OBJECTION

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

Our ref: AN/2010/109262/01-L01

Your ref: H18-0113-10

Date: 09 April 2010

PLANNING & DEVELOPMENT
- 9 APR 2010

FAO: Gill Dewhurst

Dear Madam

Change of use of land to touring caravan site (5 caravans)
Riverside Lodge Garners Lane, Sutton Bridge, Spalding, PE12 9YP.

Thank you for referring the above application, which was received on 25 February 2010 and agreeing to an extension of time.

Environment Agency position
We OBJECT to this application because the proposed development, falls into a flood risk vulnerability category, that is inappropriate to the Flood Zone in which the application site is located.

Reasons
Planning Policy Statement 25 (PPS25) classifies development types according to their vulnerability to flood risk and gives guidance on which developments are appropriate in each Flood Zone. PPS25 requires decision-makers to ensure that development sites are appropriate to the type of development or land use proposed.

In this case, the application site lies within Flood Zone 3a defined by PPS25 as having a high probability of flooding. The development type in the proposed application is classified as highly vulnerable in accordance with table D.2 of PPS25. Tables D.1 and D.3 of PPS25 make clear that this type of development is not compatible with this Flood Zone and should not therefore be permitted.

We note that the proposed development is for holiday caravans but it is intended that the site will be open for use all year round. Paragraph D19 of PPS25 states that "Caravan or park-home sites intended for permanent occupation are regarded as 'highly vulnerable'. The instability of such structures places their occupants at special risk and they are likely to be occupied during periods when flood risk is likely to be higher."

We therefore consider that the proposed development is highly vulnerable as no occupancy restriction is proposed during periods when flood risk is likely to be higher.

Please note that even with an occupancy restriction the proposed development would be classed as 'more vulnerable' and would need to be accompanied by a Flood Risk Assessment (FRA) which demonstrates that the site is safe. The occupancy restriction imposed would have to be in line with that recommended in Policy 5a of the Revised Draft East Midlands Regional Plan (Partial Review) March 2010 which states that "new sites or extensions to existing sites for holiday or short-let caravans and camping or other temporary occupancy may be permitted for use only between 1 May and 30 September on an exceptional basis, subject to the mitigation of flood risk through flood resilient design, emergency planning and evacuation procedures." A site specific FRA will be needed to provide this detail.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact Chris Hayes on the number below.

Yours faithfully

Richard Kisby
Team Leader Planning Liaison

Direct dial 01522 785827
Direct fax 01522 512927
Direct e-mail Chris.hayes@environment-agency.gov.uk

End