

FAO: Mark Niland
South Holland District Council
Planning & Development
Priory Road, Spalding
PE11 2XE

EA reference: PA-0012788/01

LPA reference: H02-0860-26

Date: 19 October 2026

Dear Mark

**Material change of use of land to use as a caravan site for residential purposes
- retrospective**

Wayside, James Road, Crowland, Spalding PE6 0AA

Thank you for consulting us on the above application, on 24 September 2026, and for allowing us additional time in which to respond.

Environment Agency position

We object to this application which does not currently comply with the National Planning Policy Framework (NPPF) and Policy 4 of the South East Lincolnshire Local Plan 2011-2036 in respect of flood risk and foul drainage, for the following reasons:

1. The development falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located
2. The development involves the use of non-mains foul drainage systems in circumstances where it may be reasonable for the development to be connected to a public sewer

Reason 1: Flood risk

We primarily object in principle to the development on flood risk grounds. NPPF Annex F classifies development types according to their vulnerability to flood risk. Annex F provides guidance on which developments are incompatible with certain Flood Zones. This site lies within Flood Zone 3a, which is land defined as having a high probability of flooding. The proposed residential caravans are classed as 'highly vulnerable' in accordance with the NPPF.

Table 3 of NPPF makes it clear that highly vulnerable development is not compatible with Flood Zone 3a and therefore should not be permitted. The application is also contrary to Policy 4 of the South East Lincolnshire Local Plan, which states *‘Caravans, mobile homes and park homes intended for permanent residential use will not be permitted in areas at risk of flooding.’*

In addition, the site has a future hazard classification of ‘Danger for Most’ (includes the general public) and could experience flood depths of 0.5 – 1.0m 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. The proposed development therefore poses an unacceptable risk to people from tidal flooding.

Reason 2: Foul drainage

Notwithstanding our in-principle flood risk objection, we also object to the proposed foul drainage. The submitted Flood Risk and Drainage Strategy dated 16 June 2026, ref: 0336023/JB/EKB, prepared Colliers Building Consultancy Limited outlines two options for foul drainage. The options include the use of a Package Treatment Plant (PTP) or PTP and cesspit.

Private sewage treatment facilities should only be used where it is not feasible for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems.

This objection is supported by the Planning Practice Guidance (PPG) for Water Supply, Wastewater and Water Quality (ref ID: 34-020-20140306) which advises that the first presumption must be to provide a system of foul drainage discharging into a public sewer. Only where, having taken into account the cost and/or practicability, it can be shown to the satisfaction of the LPA that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

The Building Regulations 2010 and Government Guidance contained within the PPG (paragraph 020 ID: 34-020-20140306) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Connection to a private sewer that drains to a public sewer
3. Package sewage treatment plant or septic tank
4. Cesspool

Overcoming our objection

Our primary objection is that the proposal is contrary to national and local policy, as outlined under Reason 1, and we would support the refusal of planning permission on these grounds.

In this event, we recommend that the applicant does not incur any further expense in addressing the point of our objection, outlined under Reason 2.

Please re-consult us on any amended plans submitted and we will respond within 21 days of receiving them.

Information for your Local Planning Authority- Sequential Test

As you will be aware, in accordance with Policy F5 of the National Planning Policy Framework, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding and the sequential test establishes if this is the case.

Where the sequential test has to be applied, it is for you as Local Planning Authority to determine an appropriate area of search and whether the test is passed.

Further advice on how to do this is found in Paragraphs 27 to 30 of the Government's Planning Practice Guidance on Flood Risk and Coastal Change [here](#).

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 conditions on any subsequent approval.

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

Yours sincerely

Danielle Maclean-Spencer
Sustainable Places Planning Advisor

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