

Leicestershire County Council
County Hall
Glenfield
Leicester LE3 8RA

For the attention of Danielle Degville, Reviewing Officer on behalf of Leicestershire County Council

Our Ref: NXG-JBA-XX-XX-L-C-0001-S3-P03-LLFA Response Letter

13th July 2026

Dear Danielle Degville,

Response to LLFA Consultation Response regarding Land South of Saceverell Way, Groby, Leicestershire

We write on behalf of Bloor Homes in response to the Lead Local Flood Authority's consultation response dated 24th February 2026 and to provide the additional drainage and flood risk information requested.

The enclosed revised Flood Risk Assessment and Outline Surface Water and Foul Water Drainage Strategy have been prepared to address the matters raised by the LLFA and demonstrate that the site can be drained sustainably in accordance with the National Standards for Sustainable Drainage Systems (SuDS), NPPF requirements and local policy. The response below follows the structure of the LLFA's comments.

Outline Surface Water and Foul Drainage Strategy

A revised Outline Surface Water and Foul Water Drainage Strategy (OSFWDS) has been prepared and submitted.

The strategy confirms:

- The site extends to approximately 10.55 ha and is currently greenfield agricultural land.
- Greenfield runoff rates have been calculated using the FEH Statistical Method.
- The calculated QBAR runoff rate for the existing site is 54.6 l/s.
- In accordance with discussions with the LLFA, a more restrictive discharge rate of QBAR minus 20% has been adopted, resulting in a proposed discharge rate of 43.68 l/s.

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ISO 45001:2018

- Surface water runoff will be attenuated on site and discharged at the restricted rate to the ordinary watercourse along the southern boundary.
- A 40% climate change allowance has been incorporated consistent with the Soar Management Catchment allowances.
- A 10% urban creep allowance has also been included to ensure the drainage system remains resilient throughout the lifetime of the development.
- Preliminary drainage calculations indicate an attenuation requirement of approximately 2,394m³, accommodated within a detention basin located in the southern part of the site.

The proposed drainage network incorporates a treatment train approach, including:

- Source control measures through the site drainage network;
- Conveyance via swales;
- A detention basin providing attenuation, interception and water quality treatment prior to discharge.
- Accordingly, a sustainable drainage strategy has now been provided demonstrating that the site can be drained without increasing flood risk elsewhere.

Infiltration Potential and Ground Investigation Information

The LLFA requested ground investigation information and evidence that infiltration had been considered.

Since submission of the application, site-specific infiltration testing has been undertaken by GeoDyne Geotechnical & Environmental Consultants. Five soakaway tests were completed within the proposed attenuation basin area. The recorded infiltration rates ranged from 8.87×10^{-6} m/s to 2.49×10^{-5} m/s. The most conservative value of 8.87×10^{-6} m/s has been adopted within the drainage assessment.

The testing demonstrates that infiltration is technically feasible and exceeds the minimum threshold referenced within the National Standards for SuDS. However, the relatively low infiltration rates indicate that infiltration-only drainage measures would not provide a practical stand-alone drainage solution for a development of this scale. Consequently:

- Infiltration has been incorporated into the strategy as part of the interception approach.
- The first 5mm of rainfall will be retained and allowed to infiltrate slowly within the detention basin.

- The primary runoff destination remains the receiving ordinary watercourse in accordance with the drainage hierarchy.

The submitted drainage strategy therefore demonstrates that infiltration has been fully assessed and incorporated where practicable.

Compliance with the New National Standards for SuDS

The revised drainage strategy has been prepared with direct reference to the National Standards for SuDS published in June 2025 and updated in July 2025.

In particular, the strategy demonstrates compliance through:

Runoff Destination Hierarchy

The discharge hierarchy has been assessed. Options for water reuse, infiltration and discharge to surface water sewers were considered. The preferred discharge destination is into an ordinary watercourse.

Interception Requirement

The strategy specifically addresses the requirement to retain the first 5mm of rainfall on site. A detention basin has been sized and configured to provide sufficient attenuation for the 1 in 100 year plus climate change, 6-hour rainfall event, and facilitate infiltration of the first 5mm of rainfall on site.

Extreme Event Management

The drainage system has been assessed for the 1 in 100 year plus 40% climate change event and includes exceedance routing considerations to ensure flood water is directed away from residential properties and towards roads, open space and designated drainage features.

