

<b>Application address</b> Land South of Lindley Wood Fenn Lanes Fenny Drayton Leicestershire		<b>Planning ref.</b>	25/01229/FUL
		<b>Our ref.</b>	2025/1229/04/F
<b>Description</b> Proposed change of use from residential (Class C3) to a self-storage facility (Sui generis). To include 240 self-storage containers and caravan self-storage; removal of one set of entrance gates and replacement of other entrance gates; provision of soft landscaping and sustainable drainage infrastructure		<b>Consultation date</b>	13/01/2026
		<b>Response date</b>	03/02/2026
<b>Planning officer</b>	Christine Zacharia	<b>Reviewing officer</b>	Danielle Degville
<b>Application type</b>	Change of Use	<b>Extension requested</b>	<input type="checkbox"/>
<b>Refer to standing advice</b>	<b>Conditions</b>	<b>Further consultation required</b>	<b>Concerns</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Consultation checklist

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

### LLFA Key Observations and Advice

Leicestershire County Council as Lead Local Flood Authority (LLFA) notes that the 3.24ha brownfield site is located within Flood Zone 1 being at low risk of fluvial flooding and a low to high risk of surface water flooding. The proposals seek to discharge at 521 l/s via a dry swale to the downstream drainage network in the existing sewer.

The National Standards for SuDS (NSS) require brownfield sites to reduce runoff rates and volumes post development to greenfield runoff rates with “the peak allowable discharge rate from the development for the 1% AEP...limited to the 1% AEP greenfield runoff rate or 3l/s/ha, whichever is the greater.” However, as the proposals do not propose significant changes to impermeable areas the LLFA is happy to consider a relaxation factor on these rates, of 5x the greenfield runoff rate (as stated in the NSS), which would set runoff rates at 188 l/s. The LLFA may consider a further relaxation but needs to understand more about the current sites drainage regime.

No information has been provided on how the current site drains other than a point noting an outfall from the site. It is not clear how the large area of impermeable area is drained, what connections are on site and how the drainage connects to the existing outfall. There is also no information about the onward connectivity of the outfall. The LLFA need to understand how the existing site currently drains to understand the effect the current drainage regime has on the runoff leaving site, as it could be providing restricts due to outfall sizes and already providing some attenuation on site. It is also unclear how, if current drainage on site is unknown, the existing drainage will connect to the newly built swale. It should be noted that the existing drainage may be restricting flows off-site beyond those calculated.

The Modified Rational Method is being used to calculate the brownfield runoff rate from the site. The LLFA require an intensity of 50mm/hr to be used in calculations. And a runoff coefficient of 1.0 can be used. The LLFA calculate the brownfield runoff rate for the site as 450.36 l/s ( $Q = 2.78CiA$  therefore  $Q = 2.78 \times 1.0 \times 50 \times 3.24$ ). A climate change allowance should be applied on proposals only, not the existing drainage calculations.

The LLFA would like to note that whilst the changes requested above may not require a significant change to the proposed storage required on site, despite the reduction in runoff rate, it will provide protection for downstream flood risk.

There does not appear to be any freeboard provided on the swale. The LLFA would request a suitable freeboard be designed into the feature.

The topographical survey for the site is not readable, when zoomed in it blurs. Please can a readable survey be submitted for review.

---

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 following information is required:

- Existing drainage plan for the site, including all connections on site to the outfall
  - Proof of onward connectivity to the wider network of the proposed point of discharge
  - Proposed runoff rate reduced to 5 x greenfield runoff rate (188l/s) – unless otherwise agreed with LLFA following submission of existing drainage details
  - Topographical survey for the site
  - Suitable freeboard added to swale design
-

## **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 Environment and Transport.*