

Planning Statement

Former nursery site, Foxes Low Road,
Holbeach

Housing development

Purewal Developments Limited



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Introduction

AJ Carter Consulting has been instructed by the applicant, Purwal Developments Limited, to prepare and submit a full planning application for the proposed residential development to deliver twenty-three new homes and associated landscaping and infrastructure at Foxes Low Road.

The Planning Statement will provide an overview of the site and the surrounding context, including relevant planning history, and the relevant national and local planning policy considerations. A review of pre-application engagement with the Local Planning Authority will then be undertaken, and subsequently the development proposals will be presented. The Statement will then provide a detailed assessment of the proposed development against the relevant planning policy and other material considerations. Finally the Statement will provide a summary and conclusion which will demonstrate that planning permission should be granted for the proposed development.

Application Site

Site Context

The site is located on the eastern side of Holbeach, with access from Foxes Low Road. The context to the south and east of the site is primarily formed by large arable fields punctuated by occasional dwellings and agricultural buildings. To the north and west of the site is the most recent residential growth within Holbeach.

Individual dwellings form part of the site boundaries to the west, east and south, with the recent development by Ashwood Homes forming the boundary to the north. It can reasonably be considered that despite the edge of settlement location the site is well contained by existing residential development.

Application Site

The site which totals 0.81 hectares was formerly used as a plant nursery, but the use is thought to have ceased in 2008. Two buildings occupied the site during the nursery use; a barrel roofed corrugated metal building and a brick built single storey structure. The latter of these buildings which was positioned across the centre of the site was demolished some years ago and little remains on-site. The barrel roofed structure remains and fronts the dwellings on the opposite side of Foxes Low Road. The rest of the site is overgrown with self-set trees and bushes of limited quality.

To the front of the site running alongside Foxes Low Road is a drainage ditch. The ditch provides for surface run-off and links west to Holbeach and northeast beyond the A17. As with much of Lincolnshire site forms part of the floodplain with flood zone 2 and flood zone 3 making up parts of the site.

Foxes Low Road at the front of the site provides access to Fleet Street to the west and the centre of Holbeach and the A17 strategic route to the east. This means the site is well located from an accessibility perspective.

Planning history

The relevant planning history of the site is set out in the table below:

Reference number	Description of development	Status
H09-1021-20	Residential development for 13 dwellings	Non-determination – 20/12/22
H09-0251-19	Residential development for 18 dwellings	Withdrawn – 20/3/20
H09-0248-19	Erection of detached dwelling – plot 3	Approved – 07/10/19 (since expired)
H09-0249-19	Erection of detached dwelling – plot 2	Approved – 07/10/19 (since expired)

The table above demonstrates that there have been a series of planning applications made for residential use on part or all of the site. Some of the minor application were successful but have since expired having not been implemented.

The relevant planning history of the surrounding area is set out in the table below:

Reference number	Description of development (location)	Status
H09-0613-21	Residential development for 81 and associated infrastructure (East of Chaffinch Way)	Approved – 01/03/22 – majority of development built out
H09-0115-21	Residential development for up to 185 dwellings (Land south of Battlefields Lane)	Approved at outline – 15/06/23
H09-0706-19	Residential development for 36 dwellings (Land off Balmoral Way)	Approved – 30/11/19 – development built out

The table above sets out the most recent approvals for strategic sites within the vicinity of the application site. Two of the approvals have been commenced and in the case of Land of Balmoral Way the development has been completed. The latter stages of the approval East of Chaffinch are currently being delivered. The approval for 185 dwellings on land south of Battlefields Lane has yet to be implemented. Collectively these three sites form the strategic housing growth to the east of Holbeach.

National Planning Policy

National Planning Policy Framework (NPPF) – December 2024

The NPPF seeks to ensure that the planning system delivers sustainable development. In delivering sustainable development three primary objectives are followed; namely economic objectives, social objectives and environmental objectives. The NPPF requires decision to be taken in the context of these objectives and to guide development towards sustainable solutions whilst taking account of local characteristics.

To achieve the primary aims of the NPPF there is the key tenant of a ‘presumption in favour of sustainable development’. In practice this means that a Local Planning Authority should approve development proposals that accord with an up-to-date development plan without delay.

