

Sibley, Sally

From: Chance, Jennifer
Sent: 13 March 2026 09:33
To: _planningadvice
Subject: FW: H09-0442-25 - Land off Battlefields Lane South Holbeach Spalding PE12 7PG

Dear Planning advice

Could the email below be uploaded to Ocella as an additional consultation response please?

It can be public.

Kind regards

Jen

From: Planning Department <planning@wlma.org.uk>
Sent: 27 February 2026 11:03
To: Chance, Jennifer <Jennifer.Chance@sholland.gov.uk>
Subject: RE: H09-0442-25 - Land off Battlefields Lane South Holbeach Spalding PE12 7PG

Good morning Jennifer,

Thank you for your email. [REDACTED] Having reviewed the application, and James' email below, I have the following comments to make:

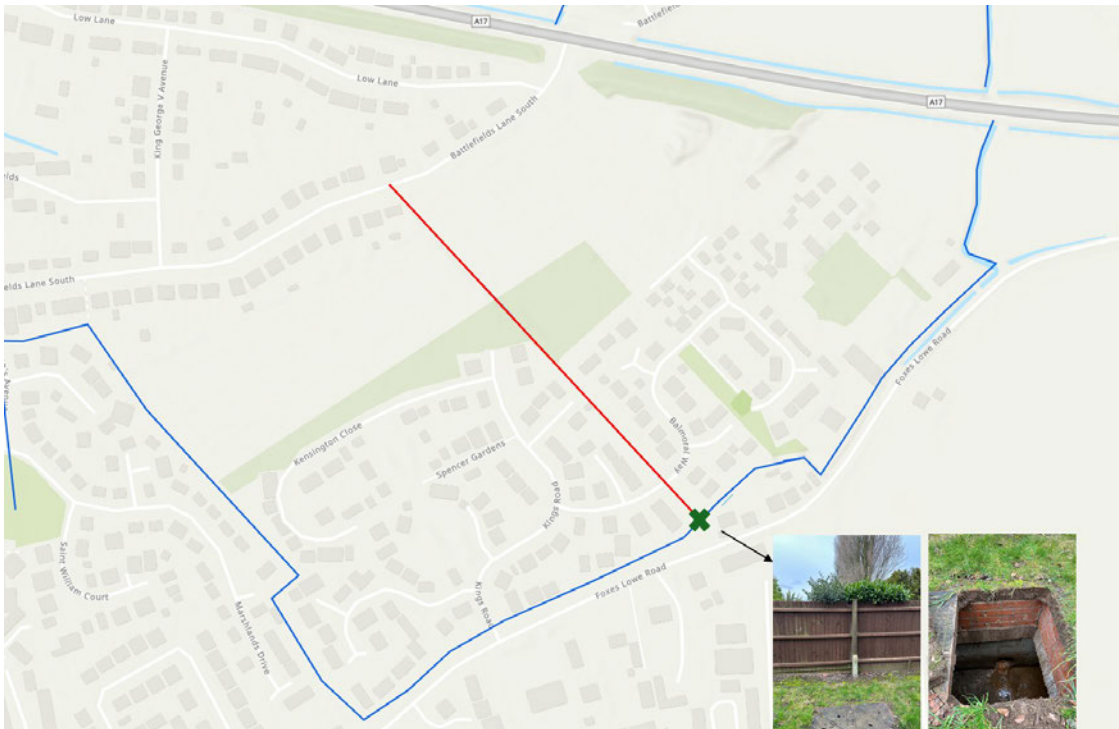
1– Byelaw 3:

- A) Thanks for confirming that the discharge from Phase 2 and Phase 3 will equal a combined total discharge rate of 3 l/s.
- B) Following the changes to the National SuDS Standards Guidance (30th July 2025), we acknowledge that the pre-development greenfield rate can be calculated based on the entire development site. We will therefore accept the greenfield discharge rate as 5.7 l/s. Please note however, that our Surface Water Development Contribution fee (SWDC) will be charged on the impermeable area only, in line with our policy and as outlined within our [Development Control Charges and Fees](#).

