supported by evidence to demonstrate that the Sequential Test can be passed.
- 6.30 The NPPF advocates that the Sequential Test should be applied to all forms of development in medium and high-risk areas (Flood Zones 2 or 3), other than sites which have been allocated in the Local Plan or for applications for minor development or change of use.
- 6.31 The NPPF requires that a site-specific Flood Risk Assessment (FRA) should accompany all planning applications for development proposals of 1 ha or greater in Flood Zone 1 and all proposals for new development located in Flood Zones 2 and 3. For major developments in all Flood Zones, the FRA should identify opportunities to reduce the probability and consequences of flooding.
- 6.32 The National Planning Practice Guidance advises one of the considerations to ensure that any new development is safe, including where there is a residual risk of flooding, is whether adequate flood warnings would be available to people using the development.

#### Annual Monitoring Report (2023)

- 6.33 The AMR sets out that in respect of housing, the number of houses delivered between 2022 and 2023 exceeded the annual requirement in the local plan by over 250 and the Council can demonstrate a five-year land supply. The houses delivered met the Strategic Housing Market Assessment (SHMA) targets for 1, 3, and 4+ bedroomed market houses, plus 3 bedroomed affordable houses. 2 and 4 bedroomed affordable housing were close to the requirement.
- 6.34 The overall affordable housing target of 25% was almost achieved (24%). The intermediate housing requirement was met but the affordable rent required was not met. Overall, 7 of the Council's 12 targets for housing were met.



- 6.35 As of 31<sup>st</sup> March 2023, the Council claim to have a 6-year housing land supply figure.
- 6.36 However, since this AMR was published, the updated NPPF and changes to the standard method for calculating housing requirements has come into effect. For South Holland, the previous standard method was for 427 net additional dwellings per annum. The new standard method requires 542 net additional dwellings to be provided per annum. This equates to a 26.9% increase in requirements for local housing needs.
- 6.37 Whilst no official figures on the Council's current housing land supply position are available, this new requirement may mean the Council is no longer able to demonstrate a housing land supply position of 6 years.

## **7.0 Planning Assessment**

### *Principle of Development*

- 7.1 As the Council will be aware, the site is within the settlement boundary of Holbeach and is allocated for residential development in the Local Plan. It has also recently been granted outline planning permission for the development of the site for 185 dwellings. As such, this and other preceding applications prior to this have firmly established the principle of the sites development for residential purposes.
- 7.2 However, instead of applying for Reserved Matters following the recent outline grant, this application is for a hybrid application which seeks to put forward a proposal to development the north-eastern part of the site ('Phase 1') for 62 residential units, associated landscaping and infrastructure under a full application; alongside a proposal for outline planning permission to development the south-western part of the site ('Phase 2') for approximately 96 residential units (some matters reserved).
- 7.3 Local Plan Policy 11 does not provide any specific requirements for the site in terms of development objectives, only identifying its size and the site's capacity for 185 dwellings. As a result, the applicant has prepared a scheme, building on the outline consent, to make the best and most effective use of the site.
- 7.4 The housing mix is therefore focused on the delivery of family housing, with a strong weighting towards three-bedroom family homes, as well as two- and four-bedroom dwellings in market tenures. The overall scheme seeks to deliver a high-quality development, with a range of dwelling types to meet identified housing needs, having regard to the Council's Strategic Housing Market Assessment (SHMA).
- 7.5 Given the site's recent planning history and status as a long-allocated site, it is not considered the proposal should be contentious in any way and this proposal should therefore be capable of being supported by the Council.

### *Housing Mix and Tenure*

- 7.6 The density of Phase 1 is circa 30 - 40 dwellings per hectare (dph), which is in keeping with the site's context and what was considered acceptable as part of the extant outline consent. The following details of the proposed tenure mix of market housing units is identified in the table below:

Accommodation Type	Market Unit Numbers
2-bed Units	20
3-bed Units	40
4-bed Units	2
<b>Total Units</b>	<b>62</b>

Table 1: Phase 1 Market Homes.

- 7.7 The density for Phase 2 ranges between 25-29 dph and 30-40 dph across the site. The following indicative details of the proposed number of dwelling units for 2-,3- and 4-bed market housing units is identified in the table below:

Accommodation Type	Market Unit Numbers
2-bed Units	30
3-bed Units	55
4-bed Units	11
<b>Total Units</b>	<b>96</b>

Table 2: Phase 2 Dwelling Sizes.

- 7.8 In relation to the open market housing, the mix comprises 2, 3 and 4-bed dwellings which will be delivered as detached, semi-detached and terraced units across both phases. This mix is considered appropriate and acceptable in relation to the surrounding character of the area.
- 7.9 The proposal for Phases 1 and 2 therefore incorporates an appropriate mix of housing types, having regard to the characteristics of the area and requirements for the type of housing to be provided in Holbeach. As such, the

scheme complies with Local Plan Policies 17. The development is not considered able to provide for affordable housing due to viability matters. Further details on affordable housing, developer contributions and viability are set out in a subsequent section of this statement.

