

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

Our ref: LT/2025/129061/04-L01
Your ref: 24/01157/HYB
Date: 20 June 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 reconsulting the Environment Agency on the above application received 2nd of June 2025.

Full planning permission for the erection of a golf leisure and health spa
Our previous 'no Objection' response remains valid.

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.

Reasons

The FRA v 2 dated April 2025 does not adequately assess the issues previously raised regarding the flood risks posed to or by the development and therefore remains inadequate for the following reasons. In particular, the FRA fails to:

1. propose a site boundary/layout that can be relied upon for the lifetime of the development - The red line boundary for the holiday lodges has been amended to that shown on the separately submitted Location Plan amended 10.6.2025 in order to avoid the FZ3 extent as shown on the flood map for planning (and as shown on the not updated Figure 2, and Appendix B location plan).
 - The flood map for planning maps are provided to only indicate the extent and likelihood of flooding from rivers or the sea to steer planning applications to areas of lower flood risk. They are not definitive, and should not be used for site specific FRA development level assessment, or to sequentially set out a site.
 - Suitable hydraulic calculations or modelling of the adjacent watercourse, will be needed to establish the flood levels at the upstream, mid-point and downstream extents of the proposed lodges area of the site, for the 1 in 30, 1 in 100, 1 in 100 plus an allowance for climate change, and 1 in 1000 return period flood events.
 - The flood levels established above should then be marked on site specific topographic survey as contour lines to confirm the site specific flood plain extents and flood risk.

Environment Agency
Trent Side North, West Bridgford, Nottingham, NG2 5FA.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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- The topographic survey submitted needs updating because the version within Appendix C, drawing No. 020235-08-01, dated 13-08-08, was undertaken over 15 years ago, so cannot be relied upon to provide current site levels. To confirm existing site levels and flood risk, prior to proposing a site layout for the lodges, new survey will need to be undertaken.
 - In addition it is not clear which flood map has been used as the background for Figure 2, because no key or map title block have been included on the screenshot.
2. Be based on suitable hydraulic calculations or modelling to establish the site specific flood risk: -
- Section 4.3 Finished Floor Levels (4.3.2) states - " Floor levels of the lodges are to be set such that they are a minimum of 300mm above the 100-year plus climate change peak flood levels."
 - However it will not be possible to apply the above statement to the Holiday Lodges element of the development without suitable hydraulic calculations or modelling being undertaken to determine this flood level, as advised in point 1 above.
3. Adequately consider the provision and feasibility of flood warning systems, or evacuation, in respect of this site.
- The holiday lodge development is located in an area where only the generalised "Flood Alert" for the Rivers Anker and Sence, covers this location. There is no Flood Warning or severe Flood Warning as referenced in Section 4.5.8, covering the site 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.
 - In addition, the Appendix C submitted survey currently shows the area of land running parallel to the watercourse where a line of lodges are proposed to be at a slightly higher than the land for the middle horseshoe of lodges. This could hamper evacuation if guests have to cross an area of deeper flooding to reach the main site, during extreme flood events. As shown on the Flood Map for Planning, Rivers and sea with (and without) defences, Climate change, Rivers and sea 1 in 1000 map on Gov.uk.
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4. Use the latest set of surface water flooding maps as shown on the flood map for planning on Gov.uk, for Figure 4.
- the existing Figure 4 is based on a previous SW map which includes fluvial flood extents, and not purely surface water risk.
 - In addition, the red surface water flow arrow at the top of Figure 4 (and on Figure 3 and the Appendix A, Site Location - Road map figure) should be pointing from east to west, the direction in which the watercourse flows (towards the railway line and sewage treatment works). However the arrows are currently pointing in the wrong direction, west to east, suggesting water can flow uphill. It is unclear if this is a simple drawing error or a misunderstanding of how the watercourse and catchment drainage functions, contrary to the statement that the land falls from east to west in Sections 2.6.2, 3.2.2 and 3.5.4.

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.

Additional information on FRA

Whilst it is 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, we would like to highlight the 'Stay Put' approach proposed for vulnerable users during extreme flood events in Sections 4.4.6 and 4.5.1, could lead to guest who may subsequently have to be rescued, during an extreme flood event, due to the flood extent as shown on the Flood Map for Planning, Rivers and sea with (and without) defenses, Climate change, Rivers and sea 1 in 1000 map on Gov.uk, surrounding some of the lodges.

Section 4.3 Finished Floor Levels

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 flood event level, see point 2 above.

However the lodges should not be located in FZ3, because they do not have to be there, and in order to design for residual flood risk in FZ2 and current FZ1 - for temporary buildings such as the lodges, the above recommendation 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 where this proposed level would make the underside of the lodges higher than the above recommended internal finished floor level.

IMPORTANT Information for LPA and Applicant

The Environment Agency would not wish to see any previously permitted ground level raising from circa 1998 or 2002 (over 20 years ago) that has not been undertaken, being implemented now in the area proposed for the lodges, and/or within the currently shown flood plain extents, in order to facilitate the current development proposals. This is because any loss of existing flood plain storage as shown on the Flood Map for planning, could result in an increase in flood risk off site to third parties.

Yours sincerely

Ms Huda Al Tahhan
Planning Advisor

Direct e-mail planning.trentside@environment-agency.gov.uk