

**DECISION DELEGATED TO HEAD OF PLANNING**

**Application No:** H13-0980-25                      **Applicant:** Naylor Flowers  
**Proposal:** Extension to Agricultural Storage Shed  
**Location:** Common Road Moulton Seas End Spalding  
**Terminal Date:** 12th January 2026

**Planning Policies**

**South East Lincolnshire Local Plan - Adopted: March 2019**

01                      Spatial Strategy  
02                      Development Management  
03                      Design of New Development  
04                      Approach to Flood Risk  
28                      The Natural Environment  
30                      Pollution  
31                      Climate Change and Renewable and Low Carbon Energy  
36                      Vehicle and Cycle Parking

**National Guidance**

**National Planning Policy Framework December 2024**

Section 2 - Achieving sustainable development  
Section 4 - Decision-Making  
Section 9 - Promoting sustainable transport  
Section 12 - Achieving well-designed places  
Section 14 - Meeting the challenge of climate change, flooding and coastal change  
Section 15 - Conserving and enhancing the natural environment

**Representations:**

|   | <b>Object</b> | <b>Support</b> | <b>No Obj.</b> | <b>Comments</b> |
|---|---------------|----------------|----------------|-----------------|
| PARISH COUNCIL                              | 0             | 0              | 0              | 0               |
| WARD MEMBER                                 | 0             | 0              | 0              | 0               |
| HIGHWAYS & SUDS<br>SUPPORT                  | 0             | 0              | 0              | 1               |
| SOUTH HOLLAND<br>INTERNAL DRAINAGE<br>BOARD | 0             | 0              | 0              | 1               |

|                        |   |   |   |   |
|------------------------|---|---|---|---|
| SHDC INTERNAL          | 0 | 0 | 1 | 0 |
| OTHER STATUTORY BODIES | 0 | 0 | 0 | 3 |

## CASE OFFICER ASSESSMENT

### **Proposal**

This is a full planning application for an extension to an Agricultural Storage Shed.

The proposed building is to be located to the west (rear) of the site located adjacent to large existing buildings associated with site operations. The new building will be constructed over existing hardstanding area and there are no changes to the existing access arrangement.

### **Site Description**

The site comprises land at Naylor's Flowers, to the east of Common Road, approximately 1km north of Moulton Seas End. The site features an existing car park and machinery storage area which is part of the wider Naylor's Flowers site, within which there is a flower packaging facility.

The site is located outside any defined settlement limits as identified within the South East Lincolnshire Local Plan (2019). The site is therefore within the countryside in planning policy terms.

### **History**

H13-0941-11 - Proposed agricultural implement store and associated lagoon.  
24-02-12

H13-0682-11 - Photovoltaic panels on roofs of outbuildings. Approved 01-11-11

H13-1097-13 - Erection of a building extension for storage and grading of agricultural produce.  
Approved 30-04-14

H13-0560-14 - Erection of extension to house lorry docking bay, electrical generator, transformer and new electricity supply and associated works. Approved 01-09-14

H13-0961-24 - Proposed New Access, Extension to Parking Area & Erection of 1.8m Close Board Fencing. Approved 21-01-25

### **Consultation Responses**

#### Anglian Water

We have reviewed the submitted application and Flood Risk Assessment and the developer is not proposing to connect to Anglian Water network therefore this planning application is outside of our jurisdiction to make comments

#### IDB

I note within the Flood Risk Assessment (ELLINGHAM CONSULTING LTD, September 2025) that surface water from the proposed development will be discharge to the existing lagoon. I also note within the Biodiversity Net Gain Statement 4325-24 (GR Merchant, October 2025) that the extension to the storage building will be constructed over existing hardstanding area and therefore no new impermeable area will be created as part of this application. We therefore recommend that you satisfy yourselves that the existing lagoon is sized appropriately and in good condition. If for any reason the applicant proposes to discharge surface water to a watercourse, either directly from the new extension or from the existing lagoon, then consent would be required under Byelaw 3.

#### Highways & SuDs

No objection - This proposal is for an Extension to agricultural storage shed and there is no change in parking or access arrangements. As Lead Local Flood Authority, Lincolnshire County Council is required to provide a statutory planning consultation response regarding Drainage on all Major Applications. The new building will be constructed over existing hardstanding area and therefore, no new impermeable area will be created. Surface water from the proposal will discharge to the existing lagoon which is used for irrigation purposes. Although the development site is within a flood zone 3 (high probability) it is not at risk of surface water flooding. Therefore the Lead Local Flood Authority does not consider that this proposal would increase flood risk in the immediate vicinity of the site.

