CLAYTON ARCHITECTURE LIMITED

Architectural Design | Interior Design | Planning Permission | Building Regulations

Clayton Architecture Limited

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15/04/2025

To South Holland District Council,

We write in response to the Environment Agency's consultation response dated 8 April 2025 (ref: AN/2025/136474/01-L01) regarding the application to remove Condition 5 from permission H18-0463-24. The condition currently restricts the basement level of the Bridge Hotel to non-habitable uses.

We respectfully submit this additional representation in support of our application and seek reconsideration of the objection in light of the points below.

**1. Historic and Functional Use of the Basement**

The basement level of the Bridge Hotel has historically supported habitable or semi-habitable uses, particularly during the building's operation as a hotel. Features such as large sash windows, cornicing, and ceiling rose provide visual and architectural evidence of this. Our proposal seeks to reinstate only **three rooms at basement level for habitable use**, limited to living space (e.g. lounge, home office), not sleeping accommodation.

This is not a speculative expansion of the building's use but rather a **restoration of existing, underused space**, enhancing efficiency and preserving the building's integrity.

Below is a photograph of the historical use of the basement, as mentioned above features of the room suggest its habitable use. It would not have been typical of the time to include features such as cornicing, ceiling rose or curtains in rooms that were not habitable.



*Figure 1 - Basement room labelled as 'store' on existing plans, shows that the room was previously habitable. Source - https://www.28dayslater.co.uk/threads/the-bridge-hotel-sutton-bridge-oct17.110420*

**2. Suitability for Habitable Use**

The basement:

- Provides **natural light and ventilation** through full-size windows;
- Has a **sufficient ceiling height** suitable for modern standards;
- Will be upgraded to meet all applicable **Building Regulations**, including fire safety, insulation, drainage, and ventilation.

These characteristics collectively support the use of the basement as quality living accommodation.

**3. Flood Risk and Mitigation**

We fully recognise the Environment Agency's flood hazard classification of the site ('Danger to All'), and we take these concerns seriously.

To ensure future safety and compliance, we propose the following mitigation and restrictions:

- No **bedrooms or sleeping accommodation** at basement level;
- Use of the basement limited to **non-essential daytime uses** such as a lounge, office, or games room;
- Implementation of **robust flood resilience measures**, including:
    - Raised electrical points and services;
    - Non-return valves on drainage;
    - Flood-resistant wall and floor materials;
    - Easily removable low-level joinery;
    - Installation of flood barriers and door guards;
    - A comprehensive **Flood Warning and Evacuation Plan**.

This approach is fully aligned with the **National Planning Policy Framework (NPPF)** and **Policy 4 of the South East Lincolnshire Local Plan**, which encourage **a risk-based, proportionate response**, not a blanket prohibition on development in flood risk zones.

**4. Policy Considerations**

***National Planning Policy Framework (NPPF)***

Paragraphs 159–169 promote a sequential, evidence-led approach to managing flood risk. Our proposal passes the **Exception Test** because:

1. It brings significant **sustainability benefits** by converting a vacant building and delivering high-quality homes in a sustainable location;
2. It can be made **safe for its lifetime** through appropriate adaptation.

This development does **not increase** or change the building footprint—only the internal arrangement—meaning **no additional pressure** is placed on emergency infrastructure.

***South East Lincolnshire Local Plan – Policy 4***

Policy 4 does not prevent development in flood risk areas but instead requires a demonstration of **resilience and safety**, particularly when dealing with existing buildings. This policy explicitly supports the **reuse of existing buildings** and promotes development within defined settlement boundaries such as Sutton Bridge.

Our proposal is fully capable of compliance.

**5. Local Precedent**

We believe the current application aligns with several previously approved developments within South Holland District where habitable accommodation at ground or lower ground levels—within high-risk flood zones—was considered acceptable subject to appropriate mitigation. This demonstrates a clear and consistent planning approach that supports our case:

**a. H18-0842-15 – Erection of 2 detached houses and garages – Church Street / Wharf Street**

- Approved: 2 detached houses and garages in Flood Zone 3.
- Key Detail: Ground-floor living spaces including kitchens, lounges, and WCs were permitted despite flood risk.
- Mitigation: Raised finished floor levels and flood resilient construction methods were secured via condition, however this is still below the flood risk level.
- Relevance: Demonstrates that full habitable accommodation has been supported in higher-risk areas, even for new dwellings.

**b. H18-1068-23 – Erection of dwelling and garage – Rear of 2 Wharf Street**

- Approved: Erection of dwelling and garage
- Key Detail: Ground floor retained as habitable space within Flood Zone 3.
- Mitigation: Finished floor level one meter above ground level.
- Relevance: Located in the same settlement as the Bridge Hotel, with comparable flood risk profile. Suggests inconsistency if basement use in our proposal is refused while this scheme proceeded without significant restriction.

**c. H18-1019-11 – Conversion of a care home into 12 flats – Sudeley House, Wharf Street**

- Approved: Residential conversion including ground-floor flats in an area subject to flood risk.
- Key Detail: All living spaces including bedrooms have been approved at ground floor level
- Mitigation: The number of bedrooms at ground floor level has been reduced based on the previous use of the building.
- Relevance: We are only proposing a secondary living space to be provided at basement level, at a similar FFL as this application has achieved. Whereas this application has all habitable space at a flood risk level, we only request additional living space.

These approvals show that the Council and Environment Agency have routinely accepted **habitable use at risk-prone levels** where risks were appropriately managed. There are several other recent proposals that support our case. Our proposal is **more conservative** than many of these, and supported by comparable or greater mitigation.

**6. Efficient Use and Sustainable Regeneration**

Preventing habitable use of the basement diminishes the **efficiency and viability** of the development. The proposal offers a **sustainable reuse** of an existing building and contributes to local housing provision without expanding footprint or density. It supports South Holland's housing strategy while preserving local heritage and character.

**Conclusion and Request**

In light of the following:

- The **historic and architectural use** of the basement;
- The **limited, non-bedroom function** proposed;
- The adoption of **comprehensive flood resilience measures**;
- The strong **policy compliance** with both national and local guidance; and
- The presence of clear **local precedent**—

—we respectfully request that Condition 5 be **removed or varied** to permit habitable use of specified rooms in the basement, subject to a condition excluding sleeping accommodation and requiring agreed flood mitigation.

We remain available to provide further supporting documentation or to discuss any concerns with the Council or the Environment Agency at your convenience.

Kind regards,

**Joseph Clayton** BA(int), MArch, ADPPA
Director / Architect
Clayton Architecture Limited