



TECHNICAL NOTE – RESPONSE TO LEAD LOCAL FLOOD AUTHORITY COMMENTS

**PROPOSED EMPLOYMENT DEVELOPMENT
HORSEPOOL GRANGE, STANTON UNDER BARDON**

DOCUMENT CONTROL

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1.0 INTRODUCTION

- 1.1 This technical note has been produced by ADC Infrastructure, to address comments made by the Lead Local Flood Authority (LLFA) on an outline planning application (ref. 26/00423/OUT) for the development of up to 10,500sqm of employment floorspace (use class B2/B8) (all matters reserved except access).
- 1.2 This report should be read in conjunction with the previously submitted Flood Risk Assessment and Drainage Strategy report ADC3968-RP-C.
- 1.3 The LLFA comments, presented in **Appendix A**, state:
 1. *Given the topography part of the site currently drains to the west. The proposed drainage strategy currently looks to discharge all water post development to a watercourse south east of the site. As the water from the western site catchment does not currently drain in this direction this would involve catchment transfer of surface water. The LLFA request an existing drainage plan including all drainage features for the pre-development site, overland flow routing and off-site relevant receptors (including downstream connectivity) to understand where the water currently drains to. The developer should look to discharge water in a way to mimic the current drainage regime on site. Full consideration of draining the sites water to its current flow path needs to be completed. The developer needs to demonstrate fully that an outfall to the west for that sub catchment is not possible, and only then can alternative outfalls be considered for the site, if demonstrated to not increase offsite flood risk.*
 2. *The current drainage regime has a pond located at the top of the development. It is unclear how this pond will take water from the development when it is uphill from the area it is looking to drain.*
 3. *The strategy includes the use of attenuation tanks and ponds on site. There seems to be space around several of the ponds to increase pond size. Therefore, the LLFA would request that the ponds are increased in size to reduce the size of the tanks required on site. Ponds would be the method of storage preferred by the LLFA.*
 4. *Some permeable paving has been included on site, but it should be confirmed why further permeable paving has not been included.*
 5. *The drainage on the western side of the site currently uses pipework underneath greenspace. These pipes should be changed to be swales where possible. This will also help with meeting Standard 2 of the National Standards for SuDS (NSS).*
 6. *Notwithstanding any surface water drainage details submitted under this application, as the proposals are for outline permission, no specific drainage elements are fixed at this stage. As such, the LLFA would require that later reserved matters and detailed design fully comply with the National Standards for SuDS and to any other amended local or national policy/guidance relevant at the time of submission of those details. This includes (but is not limited to) a re-assessment of discharge rates, contributing areas, attenuation scale and the retention of the first 5mm of rainfall on-site. Any departure from the standard should be fully substantiated and agreed with the LLFA.*
- 1.4 This technical note addresses the LLFA comments in chronological order.

2.0 RESPONSE TO LLFA COMMENTS

Response to Comment 1 – Existing topography and drainage

- 2.1 The LLFA has requested an existing drainage drawing showing all drainage features for the pre-development site, overland flow routing and off-site relevant receptors (including downstream connectivity) to understand where the water currently drains.
- 2.2 The existing drainage layout drawing (**Appendix B**) shows the existing drainage features on the site which comprise a continuous ditch on the eastern, southern and western boundaries. The whole site area sheds towards the ditch from the high point on the northern boundary.
- 2.3 The high point of the ditch is in the southwest (identified on the existing drainage layout drawing) and this effectively splits the site into two catchment areas. The western catchment drains to the section of ditch that flows northwest towards the existing industrial area. This section of ditch was observed during the site walkover and was found to continue up to the gateway into the industrial estate (Figure 1). At the boundary of the industrial estate the ditch was found to stop abruptly and there was no onward continuation of the ditch along the boundary of the industrial area (Figure 2), therefore it is assumed that any flows within the ditch would spill over the top of bank and overflow into the industrial estate. This flow regime is inline with the flow routing shown on the Risk of Surface Water Flooding on the Flood Map for Planning, which shows overland flow paths heading east around the industrial area buildings and on land further to the south. There is no known ditch network in these areas to route the flows.



Figure 1: View northwest showing ditch towards existing industrial estate



Figure 2: View north along industrial estate boundary showing no ditch along the boundary

- 2.4 The eastern catchment drains to the section of ditch that flows eastwards towards Elliott's Lane. Upon reaching Elliott's Lane the ditch is culverted below the access road entrance and continues south parallel to the highway. At the junction of Elliott's Lane/Grassy Lane/Broad Lane the ditch routes southwest across farmland to link to a mapped watercourse along the eastern edge of the woodland to the west of Markfield Lane (Figure 3).



