

**Our ref:** 25\_30828\_P

14/03/2025

**Your ref:** H22-0077-25

**Site Location:** Land off Broadgate Weston Hills  
Spalding

**Summary of Proposal:** Rural exception site  
of 24 affordable homes

Dear Mark Niland

Further to our letter dated 25<sup>th</sup> February 2025, the Board wish to update our comments following internal discussions. The Board have major concerns that this proposal has stated incorrect information within the drainage strategy, namely the flow direction and discharge route, that it will lead to an increase in flood risk in the surrounding area because of the current drainage issues within the surrounding watercourses and that the layout has been inappropriately designed as it fails to provide a suitable maintenance strip adjacent to the riparian watercourses. Our concerns are detailed below.

The proposed works are unlikely to be acceptable to the Board (in accordance with the policies outlined within the Board's [Planning and Byelaw Strategy](#)). Resultantly, the Board **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.

- 1) Firstly, as shown within the drawing "Drainage Strategy" ref:622-S11-00-SI-SK-C-9000, it is suggested that water within the boundary riparian watercourse surrounding the site's boundary flows anticlockwise around the site. The Board believe this to be untrue and that water within this riparian watercourse flows clockwise towards the north, as shown by the white arrows on the attached plan. Whilst water in this watercourse flows clockwise towards the north, the Board request that works to the riparian watercourse, including regrading and reprofiling works, should be undertaken to ensure that water can flow freely and efficiently.
- 2) The Board's watercourse, shown in light blue, begins at point A on the attached plan and flows westwards. A culvert not owned by the Board (shown by the red dashed line), runs under Broadgate Road, enters the riparian watercourse from the west at point B. This culvert connects this riparian watercourse to the Board arterial watercourse. Whilst we are aware of this culvert's existence, further investigative work is required by the applicant to determine the condition of this culvert to establish whether it is in a suitable condition to accommodate the additional surface water flows from the proposal.

Additionally, the Board are aware of drainage issues at this site, more specifically connectivity issues within the riparian watercourse at points C and D, under the site's proposed access road. The Board do not hold information as to whether there is a pipe connecting these two points.

Duncan Worth (Chairman)

Simon Bartlett (Vice-Chairman)

Phil Camamile (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)

We understand that the applicant is aware of these drainage issues and has subsequently created a temporary route from point E connecting to point C, due to the uncertainty of the existence of a suitable pipe. The Board request that investigative work, including a CCTV survey, is carried out to determine whether there is a pipe connecting the two ends of the watercourse at points C and D and whether it is in a suitable condition to accommodate the additional flows. Succeeding this investigative work, should it be found that this pipe is not in a suitable condition, then an appropriately sized replacement culvert should be installed between points C and D, following an application being made and Consent issued by the Board under Section 23 of Land Drainage Act 1991. The temporary route installed by the applicant can then be removed.

Until a viable discharge route into the Board's system for surface water is proved, **the Board object to this planning proposal** as we are concerned that this application may increase flood risk in the surrounding area due to the lack of a feasible connection from the site to the Board's system. The Board request further investigation and rectification works are carried out to prove that there is a viable connection between the riparian watercourses and the Board's system prior to any application being made to the Board under Byelaw 3 of the Board's Byelaws.

- 3) Lastly, the Board are deeply concerned that no regard to future maintenance of the riparian watercourse has been taken into account when designing the layout for this proposal. The proposed layout does not currently provide a maintenance strip adjacent to the watercourse and will result in the fences of 18 private gardens being installed up to the brink of the watercourse. This will lead to the watercourse having multiple riparian owners under riparian law with no suitable access to carry out their maintenance responsibilities which is likely to lead to flooding issues within the wider site and surrounding area. **The Board therefore object to this planning application** and recommends that the applicant redesigns the layout so that a suitable maintenance strip (around 3-5 metres) is left flat and free from obstruction adjacent to the riparian watercourse in order to enable maintenance by one future riparian owner/designated maintenance company/contractor.

