

Mr Alex Jelley
Hinckley & Bosworth Borough Council
Development Services
Hinckley Hub Rugby Road
HINCKLEY
Leicestershire
LE10 0FR

Our ref: LT/2025/129061/03-L01
Your ref: 24/01157/HYB
Date: 08 April 2025

Dear Mr Jelley

**HYBRID PLANNING APPLICATION SEEKING FULL PLANNING PERMISSION FOR THE ERECTION OF A GOLF LEISURE AND HEALTH SPA AND OUTLINE PLANNING PERMISSION (ALL MATTERS RESERVED EXCEPT FOR ACCESS) FOR THE ERECTION OF UP TO 126 GOLF HOLIDAY LODGES WITH ASSOCIATED WORKS
KYNGS GOLF AND COUNTRY CLUB STATION ROAD MARKET BOSWORTH
NUNEATON LEICESTERSHIRE CV13 0NP**

Thank you for consulting the Environment Agency on the above application, received 11th of March 2025.

We have reviewed the information for the Hybrid planning application seeking Full planning permission for the erection of a golf leisure and health spa and Outline planning permission (all matters reserved except for access) for the erection of up to 126 golf holiday lodges with associated works, and have the following comments: -

Full planning permission for the erection of a golf leisure and health spa

The site for this element of the proposals lies wholly within FZ1 and therefore we have no fluvial flood risk objections to the development of the golf leisure and health Spa building.

Outline planning permission (all matters reserved except for access) for the erection of up to 126 golf holiday lodges with associated works

Environment Agency position:

In the absence of an acceptable Flood Risk Assessment (FRA) we object to this Outline application and recommend that planning permission is refused.

The development of 126 golfing holiday lodges, in part of the site currently shown as FZ3, poses a risk of flooding to these buildings from the adjacent watercourse, and with each lodge sleeping up to 4 people, this could result in 504 people being put in a location with a risk to life (for more on this aspect see "Additional Information" below).

In addition the previously planning permission information submitted ref: 24/000026/FUL and 24/00027/FUL are not relevant to the currently proposed holidays lodges site in terms of fluvial flood risk, because the previous proposals were both located in areas away from the watercourse and outside of the floodplain in FZ1.

Reasons

The submitted FRA and supporting information (email dated 10 March 2025, ref M Ladd21) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

1. be based on suitable hydraulic calculations or modelling to establish the site specific flood risk: -
 - It is not appropriate or acceptable to transfer our flood map for planning extents onto OS map ground levels in order to estimate any flood level.
 - suggesting a flood level for this site based on the downstream STW site, developed in 1991 (?) is also wholly inappropriate for any assessment of this upstream site, where flood levels would be high as the watercourse and flood flows are on a gradient towards the STW (as opposed to remaining at a static level, as suggested by the STW assumed level applying to all 3 cross sections submitted).
 - Suitable hydraulic calculations or modelling will need to be undertaken by the applicant/their flood risk consultants in order to better establish flood levels from upstream, through to downstream of the proposed golf holiday lodge site area, if any of the lodge were to remain in the flood zone areas.
2. consider the impact on flood levels from the works undertaken to the site in 2003; Including confirming if flood plain compensation for the ground level raising in flood zone 3 was provided, and/or the impact of the loss of that floodplain storage on flood levels on and adjacent to the site and on 3rd parties on the opposite bank. Flood levels will have increased both on and off site where floodplain compensation was not previously provided.
3. show suitable flood level information on the site cross sections submitted as shown on drawing No. 3197 revisions B to D, for the reasons given in point 1 above.
4. take the impacts of climate change into account; there is no assessment of the impact of climate change using appropriate climate change allowances, for more information see ['Flood risk assessments: climate change allowances'](#)
5. adequately consider how a range of flooding events (including extreme events) will affect people and property
6. adequately consider how people will be kept safe from the identified flood hazards
7. adequately consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event. This site may be covered by our flood warning service in terms of a Flood Alert being issued for this area, but there is no Flood Warning covering it. In addition any buildings proposed to be located in the flood alert area are likely to lie within FZ3, and therefore should be re-located to an area of lower flood risk FZ2 or out of the flood plain in FZ1.

Please note our recommended internal finished floor level for any buildings that have to be located in the flood plain Flood Zones 3 and/or 2, is 600mm above the 100 year plus relevant allowance for climate change (see point 4 above) flood event level. However for temporary buildings such as the lodges, this value should be applied to the underside of the proposed buildings, to reduce any obstruction to overland flood flows. The current proposals to set the holiday lodges 250mm above existing external finished ground levels, would therefore only be acceptable where they are located on land appropriate for this element of the development (see table 2 of the NPPF) and where this proposed level would make the underside of the lodges higher than the above recommended internal finished floor level.

Overcoming our objection

To overcome our objection to the **Outline planning permission (all matters reserved except for access) for the erection of up to 126 golf holiday lodges with associated works**, the applicant should submit a revised FRA and supporting hydraulic calculations/modelling which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

IMPORTANT Information for LPA and Applicant

The Environment Agency has recently (2025) released an update to both our Long Term Flood Risk Maps, and our Flood Map for planning service, for more information see <https://www.gov.uk/government/publications/national-assessment-of-flood-and-coastal-erosion-risk-in-england-2024> and <https://flood-map-forplanning.service.gov.uk/location>

As a result the flood risk to the holiday lodges site has changed in both extent and risk rating, with some areas now showing there could be a 3.3% AEP (1 in 30) chance of flooding each year. This AEP is known as the functional floodplain, and would result in the current proposals receiving an "In principal" objection from us if they were to be pursued, as they would be contrary to Table 2 of the NPPF.

We therefore recommend that in addition to the above comments on the submitted FRA, the proposed area for the development of the holiday lodges is reconsidered and any revision of this document is also updated with the latest best available information as shown on the updated Flood Map for Planning, prior to any re-consultation with us.

Additional Information

The holiday lodge development is located in an area of FZ3 where only the generalised "Flood Alert" for the Rivers Anker and Sence, covers this location and therefore the associated evacuation needs from an actual on site flood event could be significant. This is because it is unlikely that the development would be evacuated for every flood alert the EA issues in the river Anker and Sence area. It is a matter for your Authority to review and agree on the detail of any site specific flood warning and evacuation plan, if the proposals were to proceed as submitted.

Yours sincerely

Ms Huda Al Tahhan
Planning Advisor

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