

[Farrow Walsh Ltd. Letterhead / Logo Here]

Surface Water & SSSI Addendum

Kyngs Golf & Country Club Holiday Lodges

Application Ref: 24/01157/HYB

Prepared on behalf of Statue Homes Ltd.

Prepared by Farrow Walsh Ltd. in collaboration with Housemartin Designs

Date: August 2025

1. Development Context

This Surface Water & SSSI Addendum has been prepared by Farrow Walsh Ltd. in collaboration with Housemartin Designs, on behalf of Statue Homes Ltd.

The purpose of this document is to address the request from Natural England (consultation response dated 24 January 2025) for further information regarding potential surface water impacts on the Ashby Canal SSSI.

In preparing this Addendum, Farrow Walsh Ltd. and Housemartin Designs have reviewed the proposed lodge development in the context of the site's established ground conditions, planning history, architectural design, and the conclusions of the submitted Flood Risk Assessment (FW2526_FRA_001 V3, June 2025).

For robustness, the assessment has been undertaken on a worst-case basis of 126 two-bed holiday lodges, ensuring that potential impacts are considered at maximum scale.

For robustness of assessment, the analysis has been undertaken on a worst-case basis of 126 two-bed holiday lodges.

The planning application proposes a mix of one-bed and two-bed units, but working to the higher scale ensures that the potential footprint, roof area, and occupancy are assessed at their maximum.

This approach confirms that any approved scheme with a mix of smaller lodges will result in impacts equal to or less than those presented here.

The proposed 126 two-bed holiday lodges are non-residential, leisure and tourism units. Each lodge is surface-mounted on six removable raised concrete pads (450 × 450 × 200 mm).

The design ensures that finished floor levels will sit at least 300 mm above existing ground level, in accordance with the Flood Risk Assessment recommendations.

No foundations, trenching, or excavation are required.

Lodges are prefabricated lightweight kit structures, bolted together on site.

Each lodge incorporates a sedum (green) roof, intercepting rainfall, reducing runoff, and enhancing biodiversity.

Access uses the existing track; no widening or new construction is proposed.

This ensures a fully reversible installation with minimal land disturbance, improved surface water resilience, and positive ecological enhancement.

2. Hydrological Setting

The site lies within the catchment of the Ashby Canal SSSI, linked via a watercourse to the north.

The SSSI supports sensitive aquatic plants, invertebrates, and mammals reliant on clean

water.

Natural England has requested confirmation of surface water management to demonstrate no hydrological risk.

2a. Established Ground Levels and Planning History

Following planning permission 02/00685/COU, over 1.5 million tonnes of inert material were imported, significantly raising and re-profiling the golf course.

This created engineered, compressed capping foundation levels across the site, which remain extant.

The current proposal does not alter these levels: lodges are placed directly onto stable, engineered ground.

This means the major disturbance event has already occurred, and no further ground modification is required.

2b. Holiday Lodges vs. Residential Dwellings

The lodges are holiday accommodation, not residential dwellings.

Under the NPPF (2023, paras 84–85), sustainable rural tourism and leisure developments are distinct from permanent housing supply.

Occupation is short-term and seasonal, not continuous.

This results in reduced sensitivity to emissions, odour, or noise; lower demand on water and wastewater;

and a reversible, low-intensity use consistent with tourism policy, not housing delivery.

Ecologically, this confirms the development does not carry the same continuous risk pathways as permanent residential schemes.

3. FRA Findings Relevant to SSSI & Surface Water

According to the Flood Risk Assessment (Farrow Walsh, 2025):

- The site lies wholly within Flood Zone 1 (low probability of flooding).
- Both the spa and lodge areas are at very low risk from fluvial and surface water flooding, and negligible risk from groundwater or sewers.
- Historic re-profiling (02/00685/COU) further mitigates groundwater risk.
- The drainage strategy relies on sedum roofs attenuating rainfall, with water dispersing to grassland and natural infiltration before flowing to the northern ditch.
- Foul water will be managed via sealed on-site tanks, removed by tanker off site.
- Sequential Test confirms the site is appropriate for development, with lodges acceptable as a “less vulnerable” use in Flood Zone 1 under NPPF and NPPG.

This evidence confirms there is no credible flood risk pathway linking the lodges to the Ashby Canal SSSI.

4. Construction Phase Controls

To ensure no temporary hydrological impact:

- No excavation or soil stripping; pads placed directly on grass.
- Silt fencing/straw bales if material handling occurs near the northern watercourse.
- Drip trays/spill kits for all plant; refuelling >50 m from watercourses.
- Material and waste storage raised off ground and away from drains.
- Daylight working only to minimise disturbance.

5. Operational Phase Controls

- Impermeable footprint negligible (≤ 0.023 ha).
 - Sedum roofs provide interception, water quality treatment, and biodiversity.
 - Rainfall drains by natural infiltration, maintaining existing hydrology.
 - No drains, culverts, or outfalls are required.
 - Site management will avoid chemical storage near watercourses and maintain sedum roofs and grass cover.

6. Compliance with CIRIA SuDS Guidance

- Scale of impermeable area is well below thresholds for formal SuDS.
 - Sedum roofs act as SuDS source-control, consistent with CIRIA C753 and the Simple Index Approach.
 - Combined with infiltration to grassland, this achieves appropriate pollution control for the SSSI.

7. Conclusion

The lodges are surface-mounted, reversible, non-residential holiday units with sedum roofs.

The site is underpinned by extant engineered ground levels established via previous planning consent.

The FRA confirms the site is within Flood Zone 1, with very low risk of flooding from all sources.

Both construction and operational phases include robust surface water safeguards.

There is no hydrological risk to the Ashby Canal SSSI, and significant effects can be excluded.

This addendum satisfies Natural England's request for surface water management detail and demonstrates full compliance with the NPPF, NPPG, and CIRIA SuDS guidance.