No Objections - Having given due regard to the appropriate local and national planning policy guidance (in particular the National Planning Policy Framework), Lincolnshire County Council (as Highway Authority and Lead Local Flood Authority) has concluded that the proposed development would not be expected to have an unacceptable impact upon highway safety or a severe residual cumulative impact upon the local highway network or increase surface water flood risk and therefore does not wish to object to this planning application.

#### Lincolnshire Wildlife Trust

Thank you for inviting comment from Lincolnshire Wildlife Trust on this application. Our conservation officers have reviewed the referenced development against a series of strategic conservation and ecological criteria. In review of the variation documents presented, The Trust has no substantive comments or recommendations on the proposal.

#### Historic Places Team

Having reviewed the application documents and the updated available Historic Environment information for this application, the proposal is unlikely to have an impact on significant archaeological remains. Consequently, no further archaeological input is necessary for this application. It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request

#### Environmental Protection

No comments

#### **Representations**

This application was advertised in accordance with the Development Management Procedure Order 2025 as amended. No representation has been received.

#### **Planning Considerations**

##### **Evaluation**

Section 38 (6) of the Planning and Compulsory Purchase Act 2004, as amended, requires that the Local Planning Authority makes decisions in accordance with the adopted Development Plan, unless material considerations indicate otherwise.

In this case, the adopted South East Lincolnshire Local Plan 2011-2036, adopted March 2019, forms the development plan for the District, and is the basis for decision making in South Holland. The relevant development plan policies are detailed within the report above .

The policies and provisions set out in the National Planning Policy Framework (updated December 2024) are also a material consideration in the determination of planning applications, alongside adopted Supplementary Planning Documents. Furthermore, where a Neighbourhood Plan has been adopted, this alongside the adopted Local Plan, forms part of the Development Plan for the District, and must be considered when assessing development proposals.

In this instance, no relevant neighbourhood plans have been adopted.

#### **Assessment**

The main issues and considerations in this case include the following:

- Principle of Development;
- Character & Landscape;
- Environmental Issues/Amenity;
- Flood Risk & Drainage
- Highway Safety and Parking;
- Biodiversity;
- Planning Balance

#### Principle of Development

The South East Lincolnshire Local Plan (2019) sets out the settlement hierarchy in respect of delivering sustainable development that meets the social and economic needs of the area whilst protecting and enhancing the environment; in order to provide enough choice of land for housing to satisfy local housing need, whilst making more sustainable use of land and to minimise the loss of high-quality agricultural land by developing in sustainable locations and at appropriate densities.

Policy 1 of the South East Lincolnshire Local Plan (2019) sets out a spatial strategy for delivering sustainable development across South East Lincolnshire to 2036. Policy 1 (Spatial Strategy) expresses this sustainable framework of settlements, ranking the settlements deemed to be most sustainable in descending order.

The most sustainable locations for development are situated within the 'Sub-Regional Centres', followed by 'Main Service Centres'. Lower down the hierarchy in respect of sustainable development are areas of limited development opportunity including 'Minor Service Centres', with areas of development constraint comprising 'Other Service Centres and Settlements'. The countryside is at the bottom of the settlement hierarchy and represents the least sustainable location.

Part D of SELLP Policy 1 sets out permitted development types within the open countryside. It states that The rest of the Local Plan area outside the defined settlement boundaries of the Sub-Regional Centres, Main Service Centres, Minor Service Centre and Other Service Centres and Settlements is designated as Countryside. In the Countryside development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits.

Within the reasoned justification (under para. 3.2.15) it states that "Agriculture and forestry are clearly uses which must function in the Countryside but other uses which may diversify from agriculture and forestry, e.g. recreation and tourism, can meet the broad sustainable objectives of the Local Plan."

The proposal is for an agricultural store unit, which the applicant expands upon will be used for bulb storage in the summer and machinery storage in the winter. It is sited within the confines of an existing (albeit industrial scale) agricultural operation, and on previously developed land.

The proposal is therefore in accordance with Policy 1 of the South East Lincolnshire Local Plan and acceptable in Principle.

#### Character & Landscape

Policy 2 of the SELLP states that design which is inappropriate to the local area, or which fails to maximise opportunities for improving the character and quality of an area, will not be acceptable. Policy 2 point 1 states that proposals should meet sustainable development considerations specifically in relation to "size, scale, layout, density and impact on the amenity, trees, character and appearance of the area and the relationship to existing development and land uses."

Policy 3 sets out the 'Design of New Development'; in part it states that "Design which is inappropriate to the local area, or which fails to maximise opportunities for improving the character and quality of an area, will not be acceptable."

NPPF Paragraph 187(b) is relevant; it states that planning policies and decisions should contribute to and enhance the natural and local environment by "recognising the intrinsic character and beauty

of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland."