Figure 3: Downstream watercourse network serving eastern catchment

- 2.5 Therefore, due to the lack of suitable downstream connectivity of the drainage ditch network in the west, and it is considered appropriate to discharge the full extent of the proposed development drainage system to the existing outfall in the east, as this outfall route has confirmed connectivity to the mapped watercourse system further to the south. In any event the two catchments for the wider area combine at the confluence of the mapped watercourses approximately 1700m to the south of the site upstream of the watercourse crossing beneath Markfield Road and continuing towards Thornton Reservoir.

Response to Comment 2 – SuDS basin location in the north

- 2.6 The basin in the north of the site on the indicative drainage layout is referred to as ‘Catchment 1 Attenuation Basin’. The indicative levels for the basin are a top of bank level of 182.0mAOD and a basin invert level of 180.7mAOD. The ground levels on the development area to the west of the basin range from 182.0mAOD to 183.0mAOD. Therefore, there is opportunity for the development area to the west of the basin to use the open space at the basin 1 location as a SuDS drainage feature.
- 2.7 It should be noted that the development levels for the scheme have not yet been determined, so the extent to which the SuDS features shown on the indicative layout will serve each development area is yet to be determined.
- 2.8 The required attenuation storage will be made up from a mixture of detention basins in the open space areas and below ground geo-cellular crate storage below the yard and car park areas.

Response to Comment 3 – Use of open space around the detention basins

- 2.9 The SuDS detention basins are positioned in areas of open space around the perimeter of the site, however an earthworks and levels design for the scheme has not yet been undertaken. Therefore, due to the early stage of the design for the scheme as a whole and the indicative status of the layout, the SuDS basins have been shown with space around the perimeter of each one to account for a suitable maintenance margin and predicted earthworks that will be required to tie-in the basin to the surrounding ground levels.
- 2.10 For the SuDS features in the south of the site, a maintenance margin is required for the adjacent ditch along the site boundary, and this has been incorporated in the positioning of the basins.
- 2.11 As stated above, the attenuation storage will be made up from a mixture of detention basins and below ground geo-cellular crate storage. Therefore, following consent of the outline planning application, the detailed design at reserved matters stage will seek to maximize the use of open detention basins to provide attenuation storage with the remainder provided by the below ground storage.

Response to Comment 4 – Permeable paving

- 2.12 The development layout is indicative, so the extent of permeable paving to be used across the scheme has not yet been fully determined.
- 2.13 It is recognised that permeable paving would be an appropriate SuDS technique for use on car park areas. However, the industrial yard areas will require robust surfacing for HGV turning manoeuvres, and it is likely that these will be concrete slab surfaced, and therefore not suitable for permeable paving. The use and extent of permeable paving is to be determined at reserved matters stage when the detailed design of the drainage will be undertaken.

Response to Comment 5 – Drainage in west of site

- 2.14 The drainage in the west of the site runs through an area of open space, however it is likely that an earthworks embankment will be required in this part of the site. Therefore, the drainage has been shown as a piped system so that it can be accommodated in the available space along with the required earthworks.
- 2.15 Based on the current indicative layout, there is unlikely to be sufficient space for a swale in this part of the site due to the predicted extent of the earthworks.
- 2.16 The drainage design at Reserved Matters stage will provide detailed drainage calculations to demonstrate that Standard 2 of the National Standards for SuDS, which requires the first 5mm of rainfall for the majority of rainfall events to not result in runoff discharging off-site, is achieved via the SuDS to be incorporated in the development.

APPENDIX A

LEAD LOCAL FLOOD AUTHORITY COMMENTS

Application address Land East of Horspool Grange, Stanton under Bardon		Planning ref.	26/00423/OUT
		Our ref.	2026/0423/04/F
Description Outline planning application for a development of up to 10,500sqm of employment floorspace (use class B2/B8) (all matters reserved except access)		Consultation date	14/05/2026
		Response date	11/06/2026
Planning officer	Ashleigh Gade	Reviewing officer	Danielle Degville
Application type	Outline	Extension requested	☒
Refer to standing advice ☐	Conditions ☐	Further consultation required ☒	Concerns ☐

Consultation checklist

No.	Description	Check
1	Location plan	☒
2	Proposed layout plan	☒
3	Evidence that the site can be drained	☐
4	Topographic and ground investigation details	☒
5	The total impermeable area pre and post development	☒
6	All potential flood risk sources have been identified and assessed	☒
7	Existing and proposed peak discharge rates	☐
8	Consideration of sustainable drainage systems	☒
9	Attenuation volume calculations	☒
10	Consideration of the maintenance and management of all drainage elements	☒

LLFA Key Observations and Advice

Leicestershire County Council as Lead Local Flood Authority (LLFA) notes that the 4.1ha greenfield site is located within Flood Zone 1 being at low risk of fluvial flooding and a low risk of surface water flooding. The proposals seek to discharge at 1 in 2 year greenfield return period via attenuation tanks and 3 attenuation basins to the on-site watercourse.

