

Planning Statement

Land off Stephenson Avenue Pinchbeck Spalding PE11 3SW

Tawny Homes Ltd | H14-1286-25 | Eleven industrial units

13 October 2026 | Request for agreement to finished floor level 3.70 m OD

The request

TAC Architects asks South Holland District Council to agree a common minimum finished floor level of 3.70 m OD for both blocks under condition 7 of permission H14-1286-25. The request retains flood resilience to at least 4.50 m OD and is supported by the accompanying site-wide Flood Risk Assessment, measured AutoCAD sections and primary-source appendices. No alternative floor datum is offered.

The revised level provides a proportionate balance between passive flood protection and the safe, workable operation of eleven industrial units. It is 310 mm above the controlling recorded ground point within the eight-unit footprint and 420 mm above the highest recorded point in the three-unit footprint. Reducing the floor by 300 mm materially eases loading and pedestrian approaches while retaining the conditioned recovery provision. Those measurements give the Council a firmer basis for reassessment than a comparison of floor numbers alone.

The development principle, unit layout and commercial use remain the approved starting point. The applicant recognises that the changed mitigation needs its own supported judgement. This statement does not claim that another site's approval or the absence of sleeping accommodation removes the requirement to protect staff, visitors and delivery users.

1 Planning mechanism and scope

Permission was granted on 16 July 2026. Condition 7 requires floors at minimum 4.00 m OD and resilience to 4.50 m OD unless otherwise agreed in writing by the LPA. It also states that the approved plan does not give final approval of detailed site or finished-floor levels. That express wording provides the basis for seeking written agreement to the supported 3.70 m datum. [S02; FRA Appendix I]

The applicant asks the Council to confirm that mechanism and the necessary coordination with condition 2 approved drawings, including absolute roof levels, thresholds and external approaches. This submission also presents indicative surface-water arrangements for the condition 8 request. Agreement to the floor datum does not itself approve the drainage details or discharge condition 2.

A Section 73 application should be used if the Council determines it is required for the actual changes. This request does not assume that material changes can be approved informally or that a revised floor automatically qualifies as non-material. The preference is to use condition 7's written-agreement provision where legally and procedurally appropriate. [W03]

At the retained relative eaves/ridge dimensions of approximately 5.00 m and 6.41 m, corresponding levels from a 3.70 floor would be approximately 8.70 m and 10.11 m OD. Revised drawings must confirm the intended approved relationships. The measured sections dated 6 October 2026 retain their survey and geometry and are bound into the accompanying FRA.

2 A more complete evidence basis

The April 2026 FRA informed the permission. The present review benefits from material that allows the floor choice to be examined more specifically: the September GPS survey and native CAD, October EA Product 4, measured access sections, independently checked commercial decision records and verified warning-area coverage. This further evidence supports a more specific appraisal of the floor datum.

The earlier assessment did not demonstrate the floor's operational consequences with measured footprint/approach sections. Its strategic depth mapping also cannot be treated as a precise flood-water elevation at each unit without the corresponding model terrain and scenario information. The new FRA makes the measured-ground comparison, hydraulic interpretation and design assumptions explicit, and evaluates drainage and people safety separately.

The digital GPS survey is accepted. The controlling recorded ordinary ground height is 3.39 m OD at E525243.934 N324391.547 within the eight-unit outline; the three-unit recorded maximum is 3.28 m OD. No interpolated terrain or area-average ground

level is used. The external 3.52 m observation remains on the drawing and requires consideration in the relevant surrounding-ground/threshold coordination; it is not projected into a building footprint.

3.70 is the lowest instructed test value satisfying at least 300 mm above all recorded ordinary footprint ground observations. That is a transparent measured-ground result, not a claim that 310 mm is freeboard over floodwater. The floor should be set as a minimum datum with reliable construction checks; the nominal 10 mm margin above the local criterion at the critical point cannot be consumed by tolerance.

3 Why 3.70 better serves the approved industrial use

The floor affects the daily relationship between the units, loading aprons, parking and shared roadway. Industrial use requires level space for opening shutters, placing loads, manual pallet/trolley handling, forklift control, deliveries and pedestrian/disabled turning. Higher approach rises can consume manoeuvring and landing space and increase effort, rollback and traction risks. These effects are material to the design of a safe and accessible place.

