

**Our ref:** 26\_36628\_P

24/09/2026

**Your ref:** H06-0819-26**Site Location:** Land south of Blazegate and West of Gedney Drain Gedney Spalding**Summary of Proposal:** 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

Dear Mark Niland,

Thank you for your consultation on the above application.

The site is within the Internal Drainage District (IDD) of the South Holland Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents.

The Board's Officers have reviewed the documents submitted in support of the above planning application. Officers have noted works which require Land Drainage Consent from the Board as outlined in the table below and detailed overleaf.

The proposed works are unlikely to be acceptable to the Board (in accordance with the policies outlined within the WMA's [Development and Consent](#) pages on our [website](#)). Resultantly, the Board **currently objects to this planning application**. The reason for the Board's objection is to avoid likely conflict between the planning process and the Board's regulatory regime (as outlined below) and to prevent increased flood risk in accordance with National Planning Policy Framework.

The Board will consider the proposals in detail on receipt of an application for Land Drainage Consent. The annexe at the end of this letter outlines the Board's regulatory function and how to apply for Land Drainage Consent.

Duncan Worth (Chairman)

Simon Bartlett (Vice-Chairman)

Marcus Coleman (Chief Executive)

Constituted by The Anglian Water Authority (South Holland Internal Drainage District) Order 1974,  
Statutory Instrument 1974 No.1209. Reconstituted in 1993. Statutory Instrument 1993 No.453.[www.wlma.org.uk](http://www.wlma.org.uk)

| Byelaw / Section of Act            | Description                                                         | Requirement                    |
|------------------------------------|---------------------------------------------------------------------|--------------------------------|
| Byelaw 3                           | Discharge of water to a watercourse (treated foul or surface water) | Consent may be required        |
| Section 23, Land Drainage Act 1991 | Alteration of a watercourse                                         | Consent not currently required |
| Byelaw 10                          | Works within 9 metres of a Board arterial watercourse               | <b>Objection</b>               |

### Byelaw 3 (Surface Water)

Within the application form, the applicant has proposed to dispose of surface water via a sustainable drainage system however I cannot see that the applicant has detailed what the system consists of. We recommend a clear drainage strategy is provided for the site. If the applicant proposes to discharge surface water to a watercourse, consent would be required under Byelaw 3.

The Board recommend that any discharge is in line with the [National standards for sustainable drainage systems \(SuDS\)](#) published in June 2025. Further to the National Standards for SuDS, the Board's policy is to restrict discharges to 2/l/s/ha or annual average flood flow rate (QBar or QMed), whichever is higher.

Please note that any consent granted for the discharge of surface water is likely to be subject to a Surface Water Development Contribution fee (SWDC) as outlined within our [Development Control Charges and Fees](#).

### Byelaw 3 (Treated Foul Water)

We note that the applicant intends to treat foul waste using a package treatment plant, however we cannot see that the applicant has indicated how they intend to dispose of the foul water from this development once it has been treated. If the applicant proposes to discharge treated foul water to a watercourse, consent would be required under Byelaw 3. Please note that any consent granted for the discharge of treated foul water is likely to be subject to a Treated Foul Water Development Contribution fee (TFWDC) as outlined within our [Development Control Charges and Fees](#).

### Section 23, Land Drainage Act 1991

I note the presence of a watercourse which is not maintained by the Board (a riparian watercourse) adjacent to the northern site boundary. Whilst not currently proposed, should the applicant's proposals change to include works to alter the riparian watercourse, or if works are proposed to alter the watercourse at any time in the future, consent would be required under the Land Drainage Act 1991 (and byelaw 4).

We note the presence of a Board **owned** arterial watercourse known as K09 Gedney (DRN201G0902) adjacent to the eastern site boundary. Whilst not currently proposed, should the applicant's proposals change to include works to alter the watercourse, or if works are proposed to alter the watercourse at any time in the future, consent would be required under the Land Drainage Act 1991 (and byelaw 4).

The Board recommends that adequate space (5 metres) is left flat and free from obstruction adjacent to the riparian watercourse in order to enable maintenance by future riparian owners or a designated maintenance company/contractor.

**Byelaw 10**

I note within the drawing 'Site Layout Plan PBA 02' (Philip Brown Associates Limited, September 2026) that the applicant intends to erect a new permanent fence line and hardstanding within 9 metres of the aforementioned Board owned arterial watercourse.

This proposal is not acceptable under the Board's [policies](#) due to the impact on the Board's ability to carry out future operations while also likely increasing the liabilities of the Board, therefore the Board **objects** to this proposal.

However, we would welcome a meeting with the applicant to discuss an alternative design which facilitates both the Board's requirements and the applicant's site design. Please could you contact us using the details at the top of the letter so that we can arrange mutually acceptable date and time.

**Please see the supplementary information overleaf for further detail on the Board's policy and consenting process.**

If, following review of our comments and supporting policy documents linked below, you wish to discuss any of the requirements I have raised, please contact the Board using the details at the head of this letter.

Yours sincerely,

Rachael

Rachael Mason  
Senior Sustainable Development Officer  
Water Management Alliance

## How to Apply for Land Drainage Consent

To apply for Land Drainage Consent please complete an application form.

Application forms, application fees and 'Frequently Asked Questions' can be found on the 'Development & Consent' section of the Board's website, here: <https://wlma.org.uk/development-consent/>

For any additional help please call us on 01553 819600 or email [planning@wlma.org.uk](mailto:planning@wlma.org.uk)

## Byelaws

A copy of the IDB Byelaws can be found via the following link:

<https://wlma.org.uk/development-consent/byelaws/>

## Mapping

Mapping of the district can be viewed via the following link: <https://wlma.org.uk/mapping/>

## Further Guidance

The Board's webpages seeks to provide:

- Guidance on how (and why) the Board will review and comment on planning applications.
- Information on the policies against which the Board will assess and determine applications.
- Guidance to riparian (waterside) landowners regarding watercourse maintenance.

Please see the Development and Consent pages on the Board's website via the following link:

<https://wlma.org.uk/development-consent/>

## Arterial Watercourses

Maps on the Board's website show which watercourses are designated as Arterial Watercourses by the Board. You may also have heard these watercourses referred to as 'Main Drains' or 'Maintained Watercourses'. The designation is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the WMB using the Board's Permissive Powers. Although the Board opts to proactively maintain this arterial network, there is no change in the ownership or liability associated with the watercourse resulting from this designation.

## Why we have commented on this planning application:

By engaging with the planning process the Board is seeking to:

- Reduce flood risk to communities within the Internal Drainage District
- Promote sustainable development in sustainable locations by supporting sound planning decisions in accordance with the National Planning Policy Framework (especially [Paragraph 181](#)) and the [National standards for sustainable drainage systems \(SuDS\)](#)
- Reduce the potential for conflict between the planning process and the Board's regulatory process.

For further information please refer to the Board's webpages: <https://wlma.org.uk/development-consent/>