

Subject: FW: 24/01157/HYB - Kyngs Golf Club, Station Road, Market Harborough - drainage information

From: george denny <
Sent: 08 October 2025 12:48
To: Alex Jelley <
Cc: Martin Ladd < Edward Stacey
Subject: Re: 24/01157/HYB - Kyngs Golf Club, Station Road, Market Harborough - drainage response

Subject: Clarification of Drainage and Flood-Risk Position – Application 24/01157/HYB

Date: 8 October 2025

Hello Alex

Further to your email of 8 October 2025 regarding drainage and flooding matters, I wish to confirm that all flood-risk and drainage information required by both the Environment Agency (EA) and the Lead Local Flood Authority (LLFA) has been submitted, accepted, and available on the public planning portal since **29 July 2025**.

Environment Agency Position

The Environment Agency's Trentside Office (the statutory planning consultee) confirmed by letter dated **29 July 2025 (Ref LT/2025/129061/05-L01)** that both the Full and Outline elements of the application lie wholly within **Flood Zone 1**. That letter explicitly accepted **Flood Risk Assessment (FRA) v4 – FW2526_FRA_001 (14 July 2025)** and required only standard conditions on finished-floor levels (300 mm above the top of bank of the northern boundary watercourse).

The Borough Council's Drainage Officer subsequently confirmed on **30 July 2025** that the EA's conditions were sufficient to satisfy the NPPF, and the EA reaffirmed on **15 September 2025** that its July advice remained current. This means that as of the end of July 2025, all statutory flood-risk consultees had confirmed acceptance of the FRA and imposed only routine planning conditions.

Lead Local Flood Authority (LCC) Position

The LLFA's latest letter of **7 October 2025 (Ref 2024/1157/04/F/R5)** clearly references "**FRA v4**", confirming it was working from the same EA-approved version. That response retains the 11 ha figure but now records that the **entire site lies within Flood Zone 1**. By citing the same FRA v4 and adopting the EA's mapping, the LLFA effectively accepted the EA's position and was up to date with the statutory consultee's conclusions. Any residual statements about "further information" therefore relate to internal consistency within the LLFA, not to any deficiency in the application documents.

QBAR and Surface-Water Drainage

FRA v5 (July 2025) and the accompanying **Surface Water & SSSI Addendum (August 2025)** confirm that QBAR is **not applicable**, as the proposal has **no positive outfalls** and relies entirely on infiltration through sedum roofs and permeable grassed areas. This infiltration-based approach was accepted by the EA in its 29 July 2025 letter and endorsed by the Borough Drainage Officer on 30 July 2025. Accordingly, there are **no outstanding QBAR or discharge-rate matters** to address.

Summary

From the end of July 2025 onward, all statutory flood-risk consultees confirmed that:

1. The development lies wholly within Flood Zone 1;
2. The submitted FRA is satisfactory subject only to standard conditions; and
3. No further drainage or flood-risk information was required from the applicant.

It appears that subsequent internal data-handling inconsistencies within the consultee process have led to the Environment Agency's Trentside Office factual data and assessments not being correctly referenced. The Trentside Office clearly confirmed on **7 January 2025** that the site lies within **Flood Zone 1**, and this position has remained consistent throughout. This disjoint has likely caused a mismatch in document referencing and unnecessary delays in consultee alignment, despite all parties effectively working from the same approved FRA and evidence base.

On this basis, it would seem inaccurate to attribute any delay to the applicant or to require a further extension of time on drainage grounds. All necessary evidence and consultee acceptances have been in place and publicly available since **29 July 2025**.

Kind regards,

George Denny

On Tue, 7 Oct 2025 at 13:04, Alex Jelley <> wrote:

Good afternoon,

Please find attached the latest comments from the LLFA. Further information/submission of missing information is still required.

I am still awaiting the latest highway comments, but as it stands there remain issues with Ecology and Drainage/flooding matters. I am of the view that we cannot keep seeking further information or repeatedly requesting the same details to be provided over and over again. There has been ample time and opportunity to provide drainage and ecology details for this proposal. If you want to attempt to address these matters, I will need the outstanding/necessary details asap. As the case officer I have already allowed several rounds of re-consultation. In some authorities, amendments are not allowed and the application is determined on its initial submission. This application is taking up a lot of my time and I need to get this determined.

The deadline for Committee reports for the November Committee is 21 October. It is now clear that the information required for this application cannot be submitted and re-consulted on in this timeframe. If you want to attempt to overcome these matters, then an extension of time will be required to cover off the December Committee. Please bear in mind, if you do not agree to this then I will be refusing the application on or before the current expiry date of 7 November 2025.

If you agree to an extension of time and provide the required information, then the application will only go to Committee with all matters resolved to the satisfaction of the consultees and myself as the case officer. If the matters are not resolved/remain outstanding, then this application will be refused under delegated powers.

Please could you let me know how you would like to proceed? I would suggest one final extension of time until 5 December 2025. If you are agreeable please confirm by return of email at your earliest convenience?

Regards

Alex Jelley BA MSC MRTPI

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