Maintenance and Management of SuDS

The revised drainage strategy contains a comprehensive operation and maintenance section identifying:

- Maintenance requirements for the detention basin;
- Inspection frequencies;
- Vegetation management;
- Sediment management;
- Access requirements for maintenance vehicles and personnel; and
- Long-term asset management responsibilities.

Dedicated maintenance access is proposed to the attenuation basin, and a detailed maintenance plan will be developed as part of the detailed design stage.

The submitted information therefore addresses the LLFA's request for maintenance and management proposals.

Clarification of Flood Risk Assessment Inconsistencies

The LLFA identified several inconsistencies within the previous Flood Risk Assessment.

The FRA has been reviewed and updated to:

- Correct references to previous LLFA correspondence.
- Clarify the routing of exceedance flows and drainage pathways.
- Ensure consistency between the written text, hydraulic modelling outputs and drainage drawings.

These amendments have been incorporated within the updated submission package.

Existing Culverted Watercourse

The LLFA requested that the site layout be amended to accommodate full daylighting of the existing culverted section of watercourse.

The Applicant respectfully maintains that retention of the existing culvert remains appropriate in this instance.

This conclusion is based on the following factors.

Existing Function of the Watercourse

Investigations undertaken by the project team have established that the feature is closely integrated with the surrounding surface water drainage network and receives flows from the existing storm sewer system before discharging downstream. As such, it functions more akin to a drainage conveyance feature than a natural watercourse.

Previous LLFA Discussions

During pre-application discussions with the LLFA in 2024, the Applicant sought specific advice regarding the necessity of daylighting the culvert.

As recorded within correspondence dated 17 December 2024 (see Appendix A), the Applicant was advised that retention of the culvert would not be objected to because it maintained the existing drainage regime.

The scheme design, master planning process and drainage strategy subsequently evolved on this basis.

Practical Implications of Daylighting

The existing culvert is understood to be approximately 2m below existing ground level across parts of the site. Opening the watercourse would require significant excavation and earthworks, creating a substantial corridor through the centre of the development.

This would:

- Significantly reduce developable land;
- Affect the efficient use of an emerging allocation site;
- Constrain the approved masterplanning principles; and
- Introduce additional engineering and environmental impacts associated with major excavation works.

Policy Considerations

The Applicant notes that the LLFA Culvert Policy identifies a general preference for the removal of culverts where appropriate. However, the policy does not impose an absolute requirement in every circumstance every existing culvert to be removed or daylighted.

In this case, retention of the existing culvert:

- Does not introduce any new culverting;
- Maintains the existing drainage regime;
- Avoids substantial engineering intervention;
- Does not increase flood risk;
- Supports the efficient development of the site; and
- Reflects previous advice received from the LLFA.

The Applicant therefore considers that retention of the existing culvert is justified and that the submitted drainage strategy demonstrates a safe and sustainable drainage solution without requiring daylighting.

Conclusion

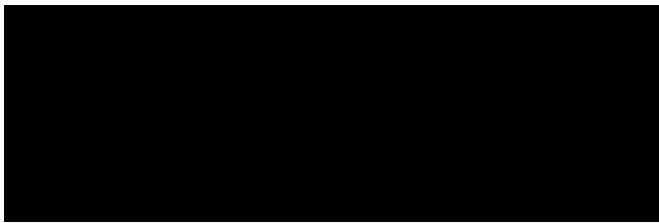
The revised submission addresses each of the matters raised by the LLFA through:

- Submission of a revised outline surface water drainage strategy;
- Provision of infiltration testing and ground investigation information;

- Demonstration of compliance with the National Standards for SuDS;
- Provision of attenuation calculations including climate change and urban creep allowances;
- Inclusion of maintenance and management proposals; and
- Correction of identified inconsistencies within the FRA.

The Applicant therefore respectfully requests that the LLFA reviews the enclosed information and confirms that sufficient information has now been provided to allow a substantive consultation response to be issued.

Yours sincerely,



John Panesar

For and on behalf of Jeremy Benn Associates Limited

Principal Engineer



Appendix A

From: Jack Harriman [REDACTED]
Subject: RE: 2024s1306 Groby, Leicestershire - Culvert Response
Date: 17 December 2024 at 15:58
To: John Panesar [REDACTED]

JH

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Hi John,

Yes this is what we discussed, I've just added a note in red to contextualise the discussion.