One of the main principles of the NPPF is to direct the delivery of a sufficient supply of homes. The document states that it is important that a sufficient amount and variety of land come forward when it is needed, meeting the needs of the community, and achieving housing delivery without delay.

The provision of affordable housing within residential developments is given due weight and consideration within the NPPF to achieve balanced communities and social cohesion. It is noted that the NPPF recognises that the supply of a large number of homes can be achieved through new settlements or extensions to existing settlements.

In terms of accessibility and transport links the NPPF requires applications for development to give priority to pedestrians and cycle movements within the scheme and through neighbouring areas. There is also a desire to facilitate access to public transport when possible.

Efficient use of land sits alongside connectivity in the development principles of the NPPF. When planning for new housing the document seeks Local Authorities to optimise the use of land in their area and meet as much of the identified need for housing as possible. Densities within residential developments should reflect these aims.

In respect to planning for climate change the NPPF requires that when new development is brought forward in areas which are vulnerable to flooding that care should be taken to ensure suitable adaption measures such as green infrastructure and sustainable drainage systems are incorporated.

In terms of flood risk the NPPF is clear that where planning applications are made on sites allocated in the development plan through the sequential test there is no requirement for the applicant to undertake the sequential test again. There is however a requirement for the development to be appropriately flood resistant and resilient such that in the event of a flood it could be brought back into use without major refurbishment.

Planning Practice Guidance (PPG) December 2024

The Government's Planning Practice Guidance (PPG) sets out the key principles for local authorities when plan making and decision taking. The document mirrors to a degree the NPPF and details how the planning system should work for the benefit of the applicant, general public and the Local Authority.

At the housing chapter there is an overarching aim for Local Authorities to identify a deliverable five year supply of housing sites; and for that supply to be maintained and updated. Beyond that five year period Local Authorities should also identify broad locations for growth for 6-10 years and where possible for years 11-15.

Guidance is provided on other matters including the efficient and effective use of land, flood risk and climate change, and the determination of planning applications.

Development Plan

South East Lincolnshire Local Plan (SELLP) March 2019

The **South East Lincolnshire Local Plan (SELLP)** sets out the policy framework for development within the plan area for a duration of 25 years (2011-2036). The plan sets out the overarching policies and development management policies which should direct development within the plan area.

The salient policies for the planning application are summarised below.

Policy 1: Spatial Strategy – Holbeach is identified within the policy as a main service centre. This settlement classification is below sub-regional centres or Boston and Spalding, but sits alongside settlements such as Long Sutton and Sutton Bridge. The intention of the policy is to direct strategic level housing growth to such locations.

Policy 2: Development Management – the development management considerations are set out in the policy. The policy includes a list of matters ranging from size, scale layout, density and impact on amenity to access and trip generation.

Policy 3: Design of New Development – the policy requires that new development creates distinctive place through the use of high quality and inclusive design. The principles of good urban design are set out in a list of considerations.

Policy 4: Approach to Flood Risk – the policy confirms that the sequential test is not required when considering sites allocated in the Local Plan. It will however be necessary for applications to be supported by site specific flood risk assessments which consider the risk from all sources of flooding.

Policy 6: Developer Contributions – developments of 11 or more dwellings will be expected to mitigate their impacts upon services, infrastructure and the environment. Subject to matters of viability and the specific considerations of the development the contributions can include education, healthcare and transportation.

Policy 10: Meeting Assessed Housing Requirements – the housing commitment for the area of South Holland during the plan period is 11,681 dwellings, equivalent to 467 dwellings per annum.

Policy 11: Distribution of New Housing – the policy sets out approximate numbers of new houses for settlements and allocated sites. Holbeach as a main service centre has a figure of 2202 new dwellings. Within the specific site allocation list is Hob004 Land east of Balmoral Way for 109 dwellings. The application site makes up a portion of that housing allocation. The supporting text at para 5.3.9 outlines that the site housing numbers are a broad indication based on 20 dwellings per hectare within the main service centres.

Policy 17: Providing a Mix of Housing – the policy points to the need for the provision of new homes to meet the long term needs of South East Lincolnshire. Family homes of

two and three bedrooms are stated as being in highest demand for both market and affordable housing sectors.

Policy 18: Affordable housing – in South Holland about 282 new affordable dwellings are required per annum. The policy makes it clear that affordable housing will be sought on sites of 11 homes or more with a ratio of 25% being affordable. Of those 25% the tenure split in South Holland is set out as 70% affordable for rent and 30% intermediate housing for sale. On site provision is the preferred approach.