#### *Access, Parking and Highway Matters*

- 7.10 The site is to be accessed principally from Battlefield Lane South and from Kings Road, as was approved as part of the recent outline consent. Previously, it was considered that the outline proposal satisfactorily accorded with Local Plan Policy 2 and had demonstrate that access arrangements and vehicle generation levels were acceptable. In the design of this hybrid application, much thought has gone into ensuring that similar conclusions will be reached.
- 7.11 To this end, Paul Basham Associates have prepared a Transport Assessment and a Travel Plan, alongside visibility splay plans, refuse vehicle tracking plans and access design plans to accompany this submission. This identified that the proposed development site is within a sustainable and accessible location, with a number of facilities available within a reasonable walking or cycling distance, whilst bus services along nearby Fleet Street and Penny Hill Road link the site with Spalding and Kings Lynn. This enables occupants to avoid over-reliance on private car ownership to access local shops, services and facilities or areas of employment in the area or further afield.
- 7.12 Across Phase 1, the site has suitable visibility from all points of access and at all internal junctions. A total of 316 parking spaces alongside 13 garages are proposed, including six visitor parking spaces, which is considered to accord with South East Lincolnshire's parking standards as it is likely that visitors will be able to park in a space allocated to the dwelling they intend to visit.
- 7.13 The following table summarises the number of spaces to be provided across each of the phases:

	Phase 1		Phases 2 and 3			
	Units	Spaces	Units	Spaces	Units	Spaces
<b>2-Bedroom</b>	20	40	2	4	28	56
<b>3-Bedroom</b>	40	80	31	62	24	48
<b>4-Bedroom</b>	2	4 + 2 garages	9	18 + 9 garages	2	4 + 2 garages
<b>Total</b>	62	124 + 2 garages	42	84 + 9 garages	54	108 + 2 garages

Table 3: Car Parking Provisions.

- 7.14 Cycle parking will be provided in line with the East Lincolnshire's guidance as well, within the curtilage of each dwelling. This equates to one space per unit.
- 7.15 Internal layout tracking has been undertaken to ensure that a refuse vehicle, fire tender and cars can access all areas of the Phase 1 development and that refuse vehicles can be within 25 metres of each unit/refuse collection point. This has ensured that there is adequate space for large refuse vehicles and fire tenders to navigate the site safely and manoeuvre without impingement. This part of the site's layout ensures that a circular flow of traffic movement is possible in either direction, whilst turning heads on private driveways are suitably designed to enable large vehicles to turn. Phases 2 and 3 will be considered in detail at the reserved matters stage.
- 7.16 Pedestrian crossing points are provided along the main access road, at both access points to the site and throughout the phases of the proposed development. Pedestrian visibility splays are provided from the crossing points, all of which are achievable to a 30mph speed limit along the main access road and 20mph speed limit internally.
- 7.17 As a whole, the proposal is anticipated to generate up to 80 two-way vehicle movements in the AM peak, 77 two-way vehicle movements in the PM peak and up to 692 movements across a 12-hour period. With regard to Phase 1 specifically, up to 32 two-way vehicle movements in the AM peak and 30 in the

PM peak can be anticipated, with a total of 271 movements across a 12-hour period.

- 7.18 The development as a whole can be anticipated to generate up to 155 pedestrian movements, 26 cycle trips and 37 public transport trips across a 12-hour period.
- 7.19 This scheme will result in seven fewer trips in the AM peak, 11 fewer trips in the PM peak and 101 fewer movements across a 12-hour window, when compared with the outline consent for the site. Taking account of this reduction, it is not considered the proposed development will have a negative impact on the operation of the surrounding highway network in the context of the NPPF.
- 7.20 In terms of the dwellings themselves, except for plots 110 to 112 and 125 to 144 of Phase 1, which feature rows of allocated tandem parking spaces, driveways are provided to each of the dwellinghouses, with off-street tandem parking to the sides of the units.
- 7.21 All units benefit from at least two allocated car parking spaces, with garaging also proposed to each of the four-bedroom units to provide a requisite third parking space in compliance with the adopted parking standards. These are typically set back to the side of the dwellings.
- 7.22 Where garages are not provided, secure and lockable cycle storage sheds are proposed within rear garden spaces. In total, 124 car parking spaces and two garages are proposed for Phase 1, with each dwelling having space to incorporate an Electric Vehicle Charging Point (EVCP) to promote more sustainable modes of transport. A number of visitor spaces are proposed across the site to reduce the need for on-street parking.
- 7.23 Within Phase 2, a number of private driveways are proposed, alongside two allocated parking spaces for each dwelling. As with Phase 1, Phase 2 includes space for EVCP infrastructure, alongside garaging for the four-bedroom units. Secure and lockable cycle storage sheds will also be provided within rear garden spaces.