C) Consent will be required from the Board for both discharges under Byelaw 3 of the Board's Byelaws.

2 (Objection) – Section 23:

- A) We note that the applicants have mentioned that the riparian watercourse is not connected to the wider network. Please could they provide us with copies of the findings/results of the survey works that have been carried out, including any CCTV surveys to confirm this. If the excavations around the 'field drains' have been left exposed, we would like to carry out a site visit to look at this if possible.
- B) I have looked into the history of the watercourse across both the applicants' site and the existing development. The watercourse was previously open and connected from Battlesfield Lane South across the field to the Board arterial watercourse, P14 Foxes Low (DRN206G1405), adjacent to Foxes Low Road. There is a visible pipe within an inspection chamber above the Foxes Low pipeline ((W3W: geese.rewriting.tutored), marked by green cross on the below map, where this open watercourse was previously located. We request that a CCTV survey of this pipe, starting from the inspection chamber connection into the Board arterial watercourse, heading northwards is carried out. This should help to identify the end of this pipe, which may be buried within the applicants site.



Map 1 - Existing open watercourse shown by red line. Inspection chamber connecting now piped section of watercourse to the Board arterial watercourse shown by green cross. Arterial watercourses shown dark blue. (Ordnance Survey Licence Number AC0000808046, ? Crown Copyright 2026, all rights reserved).

- C) Please confirm what investigations were carried out to prove that no flow enters the drain from the north.
- D) Please confirm if any environmental surveys have been carried out to support the infilling or culverting of the watercourse and provide us with a copy of the reports.
- E) Additionally, there is mention that the IDB have previously approved an application for the infilling of the watercourse. We would be grateful if the applicant could provide us with further information on this, as we are not aware of the Board approving a consent for any infilling.

3 (Objection) – B10 (works within 9m):

- A) Noted that discussions with the architects are taking place regarding this. To reiterate, we request that no works are proposed within 9 metres of the Boards piped watercourse, including any land raising, houses, fences, roads, parking spaces and trees.
- B) Additionally, access must be available to the Board's 9 metre maintenance strip from the roads on the new development. This is often facilitated by a dropped kerb from the nearest road.

I am happy for you to pass my contact details on to James if he would like to discuss anything further with me directly.

Kind Regards,

Ella



Ella Thorpe, BSc (Hons), MSc, MCIWEM

Senior Sustainable Development Officer

Water Management Alliance

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Advanced notice of leave: 8th – 11th May

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Defenders of the Lowland Environment

From: James Blake <james@kppcltd.co.uk>

Sent: 19 January 2026 12:09

To: Chance, Jennifer <Jennifer.Chance@sholland.gov.uk>

Subject: RE: H09-0442-25 - Land off Battlefields Lane South Holbeach Spalding PE12 7PG

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Dear Jennifer,

Thank you for your update, I'll look forward to discussing with you further later this week. Please could we arrange a time for a quick phone call? Additionally, please pass my details onto the Housing Strategy Team.

In respect of other matters on the application, please see below and attached the following updates:

