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BY E-MAIL

Our Ref. 1506/5412

28th October 2025

To whom it may concern,

H16-0692-25 - LAND TO THE SOUTH OF HOLBEACH ROAD, SPALDING, LINCOLNSHIRE, PE12 6JP - DEVELOPMENT OF SITE TO PROVIDE A FOOD STORE AND DRIVE-THRU, ALONG WITH ALL ASSOCIATED WORKS AND ACCESS

We write with respect to the above planning application, and specifically in response to points of objection raised with respect to the drainage proposals, as set out in South Holland Internal Drainage Board's consultation response dated 18th August (their reference 25_32649_P) and Lincolnshire County Council's consultation response (as Lead Local Flood Authority) dated 4th September 2025.

This letter provides a summary of the points of objection raised by the consultees, provides further evidence and clarification in relation to the points of objection, and sets out details of revisions made to the drainage proposals for the development in order to address outstanding points of objection.

Basis of Objections

The response from the South Holland Internal Drainage Board (IDB) confirms that the site is within the Internal Drainage District of the IDB, and therefore the IDB's Byelaws apply. The IDB notes that the current proposals include works which would be subject to Land Drainage Consent being granted, which is separate from the planning process. However, the board's initial assessment is that Land Drainage Consent would not be granted for the proposed works in their current form, and thus a formal objection to the planning application has been raised as the IDB believes the proposals cannot be delivered within its regulatory regime. The IDB also suggests that the proposals in their current form may lead to an increase in flood risk which is contrary to National Planning Policy Framework.

Specifically, the IDB notes a concern that there may not be viable discharge route from the current proposed surface water outfall to the IDB's downstream system to the south of the site. It is further suggested that discharge of surface water to the IDB's systems to the north of the site, possibly via an existing Lincolnshire County Council maintained watercourse system to the west of the site, be considered as a potentially more viable solution.

Secondly, the IDB notes a number of concerns with respect to the proposal to infill, and divert via



culvert, the existing watercourse in the east of the site. The IDB states that the current proposal is not acceptable on the basis that there will be an increase in flood risk due to loss of storage within the open channel, an impact upon upstream users of the watercourse due to a restriction in flow, and a potential to cause environmental harm due to loss of the open watercourse.

Lincolnshire County Council's response, in its capacity as Lead Local Flood Authority, also requested additional information in relation to the maintenance and potential diversion of the existing watercourse within the east of the site.

The two headline issues raised by the consultees are discussed in turn below.

Surface Water Discharge Route

Following receipt of the IDB's comments, ARP undertook a site walkover to inspect the on-site watercourse and its connectivity to the downstream channels immediately outside of the site. Although it is possible the on-site ditch did once have connectivity to the downstream channels, no outfall pipe is visible on site, and no incoming pipe is visible in the downstream channels. Also, although the downstream ditches are well-defined, they are more akin to field boundary drains rather than watercourses, with no flow present on the day of the walkover. On this basis ARP concur with the IDBs suggestion that discharge of surface water from the site to this drainage system may not be the most sustainable approach.

In order to explore alternative discharge arrangements and understand more about the drainage systems which are present within and around the adjacent roundabout, further consultation was initiated with Lincolnshire County Council, in its role as both Lead Local Flood Authority and Highway Authority. At the time of writing the County Council has not provided a response to the queries raised.

However, as noted by the IDB, and as shown on the IDB's network plans, there is understood to be an Ordinary watercourse which flows through the centre of the roundabout then alongside the northern side of the A151 Holbeach Road. Parts of the watercourse are understood to run in culvert, but a short open section exists opposite the site entrance. This watercourse eventually flows into the IDB's Lords catchment.

Based on the response of the IDB and inspection on site, it is proposed that the surface water discharge from the site be made to the existing Ordinary watercourse to the north of the site, on the opposite side of the A151 Holbeach Road. It is likely a direct outfall to the watercourse could be made within the public highway boundary, but would need to be secured via a surface water sewer requisition from Anglian Water or a Section 50 (private apparatus in public highway) agreement with the Highway Authority. Alternatively, it may be feasible to discharge surface water to the existing highway drainage system on the southern side of the A151 Holbeach Road, by agreement with the Highway Authority, which would negate the requirement to cross the road with the outfall pipe. To confirm, it is proposed that the discharge shall be made at a maximum rate of 2l/s as set out previously.

The specific means and point of discharge is subject to further agreement with the Lead Local Flood Authority and Highway Authority (from whom a response is currently awaited), but is considered to represent a sustainable and feasible means of discharging surface water from the site.



The Flood Risk Assessment report (1506/54r1), Drainage Strategy report (1506/54r2) and Drainage Strategy plan (1506/54/SK05) have been revised to reflect the above.

Watercourse in the East of the Site

Following receipt of the IDB's comments, ARP undertook a site walkover to inspect the on-site watercourse. From the site walkover it was clear that the upstream end of the ditch is within the development site boundary and does not extend upstream into neighbouring land (i.e. as shown on the topographical survey of the site).

Furthermore, from inspection of the topography local to the ditch (both on site and via the topographical survey) and noting that there is no evident positive downstream discharge from the ditch as discussed above, it is evident that this section of ditch does not serve to drain any significant area of land.

On this basis, it can be concluded that removing the ditch as part of the development would not have an adverse impact on flood risk upstream or downstream. There would be no benefit to maintaining the watercourse in culvert on a diverted route, and therefore culverting is no longer proposed.

The Flood Risk Assessment report (1506/54r1), Drainage Strategy report (1506/54r2) and Drainage Strategy plan (1506/54/SK05) have been revised to reflect the above.

In terms of the potential ecological impact of removal of the ditch, the ditch has been surveyed and considered as part of the wider ecological studies for the site and in determining the Biodiversity Net Gain strategy. On this basis, there is not expected to be any significant net environmental impact as a result of removing the ditch. The associated ecological reports should be reviewed for further discussion of this.

Conclusion

On the basis of the above and attached, we would request that the Lead Local Flood Authority and the South Holland IDB are re-consulted with regards to the additional evidence and revised proposals presented and signposted herein. It is anticipated that the previous objections can be removed and appropriate planning conditions set out to secure necessary safeguards on matters of drainage and flood risk.

Yours sincerely,

Matthew Wilson BEng (Hons) MCIWEM
Associate Director