

FRST Addendum (24/00083/HYB)

Our ref 61188/06/JK/MWS/PH
Date 21 August 2025
To Hinckley and Bosworth Borough Council
From Lichfields/Farrow Walsh

Subject Statement of compliance with Hinckley and Bosworth's 2025 Level 1 SFRA

1.0 Introduction and purpose

- 1.1 This note has been produced by Lichfields and Farrow Walsh as an addendum to the Flood Risk Sequential Test (dated 6 June 2025) submitted as part of the live planning application (ref. 24/00083/HYB) pursuant to the Land at Burbage Fields Farm, Bullfurlong Lane, Burbage, Leicestershire [‘the FRST’].
- 1.2 The note has been prepared at the request of Hinckley and Bosworth Borough Council [‘the Council’]. The Council has requested that the applicant demonstrate compliance with the Council’s 2025 Strategic Flood Risk Assessment Level 1 document¹ [‘L1 SFRA’], dated 16 April 2025 and produced by JBA consulting. In particular, the Council has asked that we demonstrate compliance with Appendix C of the L1 SFRA, which relates to the assessment of flood risk.

Purpose and role of the L1 SFRA

- 1.3 We note that the Council’s website² states, in relation to the purpose of the L1 SFRA:
- “The Level 1 SFRA (2025) document provides a comprehensive and robust evidence base on flood risk issues to support the review and update of the planning policies for Hinckley and Bosworth borough.”*
- 1.4 This is distinct from a Level 2 SFRA, which assesses in detail the nature and implications of flood characteristics within an LPA. Neither of these documents is considered policy or supplementary guidance.
- 1.5 Whilst we accept that there are synergies between the Council’s assessment of flood risk for its own policymaking purposes and the general requirements for - and procedure involved with - producing sequential tests for planning applications, the two matters are treated

¹ https://www.hinckley-bosworth.gov.uk/downloads/file/8507/strategic_flood_assessment_sfra_2025_level_1_main_report
² https://www.hinckley-bosworth.gov.uk/info/1004/planning_policy_and_the_local_plan/1571/strategic_flood_risk_assessment_sfra_2019

separately to the sequential test for plan preparations in national policy³. In other words, there is no policy requirement for an FRST submitted with a planning application to be aligned with the L1 SFRA, particularly since the Level 1 assessment does not speak to a quantifiable level of flood risk on the sites assessed within the FRST.

- 1.6 Next, it is demonstrated that the flood risk modelling undertaken as part of the FRST was undertaken in compliance with the methodology in Appendix C of the L1 SFRA.

2.0 Compliance of the FRST with L1 SFRA ‘Appendix C: SFRA User Guide: Sequential test methodology’

- 2.1 This section demonstrates how the FRST complies with the main points of the L1 SFRA. Given that the application site did not pass the sequential test, issued around the exceptions test are not explored.

Considering flood risk from all sources

- 2.2 As summarised in part 1.2 (p.2) of Appendix C:

“The sequential test now requires that all sources of flood risk should preferably be considered in terms of low, medium, and high-risk areas, both now and in the future. To address this requirement, it is necessary to explicitly consider the effects of climate change when performing the sequential test. It is important to recognise that the new guidance advises that the sequential test can no longer be performed by simply using the present day Flood Zones describing river and sea risk.”

- 2.3 The FRST assesses all forms of flood risk. This is demonstrated primarily by virtue of the fact that there is no risk of river and sea flooding on the site; the FRST was necessary on account of the presence of surface water flood risk on the site. The presence of surface water flood risk can be identified on the Environment Agency’s [‘EA’] flood maps for planning service, as well as within the site-specific flood risk assessment for the scheme, undertaken by Farrow Walsh. No source of flood risk other than fluvial (river and sea) and/or pluvial (surface water) was identified in any of the sites that were assessed.

- 2.4 The assessment undertaken by Farrow Walsh for the FRST considered the effects of climate change for both fluvial and pluvial flood risk. The approach taken is demonstrated in more detail below.

Logical comparison and risk sequence

- 2.5 As summarised in part 2.1 of Appendix C:

³ See NPPF paras 173-175 and PPG ID: 7-027-20220825.

“The sequential test must be based on mapping that enables decision making according to a prioritisation based on a risk-based sequence (for river and sea flooding national mapping is available that describes low, medium and high-risk flood zones but comparable mapping of this specific type and quality is not available for other sources; for river and sea flooding the risk zones are based on the assumption that no flood risk management features are present).”