The measured representative shutter approach has 8.031 m of graded run after allowing a 1.5 m top landing. Using the declared proposed circulation node at 3.30 m OD, a 3.70 floor gives approximately 4.98%, or 1:20.08. The conditioned 4.00 floor with the same node gives approximately 8.72%, or 1:11.47. The personnel route, after allowing lower, turn and upper level areas, gives approximately 1:21.05 at 3.70 and 1:12.03 at 4.00. [FRA section 7 and Appendices B C]

Those examples declare the external node and landings as design inputs. The relative grade improvement remains valid independently of the lower-node level for the same measured runs: 3.74 percentage points for vehicles and 3.56 for personnel. At 1:20, the 300 mm reduction saves 6 m of graded approach length before landings. This explains the practical benefit without claiming a fully approved civil or fleet-access design.

A 4.00 floor has not been described as impossible. It may require higher shared circulation, longer approaches or broader land raising, which in turn affects yard use, drainage and external flow paths. The 3.70 proposal reduces those pressures while retaining a measured floor rise and the 4.50 recovery standard. Final approach widths, turning, landings, vehicle separation, drainage and accessibility will be coordinated.

4 Flood protection and relevant Council practice

The October 2026 EA Product 4 says its defended modelled extents do not impact this site and identifies no tidal risk at this site. It separately directs residual hazard assessment to the SFRA. The new FRA respects that scope and retains the residual-

failure assessment; it does not use in-channel levels as local flood-water levels. [S01; FRA Appendix H]

The recorded local commercial E4 approach considers floors as high as practicable with at least 300 mm above ground, together with resilience and an adequate refuge or warning/evacuation approach where necessary. Current national policy still requires a safe lifetime outcome and no increased risk elsewhere. The national generic floor/refuge guidance is acknowledged in the FRA; the request is for a supported local commercial mitigation package, not a universal 300 mm exemption. [W01 W06 W10 W14]

Relevant primary Council decisions support that method. County Interiors H14-0836-25 binds an amended FRA and requires a 300 mm rise, with warning, water-entry recovery and raised services. H14-1252-18 combines a 300 mm floor condition with an approved warning/evacuation plan before occupation. H02-0493-19 binds an amended FRA that expressly addresses constrained ramps and infeasible upper refuge in single-storey premises through a management plan. Crowland H02-0925-24 records a revised operational case overcoming an EA objection.

Those cases support reasoned consideration of a combined practical solution. Their ground datums, hazards, warning times and route assumptions are not transferred. Other low-floor cases contain first-floor refuge or a different matrix cell. The same-site 2020 three-unit scheme used 3.50 m OD but is not claimed as a current lawful fallback. [FRA Appendix E]

5 An enforceable mitigation package

Harry Brown, owner of Tawny Homes, will retain the site freehold and remain responsible for the common areas, shared roadway, drainage maintenance and estate flood management. He is the designated flood-warning and site-management lead, coordinating closure, prevention of attendance and reopening. Deputy cover and binding occupier duties will be secured before occupation. The mitigation package below retains physical recovery measures and establishes continuing accountability. [S15]

Measure	Required provision
Finished floors	Minimum 3.70 m OD in both blocks, with datum/threshold verification and no construction tolerance that reduces the agreed minimum clearance.
Passive recovery	Retain resilience to at least 4.50 m OD, with services, finishes and structure designed for inundation and recovery. Review the extent against accepted design/residual information.
Access and drainage	Coordinated external levels, level loading/door landings, segregated accessible approaches, maintained drainage and safe exceedance. Condition 8 remains effective.

Measure	Required provision
People safety	Harry Brown as retained freeholder and designated warning/site-management lead, with deputy cover, binding duties for all eleven occupiers, early closure/access control and an LPA-accepted route and response-failure strategy.
Planning coordination	Written agreement under condition 7 and confirmation of the means to reconcile condition 2 drawings before implementation.