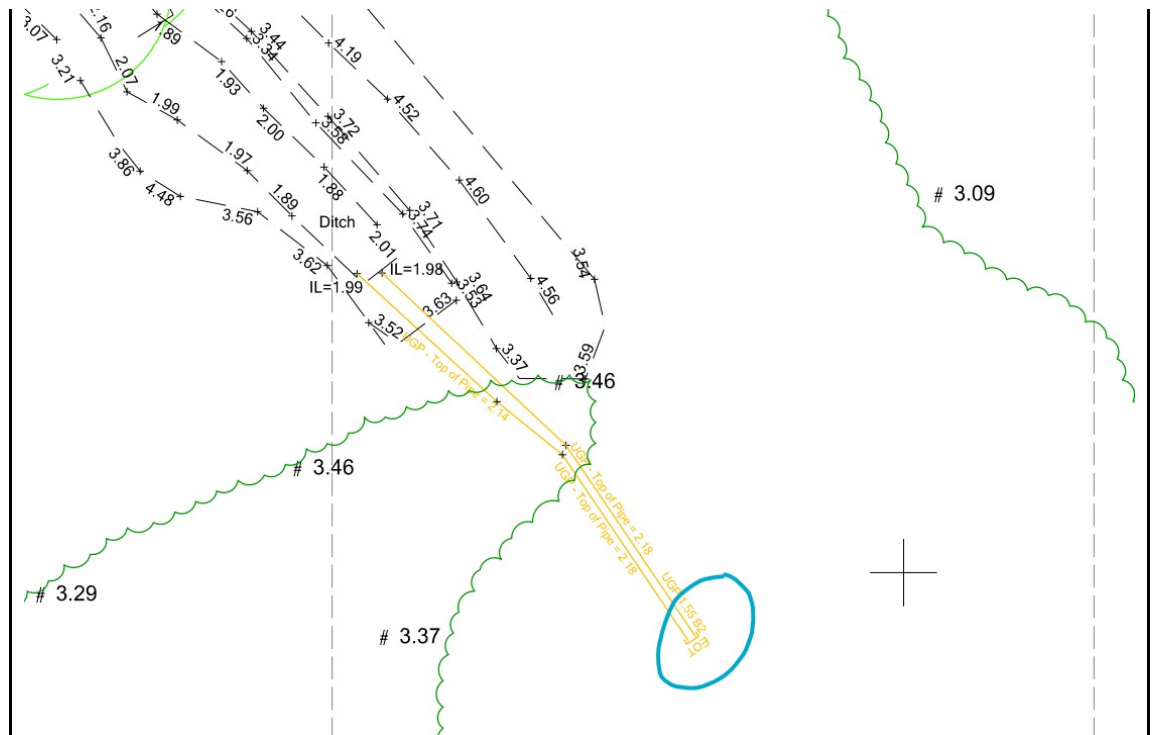
Flood Risk and Drainage Matters

Now that the EA objection has been withdrawn, we are working to deal with the Internal Drainage Board's (IDB) comments. I attached below the response from the Drainage Consultation, PBA, to address these matters:

Responses to the IDB

Reference	IDB Comment	PBA Response
1 (No Objection)	The IDB state consent shall be required for the proposed surface water connections and seek clarification on the discharge rates. Specifically. A - It is unclear whether the surface water discharge from Phase 3 has been included in the discharge rate proposed for Phase 2. Could the applicant please confirm if the discharge rate specified for Phase 2 accounts for the impermeable areas created by Phase 3? B - The applicant has stated in the Flood Risk Assessment (087.5018/FRADS/2 Including Drainage Strategy – October 2024) that the discharge rate will be limited to greenfield rates for the site's developed area. Could the applicant clarify what is meant by 'the developed area'? Does this include both permeable and impermeable surfaces? The Board requests that any proposed discharges into our system are reduced to the QBar rate for the impermeable areas only. For example, if the total site area is 6.2 ha but the	A – Phase 1 (62 dwellings), Phase 2 (42 dwellings) & Phase 3 (54 dwellings). Discharge from Phase 1 is to the Anglian water sewer and is limited to 2.7l/s. Discharge from Phase 2 and Phase 3 is to the Foxes Low Drain at the southwest corner of the site and is limited to 3l/s. The total post development discharge is 5.7l/s. B – The total site area is 6.2 ha. The only part of the site that should be excluded from the calculation of pre-development greenfield rates is the proposed nature-rich grass area, which has an area of 0.6 ha. The remainder of the site is to be developed and contains no notable areas of green space, excluding the SuDS basins, which are classified as an impermeable contributing area. Calculating pre-development greenfield rates based only on the proposed impermeable area is inappropriate and does not align with paragraph 3.29 of the National SuDS Standards: <i>3.29 The entire development area that could potentially drain to the proposed surface water drainage system in an extreme event shall be used for estimating greenfield runoff rates and volumes (including both permeable and impermeable surfaces).</i> Source: https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds#standard-3-management-of-extreme-rainfall-and-flooding