Policy 28: The Natural Environment – directs the need to ensure the protection and enhancement of the natural environment. This includes ensuring that designated sites are properly protected and appropriate mitigations are in place.

Policy 33: Delivering a more Sustainable Transport Network – the Local Plan supports the enhancement of the sustainable transport network through improved connectivity. With regard to walking and cycling this means creating new routes and increasing permeability.

Policy 36: Vehicle and Cycle Parking – the Local Plan sets out the requirement for all new developments to provide parking in accordance with the Council's minimum parking standards. The support policy text at para 8.5.3 advises that at least two parking spaces will be sought for a three bedroom dwelling, and at least three spaces should be provided for dwellings larger than three bedrooms. The text is clear that one of those spaces could be a garage or car port.

Five Year Housing Land & Housing Delivery Performance

The Council's most recent 5-year housing land supply position states that the Local Authority is able to demonstrate a supply of deliverable sites equivalent to 5.5 years as per June 2025. The figures up to 2026 have not yet been published.

Pre-application engagement

The applicant sought pre-application engagement in late 2025 on a layout showing twenty-two dwellings with a single link into the site from Foxes Low Road. Following the feedback received the layout and proposals have evolved. This section of the Statement explains the evolution and how that now informs the proposed development.

The case officer confirmed that the principle of development was established through the site allocation in the Local Plan. Observations within the letter went on to make suggestions in respect of the connectivity of the site with the wider built form context.

Other considerations from the case officer referenced the layout of the on-site open space and how this would relate to the proposed houses with emphasis on natural surveillance and usability of space. The pre-application response also identified the need for flood risk considerations, drainage and biodiversity net gain.

The pre-application response concluded that the development proposals were acceptable in principle subject to matters of technical details being appropriately addressed.

Development Proposals

Description of Development

The description of development proposed through this full planning application is:

“Demolition of existing barn and erection of twenty-three dwellings, with access from Foxes Low Road and secondary access formed to the north, together with associated landscaping and open space.”

Design and Scale

The design of the housing scheme takes its queues from the immediate residential context on Frogmore Road, Barnwell Street and Balmoral Way. Plot sizes and proposed building heights are comparable with the recently completed development.

Layout and Use

The layout of the housing scheme uses the current site access from Foxes Low Road to create a north south axis with Barnwell Street to the north. This has the effect of apportioning the site into three parts. The first is a street of dwellings on the west side of the site, the second is a close of dwellings fronting onto the open space and the third is the frontage of the site by Foxes Low Road and the drainage channel.

The proposed use of the site is for residential, but with an area of open space at the heart of the housing scheme which will have natural surveillance from the houses overlooking it.

Connectivity

The site has considerable connectivity benefits which are enhanced by the proposed layout. The connection from Foxes Low Road to the housing development to the north will allow pedestrians and cyclists to have access to the footpath and cycle network of the surrounding residential areas. Ultimately this will allow sustainable links to the University of Lincoln Holbeach Campus via Low Lane and also to Holbeach town centre via Kings Road and the western end of Foxes Low Road.

Landscape and Biodiversity Net Gain

The proposed layout plan for the planning application shows a number of new trees within the shared spaces and garden spaces. These are to mitigate the loss of self-set trees from the development.

Additionally the proposed development will make a financial contribution to off-set the difference in biodiversity units as a result of the housing scheme. The full details are provided in the Biodiversity Net Gain Metric produced by ML-Ecology.

Drainage

The proposed layout incorporates drainage crates in the ground below the open space area. The access driveway to the front of the site will act as a tanked permeable access road. The proposals will also increase the physical capacity within the surface drainage channel alongside Foxes Low Road. Surface water and foul sewer connections are shown on the drainage strategy drawing which identifies the links with the existing network.