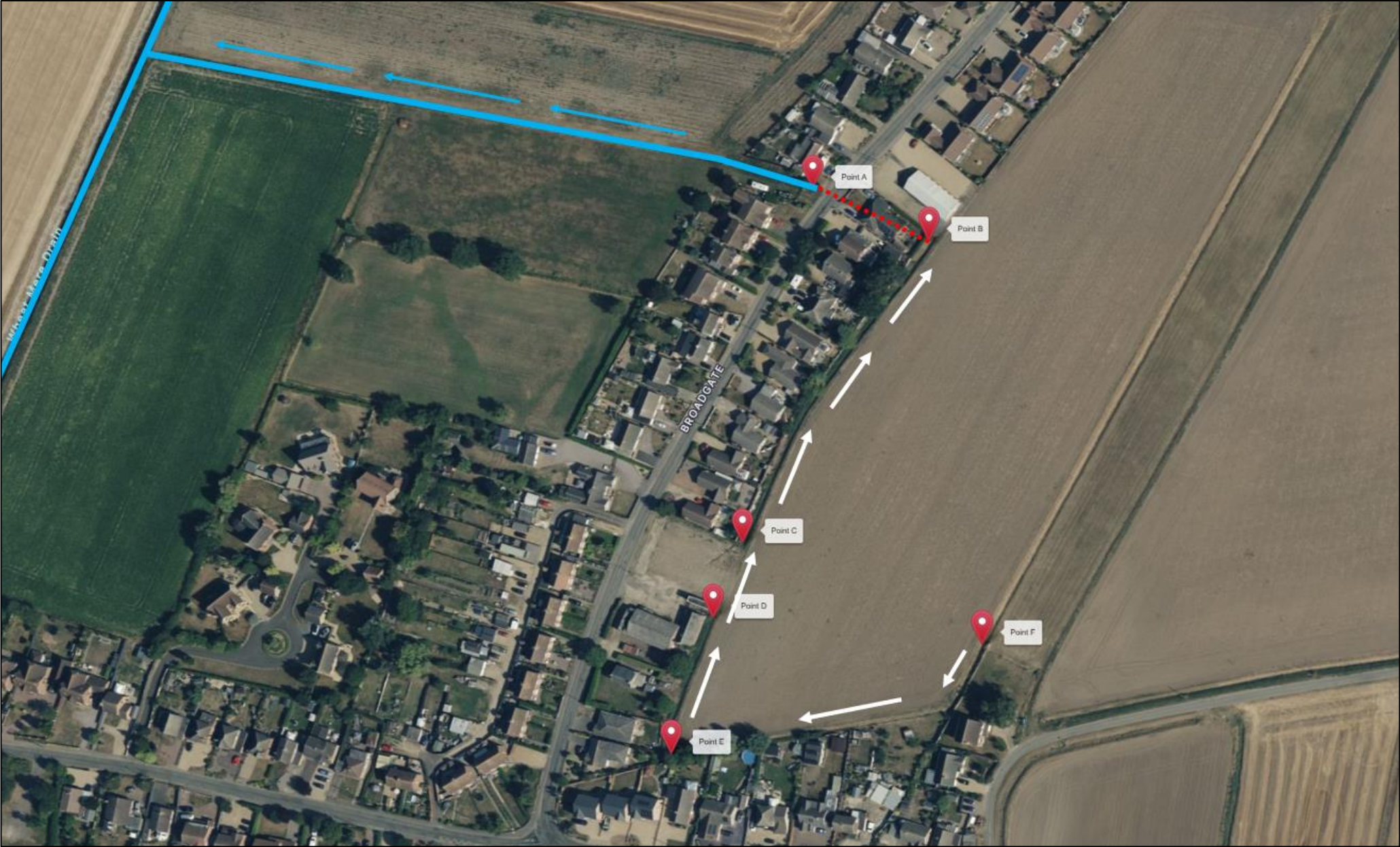
**Please see the supplementary information overleaf for further detail on the Board's policy and consenting process.**

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 Yeowell  
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' section of the Board's website, here:

<https://www.wlma.org.uk/south-holland-idb/home/#Development>

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

## Byelaws

South Holland IDB Byelaws can be found via the following link:

[https://www.wlma.org.uk/uploads/SHIDB\\_Byelaws.pdf](https://www.wlma.org.uk/uploads/SHIDB_Byelaws.pdf)

## Mapping

Mapping of the district can be viewed via the following link:

[https://www.wlma.org.uk/uploads/210-SHIDB\\_Index.pdf](https://www.wlma.org.uk/uploads/210-SHIDB_Index.pdf)

## Planning and Byelaw Strategy

The Board's Planning and Byelaw Strategy 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.

The Planning and Byelaw Strategy can be found via the following link:

[https://www.wlma.org.uk/uploads/WMA\\_Planning\\_and\\_Byelaw\\_Policy.pdf](https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf)

## 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 IDB 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 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 167](#)) and the [Non-standard technical standards for 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 Planning and Byelaw Strategy.