

Our Ref: 25\_32631\_P

11/08/2025

Dear Sir/Madam

**RE: Local Plan for the Broads - Regulation 19 version**

Thank you for consulting the Water Management Alliance (WMA) on the Local Plan for the Broads - Regulation 19 version.

The Broads coincides with parts of the Internal Drainage Districts (IDD) of the Broads (2006) Internal Drainage Board (IDB), Norfolk Rivers IDB and the Waveney, Lower Yare and Lothingland IDB, members of the WMA. The Board's Byelaws apply to any development within a Board's area.

The principal function of an IDB is to provide flood protection within the Board's area. Certain watercourses within an IDD receive maintenance by the Board. The maintenance of a watercourse by an IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. Main Rivers within an IDB are regulated by the Environment Agency.

The area outside the Boards' IDDs falls within the Boards' watershed catchments (meaning water from the site will eventually enter the IDD). The Board will comment on planning for major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites. For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance [SuDS discharge location hierarchy](#).

Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application.

I am pleased to note the inclusion of policies PUBSP2: Strategic flood risk policy, Policy PUBDM8: Development and flood risk, and Policy PUBDM9: Surface water run-off, which address sustainable drainage in development within the Broads area. Notably, I am glad to see that the IDBs have been named as regulators within these policies and I hope that this will direct developers to the WMA for early discussion regarding any works that may affect a Board's IDD.

On page 77, I note that the Broads IDB Development page on the WMA website has been provided. Whilst I am pleased to see that the IDB is being signposted, I'd like to highlight that whilst the most prominent IDB within the Broads in terms of area covered is the Broads (2006) IDB, the area covered by the Broads Authority is also partially coincidental with the Norfolk Rivers IDB (Belaugh to Ranworth, and West of the North Walsham and Dilham Canal) and the Waveney, Lower Yare and Lothingland

*MEMBER INTERNAL DRAINAGE BOARDS*

*Broads (2006) IDB, East Suffolk WMB, King's Lynn IDB, Norfolk Rivers IDB,  
South Holland IDB, Waveney, Lower Yare and Lothingland IDB*

*In association with Pevensey and Cuckmere WLMB*



IDB (South of the River Yare from the East of Rockland St Mary to Great Yarmouth). It may be more beneficial to direct users of the plan to the WMA website (<https://www.wlma.org.uk/>) from which they can access maps and our contact details to determine which Board's area a development falls into, if any.

Within the 'Designing SuDS' section on page 77, I'd request that the IDBs are referenced as regulators of surface water discharges within IDD's as per Byelaw 3 in each of the Boards' Byelaws. WMA officers are open to and actively support early engagement in the drainage design process to support developers in achieving sustainable drainage, as well as reducing the risk of conflict between the Board's regulation and that of Local Planning Authorities.

On page 73 beneath policy PUBDM8, I am pleased to see that Section 23 of the Land Drainage Act 1991 has been referenced regarding any proposal to alter a watercourse. I would like to note that the Boards are only the regulator of Section 23 within their IDD's, whilst the legislation applies to any ordinary watercourse, in or out of an IDB's district. I understand that the Lead Local Flood Authority is the regulator of works to ordinary watercourses outside the Boards' districts in the Broads area.

In order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes where developments are proposed within or partially within a Board's IDD, please be aware of the following standing advice:

### **Byelaw 3- Discharge of Surface Water into the Board's District**

- If a development proposes to dispose of surface water via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.
- If (following testing) a strategy wholly reliant on infiltration is not viable and/or a development proposes to discharge surface water to a watercourse, the proposed development will require consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (available at [https://www.wlma.org.uk/uploads/WMA\\_Table\\_of\\_Charges\\_and\\_Fees.pdf](https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf)).
- If a development proposes to discharge surface water to a sewer, I recommend that you satisfy yourselves that this proposal is in line with the drainage hierarchy (as per best practice) and is viable in this location.