The proposed store would stand at 11.3m to the ridge and 8m to the eaves, commensurate with the existing chill store it would attach to and it has a total floor space of circa 1338 sqm.

Whilst the proposed building is large, it is located (adjoining) existing large agricultural buildings. The proposal would be read against these existing operations and would form a cluster of development. The wider impacts are therefore mitigated by the presence of the existing form associated with the application site and views looking (eastwards) from the west would read the proposal against the backdrop of an already established agricultural operation. Views from common road would be diluted due to the presence of existing buildings.

The application form states that materials are to match, however there are a number of buildings within the broader planning unit and the details therefore do not provide sufficient clarity. On this basis material will need to be agreed and are controlled through planning condition.

On this basis, the proposal is considered to accord with the aims and requirements of SELLP Policies 2 and 3, as well as the environmental protection objectives set out in NPPF Paragraph 187(b).

#### Environmental Issues/Amenity

Paragraph 135f of the National Planning Policy Framework (2024) states that development should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Policy 2 and of South East Lincolnshire Local Plan (2019) sets out that residential amenity and the relationship to existing development and land uses is a main consideration when making planning decisions.

Policy 30 is concerned with pollution and places impacts in relation to noise, disturbance and air quality as important consideration when considering proposals for planning.

In terms of its built form the impact from the development would fall upon the application themselves, with neighbouring land uses located at a sufficient distance not to be unacceptably burdened by the proposed development. Operationally the proposal is for a storage use and would give rise to limited impacts.

Therefore, subject to the aforementioned mitigation the proposal would accord with SELLP Policies 2, 30 and NPPF paragraph 135f.

#### Flood Risk & Drainage

Section 14 of the NPPF sets out guidance relating to how local authorities should assess and determine applications which are subject to flood risk concerns. The site lies within Flood Zone 3 of the Environment Agency's Flood Maps.

The South East Lincolnshire Strategic Flood Risk Assessment (SFRA) provides an overview of how flood risk has been considered in shaping the proposals of the Local Plan; including the spatial strategy and the assessment of housing and employment sites. Policy 4 of the Local Plan allows for certain types of development within Flood Zones 2 and 3 where specific criteria is met. Within the SFRA, areas of South Holland are categorised according to a hazard rating. The site is located within a 'Danger to SOME' area.

Annexe 3 Flood risk vulnerability classification associates land and buildings used for agriculture and forestry as 'Less Vulnerable'. NPPF Paragraph 175, as well as SELLP Policy 4, requires in such locations that a sequential test is carried out. Planning Practice Guidance (Paragraph 27, Flood Risk & Coastal Change) , offers a recent instruction stating that:

*In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures*

*would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.*

The proposal, requires this location as it forms an ancillary addition to the existing operation, therefore such a location is required and it would not be feasible to site the store elsewhere. The use of the building is also considered to be 'less vulnerable' and in line with **Table 2: Flood risk vulnerability and flood zone 'incompatibility'** the exception test is not required.

In terms of drainage, the land, that the store will be located upon is currently impermeable, hard standing, and therefore no additional surface water would be generated. That said, the existing strategy is to direct to the on site lagoon (used for irrigation purposes) and this will be the case for the capture of water from this building. This is considered acceptable and would require no additional conditions.

The LLFA, Anglian Water and the IDB have all made comment and have no objections. The proposal would comply with Section 14 of the NPPF and Policy 4 of the South East Lincolnshire Local Plan as well as Paragraph 27, Flood Risk & Coastal Change of Planning Practice Guidance.

### Highway Safety and Parking

SELLLP Policy 2 details that proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to access and vehicle generation.

SELLLP Policy 3 details that development proposals will demonstrate how accessibility by a choice of travel modes including the provision of public transport, public rights of way and cycle ways will be secured, where they are relevant to the proposal.

SELLLP Policy 36 is concerned with Vehicle and Cycle Parking; it states that "All new development, including change of use, should provide vehicle and cycle parking in accordance with the minimum Parking Standards adopted by the Local Planning Authorities (in Appendix 6)."

The applicant does not intend to make any changes to the existing access arrangement or parking provision on site. The proposal which is for storage is confirmed not to generate additional staff. The Highway Authority have been consulted and have stated that "Having given due regard to the appropriate local and national planning policy guidance (in particular the National Planning Policy Framework), Lincolnshire County Council (as Highway Authority and Lead Local Flood Authority) has concluded that the proposed development would not be expected to have an unacceptable impact upon highway safety or a severe residual cumulative impact upon the local highway network"

The development is therefore considered acceptable in highway terms and compliant with SELLLP Policies 2, 3 and 36.

