

From: Planning Department <planning@wlma.org.uk>
Sent: 27 March 2026 11:58
To: Niland, Mark
Cc: _planningadvice
Subject: RE: South Holland DC Planning

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Our ref: 25_30828_P
Your ref: H22-0077-25

Good morning Mark,

Thank you for your email.

Please find our comments below regarding points 1-3 outlined in our response dated 7th January 2026.

- 1) We raised no objection to this point, as the matter had been addressed within the applicants updated drainage plan.
- 2) Points C to D:
Apologies that the proposed culvert between points C and D was not addressed in our previous response. We are pleased to see that a new culvert is proposed to be installed beneath the access road, reconnecting the two sections of riparian watercourse. This will required consent under Section 23, Land Drainage Act 1991, and we would welcome an application from the applicants at their earliest convenience.

Points A to B:

We are happy for the condition of the culvert between points A and B to be investigated at the detailed design stage. We would, however, request further information regarding the proposed alternative route is provided. This can also be addressed as part of the detailed design.

On this basis, we are therefore happy to remove our objection to this point, subject to the inclusion of a pre-commencement condition requiring:

- Detailed investigations of the existing culvert between points A and B, including CCTV surveys
 - An appropriately detailed drainage strategy
 - Detailed design drawings for the proposed culvert between points C and D
 - If required, detailed information regarding the alternative route (should the existing culvert between points A and B be in poor condition).
- 3) This point has not been addressed in the email below. As noted in our letter dated 7th January 2026, we remain concerned about the existing drainage issues at the site. The proposed development will restrict access to the watercourse for future maintenance which may increase the risk of flooding issues for the new development and the existing surrounding properties. Our comments and objection to this point therefore remain.

Please let me know if you would like to discuss any of the above further.

Kind Regards,

Ella



Ella Thorpe, BSc (Hons), MSc, MCIWEM

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Advanced notice of leave: 8th – 11th May

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Defenders of the Lowland Environment

From: Niland, Mark <Mark.Niland@sholland.gov.uk>
Sent: 24 March 2026 15:02
To: Planning Department <planning@wlma.org.uk>
Cc: _planningadvice <planningadvice@sholland.gov.uk>
Subject: South Holland DC Planning

Dear Sir/Madam,

H22-0077-25 - Land off Broadgate

We write in respect of your letter dated 7 January 2026 regarding the above planning application.

We have been asked to forward the applicant's response to the points raised in your correspondence, specifically in relation to the surface water discharge strategy and watercourse connectivity.

The applicant has advised as follows:

"In terms of the IDB further comments I think they may have missed some of the amendments on the drawings but I have reviewed their whole letter and can respond as follows:

- **Response to IDB Comments — Points 1 and 2: Surface Water Discharge Route and Receiving Network Capacity**

The IDB's outstanding objection relates principally to the absence of a demonstrated viable discharge route into their system, and to uncertainty around the condition of the culvert under Broadgate Road (between Points A and B) and the connectivity of the riparian watercourse at Points C and D. I can address each element in turn.

- **Watercourse Connectivity at Points C and D**

The IDB's letter dated 7th January 2026 states that the connectivity issue at Points C and D has not been addressed. We would respectfully draw the planning authority's attention to the revised Drainage Strategy drawing ref: 622-S11-00-SI-SK-C-9000 Rev A (Studio 11 Architecture, 13th November 2025), which was submitted prior to the IDB's January letter. Rev A clearly shows a new pipe connecting the watercourse at Points C and D beneath the proposed estate road, with the existing open watercourses to be cleaned and reprofiled as necessary. This directly addresses the IDB's concern at this location. It appears this revision was not fully acknowledged in the IDB's subsequent correspondence. The connectivity of the riparian watercourse through the site is therefore addressed in the submitted documents, and this element of the objection should not be treated as outstanding.

- **Culvert Under Broadgate Road (Points A to B) and Viable Discharge Route**

The IDB has requested investigative works to confirm the condition and capacity of the culvert under Broadgate Road before accepting the principle of discharge into their system. We consider this requirement, whilst understandable, to be more appropriately addressed at the detailed design stage rather than as a prerequisite to the grant of planning permission, for the following reasons.

The submitted drainage strategy is, by its own description, a preliminary strategy accompanying the planning application. It is well-established practice and consistent with the approach taken by Lead Local Flood Authorities and IDBs across similar drainage districts that a planning application is required to demonstrate that a viable and deliverable drainage strategy exists in principle, with the technical detail of connections and consents to be resolved at the detailed design stage, secured by pre-commencement planning condition. This application does precisely that.

Critically, the development has been designed to discharge surface water at no greater than the pre-development greenfield runoff rate of 1.0 l/s, calculated at QBAR in full accordance with greenfield runoff estimation methodology. The site is currently undeveloped agricultural land. The proposed development will therefore generate no increase whatsoever in the volume or rate of surface water flows entering the riparian watercourse network or the IDB's arterial system compared to the existing situation. In those circumstances, the condition of the Broadgate Road culvert is a matter of detailed design, not of planning principle. If the culvert is adequate to carry existing flows today, a development discharging at precisely the same rate presents no additional burden.

Furthermore, should the detailed design stage investigation reveal that the existing Broadgate Road culvert is not in a suitable condition to serve as the outfall, an alternative connection is available. A new surface water sewer could be laid along Broadgate to connect directly to the IDB's drain, removing reliance on the existing culvert entirely. The viability of the drainage strategy is therefore not contingent on the condition of that culvert. A deliverable fallback exists.

The applicant is content to accept a pre-commencement planning condition requiring the submission and approval of a detailed drainage scheme, including investigation of the Broadgate Road culvert and, if necessary, the design of a replacement connection before development commences. This is the appropriate and proportionate mechanism to resolve this matter, and it gives the IDB full opportunity to scrutinise and consent the connection under their regulatory regime at the right stage in the process.

For these reasons, the drainage strategy as submitted demonstrates a viable and deliverable approach to surface water disposal. The principle of discharge to the IDB system at greenfield runoff rates is sound, and there is no technical basis on which to conclude that the development would increase flood risk in the surrounding area.”

We would be grateful if you could review the above and confirm whether this information alters your position as set out in your letter dated 7 January 2026.

Should you require any further information, please let me know and I will liaise with the applicant accordingly.

Kind Regards

Mark

Mark Niland / Planning Officer / South Holland District Council

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www.sholland.gov.uk

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