- 7.24 The site incorporates a number of pedestrian and cycle pathways and connections to help encourage walking and cycling across the estate and improve connectivity for existing and future occupiers of the area.
- 7.25 It is anticipated that the proposed development will be sending less traffic through the junctions of Kins Road/Foxes low Road/B1515 and Foxes Low Road/A17, with these junctions being able to operate better than the modelling scenarios within the extant consent. Additionally, the proposed site access onto Battlefields Lane South has been designed to accommodate the development traffic. As a result, additional traffic through the Battlefields Lane South/A17 junction is considered to be negligible.
- 7.26 The Transport Assessment concludes there will be no severe residual cumulative impacts as a result of the development, nor will there be an unacceptable impact on highway safety. As a result, there are no reasons for the proposed development to have a negative impact on the operation of the surrounding highways network in the context of the NPPF.
- 7.27 With regard to the Travel Plan, this sets out a clear strategy for managing travel demand to the development site by addressing the travel needs of future users, reducing the impact of car travel by promoting and facilitating the use of sustainable modes of transport, encouraging a reduced need to travel and increasing sustainable travel practices, where possible.
- 7.28 The objectives of the Travel plan are to result in a 10% reduction in vehicle trips, which is in line with Lincolnshire County Council's Travel Plan Guidance (2021) as well as an increase in sustainable travel modes by 10%. Further the Travel Plan seeks to encourage and promote walking, cycling and use of public transport to residents to help cut carbon emissions by reducing those driving and encouraging residents to reduce travel during peak AM and PM periods.
- 7.29 The proposal has been designed to encourage active travel through the provision of pedestrian infrastructure, linking into local facilities and public transport services.
- 7.30 Overall, the proposal is considered to accord with Local Plan Policies 33 and 36.

*Design, Massing, Layout, Character and Appearance*

- 7.31 Phase 1 of the estate has been designed with a high standard in mind to ensure it delivers a quality, landscaped development appropriate to its setting. As a result, the proposal will blend in well with the existing semi-rural character of the area whilst 'marrying up' with the adjoining consented scheme to the north/north east and that of existing neighbouring developments.
- 7.32 The development will utilise similar materials, colours, textures and design features to ensure it is suitable within the context of the area, but within this rationale, will incorporate its own subtle, unique styling to distinguish itself.
- 7.33 The layout of this phase of development is proposed to ensure a logical street structure is presented which is easy to navigate, well-linked and allows for natural surveillance of street scenes to be achieved. Public and private spaces are well defined. Dwellings are well spaced and face outward, fronting the roads on which they are located.
- 7.34 The layout makes efficient use of the site's space and topography, including the raised finished floor levels, required to minimise flood risk. This approach provides a good balance between built development and the provision of a large area of POS and attenuation pond along this part of the site's south-eastern boundary. This helps to add variety to the site's layout, whilst the height of the built form will be largely consistent with the height of surrounding development.
- 7.35 A notable buffer is provided between development around the retained habitat on the south eastern boundary of this part of the site, providing opportunities for biodiversity protection and enhancement through additional native species planting.
- 7.36 The mix of units, as referenced above, will be set over two storeys in height and their massing is considered to be appropriate for the size of the dwellings and the context of the area. The dwellings present a logical shape and volume within each individual plot as well as collectively across the site. The proposed massing of the units will provide comfortable living spaces for future occupants,



whilst being of an efficient size to help minimise artificial heating and cooling demands.

- 7.37 The materials proposed are a mixture of red brickwork with red brick plinths, off-white render with buff brick plinths and buff brickwork with buff brick plinths to walls, whilst roofs will feature charcoal grey profiled roof tiles and red roof tiles. Elevational features include reconstituted stone lintel and cill details, reconstituted stone corner details, red brick corner details, brick lintel details (soldier courses), red brick banding (Flemish bond), buff brick banding (Flemish bond), chimneys and two porch variations. Boundary treatments will comprise a mix of red brick and buff brick garden walls and close-board timber fencing.
- 7.38 In respect of the dwellings, the design features either white UPVC fascias and soffits, with contrasting black UPVC rainwater goods and pitched slate clad door canopies or flat lead effect roof GRP door canopies. As a variation, some units do not feature door canopies. The House Type Variants plan identifies the different variants across the unit types, whilst the Porch Type plan identifies the pitched and flat roof door canopy types.
- 7.39 With regard to the garages, these are to be comprised of slate tiles, with white UPVC fascias and soffits and contrasting black UPVC rainwater goods, UPVC garage doors and a red brick plinth.
- 7.40 The use of these materials and features within the dwellings are to be 'pepper-potted' across the site to add interest and create diverse and attractive street scenes and facades. The result will be the delivery of a high-quality, visually appealing development.
- 7.41 The materials and features have been chosen as they are reflective of and sympathetic to the materials used in the local area and because they will have a positive and attractive impact on the character of the site as well as the surrounding estates. The Proposed Materials Plan, alongside the elevation plans and street scene plans submitted clearly identify where the materials will be used and the high standard of finish they will achieve.

- 7.42 Overall, it is considered that the proposed design, massing, layout, character and appearance of the Phase 1 development is respectful and enhances the context of its setting. It will offer a high-quality form of development through the use of good design and the way in which it will function. This high standard of design and layout will be reflected across Phase 2 of the development to ensure consistency and good design principles are achieved. The proposal therefore complies with Local plan Policies 2 and 3.

