

Porter, Karen

From: Planning Department <planning@wlma.org.uk>
Sent: 25 March 2026 10:42
To: _planningadvice
Subject: RE: 4. Amendment Consultation
Attachments: 25_31414_P SHIDB Comments 25.03.2026.pdf

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Our ref: 25_31414_P
Your ref: H23-0313-25
FAO: Mark Niland

Good morning,

Thank you for consulting us on the amended plans for the planning application H23-0313-25. Please find comments from South Holland Internal Drainage Board attached.

We apologise that some of the comments within our response were not previously raised. I am happy for the applicant/agent to contact me directly to discuss this if required.

Kind Regards,

Ella



Ella Thorpe, BSc (Hons), MSc, MCIWEM

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Advanced notice of leave: 8th – 11th May

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From: planningadvice@sholland.gov.uk <planningadvice@sholland.gov.uk>
Sent: 09 March 2026 09:28
To: Planning Department <planning@wlma.org.uk>
Subject: 4. Amendment Consultation

PLANNING CONSULTATION: AMENDMENT RECEIVED

Reference Number: H23-0313-25

Type: FULL

Proposal: Provision of new poultry unit & associated works

Location: Land At Peartree Hill Road Whaplode Drove

Applicant: Holbeach Poultry Ltd

Amended Information:

Amendment 1 - Revised Environmental Statement, Updated FRA & SuDs Report, Submission of Transport Statement, Archaeological comment, Updated Soft Landscaping

The Council have received an amendment to the above application and would be pleased to receive any further observations you may wish to make. You can make comments by clicking on the link below and using the **Enter Comment** button to leave your observations.

[Click here to view the application](#)

The deadline for submission of comments is **10th April 2026** and please be aware that representations submitted in relation to planning applications will be available for public inspection.

If you need any assistance please contact **Mark Niland** who is dealing with this application.

Note:

If this is a Householder Application, in the event of an appeal against a refusal of planning permission, which is to be dealt with on the basis of representations in writing, any representations made about this application will be sent to the Secretary of State and there will be no further opportunity for you to comment at appeal stage.

Our ref: 25_31414_P

25/03/2026

Your ref: H23-0313-25

Site Location: Land At Peartree Hill Road
Whaplode Drove Spalding PE12 0SL

Summary of Proposal: Provision of new
poultry unit & associated works

Dear Sir/Madam

Further to our letters dated 22/04/2025 and 28/11/2025 regarding this planning application, we wish to update our comments in response to the amended plans and documents provided by the applicant, and which have been submitted to your authority. Please note that the advisory comments made within our previous letters remain valid and should be read in conjunction with this letter.

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.

Parts of the proposed works are unlikely to be acceptable to the Board in their current form (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.

| Byelaw / Section of Act | Description | Requirement |
|------------------------------------|---|---|
| Byelaw 3 | Discharge of water to a watercourse (treated foul or surface water) | Consent required (further clarification required) |
| Section 23, Land Drainage Act 1991 | Alteration of a watercourse | Consent required – OBJECTION (unacceptable culvert design) |
| Byelaw 10 | Works within 9 metres of a Board arterial watercourse | Consent required – OBJECTION (unacceptable works within 9 metres - hedging) |

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.

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To confirm, from the current plans provided, the applicant will need to make five applications to the Board for the following, and detailed further below:

1. Byelaw 3 (Surface Water) – *surface water discharge to a watercourse*
2. Byelaw 3 (Treated Foul Water) – *treated foul water discharge to a watercourse*
3. Byelaw 10 (works within 9 metres of a Board arterial watercourse) – *two outfall pipes, post and rail fencing and hardstanding surface above site access culvert*
4. Section 23, Land Drainage Act 1991 – *site access culvert in the Board arterial watercourse*
5. Section 23, Land Drainage Act 1991 – *culvert in the riparian watercourse within the site*

Byelaw 3 (Surface Water)

We note that the applicant proposes to restrict the discharge rate from the development to the 1 in 1 year greenfield rate (2 l/s). We are pleased to see that measures have been taken to reduce the discharge rate to as close to the greenfield rate as possible.

The total impermeable area of the site remains unclear. There are discrepancies within the *Flood Risk & Drainage Assessment - Amendment 1* and the drawings provided to support the application. In several sections of this document, the impermeable area is stated as **1.605 ha** and page 11 specifies that each unit has a roof area of **2675 m²**, implying that there are six units within the development. However, Figure 3 (modelled arrangement) provides a total area of **32490 m² (3.249 ha)**, and all submitted drawings indicate that there are 12 units on site. Therefore, as suggested in figure 3, the total impermeable area may be at least double that used within the modelling. It is unclear whether the access road surface has been included within these calculations.

