

**FAO: David Grant**  
South Holland District Council  
Planning & Development  
Council Offices Priory Road  
Spalding  
Lincolnshire  
PE11 2XE

**Our ref:** AN/2024/135649/01-L01  
**Your ref:** H18-0463-24  
**Date:** 20 June 2024

Dear David Grant

**Change of use from hotel Class C1 to residential Class C3 including the creating of 15 residential units  
Bridge Hotel, 4 Bridge Road, Sutton Bridge, Spalding, PE12 9UA**

Thank you for consulting us on the above application, on 31 May 2024.

**Environment Agency position**

As this development poses an unacceptable risk to life and property from flooding, we **object** to this application in accordance with Policy 4 of the South East Lincolnshire Local Plan 2011-2036 and recommend that planning permission is refused.

**Reasons**

The site lies within both Flood Zone 3a and 2, which is land defined by the planning practice guidance as having a high and medium probability of flooding. The site also has a future hazard classification of 'Danger to All' (includes the emergency services) and could experience flood depths of up to 1.6 metres arising from a breach in the defences during a flood that has a 0.1% chance of occurring in any one year up to 2115. Notwithstanding the mitigation measures proposed, the risk to life and property, from tidal/fluvial inundation would be unacceptable if the development were to be permitted.

The submitted drawing dated 20 May 2024, ref: '723-04-C', prepared by Clayton Architecture Limited proposes self-contained ground floor flats, below the predicted flood level, with kitchen/dining spaces proposed at the basement level. In accordance with Policy 4 of the South East Lincolnshire Local Plan 2011-2036, we do not consider the proposed self-contained ground floor residential accommodation to be appropriate due to the flood risk at this site.

In addition, the submitted flood risk assessment (FRA), dated 23 May 2024, ref: '4 Bridge Road, Sutton Bridge' does not comply with paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific FRA checklist. In particular, the FRA fails to adequately assess the impacts of climate change and does not propose adequate flood risk mitigation to keep people safe for the lifetime of

the development with an allowance for climate change, as required by Paragraph 006 of the planning practice guidance section on Flood Risk and Coastal Change.

The submitted FRA currently includes references to the present-day hazard maps, found in the South East Lincolnshire Strategic Flood Risk Assessment; however, in order to assess the flood risk over the lifetime of the development, the FRA should refer to the 2115 0.1% breach hazard maps to inform the proposed flood risk mitigation.

There is also a lack of information on the existing elevations and finished floor levels (FFL) at the site. The submitted drawing dated 26 April 2024, ref: 'Existing Elevations' appears to show that the basement is partially below the existing ground level, which suggests that the ground floor level might be elevated above the existing ground levels. Therefore, further clarification should be provided on the existing FFLs at the site to inform any further assessment of the flood risk. Levels should be provided in metres above Ordnance Datum.

### **Overcoming our objection**

To overcome our objection, the applicant should submit evidence to demonstrate that the proposal will not pose a risk to life and property as highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised information and we will respond within 21 days of re-consultation.

### **Notes on FRA**

We would like to point out that the submitted FRA states that the proposed development is retrospective, this appears to contradict the other submitted documents and it is our understanding that the development has not yet taken place. In addition, the hazard maps included in the FRA do not appear to show the 'Low Hazard' rating and the adjacent text refers to the Boston Borough Council hazard map; both these points should be amended in any updated FRA.

### **FRA sources of information**

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available. To request the hazard mapping for this site please email our local Customers and Engagement team at [lnenquiries@environment-agency.gov.uk](mailto:lnenquiries@environment-agency.gov.uk). There is no charge for this information.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, it is likely we will recommend the inclusion of a condition on any subsequent approval.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

**Danielle Maclean-Spencer**

**Sustainable Places Planning Advisor**

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