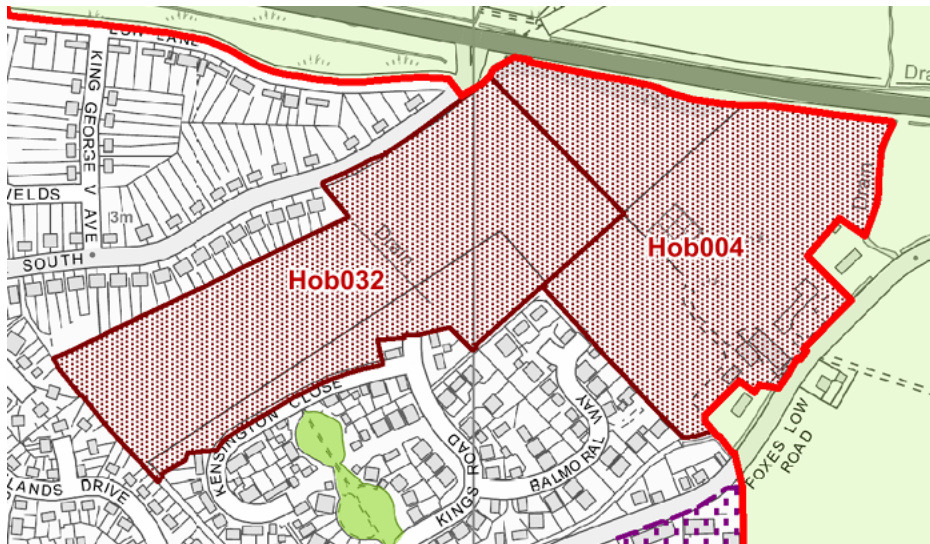
Planning Assessment

Planning legislation requires that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. As such the Local Plan is the starting point for decision making.

Proposed development which accords with an up to date Development Plan should be approved without delay. Proposals need to be assessed against the Development Plan as a whole. If the proposals are in accordance with the majority of policies but there is friction with others, then it is for the Council as decision maker to consider what weight is to be afforded to the various policies of accordance and also those where the proposal provide conflict. In the planning balance if any infringement of policy (minor or otherwise) can be off-set by the use of alternative measures then these should be used rather than an unnecessary planning refusal.

Principle of Development

The site forms a parcel of the larger allocation Hob004 as identified through Policy 11 of the Local Plan. Consequently principle of development residential use has been established and independently verified through the Local Plan system. The site represents the final parcel of Hob004 and would complete the strategic intent of housing development on the eastern side of Holbeach.



The extract from the proposals map of the Local Plan shows the extent of the housing allocation and the settlement boundary of Holbeach.

The site does not represent previously development land based on the definition within the NPPF which excludes land that is or was last occupied by agricultural or forestry buildings. However, the site shares many of the characteristics of previously developed land and alongside the site allocation there is demonstration of land use efficiency through the proposed development.

Policy 11 of the Local Plan gives an approximate number of 109 dwellings for the wider Hob004 allocation. The consented scheme of 81 dwellings plus the proposed 23 dwellings on the application site would collectively achieve 124 dwellings. Given the housing pressures on the region, the Government's increased housing targets (using the updated standard method) and the national policy to ensure the efficient use of development sites it is considered appropriate for the Hob004 allocation to deliver a modest increase in housing.

Housing mix

The proposals see a range of house types which respond to policy 17 of the Local Plan. The policy requires an appropriate mix to meet the long term needs of the plan area and maintain mixed, inclusive and sustainable communities. The proposals see the following split of housing sizes:

- 2 bed dwelling – 7
- 3 bed dwelling – 10
- 4 bed dwelling - 6

The Strategic Housing Market Assessment which forms part of the evidence base for the Local Plan identified that approximately 80% of new homes should be two and three bedroom. The proposals see 70% of the houses meeting this demand.

Affordable housing

The affordable housing requirement for the site totals five dwellings (all two-bed) based on policy 18 of the Local Plan. The policy seeks a tenure split of 70/30 with 70% being affordable rent and the remaining 30% being intermediate housing for sale. Based on the proposed site plan (ref Hol-051-002) the following plot numbers are intended to be on-site affordable:

- Plot 16 (affordable rent)
- Plot 17 (affordable rent)
- Plot 18 (intermediate sale)
- Plot 19 (affordable rent)
- Plot 20 (intermediate sale)

The registered social landlord has yet to be identified.

Flood risk and drainage

The site specific flood risk assessment dated May 2026 has been prepared in accordance with the NPPF guidance and local policy on flood risk. The site is within flood zone 3 owing to the potential for tidal flooding resulting from breaches or overtopping of coastal defences. The flood risk assessment concludes that “the proposed development will not have a material impact on the hydrology of the existing land; and that any runoff from the increase to the amount of impermeable areas will be managed by appropriate sustainable drainage components.