#### *Landscaping*

- 7.43 A Landscape General Arrangement Plan and Landscape Planting Plan has been developed by Ubu Design which provides detail on the hard and soft landscaping elements across Phase 1 of the development site.
- 7.44 With regard to soft landscaping features, the plan provides detail on the existing trees and vegetation to be retained as part of the proposal, alongside the location of proposed trees (12-14cm) to be planted across this phase of the development in public spaces. The location of proposed tree, hedge and shrub planting is set out, alongside the location of thicket planting and public planting spaces.
- 7.45 Private garden spaces are proposed to be grassed, with proposed planting shown to the frontage of each private dwelling to help enhance the look and visually attractive character of the development. These areas are differentiated by 'sunny' mixes and 'shady' mixes subjected to the units orientation within the site.
- 7.46 With regard to units 97-114, these are shown to have planting along the boundary of the site which can be maintained externally. Additionally, for units 111-114 specifically, there is Public Open Space to the east of these units associated with the neighbouring development site, ensuring that these areas of planting will remain accessible for maintenance purposes without private access being required.
- 7.47 In relation to hard landscaping features, the plan sets out a mixtures of surfacing and materials including vehicular macadam across the estates internal roads, alongside pavements constructed of pedestrian macadam.

Resin bound gravel areas are proposed to provide linkages between parking areas and dwellings as well as to footpaths through this part of the site.

- 7.48 For private spaces, patio areas are proposed in the rear garden spaces of each dwelling, with block paving driveways and block paving to front garden paths. A mix of close board fencing and gates between individual plots and brick walls to plot ends are proposed as boundary treatments to private spaces across the site. A mix of post and wire/1.2 metre flat bar fencing around the Phase 1 perimeter and to the public areas of nature-rich grass area and attenuation basin are proposed as boundary treatments across the remainder of the site.
- 7.49 Overall, the mix of hard and soft landscaping features is considered to be suitable and appropriate for the high-quality design and layout of this phase of the development and therefore accords with Local Plan Policies 2 and 3.

*Impact upon Amenity*

- 7.50 The development site is surrounded on all sides by existing and upcoming residential development. In consideration of the outline consent for 185 dwellings, the Officer Report acknowledged that details such as scale, layout and orientation of fenestration would be dealt with at the reserved matters stage, but that, notwithstanding the need to raise finished floor levels as a flood mitigation measure, it was considered that an acceptable standard of residential amenity is capable of being provided.
- 7.51 The Officer Report continues by setting out that satisfactory separation distances, boundary treatments and window arrangements can be factored in at detailed design stage. This assessment should hold true for Phase 2; however, for Phase 1, detailed proposals are included to demonstrate that the scheme does not have an adverse impact on amenity.
- 7.52 To this end, Phase 1 of the proposal has been designed to avoid impacting on the amenities of existing occupiers within surrounding dwellings or the new future occupiers of the consent scheme, which is under construction to the north/north east, as well as the future occupiers of the dwellings proposed themselves.

- 7.53 To aid with this, landscape planting in combination with appropriate fenestration and the retention of existing trees and hedging along boundaries is proposed. These will serve as both visual screens and as noise buffers between current and future occupiers in relative proximity of the site.
- 7.54 The separation distances between the site and existing dwellings means that the amenities of existing occupiers will not be materially or unacceptably harmed by the development. Further, the scale of the dwellings on the site ensures that there will be no loss of light, outlook or privacy arising from the development.
- 7.55 In relation to the location of habitable rooms and proposed windows within dwellings, these have been carefully considered to ensure that suitable levels of privacy are available, whilst opportunities to avoid overlooking have been taken. Side facing windows typically serve bathrooms or other secondary rooms, such as kitchens etc. The placement of windows has been balanced against the need to for privacy and the need to ensure natural surveillance of the street scene is available to reduce opportunities for crime and anti-social behaviour to take place.
- 7.56 The orientation of dwellings across the site ensures that good levels of daylight and sunlight are received to the Phase 1 dwellings on the estate and that overshadowing or loss of light are not factors which impact adversely on either current or future occupants.
- 7.57 With regard to external amenity space, all dwellings are provided with generously sized private rear garden spaces with patio areas to allow for both outdoor enjoyment and domestic activities such as hanging out washing. Front gardens spaces with pathways to front doors are also proposed. It is considered that the Phase 1 development as proposed will provide high quality amenity for future occupants, without having an adverse impact on existing nearby residents.
- 7.58 With regard to Phase 2, the Council will appreciate that this part of the proposal is made in outline, with layout not a matter for consideration in its determination. The proposal has, however, had regard to the expectations of

Local Plan Policy 2 in needing to take account of the amenity of other properties and uses surrounding the development site.

- 7.59 The indicative plan provided as part of this phase has been prepared with to ensure neighbouring residential amenities are protected and to ensuring a good standard of living is capable of being achieved for future residents of this phase.
- 7.60 The Council will be able to consider this matter in detail at the reserved matters stage, when a detailed scheme for Phase 2 is presented; however, for the purposes of this application, it is reasonable to conclude that the proposal as shown is arranged in a suitable manner to ensure appropriate screening and that mitigation, where necessary, is achievable to preserve amenity and separation distances between built forms. As a result, there will be no unacceptable overlooking or overbearing issues apparent.
- 7.61 In summary, there is no barrier to a detailed scheme coming forward for Phase 2 based on this outline proposal. There is therefore no unacceptable harm, nor conflict with the Local Plan in this respect.
- 7.62 Overall, the proposal is considered to accord with Local Plan Policies 2 and 3.

