

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

EA reference: PA-0011443/01

LPA reference: H06-0819-26

Date: 23 September 2026

Dear Mark

Change of use of land to a residential caravan site comprising 4 Gypsy/Traveller pitches, each accommodating a static caravan/mobile home and a touring caravan, together with hardstanding, erection of 4 amenity buildings and improvement of existing access - retrospective Land south of Blazegate and West of Gedney Drain, Gedney, Spalding

Thank you for consulting us on the above application, on 03 September 2026.

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 Policy 4 of the South East Lincolnshire Local Plan 2011-2036. We recommend that planning permission is refused on this basis.

Reasons

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

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

In addition, as outlined in the submitted flood risk assessment, the site has a future hazard classification 'Danger for Most' (includes the general public) and could experience flood depths of 1.0 – 1.6m 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 flood risk mitigation measures, we consider that the development poses an unacceptable risk of flooding to people.

Whilst the flood risk assessment outlines there would be sufficient time to take precautionary actions in the event of a flood, our data indicates that the site would be inundated within 4-6 hours based on a breach at point 547208,329637. A breach in the defences can happen at any time and there is no guarantee that there would be sufficient time for warnings to be issued or for safe evacuation of the site during a breach.

Informatives

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](#).

Exception test

In accordance with Policy F6(1) of the National Planning Policy Framework, the proposed development is appropriate provided that the site meets the requirements of the exception test. Our comments on the proposals relate to part b) of the exception test which requires demonstration that the development will be safe for its lifetime, without increasing flood risk elsewhere. Your Authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk and whether the test has been passed overall.

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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