Given the topography part of the site currently drains to the west. The proposed drainage strategy currently looks to discharge all water post development to a watercourse south east of the site. As the water from the western site catchment does not currently drain in this direction this would involve catchment transfer of surface water. The LLFA request an existing drainage plan including

all drainage features for the pre-development site, overland flow routing and off-site relevant receptors (including downstream connectivity) to understand where the water currently drains to. The developer should look to discharge water in a way to mimic the current drainage regime on site. Full consideration of draining the sites water to its current flow path needs to be completed. The developer needs to demonstrate fully that an outfall to the west for that sub catchment is not possible, and only then can alternative outfalls be considered for the site, if demonstrated to not increase offsite flood risk.

The current drainage regime has a pond located at the top of the development. It is unclear how this pond will take water from the development when it is uphill from the area it is looking to drain.

The strategy includes the use of attenuation tanks and ponds on site. There seems to be space around several of the ponds to increase pond size. Therefore, the LLFA would request that the ponds are increased in size to reduce the size of the tanks required on site. Ponds would be the method of storage preferred by the LLFA.

Some permeable paving has been included on site, but it should be confirmed why further permeable paving has not been included.

The drainage on the western side of the site currently uses pipework underneath greenspace. These pipes should be changed to be swales where possible. This will also help with meeting Standard 2 of the National Standards for SuDS (NSS).

Notwithstanding any surface water drainage details submitted under this application, as the proposals are for outline permission, no specific drainage elements are fixed at this stage. As such, the LLFA would require that later reserved matters and detailed design fully comply with the National Standards for SuDS and to any other amended local or national policy/guidance relevant at the time of submission of those details. This includes (but is not limited to) a re-assessment of discharge rates, contributing areas, attenuation scale and the retention of the first 5mm of rainfall on-site. Any departure from the standard should be fully substantiated and agreed with the LLFA.

Leicestershire County Council as Lead Local Flood Authority (LLFA) advises the Local Planning Authority (LPA) that the application documents as submitted are insufficient for the LLFA to provide a substantive response at this stage. In order to provide a substantive response, the information requested above needs to be submitted.

Advice to the Local Planning Authority

1. Standing Advice – National Planning Policy Framework

When determining planning applications, the local planning authority should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where informed by a site-specific Flood Risk Assessment (FRA) confirming it will not put the users of the development at risk. Where an FRA is applicable this should be undertaken in accordance with the requirements of the National Planning Policy Framework and accompanying Planning Practice Guidance.

2. Standing Advice – Consent

Where there are any works proposed as part of an application which are likely to affect flows in an ordinary watercourse or ditch, the applicant will require consent under Section 23 of the

Land Drainage Act 1991. This is in addition to any planning permission that may be granted. Guidance on this process and a sample application form can be found via the following website: <http://www.leicestershire.gov.uk/flood-risk-management>

Applicants are advised to refer to Leicestershire County Council's culverting policy contained within the Local Flood Risk Management Strategy Appendix document, available at the above link. No development should take place within 5 metres of any watercourse or ditch without first contacting the County Council for advice.

This consent does not consider local watercourse bylaws. It is the responsibility of the applicant to check if the local borough or district council has their own bylaws which the proposals will also need to consider.

3. Standing Advice – Maintenance

Note that it is the responsibility of the Local Planning Authority under the DEFRA/DCLG legislation (April 2015) to ensure that a system to facilitate the future maintenance of SuDS features can be managed and maintained in perpetuity before commencement of the works.