The published EA warning area Pinchbeck and the West of Spalding and alert area Lower Welland cover the registered site. That verified coverage supports the operational approach. It does not guarantee warning of every event or a minimum lead time. The strategy therefore leads with precautionary closure and prevention of attendance, rather than waiting for severe warning or visible water. [FRA Appendix F]

Before occupation Harry Brown must register the site with the Environment Agency's free flood warning service, formerly Floodline Warnings Direct. The deputy and each occupier's nominated manager must also register, with tested contacts and out-of-hours receipt. Harry must maintain review after tenant/personnel changes and monitor weather/local drainage because the service does not provide surface-water flood warnings. Prompt precautionary departure or prevention of attendance will follow the accepted early triggers. [S15 W30; FRA section 10 and Appendix F]

The safety strategy must address the full route/destination, slower users, winter darkness, warning and communications failure. No shared refuge is assumed from Unit 8's unverified mezzanine and no guaranteed rescue is relied upon. SHDC is asked to judge the viability of the strategy on proportionate evidence, reserving deputy/contact details, drills and installation checks to the appropriate implementation stage. If the failure case cannot be demonstrated safely, that matter must be resolved before reliance on the lower datum.

Drawing 26/714/PA/001, dated 8 October 2026, accompanies the condition 8 request and shows indicative surface-water collection with a proposed central-soakaway disposal option, separately from the dashed foul-drainage arrangement and labelled existing mains connection. It retains the existing surveyed ground points; finished yard levels, storage capacity and drainage performance are not established by that plan. Infiltration remains subject to BRE Digest 365 testing and seasonal groundwater checks. [S14; FRA section 6 and Appendix K]

The Council must be satisfied about full details of a lawful, viable disposal system before approving condition 8. Contributing areas, usable storage, pipe/invert levels, treatment, maintenance, traffic loading and safe exceedance must be reconciled with the floor/yard design. An alternative lawful outfall must be established if infiltration proves unsuitable. The indicative plan alone does not demonstrate full compliance,

and development beyond oversite must await the required drainage approval. The two requests can be considered together without treating approval of one as approval of the other.

6 Requested conclusion

The applicant asks SHDC to reassess the floor datum on the improved evidence and agree minimum 3.70 m OD in both blocks, retaining resilience to at least 4.50 m OD and the coordinated physical/operational measures in FRA . The measured clearance, reduced approach demands, retained recovery standard and relevant commercial practice provide a credible planning and design justification.

The request recognises that SHDC must be satisfied about the relevant ground reference, residual safety and drainage viability. It does not ask the Council to ignore missing information or accept an invented flood-water level. Existing strategic or authority information and an adequately demonstrated management solution may provide a proportionate basis; additional focused evidence should be identified only where needed to resolve a material question.

Written agreement under condition 7 is requested as the preferred route, with the necessary coordination of condition 2. The existing 4.00 condition remains operative until that agreement is obtained. The applicant seeks one clearly specified decision on 3.70 m OD and its accompanying mitigation, rather than an open-ended choice of alternative floors.

References

Source identifiers S01 to S15 and M01 to M18 are defined in Appendix A of the accompanying FRA. Web guidance was checked during 5 to 8 October 2026. Published records are cited by their own issue date; historic guidance is not described as current policy. Links below open the original source.

W01 Environment Agency Flood risk assessment Flood Zones 1 2 3 and 3b Floor levels and access and escape

W03 Planning practice guidance Flexible options for planning permissions Condition amendments and Section 73

W06 SFRA Appendix C Standing Advice Commercial row 4 and E4

W07 Approved Document M Volume 2 Approaches and ramp flights

W10 National Planning Policy Framework Chapter 18 Policies F4 F7 and F8; published 29 September 2026

W13 ADEPT and Environment Agency Flood risk emergency plans September 2019 guidance

W14 Adopted South East Lincolnshire Local Plan March 2019 Policies 3 and 4

W17 Health and Safety Executive Traffic routes Workplace gradients

W18 Health and Safety Executive Workplace transport safety HSG136 Slopes and loading operations

W19 Health and Safety Executive Pushing and pulling INDG478 Route and handling assessment

W26 Environment Agency Pinchbeck and the West of Spalding Published warning area 055FWTWELL4A

W27 Environment Agency Lower Welland Published alert area 055WAF135TLW

W30 Environment Agency Sign up for flood warnings www.gov.uk/get-flood-warnings