

## Online Comment

**Application** H09-0796-25  
**Location** Land East of Forest Way Holbeach Spalding  
**Proposal** Proposed Erection of 2 Bungalows

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**Name** Cllr S E Hutchinson  
**Address** c/o South Holland District Council Council Offices Priory Road PE11 2XE

**Date Submitted** 11-10-25  
**For/Against** Objections

## 1. Flood Risk and Sequential Test Failure

The site lies within Flood Zone 3a and must comply with Policy 4 of the South East Lincolnshire Local Plan and Paragraph 173 of the NPPF, which require that development proposals demonstrate there are no reasonably available sites at lower flood risk.

As the site is not allocated in the Local Plan, the Sequential Test was not undertaken at plan-making stage, and previous permissions cannot be used to bypass this requirement. A full Sequential Test must be carried out at the application stage.

The applicant has not demonstrated that a district-wide or settlement-specific search has been undertaken to identify alternative sites in Flood Zones 1 or 2. In recent appeals (APP/A2525/W/25/3364588 and APP/A2525/W/25/3362446), Inspectors supported the Council's position that suitable sites exist in lower flood zones. Given the similar or smaller scale of this proposal, the same principle applies.

The proposal therefore fails the Sequential Test and does not comply with the NPPF, PPG, or Local Plan Policy 4. The Inspectors' conclusions in the referenced appeals should be given substantial weight.

Additionally, the proximity of the proposed dwellings to the existing drainage basin raises concerns about surface water management. The basin was designed to serve the wider development and its open setting supports both function and maintenance. Introducing built form so close risks compromising its capacity and accessibility, potentially increasing flood risk to nearby properties.

## 2. Design and Landscape Impact

The proposal undermines the established landscape and design strategy of the existing development approved under H09-0326-17 and H09-0872-18, which emphasized a 'soft edge' and a respectful buffer to the adjacent cemetery.

The original Design and Access Statements stated:

"Opportunity has been taken to create a 'soft edge' to all exposed edges of the site."

"Great consideration has been given to the adjacent Cemetery. A wide band of open space plus a further band of soft landscape screening separates the new housing from the Cemetery."

These features were essential to the acceptability of the development outside the settlement boundary. The current proposal would erode this soft edge, placing built form into an area intentionally left open. The proposed bungalows would fragment the open space, creating a hard edge adjacent to the drainage basin, which would be enclosed between new and existing dwellings- undermining its open character and raising concerns about long-term maintenance and drainage performance.

This open space currently provides a positive visual break, contributing to the semi-rural character of the entrance and acting as a transition zone to the development. The proposal would disrupt this transition, creating a backland-style layout that fails to integrate the existing development with the street scene.

While the applicant references a chalet-style bungalow approved under H09-0371-18 and H09-0423-22, that dwelling is closer to the road and contributes positively to the street scene, acting as a visual bookend framing the entrance to Wignals Wood. In contrast, the new proposal would diminish views into the site and create a visually enclosed pocket of development that feels disconnected.

The proposed access, stepped back off Forest Way, would result in a staggered and incoherent building line along Wignals Gate. The entrance would lose its open character, and the development would appear disjointed and poorly integrated, with narrow access and limited landscaping. This would significantly reduce the positive views into the site, which currently help the existing development feel open and connected.