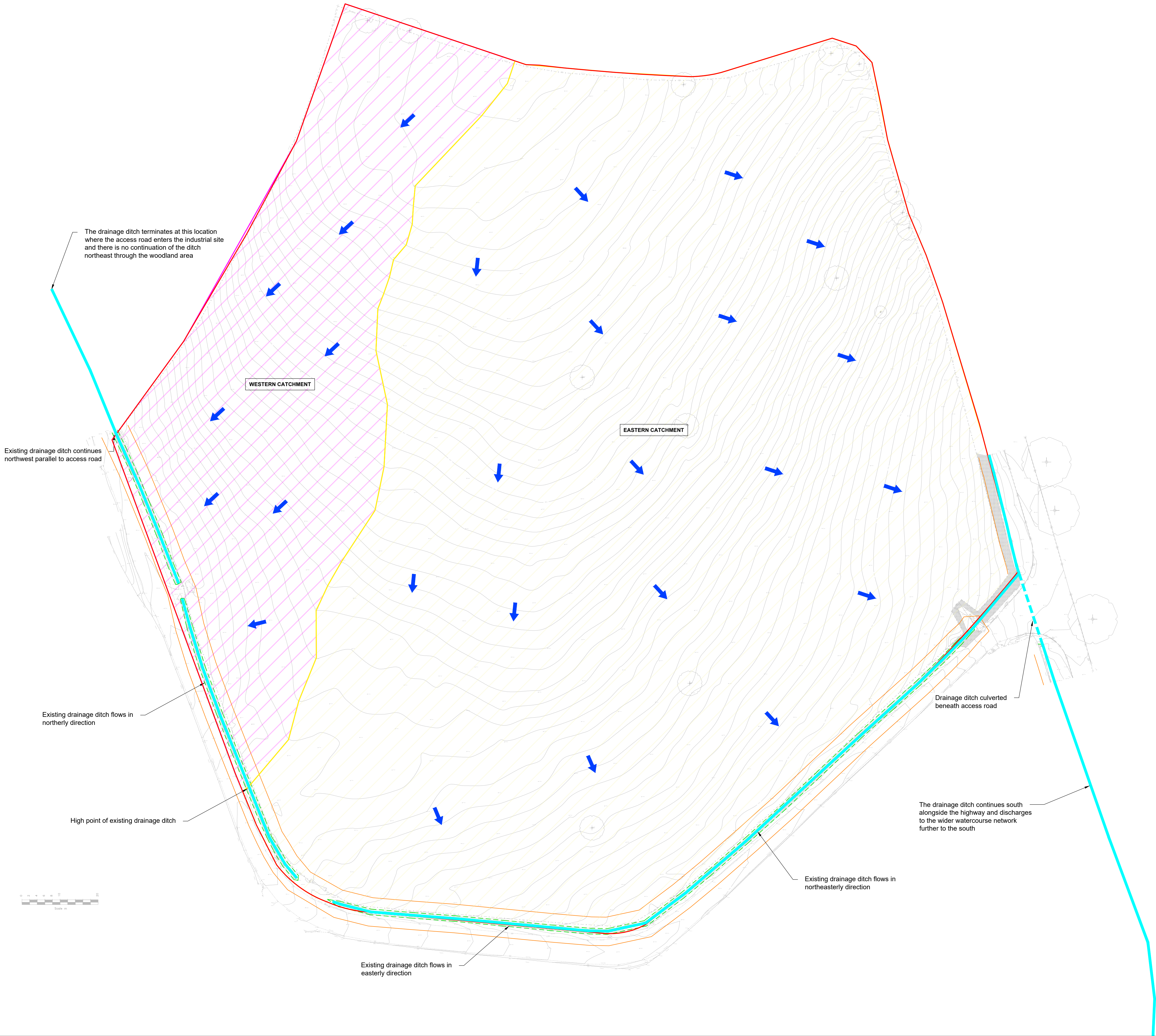
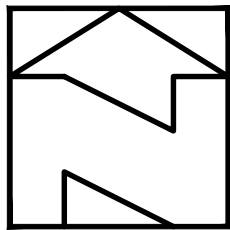
Additional information and guidance is available here:

<https://www.leicestershire.gov.uk/environment-and-planning/flooding-and-drainage/>

Note: Response provided by the Lead Local Flood Authority under the delegated authority of the Director of the Growth, Environment and Transport Department.

APPENDIX B

EXISTING DRAINAGE LAYOUT



This drawing references the data noted below

Data	Source	Reference	Rev.	Dated
Site Layout	Marrons	Concept Plan	M	15.01.26
Topographical Survey	SV Surveying	25483-25-01	-	16.11.25

General Notes

1.

Do not scale this drawing. All dimensions must be checked/verified on site.

2.

This drawing is to be read in conjunction with all relevant architects, engineers and specialists drawings and specifications.

3.

All dimensions are in metres unless noted otherwise. All levels are in metres unless noted otherwise.

4.

Any discrepancies noted on site are to be reported to the engineer immediately.

Key

Site Boundary

Drainage Features

Eastern catchment

Western catchment

Existing Drainage Ditch

Drainage Ditch Clear Margin

Direction of overland flow

P01	07.07.26	First Issue	RM	RW
Rev	Date	Description	Dr	Ch

Client:

Marrons

Project:

Horsepool Grange, Stanton under Barton

Title:

Existing Drainage Layout

ADC

INFRASTRUCTURE

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Size:

A1

Scale:

1:500

Status:

PRELIMINARY

Project	Originator	Volume	Level	Type	Role	Number	Status	Revision
3968	-ADC	-HGN	-XX	-DR	-CH	-0512	S1	P01