The drainage layout for the development has been designed to address the increase in the amount of impermeable areas. On-site solutions include attenuation capacity within the ground beneath the area of open space, tanked permeable driveways, and a tanked permeable access road serving the five dwellings fronting Foxes Low Road. The full details of these interventions are set out on the proposed drainage strategy.

Amenity and Layout

The layout of the proposed housing development follows the pattern and urban grain of the surrounding built context. Amenity is secured through appropriate plot sizes and distances to existing dwellings. This will ensure new and current residents have the necessary privacy and amenity within their gardens and houses.

Design and local context

The proposed design of the three house types is consistent with the surrounding area. All dwellings are two storey with pitched roofs and in the case of the 4 bedroom properties will have an in curtilage garage. Materials while not yet determined will follow the local characteristics with brick construction, tiled roofs and smooth render finish.

Highway connectivity

Foxes Low Road affords highway connectivity to the A17 (Newark to King's Lynn route) and also to Holbeach town centre. The layout has been designed to ensure vehicular access is primarily via Foxes Low Road which is speed limited to 30mph at the entrance to the site but without a footway. Pedestrian and cycle access is via Barnwell Street to the north linking with the existing footpath and cyclepath network.

Parking

The three house types all have the requisite number of parking spaces. The three bedroom houses have two in curtilage spaces, whilst the four bedroom houses have three parking spaces within the inclusion of the garage. The two bedroom houses have one in curtilage space.

Ecology

The Preliminary Ecological Appraisal (PEA) produced by ML-Ecology has found that the site is of relatively low wildlife interest due to the site being dominated by habitats with limited floristic diversity. The PEA advises that through an inspection of the agricultural building there were no suitable external or internal features that would support roosting or hibernating bats.

Arboriculture

An Arboricultural Survey & Method Statement has been prepared in support of the application. Whilst the site is heavily populated with trees none of the groupings contain trees of classification above Category C. As such the document concludes that

there is no protection for the species and on-site compensatory planting secured through the planning consent will be sufficient to off-site the loss.

Land contamination

It is the intention of the applicant to provide the land contamination information prior to the determination of the planning application.

Heritage

A review of the local Historic Environmental Record and Historic England's Listed Building Register has shown that there are no designated or non-designated heritage assets on or in the vicinity of the development site.

Sustainability

Holbeach is a market town within South Holland District forming part of Lincolnshire. The town benefits from good road connections to larger nearby settlement of Spalding (8 miles), Boston (17 miles), and King's Lynn (23 miles). The town is 43 miles from Peterborough where the East Coast Mainline provides onward links to the major cities.

At a local level the town is served by a number of key amenities including University of Lincoln Holbeach Campus, Holbeach Primary School, and wide range of retail and community facilities. The application site is well placed to benefit from existing connections to these uses.

Developer Contributions

It is anticipated that a successful planning application will result in a Section 106 agreement to secure contributions which mitigate the impacts of the development and make the proposals acceptable in planning terms. It is intended that the Section 106 will be discussed with the Council during the consideration of the application following receipt of formal consultation responses from statutory and non-statutory consultees.

Any obligations that are sought or proposed must be capable of satisfying the statutory tests that are set out in the Community Infrastructure Levy Regulations 2010 (as amended) and para 58 of the NPPF.

The applicant reserves the right to review the contribution requests and if necessary explore the viability of the proposals in light of those requests.

Planning Conditions

It is anticipated that planning conditions will be discussed with the Council in order to control those matters which fall outside of the scope of the S106 agreement. It is intended that the wording of appropriate conditions will be agreed with officers prior to the determination of the application to ensure that a deliverable planning consent is achieved for all parties.

Conclusions

The proposals complete the development of an allocated site and make a positive contribution to the housing stock of Holbeach. The range of house types and tenures complements the wider surrounding residential context and the layout integrates the development into the neighbouring road network.

The site is within a sustainable location forming part of the settlement of Holbeach. The layout and positioning of the site will ensure that movement to and from the site is through a range of transport modes.

The planning application has been prepared following detailed pre-application advice from the Council and the proposals reflect the feedback received at that time.

The applicant and agent welcome the opportunity to positively engage with the Council's officers during the life of the planning application to ensure a robust and evidence based decision is achieved.