

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

**Our ref:** AN/2025/136839/01-L01  
**Your ref:** H09-0442-25  
**Date:** 30 July 2025

Dear Gillian Pinna-Morell

**Hybrid application for 158 dwellings comprising:- full application for the erection of 62 dwellings, associated landscaping and infrastructure and outline application for the erection of approximately 96 dwellings (some matters reserved)**

**Land off Battlefields Lane, South Holbeach, Spalding, PE12 7PG**

Thank you for consulting us on the above application, on 10 July 2025.

#### **Environment Agency position**

In line with Policy 4 of the South East Lincolnshire Local Plan 2011-2036, we object to this application due to the submitted flood risk assessment (FRA) not considering the impact to third parties as a result of land raising.

#### **Reasons**

Paragraph 181 of the National Planning Policy Framework (NPPF) and Policy 4 (f) of the South East Lincolnshire Local Plan outline that planning applications and site-specific FRAs should demonstrate that development will not increase flood risk elsewhere.

Paragraph 049 of the planning practice guidance section on Flood Risk and Coastal Change states that '*The impact of development on flood flow routes may also be an important consideration for sites which benefit from the presence of flood risk management infrastructure and where flow routes are likely to affect the site in the event of a failure or exceedance of such infrastructure*'.

The submitted FRA dated 28 March 2025, ref: '087.5018/FRADS/2', prepared by Paul Basham Associates Limited proposes that the ground levels are to be raised to at least 4.20 metres above Ordnance Datum (mAOD). With the existing site levels ranging from 2.05mAOD to 3.30mAOD, Appendix B of the FRA highlights that the land levels would be raised by over 1.00m for most of the site.

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The Environment Agency hazard maps, contained in Appendix G of the FRA, show that the site has a future hazard classification of predominantly Danger to Most (includes the general public) and could experience depths of up to 1m arising from a breach in the defences during a flood that has a 0.5% chance of occurring in any one year up to 2115.

The site is therefore likely to be affected in the event of failure of the sea defences. We consider that the impact of the proposed development and the associated ground level raising on flood risk to third parties should be assessed. The FRA should fully detail the extent and nature of the increase in risk and the significance of any increase in risk elsewhere.

### **Overcoming our objection**

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

### **Informative**

#### 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. We do not currently consider that the application passes part b) of the exception test as the FRA fails to consider whether flood risk will be increased in the surrounding area.

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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