

Mark Niland  
South Holland District Council  
Planning & Development  
Council Offices Priory Road  
Spalding  
Lincolnshire  
PE11 2XE

Our ref: AN/2025/136967/01-L01  
Your ref: H06-0768-25  
Date: 12 September 2025

Dear Mr Niland,

**Use of land to provide 16 additional mobile homes for gypsy & traveller use  
Green Acres Park, Ropers Gate, Gedney, Spalding, PE12 0GA**

Thank you for consulting us on the above application, on 22 August 2025.

We have reviewed the submitted information that is relevant to our remit and set out our position and comments below.

**Environment Agency position**

We object to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. The application is therefore contrary to the National Planning Policy Framework (NPPF) and planning practice guidance (PPG). We recommend that planning permission is refused on this basis.

**Reasons**

NPPF Annex 3 classifies development types according to their vulnerability to flood risk. PPG Table 2 provides guidance on which developments are incompatible with certain Flood Zones. This site lies within Flood Zone 3a, which is land defined by the PPG as having a high probability of flooding.

The proposed development is classed as highly vulnerable in accordance with Annex 3 of the NPPF. Table 2 of PPG makes it clear that this type of development is not compatible with this Flood Zone and therefore should not be permitted.

The proposed development is also contrary to Policy 4 of the South East Lincolnshire Local Plan 2011-2036, which states that permanent residential use of the caravans, mobile homes and park homes should not be permitted in areas at risk of flooding.

We note that in the planning officers report for the planning application H06-0969-24 that the officer refers to the site as "*low hazard on both the South Holland District present day and 2115 flood maps*". However, the site has a future hazard classification of 'Danger for Most' (includes the general public) and could experience flood depths of between 0.5 – 1.0m and 1.0m-1.6m (to the south of the site) 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.

Whilst we acknowledge that the site is an existing gypsy and traveller site, we do not consider that the development can be made safe and therefore additional mobile homes at the site would put an increased number of people at risk from flooding.

## **Advice to the Local Planning Authority**

### **Foul drainage**

The submitted application form states that a cesspit is proposed for the disposal of foul drainage. We would like to highlight that requirement H1 in Schedule 1 to the Building Regulations 2010 requires that cesspits should only be used as a last resort option. The Environment Agency do not support the use of a cesspool as a long-term solution in anything other than exceptional circumstances. This is due to cesspits presenting a considerable risk of causing pollution when poorly managed. There must be no discharge to the environment from cesspits and whilst they are sealed units used for the storage of untreated sewage, should there be any pollution occurrences, these can be difficult to monitor and correct.

Only when it can be demonstrated that connection to a foul sewer is impracticable, the installation and operation of a package treatment plant or septic tank is not possible, and a system is in place through planning to ensure and record the proper operation and maintenance of the cesspit- would we consider the proposed use of a cesspit acceptable.

Should you be minded to approve this application, we would recommend the inclusion of the following condition and informative:

### **Condition**

The development hereby permitted shall not be commenced until such time as a scheme to dispose of foul drainage has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

### **Reason**

To reduce the risk of pollution to the environment and controlled waters in accordance with paragraph 180 of the National Planning Policy Framework and Policy 4(g) of the South East Lincolnshire Local Plan 2011-2036.

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 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,

**Mr Christopher Hill**

Direct dial 02030 256340

Direct e-mail [LNPlanning@environment-agency.gov.uk](mailto:LNPlanning@environment-agency.gov.uk)