Jack Harriman
Senior Technician (Flood Risk Management)
Union Rep for UNISON
Environment & Transport Department
Leicestershire County Council
Tel: 0116 305 2261

www.flooding@leics.gov.uk

www.leicestershire.gov.uk/planning-and-environment/flooding-and-drainage

From: John Panesar [REDACTED]
Sent: Tuesday, December 17, 2024 3:51 PM
To: Jack Harriman [REDACTED]
Subject: 2024s1306 Groby, Leicestershire - Culvert Response

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Jack,

Further to our telephone conversation this afternoon, can you please confirm the following as discussed:

- If we did not daylight the watercourse culvert running through this site, the LLFA would not object to the planning application **based upon the status quo being maintained**.
- If we were to discharge surface water from the proposed development into the culverted watercourse, then LLFA would have grounds to ask for the culvert to be daylighted.
- The storm discharge from the proposed development would be acceptable into the southern watercourse (greenfield runoff rate)
- We will need to model the culvert to prove that it would not cause flooding to the proposed development.

Kind Regards,

John Panesar



John Panesar BEng(Hons) CEng MICE

Suite 1B, First Floor (Front Wing), Coleshill House, 1 Station Road,
Coleshill, B46 1HT



M:07834586390



From: John Panesar
Sent: 17 December 2024 15:24
To: Jack Harriman [REDACTED]
Subject: FW: 2024s1306 Groby, Leicestershire - Culvert Response

Jack,

Can we arrange a Teams meeting to discuss the 'daylight' the existing culverted watercourses.

Can you please give me your availability and also any cost involved.

All the site and culvert details are indicated on the emails attached below.

Kind Regards,

John Panesar



John Panesar BEng(Hons) CEng MICE

Suite 1B, First Floor (Front Wing), Coleshill House, 1 Station Road,
Coleshill, B46 1HT



From: Jack Harriman [REDACTED]
Sent: 29 October 2024 08:55
To: John Panesar [REDACTED]
Subject: RE: 2024s1306 Groby, Leicestershire - Proposed Residential Development.

You don't often get email from jack.harriman@leics.gov.uk. [Learn why this is important](#)

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Hi John,

Thank you for request for pre-application advice. Following review of the submitted documents, I can confirm the following.

The basin is not an asset Leicestershire County Council has produced, as such there is no design data held. From review, it seems likely that this serves the estate at southern Groby to the north of your site before it discharges into the unnamed ordinary watercourse to the southwest. Where there is insufficient information regarding any aspect of risk, the responsibility to investigate falls to the applicant.

Leicestershire County Council acting as Lead Local Flood Authority (LLFA) would be adverse to the proposal of the watercourse transecting the site being wholly diverted, especially if the function of the attenuation basin cannot be identified. It would be preferential that the watercourse be kept in situ and the development proposals designed around the existing land drainage. The LLFA's culverting policy, located in the County Council Flood Risk Management Strategy, welcomes proposals to 'daylight' existing culverted watercourses. Since the LLFA acts as the deciding body on alterations to existing ordinary watercourse under Section 23 of the Land Drainage Act 1991 it would be the ultimate assessor of any proposals here. As such, continued engagement would be welcomed regarding this matter.

To safeguard access to watercourses or ditches for future maintenance, inspection and improvement works in the future; clear margins should be provided from the top of banks. A minimum clear margin of 3m should be provided from each top of bank for watercourses less than 2 metres in width, a minimum clear margin of 4.5m should be provided for watercourses 2 metres or greater in width. Watercourses here would be considered the 'riparian responsibility' of the controlling landowner for any given land parcel a watercourse travels.

I hope this helps.

Jack Harriman
Senior Technician (Flood Risk Management)
Union Rep for UNISON
Environment & Transport Department
Leicestershire County Council
Tel: 0116 305 2261

www.flooding@leics.gov.uk

www.leicestershire.gov.uk/planning-and-environment/flooding-and-drainage

From: John Panesar <John.Panesar@jbaconsulting.com>
Sent: Tuesday, October 8, 2024 6:05 PM
To: flooding <flooding@leicester.gov.uk>
Subject: 2024s1306 Groby, Leicestershire - Proposed Residential Development.

Dear Sirs,

We are proposing a residential development consisting of 200 units and associated infrastructure in Groby.

The site has several watercourses running along the along the boundaries (south and east) and one watercourse running through the centre of the site, east to west.

The basin to the east of the site has a flood elevation basin – planning reference appears to be 79/01386/4-the central watercourse we believe feeds into the basin..

