

16 April 2026

Our Ref: MJD/JP

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

By email to: Daniel.Allen@sholland.gov.uk

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 have received your initial response dated 12th March 2026 to the FVA submission of January 2026.

There are a few points that we feel have been excluded and should be reconsidered. These are:

Abnormals – 1.1 – Abnormal items to achieve new Building Regulations. This has currently been excluded. TF have stated that these extra costs “will” become included within the BCIS rates but clearly are not included yet. So, the costs need to be added. CPV have stated that the Values are uplifted to allow for these specification increases. However, as the figures are included as per Accent Nene’s bid used by both rg+p and CPV, then clearly regardless of any value inclusions, the costs need to be included somewhere.

On other recent schemes (e.g. Puritan Way), CPV included an additional £5,500 per plot for Part L Building Regulations. Therefore, clearly the 57 @ £5,500 should be reinstated at a cost of £313,500.

1.4 Dewatering – again this cost has been included on Puritan. TF have stated that they feel it to be “normal” for that location. But, as we know, “location” factors in BCIS relate to costs and resource costs so again it should have been included. Please reinstate the £40,000.

As further evidence we enclose a gas monitoring report (ENC. 1). This details the groundwater levels in Appendix B as having a high water table with the highest being at 1.29 mbgl and the lowest at 2.45 mbgl so at these levels this will impact the works.

Also, due to the high water table level its now necessary to line the basin and swales to prevent groundwater ingress that needs considering within the abnormal costs.

1.6 Removal of existing crop – this is not a “normal” item as wheat had been planted and will require removal before commencing. Please see a snip of another projects with a build up to a rate from CJ Rust for a similar exercise at a £29.46/m³ rate x 3,295.84m³ at a 200mm depth (therefore 16,479m²)

Project	Gosmead Lane, Elm									
Application number										
Application date										
Variation number										
Variation Title	Additional works to off site 278 works									
REF	DESCRIPTION	PREV QUANTITY	NEW QUANTITY	UNIT	RATE	PREV TOTAL	NEW TOTAL	%	Application total	VARIATION NOTES / COMMENTS
	SECTION 278 Road works - Off site									
	Excavate to reduce levels, commencing at existing ground level	65.66	65.66	m3	3.72	244.28	244.28	100%	244.28	
	Disposal of excavated material off site	65.66	65.66	m3	25.74	1,690.46	690.46	100%	690.46	

1.7-1.9 Raising of dwellings – this again is not a “normal” element that is included in BCIS rates. We enclose ENC 2. Topo survey and ENC 3. Drainage levels to demonstrate the required raising of levels. For example, Plots 1 & 2 have a FFL of 3.90 v 3.18 EGL, 3 & 4 have a FFL of 3.75 v 3.01 and 5 & 6 have a FFL of 3.50 v 3.12.

1.9 Attenuation – this again is not a “normal” element that is included in BCIS rates. As further explanation received from the applicant:

“From referencing the drainage stat and flood risk assessment we looked into discharging into a watercourse: This option is not feasible. The ditch located along the eastern boundary is incomplete and crosses multiple third-party land parcels, meaning a continuous and reliable outfall cannot be demonstrated. As such, this option has been discounted.

We then looked into discharging into the sewer. Anglian Water has confirmed that a connection can be made to manhole MH4503 at a maximum discharge rate of 2.5 l/s. However, the minimum allowable pipe diameter is 80 mm, which necessitates a minimum pump rate of 3.8 l/s. To accommodate this, additional attenuation storage is required to balance inflows and ensure compliance with the permitted discharge rate, thereby preventing flooding.

Hydraulic calculation: The hydraulic modelling and drainage simulations indicate that several manholes and pipe sections are at risk of surcharging and potential flooding during critical storm events, particularly for the 1 in 100-year storm event plus 40% climate change allowance. Additional attenuation is therefore necessary to mitigate these risks.

The proposed solution incorporates oversized pipework, an attenuation basin and a surface water pumping station to provide sufficient storage capacity and control discharge rates effectively”.

We trust that this explanation helps with reconsidering this element. The rate utilised at this stage is a pro-rata of Puritan Way, that had been agreed and accepted.

2.2 Vole survey – this item can be removed as an earlier report did suggest further required that has now been superseded.

2.3 Substation – a copy of the Quotation is included as a substation cannot be within the general “external works” element on BCIS and therefore it has to be treated as an abnormal cost. The three bottom elements of the quote is included relating to the substation elements of circa £98k. The applicant has requested further costs/quotes as their (National Grid) previous quote does not include the upgrade/substation.

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Totals

Option	A	B	C
Net Price (Excluding VAT)	£217,721.96	£10,669.78	£7,950.32

Breakdown of Costs

Description of CONTESTABLE WORK that is included in option		A	only
Work involved			Net price (£)
Domestic Services			
- Install single phase 35mm LV service cable in duct or cable tray. - New single phase 100A service including underground joint & termination.			£62,023.95
LV Underground Mains			
- Distribution unit termination (LV Board/Cabinet) - Install LV 300mm waveform mains cable - Install LV 185mm waveform mains cable - LV waveform mains pot end & installation of earth pin. - LV Mains branch joint of a 95-300mm cable to a 240-300mm main.			£46,360.23
HV Plant and Switchgear			
- Establish a 315kVA unit substation within a GRP Housing. Includes 315kVA transformer, Ring Main Unit, 4-way LV cabinet, RTU, internal small power/lighting and substation ancillaries. Excludes GRP, earthing, civil works, and HV/LV jointing - Ancillaries for a unit substation housed in a GRP - Transport of plant to in normal weekday working hours			£55,805.46
HV Substation Civils			
- Supply and fit of a brown GRP substation housing. - Substation Mesh Grid - Install earthing in GRP secondary substation - Sand & cap/shingle substation			£11,531.30
HV Underground Mains			
300mm HV indoor end box termination - Install 11kV 300mm aluminium Triplex mains cable in trench. - Excavate & Reinstate 11kV joint hole in unmade ground			£31,331.24
TOTAL			£207,052.18

should reasonably be treated as abnormal infrastructure costs.

Fees – we still note that using 7% all in fees for such a relatively small scheme is not acceptable. The much larger Puritan Way scheme of 122 units was included at 8% for instance by CPV.

We look forward to hearing from you, or receipt of an updated report.

Yours sincerely,



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