

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

Reference: PA-0004135/01
Customer reference: H14-0391-26
29 May 2026

LNG Station for the refuelling of trucks

Land Off Bervor Close Wardentree Park Spalding South Holland District PE11 3ZN

Dear Mark

Thank you for consulting us on the above application, on 11 May 2026.

Environment Agency position

The application by Gasrec Ltd is for a new Hazardous Substances consent for the site at Land Off Bervor Close Spalding (NGR TF256253).

The site is not currently regulated by the Environment Agency.

The site would be regulated by the Environment Agency as a lower tier COMAH site.

There is no reason to believe the operator will not comply with their duties.

The operator will need to notify the establishment in line with the COMAH regulations. See [COMAH Notifications - HSE](#)

However, the site lies within Flood Zone 3, which is land defined by the planning practice guidance as having a high probability of flooding.

Many sites with hazardous substances consent are at risk of flooding and the COMAH competent authority has a guide which sets out how to inspect such risks
See: [COMAH CA Operational Delivery Guide: Flood Preparedness Inspection](#)

However, these are existing sites and the best way of dealing with any flood risk is to eliminate it by not locating new sites in areas at risk of flooding.

The applicant has not submitted any documentation to explain how they are managing the risk of Major Accident resulting from flooding, so it is not possible to say if they are controlling the risk appropriately.

On this basis, **we object** to the application as submitted.

We note that the applicant states in their application: 'The location of the proposed refuelling station is within Flood Zone 3 according to the gov.uk flood map for planning. Flooding has, therefore, been considered within the planning application and the design of the site.'

Notwithstanding there may be a forthcoming planning application, the submitted documentation does not provide suitable consideration for the hazardous substance consent applied for.

Overcoming our objection

The objection would be withdrawn if the applicant can show that:

- i) The development cannot reasonably be located outside of an area at risk of flooding or that the benefit of the development location out ways the risks associated with the site.

and

- ii) The risk posed by the development with respect to initiation of Major Accident(s) by flooding will be managed to the standards expected by Regulation 5 of [The Control of Major Accident Hazards Regulations 2015](#)

We are happy to hold discussion with the applicant to explain our position and provide advice on how our concerns could be alleviated.

Yours sincerely

Tim Somers
Planning Advisor
LNplanning@environment-agency.gov.uk
Ceres House, Searby Road, Lincoln, LN2 4DW