We request that a drawing is provided clearly identifying the impermeable area of the full site, including all units, the access road and additional hardstanding areas. If any additional impermeable areas have not been appropriately accounted for when calculating the proposed discharge rate, the drainage strategy and supporting calculations should be revised to include all areas of contributing impermeable area on site.

Furthermore, we note that the drainage calculations appended in the *Flood Risk & Drainage Assessment - Amendment 1*, show that flooding may occur during the 100 year plus 40% CC event. The applicant should be aware that they are responsible for ensuring that the surface drainage system is designed so that (unless an area is designated to hold and/or convey water) no flooding occurs on any part of the site in a 1 in 30 year rainfall event (plus climate change), and that flooding does not occur in any part of a building or offsite during a 1 in 100 year (plus climate change) rainfall event.

To confirm, the applicant's proposal to discharge surface water to a watercourse will require consent under Byelaw 3. 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)

The applicant has indicated that they wish to discharge treated foul water to a watercourse following treatment via a new sewage treatment unit. **This proposal will require consent 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

As previously mentioned, the applicant intends to carry out works to alter the Board **owned** arterial watercourse known as C10 Peartree Hill Drain (DRN194P1002), located to the east of the site by installing a new access culvert, as shown in drawing *Proposed Access Plan and Visibility Splay 'JW/2384/0325-200_04 Rev B'* (Acorus, 15.10.2025).

The Board have concerns with the current design of the culvert, and **wish to object** to this aspect of the proposal until the below is addressed:

- We believe that the proposed 1500mm diameter culvert will be too large for this section of watercourse. We recommend that a 1050mm diameter culvert is installed. The culvert should have an invert level of -0.43m O.D.N to allow for future improvements.
- There is minimal cover over the culvert, reducing the pipe size would increase the level of cover. However, the proposed surround and infill material around the culvert is not acceptable to the Board. The Board are able to provide a standard detail drawing as an indicative design and details on the information required for a culvert application, if the applicant/agent would like to approach us to discuss this further.

To enable this proposal consent is required under Section 23 of the Land Drainage Act 1991 (and Byelaw 4).

The Board will require the applicant to enter into a Deed of Easement or suitable alternative for the proposed works as the Board owns this watercourse. We are pleased to note that the applicant has been liaising with our Estates Officer regarding this.

Additionally, as previously mentioned, we note the presence of a watercourse which is not maintained by the Board (a riparian watercourse) which runs through the middle of the site and that works are proposed to alter this watercourse via the installation of a new access culvert as shown in drawing *Proposed Block Plan 'JW/2384/0325-200_02 Rev C'* (Acorus, 15.10.2025). No design details of this culvert have been provided. We recommend that the applicants provide a drawing showing the design of the proposed culvert. **To enable this proposal consent is required under Section 23 of the Land Drainage Act 1991 (and Byelaw 4).**

Byelaw 10

As previously mentioned, we note within the drawing *Proposed Drainage Plan 'JW/2384/0325-200_05 Rev C'* (Acorus, 04.11.25) that the applicant intends to install 2no. discharge outfall pipes into the bank of the Board owned and arterial watercourse, install post & rail fencing on top of the proposed entrance access culvert, along with new hardstanding surfacing. **To enable this proposal, consent would be required under Byelaw 10.**

We also note that the drawing *Proposed Access Plan and Visibility Splay 'JW/2384/0325-200_04 Rev B'* (Acorus, 15.10.2025) states "*Drainage channel across entrance to divert surface water away from highway, to discharge into hedges either side of access*". The Board have previously advised that no planting should be located within 9 metres of the Board arterial watercourse, this includes over the culvert. We request that the hedging is removed from the drawing and a suitable drainage strategy for the road is provided. This aspect of the proposal is not acceptable under the Board's [policies](#), therefore the Board currently **objects**.

We require dropped kerbs to be installed either side of the road within the 9 metre Byelaw Zone to allow access for the Board's machinery to the maintenance strip either side of the road. Please note that the Board will not be held responsible for any damage to the road caused by the Board's tracked machinery when crossing over the road.

Please could the applicants also clarify if there is any proposed land raising within 9 metres of the Board arterial watercourse.

To avoid conflict between the planning process and the Board's regulatory regime, we recommend that the required consents are sought prior to the determination of this planning application.

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,

Ella

Ella Thorpe
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.

Byelaws

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

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

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

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.