

21 January 2026

Our Ref: 102-575

Mr Daniel Allen - Principal Planning Officer
South Holland District Council
Council Offices
Priory Road
Spalding
Lincolnshire
PE11 2XE



Dear Mr Allen,

Town and Country Planning Act 1990

Application Reference - H09-0721-25

**Planning Application by D Brown Building Contractors seeking Full detailed planning permission for the development of 57 Affordable Dwellings with associated access, open space and drainage.
Land South of Wignal's Gate, Holbeach, Spalding**

We write further to recent correspondence in relation to the above and our last meeting to discuss the proposal.

We have revised the scheme following a review of consultation responses and discussions with some consultees.

This letter should be read in conjunction with the following:

- 102-575 Drawing Issue Sheet 20
- 102-575-001P Planning Layout
- 102-575-005D Materials Plan
- 102-575-006C Boundary Treatment Plan
- 12773-WMS-ZZ-XX-D-C-39201-S8-P5-DRAINAGE_LAYOUT-25.12.12
- 12773-WMS-ZZ-XX-D-C-39501-S8-P3-S38_ADOPTABLE_EXTENTS-25.12.12
- 12773-WMS-ZZ-XX-D-C-39502-S8-P2-VEHICLE_TRACKING-25.12.12
- 12773-WMS-ZZ-XX-T-C-39201-S8-P5-DRAINAGE_STRATEGY
- Response Tracker – Lincolnshire County Council

We also set out more specific comments where these relate to either consultees or broad topic areas raised to date through the consultation process.

Lincolnshire County Council – Local Highway and Lead Local Flood Authority

Following receipt of comments from Lincolnshire County Council (LCC) and a subsequent review, a meeting was held with members of our team. For brevity, we enclose a response tracker which details the comments provided by LCC, how these have been considered and our response, including reference to relevant plans within our submission pack.

Sustainability

As the proposal has evolved, the sustainability strategy has been reviewed. While the submitted Design and Access Statement referenced the Future Homes Standard, the development will instead deliver an EPC A

rating through the use of currently available and deliverable technologies. The proposed approach utilises high-efficiency gas boilers in combination with photovoltaic panels, enabling the scheme to achieve a high level of energy performance without reliance on the not-yet-adopted Future Homes Standard.

Response to Councillor Comments – Residential Amenity

In response to Councillor comments regarding residential amenity, the site layout has been amended to improve residential relationships and accord with the Council's preferred accommodation mix. Plots 1-8 have been repositioned forward within the site to increase interface distances, with particular focus on Plots 2, 3 and 4 in relation to the existing dwelling at No. 57 Wignals Gate. As revised, Plot 3 now achieves a separation distance of approximately 21.5 metres when measured from the first-floor window of Plot 3 to the vertical face of the dormer window of the existing dwelling.

Plot 10 has been amended from a three-bed dwelling (house type E) to a larger two-bed dwelling (house type H), retaining the same footprint, in order to better align with the preferred accommodation mix of our client's registered provider partner – whilst retaining accordance with the preferred approach of the Council's housing team.

Land Supply / Affordable Housing Delivery

In regard to the supply of affordable housing within South Holland, we note comments made by a Local Ward Member and also the Local MP. These comments raise questions in relation to the local plan 'trigger' for the release of reserve housing sites. Questions are raised around 'the appropriateness of this site's release'.

It is important not to conflate the local plan mechanism for the release of reserve housing sites with the suitability of such sites in planning terms, the backdrop of a significant shortfall in affordable housing delivery and the established role of material planning considerations.

Reserve housing sites are sites which have been subject to scrutiny through the local plan process and found suitable for the delivery of housing, including relevant technical matters such as highways, landscape and flood risk. In terms of flood risk, this includes sequential testing carried out at the local plan level. These sites are also located within the defined settlement boundaries for the settlements within which they are located.

This therefore provides an important baseline for planning judgment to be informed by material planning considerations which can guide a decision on the acceptability of a proposal away from a local plan policy, hence the wording of Section 38(6) of the Planning and Compulsory Purchase Act 2004 which sets out the long established legal requirement:

"that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise"

A primary material consideration in this case flows from the delivery of affordable housing in South Holland and the lack of demonstrable supply of new affordable homes to meet acknowledged needs.

As you know and as set out within our planning statement (at paragraph 7.28) we set out that *"very significant weight must be attributed to the delivery of affordable housing in the overall planning balance"*. This remains our firm professional assessment. It is also acknowledged by the Local Planning Authority through the Local Plan, where paragraph 2.4.12 of the Local Plan confirms that at a strategic level *"The shortage of affordable housing is a significant issue for the area"*.

The pre-application advice provided by the Local Planning Authority in regard to this proposal also confirms that *"the provision of the affordable housing would be given significant weight within the planning balance"*. Irrespective of a discussion around the 'trigger' set out within Policy 12 of the Local Plan, it is clear that the delivery of affordable housing is a material consideration of 'significant weight'. To claim otherwise would be unreasonable.

To further evidence the significance of the weight to be applied, our assessment of the degree of shortfall in affordable housing is set out within the submitted planning statement. In particular paragraphs 7.24 to 7.28 of this statement sets out clear evidence based solely on published information contained within annual

monitoring reports, housing land supply position statements and data provided by officers. This confirms that (with our emphasis underlined):

"Based on the Council's failure to deliver on their own affordable housing requirement in 13 of their 14 monitoring periods of the current Local Plan has left a residual shortfall of 2,451 affordable homes"

This shortfall is severe by any reasonable measure. We have not been party to any clear evidence that our confirmation of a strategic shortfall affecting the whole of South Holland is incorrect. It is difficult to conceive how a different view could be reasonably formed as this shortfall is based on a calculation of completed affordable housing units compared to the clear target for affordable housing as set out within the Local Plan for the area. Furthermore, we note that the Council's housing team, in their capacity as Local Housing Authority have provided an unambiguous steer in their consultation response dated 16 October 2025. Within this is it is particularly noted that (with our emphasis underlined):

"There is a high need for affordable housing in Holbeach and this scheme would help meet some of that need"

And;

"To summarise, the Local Housing Authority is happy to support this proposed development to help meet the need for affordable housing."

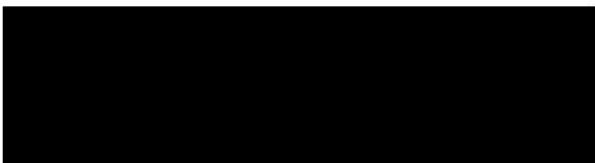
It is on this basis that there is a clear, evidenced need for affordable housing across South Holland and also within Holbeach. The housing team confirm that the proposed development would meet 'some' of the need for new affordable homes in Holbeach which points to a much bigger known need. This is notwithstanding the severe District wide need which is based on the Council's own monitoring data and evidenced through our submissions. Our client's housing delivery partner will secure funding from Homes England to support delivery of the scheme based on this clear and urgent need.

We respectfully submit with the presence of a clearly evidenced material consideration of 'significant weight' in favour of granting planning permission, any assertion that a reserve site is unsuitable to deliver affordable housing 'in principle' would be wholly unreasonable.

We trust that the information set out within this letter and as part of the enclosed plans provides you with sufficient clarity to continue to positively determine this planning application and present the proposals to the Council's Planning Committee in the near future.

Should anything require further clarification, please do not hesitate to contact us. We look forward to continuing to work on this important proposal with you and your colleagues.

Yours faithfully,



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c.c. Client Team

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