“[...] A basic requirement for the sequential test to be performed is that appropriate, competent mapping can be prepared to enable logical comparison of the flood risk from different sources at alternative locations, both now and in the future, as this is fundamental to establishing a logical “risk sequence”.

- 2.6 The assessment undertaken by Farrow Walsh used EA data and mapping to assess individual sites based on their risk of flooding from all sources. Whilst we needed to consider flooding from all sources, it was correct to assume a hierarchical approach based on sources of flooding. To this end, the approach within the FRST to discount any sites which contained Flood Zones 2/3 was appropriate. Similarly, the approach of comparing the extents of the surface water flood risk on alternative sites with that of the application site and discounting sites with a greater extent of flood risk is also appropriate and in line with the L1 SFRA. This is explored in more detail in 2.14.

Assessment of fluvial flooding

- 2.7 Thorough review and consideration of the predicted flood modelling extents obtained from the EA was undertaken on the application site, having regard to the fact that the L1 SFRA used the latest undefended models Rothley Brook (2022) model and Shenton Brook (2015) model outputs in preference to the EA's Flood Map for Planning.

Fluvial climate change modelling

- 2.8 Considered with reference to Part 5 of the Hinckley & Bosworth Level 1 Strategic Flood Risk Assessment Part 5 and Appendix A, B and C:

‘3.1.2 Recommendations for using river flood risk in the sequential test

- *For present river flood risk, the Flood Zones 1, 2 and 3a and 3b should be used.*
- *For future river flood risk, the Flood Zones with climate change allowances should be used where there is detailed modelling, and it is practicable to use these. The approach to climate change in this SFRA is set out in Section 5 of the Main Report and Appendix B: Data Sources.*
- *Where generalised modelling has been used to delineate Flood Zones and where not practicable to use detailed modelling, Flood Zone 2 should be used as a proxy for Flood Zone 3a with climate change and Flood Zone 3a should be used as a proxy for Flood Zone 3b with climate change. If a development site is located within close proximity of Flood Zone 2 using generalised modelling, then an assessment of climate change for this zone may be required at the Level 2 SFRA stage’.*

- 2.9 Climate change is increasing the chances of flooding, with climate models projecting that we will see warmer and wetter winters, and more frequent and intense extreme weather events.
- 2.10 The models adopted by the EA use projected rainfall, sea levels and river flows. They estimate flood risk in different ways, with different time periods.
- 2.11 The EA flood risk data covers the following time periods:
- 1 2040 to 2060 for surface water
 - 2 2036 to 2069 for rivers and the sea
- 2.12 The models cannot predict exactly when the chance of flooding will go up, as it could happen at any time during these time periods.

Assessment of pluvial flooding

- 2.13 Appendix C states:

“3.2.2 Recommendations for using zone maps for surface water flooding

- *Use the 0.1% AEP surface water flood extent mapping to define a simple zoning scheme that identifies higher risk and lower risk zones.*

[...]

The decision has been made to use the 0.1% AEP surface water extent as the higher risk zone. This is a potentially a slightly more conservative approach but as the predicted 0.1% AEP surface water extents include assumptions that a proportion of the predicted flow is conveyed in pipe or channel systems the outlines could potentially underpredict the flood extents where such watercourse and drainage systems do not in fact exist. The proposed approach will direct development to areas at low risk in a similar way to the fluvial Flood Zone 1 and will not preclude development in the surface water higher risk zone provided that an FRA is performed to demonstrate that the risks in the higher risk zone can be appropriately managed.”

- 2.14 Farrow Walsh’s assessment used the 0.1% AEP surface water flood extent mapping on all sites, including the application site. Any sites which had a greater extent than the application site were discounted from the assessment. Any sites with a lower extent, or which had less than 0.1% AEP surface water flood risk were not discounted on flood risk grounds within the FRST.

Pluvial climate change modelling

- 2.15 As noted in Table 5.1 of Appendix C, the use of the 0.1% AEP surface water zone implicitly includes an allowance for climate change when considering higher risk areas.

Groundwater, sewer, reservoir, and canal flooding

- 2.16 As stated above, none of the sites were identified as being at risk of groundwater, sewer, reservoir, and canal flooding. Farrow Walsh's findings on this point were reached on the basis of compliance with Appendix C.