



**RESPONSE OF THE LEAD LOCAL FLOOD
AUTHORITY TO CONSULTATION BY
HINCKLEY & BOSWORTH BOROUGH
COUNCIL**

Application address Land Adj The Trinity Centre Merchant Road Hinckley Leicestershire LE10 0LQ	Planning ref. 25/00354/FUL Our ref. 2025/0354/04/F/R2		
Description Erection of 72 bed residential care facility (C2) with associated access, car parking, ambulance drop off area and landscaping	Consultation date 28/08/2025 Response date 11/09/2025		
Planning officer Emma Baumber	Reviewing officer Danielle Degville		
Application type Full	Extension requested <input type="checkbox"/>		
Refer to standing advice <input type="checkbox"/>	Conditions <input type="checkbox"/>	Further consultation required <input checked="" type="checkbox"/>	Concerns <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 checked="" type="checkbox"/>
5	The total impermeable area pre and post development	<input type="checkbox"/>
6	All potential flood risk sources have been identified and assessed	<input checked="" type="checkbox"/>
7	Existing and proposed peak discharge rates	<input 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 0.46ha brownfield site located within Flood Zone 1 being at low risk of fluvial flooding and low to medium risk of surface water flooding especially in the southern portion of the site. The proposals seek to discharge at 25.3l/s via pervious paving and 2 linked cellular storage attenuation before draining to a Severn Trent Water combined sewer just outside the redline boundary.

A response to the previous LLFA comments has been submitted for review. This document sets out the principles previously established in the approved 2018 application for this site. However, whilst it is noted that the 2018 application was approved, previous applications have no standing on whether a new application should also be approved. Since the 2018 application SuDS guidance has been updated, most recently in June 2025 with the release of the new National Standards for SuDS.

The developer enquiry response from STW whilst agreeing to a 50% reduction in current rates does state "...However, it is advised to discuss flow rates with the LLFA as national policy states that all developments should seek to discharge at greenfield rates where practical".

The new National Standards for SuDS confirm that brownfield sites must achieve greenfield run-off rates (QBAR in this case) unless it is adequately demonstrated to not be reasonably practicable or technically viable. In such instances, the applicant should seek to reduce discharges rate as close as possible to the greenfield QBAR rate, but should never exceed the 5x the greenfield 1 in 100 year rate.

The Quick Storage Estimate drainage calculations are insufficient to support a full application. A full MicroDrainage model (or similar) or a Source Control Cascade model should be submitted to support the scale of the SuDS proposed. This is required with all full applications to ensure that a robust surface water drainage scheme is being proposed. If information has been submitted with a previous application it should be resubmitted with the new application to ensure it can be considered in full.

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 still required:

- Amended surface water drainage strategy proposals in line with current policy and standards
- Full set of drainage calculations for the proposed surface water drainage strategy

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.

4. Standing Advice – Brownfield Development Runoff

For brownfield sites, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must seek to discharge at greenfield runoff rate from the development for the same rainfall event. Where this is clearly demonstrated to not be reasonably practicable, discharge should be restricted as close to greenfield rates as reasonably practicable, but should never exceed the rate of discharge from the site prior to redevelopment.

The runoff volume from the development in the 1 in 100 year, 6 hour rainfall event should be constrained to a value as close as is reasonably practicable to the greenfield runoff volume for the same event, but should not exceed the runoff volume from the development site prior to redevelopment for that event. Where an increase in discharge volume is unavoidable, the proposals should discharge at QBar or provide alternative mitigation in line with CIRIA C753.

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.