#### *Flood Risk and Drainage*

- 7.63 The site is located within Flood Zone 3a, which covers almost the entirety of the Holbeach settlement and a significant area of South Holland as a whole. The flood risk arises from the risk of a 1 in 200-year tidal flooding event occurring from The Wash estuary.
- 7.64 It is noted there is some limited surface water risk across parts of the Phase 2 site; however, this is capable of being appropriately dealt with through the proposed surface water drainage strategy.
- 7.65 The Officer Report for the outline consent acknowledges that *“the site is a housing allocation in the Local Plan and is therefore a sequentially preferable site in flood risk terms.”*

- 7.66 As established, the site is an allocated site within the development plan (site ref. Hob032) and so a further sequential test is not required in this instance. However, the NPPF does require the preparation of a site-specific FRA.
- 7.67 A site-specific Flood Risk Assessment and Drainage Strategy (FRADS) has therefore been prepared by Paul Basham Associates which identifies that the site is protected from flooding by raised engineering defences along The Wash estuary, but that the scope of the FRADS has been prepared to ensure the risks of flooding have been mitigated should the defences be breached or overtopped.
- 7.68 It is noted that with regard to the Flood Risk Vulnerability Classification in Annex 3 of the NPPF, the site falls within the 'More Vulnerable' category as it is housing development. The site will therefore be required to pass the Exception Test. To pass the Exception Test, the NPPF sets out that proposals should demonstrate that a) the development would provide wider sustainability benefits to the community that would 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.
- 7.69 The NPPF states that both elements of the exception test should be satisfied for development to be permitted. To this end, it is considered that the provision of much needed housing for the local community provides both economic and social benefits to Holbeach, alongside improvements to the environment through the enhancement of biodiversity and geodiversity which outweigh the risk of flooding. Further, the FRADS report and modelling identifies that the site is safe and will be safe throughout its lifetime without increasing flood risk elsewhere. As a result, it is considered that both elements of the exception test are passed.
- 7.70 The FRADS sets out that the site is generally at low risk from flooding. It is not at risk from fluvial flooding and is defended from Tidal flooding events by the engineered flood defences. Should The Wash estuary defences be breached (a one-in-150 chance annually), the site could be flooded with a maximum flood depth of one meter.

- 7.71 To protect the development from such an event and to provide safe refuge within the dwellings from tidal/sea flooding, the proposed site levels are to be 4.20 metres, with finished floor levels of 4.35 metres, 150mm above the proposed site levels.
- 7.72 The FRADS considers residual flood risk from fluvial and tidal flooding as being 'not at risk' due to the engineered flood defences. From surface water flooding, the risk is considered to be 'very low' with only localised areas of 'low' risk. From groundwater flooding, the risk is considered to be 'very low' with required site levels being raised by one metre AOD.
- 7.73 The proposed attenuation will effectively manage the development's surface water runoff during a one-in-100-year storm event, plus 40% climate change buffer and will ensure the flood risk is not increased elsewhere following the development. The FRADS report sets out that it may be possible to reduce the footprint of the two main attenuation basins in Phases 1 and 2 by spreading attenuation capacity across the site through the use of permeable paving and other such methods.
- 7.74 In summary, the FRADS concludes that the site is suitable for residential development in terms of flood risk due to the overall low risk of flooding to the site and the fact that it is an allocated site within the Local Plan. Further, the development is capable of providing sufficient safe refuge and protection from flooding when the site and finished floor levels are elevated to the levels set out above.
- 7.75 With regard to surface water drainage, infiltration is not considered feasible due to the site's geology. It is therefore proposed that the eastern catchment (Phase 1) will connect to the existing Anglian Water surface water sewer network within Kings Road. The western catchment (Phase 2) is proposed to connect to the culverted Foxes Low Drain, parallel to the southwestern boundary of the site.
- 7.76 The attenuation basins proposed will be landscaped and used as an open amenity space when not being used for surface water management.

- 7.77 Surface water runoff from the proposed development will be limited to greenfield rates for the site's developed area. The proposed drainage system will include attenuation capacity designed to accommodate surface water runoff for a one-in-100-year storm event, including 40% allowance for climate change, with no flooding.
- 7.78 All run-off from the site for the 1:100-year event should be discharged at either a rate of 2 l/s/ha or the average annual peak flow (QBAR) rate, whichever is greater. For the development site, the QBAR rate has been used. Pre-and-post development discharge rates are calculated for the site and set out in Table 5 of the FRADS report.
- 7.79 All surface water run-off will pass through one of the attenuation areas; one servicing each of the two phases, before discharging at QBAR rates to a watercourse. Phase 1 will discharge via the public surface water sewers.
- 7.80 With regard to foul drainage, the proposal will connect to the foul sewer on the site, north of Kings Road, shown to be 225m in diameter and of vitrified clay. If necessary, it may also be possible to connect a small number of units to the foul sewer in Battlefields Lane South, adjacent to the northeast boundary.
- 7.81 It is concluded that, taking account of the above, the site is suitable for residential development in terms of flood risk due to the overall low risk of flooding to the site and its status as an allocated site. Further, the ability to provide safe refuge and protection from flooding events ensure that the site can be made flood resilient and resistant over the lifespan of the development. As a result, the proposal is fully capable of according with Local Plan Policy 4 and the aims of the NPPF, specifically those within Section 14.

#### *Arboriculture*

- 7.82 To support this new application, Ligna Consultancy has prepared an updated Arboricultural Impact Assessment (AIA), including a Tree Survey. The AIA sets out that 22 individual trees, 15 groups of trees and one shrub were of note across the development site. Four category 'B' trees are proposed to be removed by the development, whilst a further five category 'B' trees and six



category 'C' trees are proposed to be pruned. The installation of surfacing is considered to affect five category 'B' trees and six category 'C' trees.