Location details are as follows:

Address (near) :

Sacheverell Way, Groby, Hinckley and Bosworth, Leicestershire, England, LE6 0YL, United Kingdom

Postcode (nearest) :

LE6 0YL

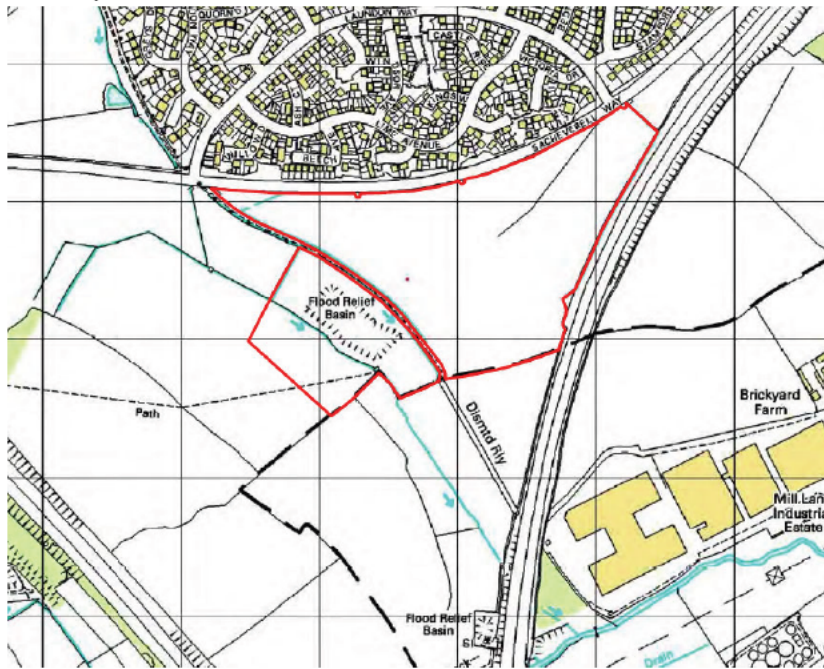
Grid Reference
SK 52641 06335
Grid Reference (6 figure)
SK526063
X (Easting) , Y (Northing)
452641 , 306335

We have attached the following plans for your reference:

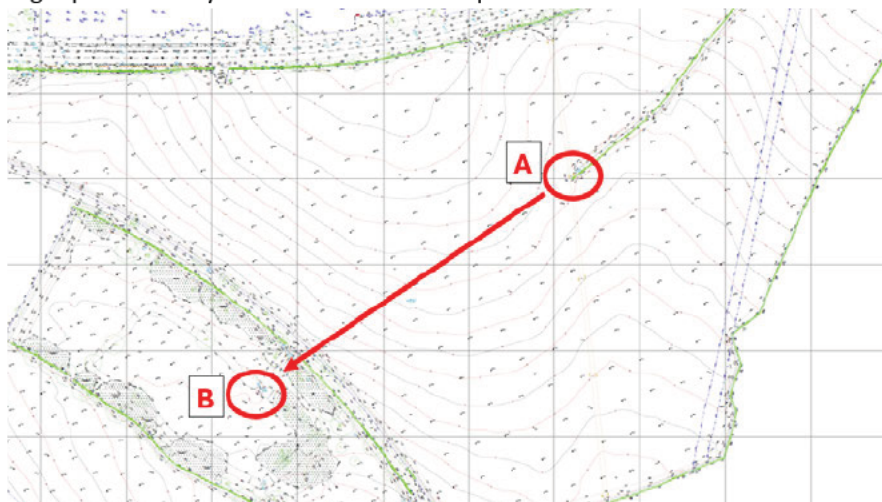
- Location Plan
- Masterplan
- Sewer Records
- Topographical Survey

Please find attached below further information for your reference:

The OS plan indicates a flood relief basin to the west of the site.



A geophysical survey was carried out which proved that the watercourse connects to the flood relief basin.



Basin outfall structure detail.





A planning layout indicating residential proposal and the watercourse diversion to the southern boundary existing watercourse.



We would be grateful for your advice/comments on the following items:

- Can you please explain or provide details of this flood relief basin and how the surrounding watercourses interact with it.
- Can we divert the watercourse running centrally towards the flood relief basin and connect to the southern watercourse.
- Who is responsible for these watercourses.
- What is the required easements for these watercourses.
- Would we need to open up the culverted watercourse and keep the same alignment.

We trust the above is satisfactory however if you require any further information please do not hesitate to

contact me.

Kind Regards,

John Panesar



John Panesar BEng(Hons) CEng MICE

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