### Biodiversity

Policies 28 and 31 of the Local Plan ensure the preservation and enhancement of the natural environment and that suitable mitigation and adaptation to the climate crisis is in place.

Policy 28 also requires proposals to provide a net gain in biodiversity. Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) introduced the requirement for applications to establish a 10% Biodiversity Net Gain (BNG), demonstrated through standard units.

Section 15 of the NPPF promotes the conservation and enhancement of the natural environment. Paragraphs 187 and 192 ensure sites of biodiversity value are protected through the planning system.

The applicant has provided a BNG exemption statement which states that "After taking advice from a local Ecology Consultant this application to erect an extension to the storage building over the existing hardstanding area will not affect any current biodiversity on the site."

From site visit it is evident that the application site forms a hard standing (hardcore). Planning Practice Guidance (Paragraph 004 (Bio-diversity net gain) expands upon what the minimum exemption is, and how LPA can view such applications. Ideally a matrix should have been provided

to quantify that there is no impact upon habitats. However the PPG offers scenario testing, Scenario 1 relates to 'A development solely on a sealed surface', the following points are given to support a de minimis exemption:

- the development does not impact on any onsite priority habitat;
- the car park ] would be classified as developed land: sealed surface which has a biodiversity value of zero under the statutory biodiversity metric; and
- there are no other onsite habitats.

Therefore, the LPA are in agreement that due to the siting of the structure on a compacted hardcore, there would be no requirement to provide BNG. Overall, the proposal is considered to accord with the relevant provisions of SELLP Policy 28 as well as Section 15 of the NPPF.

## **Planning Balance**

As detailed above, Section 38 (6) of the Planning and Compulsory Purchase Act 2004, as amended, requires that the Local Planning Authority makes decisions in accordance with the adopted Development Plan, unless material considerations indicate otherwise.

As set out in the assessment above, the proposed extension comprises an operationally-related agricultural storage building within the established confines of a long-standing agricultural enterprise. The development is located on previously developed hardstanding and is functionally linked to existing agricultural operations on the wider site. In land-use terms, the proposal accords with Policy 1 of the South East Lincolnshire Local Plan, which supports essential countryside-based agricultural development.

The scale and form of the extension would read as part of the existing cluster of large buildings and would not materially erode the character or openness of the surrounding landscape. The design approach is consistent with Policies 2 and 3, and the impacts upon amenity are limited, given the separation to neighbouring uses and the operational nature of the proposal. Matters relating to flood risk have been appropriately addressed in accordance with NPPF Section 14 and Policy 4, with the less-vulnerable classification of the use and the site-specific FRA demonstrating that the proposal can be safely accommodated without increasing flood risk elsewhere.

Highway and drainage consultees raise no concerns, and the development would not generate additional traffic or require revisions to the existing access. The biodiversity position is acceptable, with the proposal falling within the circumstances of a de minimis exemption due to its siting entirely on sealed surface. Accordingly, no conflict arises with Policies 28 or 31.

Taking the above into account, the proposal is considered to comply with the relevant provisions of the Development Plan when read as a whole. No material considerations have been identified that would weigh against the proposed development.

On this basis, the proposal represents an acceptable form of development, and permission can be supported subject to appropriate conditions.

## **Additional Considerations**

### Public Sector Equality Duty

In making this decision the Authority must have regard to the public sector equality duty (PSED) under s.149 of the Equalities Act. This means that the Council must have due regard to the need (in discharging its functions) to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and those who do not. This may include removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the special needs of those with a protected characteristic; encouraging participation in public life (or other areas where they are underrepresented) of people with a protected characteristic(s).
- Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

The protected characteristics are age, disability, gender reassignment, pregnancy and maternity,

race, religion or belief, sex and sexual orientation.

The PSED must be considered as a relevant factor in making this decision but does not impose a duty to achieve the outcomes in s.149. It is only one factor that needs to be considered, and may be balanced against other relevant factors.

It is not considered that the recommendation in this case will have a disproportionately adverse impact on a protected characteristic.

### Human Rights

In making a decision, the Authority should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as South Holland District Council to act in a manner that is incompatible with the European Convention on Human Rights. The Authority is referred specifically to Article 8 (right to respect for private and family life) and Article 1 of the First Protocol (protection of property).

It is not considered that the recommendation in this case interferes with local residents' right to respect for their private and family life, home and correspondence, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general public interest and the recommendation is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

### **Conclusion**

Taking the above considerations into account, the proposal therefore accords with SELLP Policies 1, 2, 3, 4, 28, 30, 31 and 36 of the South East Lincolnshire Local Plan (2019), along with the identified sections contained within the National Planning Policy Framework (December 2024).