- 7.83 The anticipated arboricultural impact of the proposed development is considered to be 'low' with mitigation. To mitigate against the loss of four category 'B' trees, two new high-quality, heavy standard trees should be included within the landscaping of the site. No arboricultural mitigation is considered to be required for the partial removal of a group of category 'C' trees. The significance of the proposed pruning works on several category 'B' and 'C' trees is considered to be 'negligible', thus not requiring mitigation.
- 7.84 With regard to routing and installation of utility apparatus, the significance of such works is considered to be 'negligible', although it is noted that where it is necessary for underground services to intersect a Root Protection Area (RPA), specialist excavation methods should be used.
- 7.85 With regard to the installation of foundations (resulting in root loss), one category 'C' tree is identified as being minorly affected by RPA incursion. The size of the proposed incursion at <3% is considered to be within tolerable limits and mitigation is set out to ensure the affected tree and its root are not damaged. As a result, the significance of this work is considered to be 'negligible'.
- 7.86 Installation of new surfacing will affect 11 category 'B' and 'C' trees; however, appropriate mitigation is set out to ensure that these trees and their roots are not damaged or impacted upon adverse by the works. Again, the significance of this work is considered to be 'negligible'. The implementation of fencing and the proposed scheme as a whole is judged to result in 'negligible' impacts to all retained trees.
- 7.87 Overall, the proposed developments impact on trees across the site is considered to result in a low impact with mitigation proposed. Taking account of this, the proposal accords with Local Plan Policies 2, 3 and 28.

#### *Ecology and Biodiversity Net Gain*

- 7.88 Ecosupport have prepared an updated Ecological Impact Assessment (EcIA), in support of the proposal which incorporates the previous survey work undertaken across the site, associated with the extant consent.
- 7.89 No statutory or non-statutory designated sites were identified as being within two kilometres of the site. Further, the site is not identified as being within any recreational buffers for designated sites.
- 7.90 The Officer Report for the extant consent set out that the submitted EcIA does not identify any significant adverse ecological impacts, although recommends further survey work be undertaken for clarification and provides recommendations for the site's design and enhancement.
- 7.91 The updated EcIA reaches the same conclusions in terms of not identifying any significant adverse ecological impacts as before. With regard to the survey data, it is acknowledged that some of it is now two years old, but updated assessment of the site and updated bat surveys were carried out in 2023 and 2024. The habitats and site conditions remain largely the same and therefore the other previous data is still considered to be relevant.
- 7.92 Further, the survey dates were discussed with Senior Ecologist Chris De-Ruyck at the South & East Lincolnshire Councils Partnership in September 2024. It was confirmed that provided the rough grassland / scrub areas along the south boundary of Phase 1 are retained that updated reptile and breeding bird surveys are not necessary for this application. This is the case for the proposed scheme.
- 7.93 Section 7 of the EcIA provides detailed measures on mitigation, compensation and enhancements with to the site design and sensitive lighting for bats. Recommendations for further survey work are made with regard to Phase 2 of the development to include breeding bird surveys and reptile surveys. For Phase 1, no further survey work is considered necessary due to the limited suitability for species within the area of impact.
- 7.94 In relation to enhancements, swift boxes, bat boxes, other bird boxes, tree and shrub planting, hedgehog connectivity gaps in gravel boards/fencing lines and habitat piles consisting of log/brush piles are proposed.

- 7.95 With specific regard to Biodiversity Net Gain (BNG), the BNG report sets out the biodiversity value of the site prior to development and the predicted value post-development. The report addresses how habitats will be enhanced on site and created to achieve a net gain in biodiversity units and how these habitats will be managed and monitored for at least 30 years.
- 7.96 A baseline condition assessment has been undertaken of habitats, including modified grassland, other neutral grassland, mixed scrub, native hedgerows and line of trees. A schedule of proposed habitats and net gain assessment has been prepared. Following the incorporation of such measures into the DEFRA Statutory Biodiversity Metric, on site, the proposal results in a net loss of -7.31% in habitats (or -0.95 habitat units) and so the trading rules are not satisfied. However, there is a net gain of 14.98% (or 0.30 units) for hedgerow units and so the trading rules are satisfied for hedgerow units.
- 7.97 As a result, further measures are needed to address habitat units, which will be purchased and secured through a suitable BNG provider. In order to achieve the targeted 10% biodiversity net gain, a total of 2.24 habitat units will be required from such an off-site BNG provider. Of this, at least 0.15 units must come from a 'Heathland and shrub' habitat type, such as various scrub types. The remaining loss is from low distinctiveness habitats and therefore, there are no further specific requirements to meet the trading rules.
- 7.98 Section 5.0 outlines a habitat management strategy for the protection of retained habitats for modified grassland, other neutral grassland, mixed scrub (thicket), individual trees, native hedgerows, ornamental/non-native habitats. Further, management responsibilities are details for the newly created and enhanced habitats to ensure they are managed and monitored appropriately.
- 7.99 In summary, the proposal is considered to fully accord with the requirements of Local Plan Policies 2 and 28, alongside the aims of the NPPF in relation to the protection and enhancement of the natural environment. Further, the BNG assessment concludes the development is able to deliver the requisite minimum 10% BNG requirement through a combination of on-site enhancements to be managed and monitored for a period of at least 30 years and the purchase of 2.24 off-site habitat units.