	impermeable area totals 1.2 ha, the discharge rate should be reduced to the QBar rate for the 1.2 ha of impermeable area only.	Discharge from the development is limited to the pre-development discharge rate of 5.7l/s. The pre-development discharge rate of 5.7 l/s was calculated based on the Qbar rate of 1.45 l/s/ha and the conservative assumption that 70% of the 6.2ha site area (less the 0.6 ha nature-rich grass area), will contribute to the proposed surface water drainage system in an extreme event, giving a contributing area of 3.92 ha. $(6.2 - 0.6) * 0.7 = 3.92$ ha. The contributing area of 3.92ha and the Qbar rate of 1.45 l/s/ha gives a pre-development greenfield rate of 5.7 l/s. $(3.92 \text{ ha} * 1.45 \text{ l/s/ha}) = 5.7 \text{ l/s}$ <i>NB: Please accept our apologies. There is an error in the report that states the assessment was based on 60% of the site contributing run-off in a post-development state. This is an error in the report. 60% would be too low a percentage given the density of the proposed development..</i>
2 (objection)	The IBD are objecting to the infilling of the field drain.	The IDB response assumes the field drain to be an active riparian watercourse. However, extensive survey works have been undertaken to establish that the feature is not a riparian watercourse but an abandoned field drain. The twin pipes exiting the field drain in a southerly direction towards Kings Rd have been surveyed and excavated; they terminate 15m after leaving the field drain. It is believed that the field drain was severed when the housing estate to the south was developed and has been non-functional since. Further investigations were undertaken to prove that no flows enter the drain from the north. In its current state, the field drain merely acts as a sump to drain the adjacent agricultural land. The drain does not serve any functional purpose at present. Post-development, the site shall be drained via the proposed SuDS system, and the drain will be fully redundant. As such, there is no requirement to retain the drain. This was accepted by the IDB in the previously approved application on this site. Please see attached survey with pipe termination points marked.



There is a 3rd objection relating to the planting new trees and bushes, constructing dwellings and creating private roadways and parking areas within 9 metres of a Board-maintained watercourse. We are discussing this matter with the architect and landscape architect and will provide a response to this matter shortly.

Ecology Matters

In respect of the most recent comments from the Council's Ecologist, please find attached:

- A letter prepared by the Project Ecologist to address the points raised, along with:
 - A Phase 1 & Outline BNG Assessment and HMMP (January 2026)
 - A Phase 1 BNG Metric and a Full Baseline for Outline Metric; and
 - A Biodiversity Gain Plan for the site (this has been completed as far as possible for now as the Gain Plan is only needed pre-commencement to discharge the expected conditions. It will be completed once offsite units have been purchased).

I trust these additional details will be sufficient to address the queries raised but if any further queries remain, please do let me know.

Heritage Matters

The Heritage Consultant (Wessex Archaeology) were issued site photos to confirm that the site is in a suitable condition for geophysical works to be undertaken. We are now fixing a date with them for the survey work to take place on. Once the survey work is completed, Wessex Arch. will then issue a report for the Council's Heritage Team to review.

Viability Matters

I understand that you are still chasing the DVS for an update on their report and the submitted viability information in respect of the development. Please could you continue to chase as we are keen to understand the DVS' position as soon as possible.

Other Matters

At this time, I do not believe there are any other outstanding matters, but I would be grateful if you could advise if this is not the case so we can action any other responses or requests for additional information so that the application can be determined as swiftly as possible.

Kind regards

James Blake
BA (Hons) MSc MSc MRTPI
Associate Planning Consultant



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