### **Byelaw 3- Discharge of Treated Foul Water into the Board's District**

- If a development proposes to discharge treated foul water to a watercourse, this proposal will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Treated Foul Water Development Contribution fee, calculated in line with the Board's charging policy (available at [https://www.wlma.org.uk/uploads/WMA\\_Table\\_of\\_Charges\\_and\\_Fees.pdf](https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf)).

### **Byelaw 10- Works within 9m of Board Maintained Watercourses (BIDB and NRIDB)**

- Should any development include works within 9 metres of a Board maintained watercourse, consent would be required to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure).

**Byelaw 10 & 17- Works within 7m of Board Maintained Watercourses and Works within the banks of Board Maintained Watercourses (WLYLIDB only)**

- Should any development include works within 7 metres of a Board maintained watercourse, consent would be required to relax Byelaw 10 (no obstructions within 7 metres of the edge of drainage or flood risk management infrastructure).
- If the proposal includes works to install services within, make excavations within, or otherwise alter the banks of the aforementioned Board Maintained Watercourse, consent will be required as per Byelaw 17 of the Board's Byelaws.

**Section 23 of the Land Drainage Act (1991) and Byelaw 4- Alterations Proposed to a Watercourse**

- Should any development include works to alter a riparian or Board maintained watercourse, consent will be required under the Land Drainage Act 1991 (and byelaw 4).

For developments outside a Board's IDD but within its watershed catchment, where surface water discharges have the potential to indirectly affect the Board's IDD, we would offer the following advice:

- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced. As such we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.
- If it is proposed to discharge surface water to a watercourse within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the [Non-Statutory technical standards for sustainable drainage systems](#) (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 167 of the [National Planning Policy Framework](#)). For further information regarding the Board's involvement in the planning process please see our [Planning and Byelaw Strategy](#), available online.

If you require any further information or would like to discuss the Board's regulation in more detail, please do not hesitate to contact us.

Kind Regards,

Ellie

Eleanor Roberts  
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 Boards' 'Development' sections of the WMA website, here:

Broads (2006) IDB: <https://www.wlma.org.uk/broads-idb/development/>

Norfolk Rivers IDB: <https://www.wlma.org.uk/norfolk-idb/development/>

Waveney, Lower Yare & Lothingland IDB: <https://www.wlma.org.uk/waveney-idb/development/>

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

## Byelaws

Byelaws can be found via the following links:

Broads (2006) IDB: [https://www.wlma.org.uk/uploads/BIDB\\_Byelaws.pdf](https://www.wlma.org.uk/uploads/BIDB_Byelaws.pdf)

Norfolk Rivers IDB: [https://www.wlma.org.uk/uploads/NRIDB\\_Byelaws.pdf](https://www.wlma.org.uk/uploads/NRIDB_Byelaws.pdf)

Waveney, Lower Yare and Lothingland IDB: [https://www.wlma.org.uk/uploads/WLYLIDB\\_Byelaws.pdf](https://www.wlma.org.uk/uploads/WLYLIDB_Byelaws.pdf)

## Mapping

Mapping of the IDB districts can be viewed via the following links:

Broads IDB: [https://www.wlma.org.uk/uploads/84-BIDB\\_drainindex.pdf](https://www.wlma.org.uk/uploads/84-BIDB_drainindex.pdf)

Norfolk Rivers IDB: [https://www.wlma.org.uk/uploads/179-NRIDB\\_Index.pdf](https://www.wlma.org.uk/uploads/179-NRIDB_Index.pdf)

Waveney, Lower Yare and Lothingland IDB: [https://www.wlma.org.uk/uploads/WLYLIDB\\_Index\\_Map.pdf](https://www.wlma.org.uk/uploads/WLYLIDB_Index_Map.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 comment on planning applications:

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 [National standards for sustainable drainage systems \(SuDS\)](#)
- <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-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.