### *Heritage and Archaeology*

- 7.100 The site contains no listed building or other known heritage assets. Further, the site is not within a Conservation Area, nor it is within the setting of any designated or non-designated heritage assets.
- 7.101 There are 25 identified listed buildings recorded within a one-kilometre search radius of the site. Of these, All-saints Holbeach church is noted as being a Grade I listed building. This is located some 925 metres to the south-west of the site. The closest Grade II Listed Building is Fleet Hospital, some 375 metres to the south-east of the site. The remainder of listed buildings related to 19<sup>th</sup> and 20<sup>th</sup> century dwellings or residential buildings, such as former schools.
- 7.102 The development is not considered to result in any harm arising to these heritage assets and their settings.
- 7.103 With regard to archaeological matters, previous site investigations undertaken in 2006 comprised of a geophysical survey and fieldwalking survey identified some linear anomalies across three surveyed areas, suggesting agricultural activity, with some possible pits and archaeological ditches. Two shards of Roman pottery in the south-western corner of the site were also discovered, along with post-medieval pottery, ceramic building material, coins and clay pipes across the site.
- 7.104 The Officer Report for the extant consent identified that there were no heritage concerns with developing the site in consultation with the Historic Environment Officer. Recommendations were made to impose conditions for an archaeological Written Scheme of Investigation (WSI), notification of intention to commence works to Lincolnshire County Council Historic Environment Department and the submission of final report to the Council and Lincolnshire Historic Environment Record to ensure that areas of archaeological interest revealed in previous evaluations can be subject to monitoring and recording during groundworks. These conditions were imposed on the extant consent under Conditions 11-13. It is considered that a similar approach would be appropriate in relation to this application.

7.105 In support of this hybrid application, Wessex Archaeology has prepared a Written Scheme of Investigation for an Archaeological Geophysical Survey of the site to determine, as far as reasonably possible, the nature of detectable archaeological resource within the site and to inform the scope and nature of any further archaeological work required, or the formation of a mitigation strategy or management strategy.

7.106 The proposal is thus considered to accord with the requirements of the NPPF with regard to paragraph 207.

*Developer Contributions/Viability*

7.107 The Council has not adopted a CIL Charging Schedule. As a result, all contributions are secured by way of a Section 106 agreement. Contributions may only be sought where these are considered necessary to render development, which would otherwise be unacceptable, acceptable in planning terms as confirmed by the NPPF. These must be explicitly justified and reasonably related to the development.

7.108 Policy 18 of the Local plan requires the provision of 25% affordable housing on site on all market schemes in South Holland. With respect to this application, this would equate to 40 dwellings of the 158 proposed being offered as affordable housing, with a tenure split of 70/30.

7.109 The site is allocated for housing in the Local Plan and issues such as infrastructure capacity and number of facilities available were considered through the plan-making process and associated Infrastructure Delivery Plan.

7.110 AMK Planning has prepared a Viability Appraisal and Report to accompany the planning application. The purpose of the report is to determine if affordable housing obligations and infrastructure contributions required by the Council are economically viable with regard to the proposed scheme.

7.111 The Viability Appraisal was undertaken in the context of the requirements of the NPPF and drew on best practice advice contained in Viability Planning Practice Guidance issued in July 2018, updated December 2024.

- 7.112 Economic viability has been assessed using an industry standard Residual Model approach, subtracting the Land Value and the Fixed Development Costs from the Development Value to determine the margin available for Developer Contributions.
- 7.113 Taking account of relevant comparables in property sales values and construction costs, including abnormal costs which are considered to be 'significant' at approximately £5.4 million, primarily due to necessary flood mitigation works to raise the land across the site, attenuation storage basins, which will also deliver open space recreational opportunities and biodiversity enhancement and increasing finished floor levels, the Appraisal identifies that a policy compliant scheme to deliver 40 affordable housing units and full s106 contributions of £875,121 will result in a negative viability of -£8.1 million.
- 7.114 Two further scenarios are presented as part of the Appraisal – the second scenario illustrates a 100% Market Housing Scheme and no S106 Contributions, which improve the viability position by £3.6 million but still results in a negative viability figure of -£4.46 million.
- 7.115 The third scenarios reduces developer profit to 10%, takes a view on construction contingencies and assumes the development is funded from internal sources. This again improves the viability position, but only to a marginally positive position of £239,000.
- 7.116 This illustrates the scheme can be delivered if the applicant is prepared to accept such a reduction and fund the scheme from internal resources to reduce finance costs, but there is no margin for Affordable Housing or S106 Contributions.
- 7.117 The Appraisal concludes that the abnormal costs associated with addressing the flood risk and drainage issues have a significant impact on the development's viability and thus, render a policy-compliant scheme economically unviable to deliver.
- 7.118 In summary, the development is unable to provide the policy compliant target of 40 Affordable Housing units or any S106 contributions. As a result, these requirements should be set aside in this case.

