

[REDACTED]  
South Kesteven District Council  
Land Use Planning  
Council Offices  
The Picture House  
St Catherine's Road  
Grantham  
NG31 6TT

**Our ref:**  
AN/2020/130860/OT-02/SB1-L01

**Date:** 05 March 2026

Dear [REDACTED]

## **Barrowby Neighbourhood Plan Submission Consultation**

Thank you for consulting us on the Barrowby Neighbourhood Plan.

A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time.

To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and have provided guidance on any actions you need to undertake.

We aim to reduce flood risk, while protecting and enhancing the water environment. Our comments on this matter are therefore made solely from these points of view.

### **Environmental Constraints**

#### Flood risk

We encourage all proposed development to be outside of Flood Zone 2 and Flood Zone 3. However, if development must take place within the flood zones, then it should be in line with the National Planning Policy Framework to ensure there is no increase in flood risk to development and to others as a result of the development. The Plan should state the importance of mitigation measures and flood resilience and resistance measures for new development, including an allowance for climate change.

If Essential Infrastructure is necessary within Flood Zone 3 then the application must be referred to the Environment Agency together with a supporting Flood Risk Assessment, which demonstrates that the proposal will remain operational during a 0.1% event (2115 scenario) and that appropriate mitigation measures/flood resilient construction techniques have been incorporated into the development.

The Neighbourhood Plan should also consider all sources of flooding. Within the section titled 'Water and Flood Risk', the Plan currently shows no consideration of risk from surface water flooding. Similar to fluvial risk, the site is largely at low risk from surface water flooding, however, there are small regions within the designated Neighbourhood

**Environment Agency**

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Plan area which are susceptible to this type of flooding. Therefore, we advise the Plan incorporates a specific policy addressing development in areas vulnerable to surface water flooding

We would like to highlight that the Environment Agency is not the only consultee on flood risk and other Risk Management Authorities (RMAs) are also consulted to respond to planning applications, therefore the Plan should also note other RMAs. These include the Lead Local Flood Authority, Lincolnshire County Council who lead on surface water, ground water and ordinary watercourses and the Internal Drainage Board, which is Upper Witham IDB.

We note a main river runs through part of the Plan area, therefore under the Environmental Permitting (England and Wales) Regulations 2016 a permit or exemption must be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

#### Green infrastructure and biodiversity

We support the inclusion of Policy 7: Green Infrastructure, Local Green Spaces, and Biodiversity

#### Sustainable development (Policy 1)

We note criterion 2(D) of Policy 1 refers to the need of infrastructure to meet the community's need for sanitation.

The Water Recycling Centre (WRC) for the Plan area is Marston. The evidence available to us demonstrates that the Marston WRC is near its permitted limits. Additional flows from new developments could lead to the works causing pollution of the receiving watercourse. Anglian Water Services (AWS) is legally obliged to operate within permit limits and the Environment Agency will take all necessary action to ensure that the receiving watercourse is protected.

We also wish to highlight that the Plan does not seem to include a foul drainage strategy. The lack of a foul drainage strategy can lead to degradation of any surrounding Water Framework Directive waterbodies and as such we recommend that one is designed to best service the neighbourhood needs to deal with foul waters.

We therefore encourage the Council to consult with AWS about this as part of the Neighbourhood Planning process.

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

Yours sincerely  
**Hannah Kelly**

**Planning Adviser, BSc (Hons), MSc, MRTPI**

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