## **8.0 Conclusion**

- 8.1 In conclusion, the principle of the site's development for residential purposes is already well-established. The site is an allocated site and is subject of an extant outline consent for 185 residential dwellings.
- 8.2 This statement has been prepared to accompany a hybrid application for: 1) full planning permission for the erection of 62 dwellings, including associated landscaping and infrastructure and 2) outline planning permission for the erection of approximately 96 dwellings (some matters reserved – appearance and landscaping).
- 8.3 This application seeks to split the site's development into two logical phases. Overall, the proposal will deliver an appropriate mix of dwellings, both in terms of tenure and size to meet the area's housing needs and contribute to local housing demands.
- 8.4 The layout, scale, appearance, massing, design and landscaping of the Phase 1 proposal is in keeping with the requirements of relevant local and national policies and has been informed by a landscape assessment. This has ensured the scheme has carefully evolved to complement and respect the character, form, appearance and identity of the surrounding area.
- 8.5 Phase 1 has also been designed to take account of the outline consent to offer an improved form of high-quality residential development on a well-designed and laid out, attractively landscaped site.
- 8.6 The materials proposed are all reflective of the local vernacular and the proposal has been designed to integrate well with the local area, ensuring it is in-keeping and sympathetic to its surroundings, with its own unique character to further complement the area.
- 8.7 There will be no adverse consequences as a result of the Phase 1 development on existing occupiers nearby; nor will there be any adverse consequences for future occupiers of the estate.
- 8.8 The access arrangements are suitable to serve the Phase 1 development and it has been confirmed that the development will not result in adverse impacts

on road safety or the wider local highway network. The levels of off-street parking provisions and cycle parking provisions are consistent with local requirements.

- 8.9 Phase 1 seeks to retain existing trees and vegetation where possible throughout the development, but in particular in the south/south eastern corner, where existing trees and hedging are well-established. This area will be enhanced through additional planting to improve local biodiversity and connectivity, as well as native species planting across the extent of Phase 1, complemented by a comprehensive soft landscaping scheme. Subject to mitigation measures referenced in the Ecological Impact Assessment, there are no ecological constraints to the development.
- 8.10 The requisite 10% BNG requirement is capable of being fulfilled through a combination of on-site enhancements and the purchase of 2.24 off-site habitat units. The proposal will deliver measurable gains in line with national legislation which will be managed and monitored for at least 30 years.
- 8.11 Flood risk and drainage constraints are overcome, as outlined in the respective Flood Risk Assessment and Drainage Strategy, to deliver a safe and flood-resilient and resistant form of development. Attenuation ponds are proposed across both phases, which form important parts of the POS delivery and will assist with onsite drainage.
- 8.12 In respect of Phase 2, approximately 96 dwellings are proposed, with matters of principle and access for the Council determination. All other matters are reserved for subsequent approval. Phase 2 of the scheme, however, remains carefully considered and is informed by relevant technical work commensurate to an outline application.
- 8.13 The layout put forward is considered to be 'optimal' and represents a logical and user-friendly form of development that makes efficient use of the site and appropriately responds to its context.
- 8.14 There are no issues with connectivity to Phase 1 and site accessibility in general, with the development not giving rise to any highways concerns.



- 8.15 As with Phase 1, there will be no unacceptable impacts on heritage assets within the vicinity of the site.
- 8.16 There are considered to be no technical issues which would indicate this phase of development should be restricted in any way.
- 8.17 A site-specific Flood Risk Assessment and Drainage Strategy has been prepared to inform the proposal, although it is anticipated that given the high level detailed presented at outline stage for this phase, further technical work may be needed to inform the detailed design stage. Notwithstanding this, the details provided are considered sufficient for the purpose of enabling statutory consultees to conclude no harm will arise from the development and that appropriate mitigation can be incorporated to render the development flood resilient and respond to climate change.
- 8.18 Overall, with respect to both phases, the proposal will see the removal four Category 'B' trees with Phase 2, to be replaced with two new trees. There is no issue with the loss of these species and their removal should not constitute a barrier to development and the impact of the development as a whole is considered to be low.
- 8.19 The Ecology Impact Assessment provided confirms that there are limited areas of ecological value on site and that those areas of value are proposed to be retained and enhanced. Phase 2 has limited ecological value as a result of the arable use of the land. Further survey work is recommended for Phase 2 and will direct development at detailed stage, with appropriate buffer zones provided from existing hedgerow and tree features to provide suitable corridors to preserve and enhance biodiversity interest. Further enhancement measures will be possible to include at the detailed stage.
- 8.20 There are no archaeological or heritage constraints within the site which could affect the proposal.
- 8.21 The Viability Appraisal has demonstrated that the proposal is unable to support any affordable housing provisions or other developer contributions due to significant abnormal costs associated with flood risk and drainage matters.

8.22 The guiding principle for application such as this is that development should be approved which are:

- Sustainable;
- In the public interest; and
- Where there are no adverse impacts which significantly and demonstrably outweigh the benefits when assessed against the policies contained within the Local Plan and NPPF as a whole, having regard to key policies for directing development to sustainable locations, making effective use of land and securing well-designed places.

8.23 It is considered that the planning balance falls in favour of the proposal. Accordingly, this proposed hybrid application is judged to comply with all relevant local and national policies and other material considerations, having been informed by the requisite technical studies. It is therefore respectfully requested that the application be supported by the Council and approved without undue delay.