

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

Our ref: LT/2023/128012/01-L01
Your ref: 23/00674/FUL
Date: 22 August 2023

Dear Sir/Madam

**SITING OF CHANGING ROOM, CLUBROOM, WELFARE UNIT, MAINTENANCE
AND SECURE EQUIPMENT STORE BUILDINGS FOR A TEMPORARY PERIOD OF
3 YEARS.**

**RATBY CRICKET CLUB DESFORD LANE RATBY LEICESTER LEICESTERSHIRE
LE6 0LE**

Environment Agency Flood Resilience position

The proposed development is adjacent to an ordinary watercourse, being an unnamed tributary of the Rothley Brook, which is itself a statutory main river. We have reviewed the detailed hydraulic model flood extents of the Rothley Brook and can advise that the application site is not directly impacted during the design flood event from this source. However, the applicant has not adequately demonstrated that they have assessed the impact of the flooding from the unnamed tributary adjoining the application site. Reference is made to a flood risk assessment for another proposal, but the details/evidence are not included. It is highly likely that the dominant source of flood risk to the site, is from this ordinary watercourse.

We therefore conclude that the applicant has not fully assessed the risk of flooding from all sources and the flood risk assessment is inadequate.

In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Reasons

The submitted FRA 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:

- Adequately demonstrate that the risk of flooding from the adjacent unnamed tributary of the Rothley Brook has been assessed.
- Consider how people will be kept safe from the flood hazards identified – please provide a finished floor level for the proposed development, it is not clear what height (in mAOD) 0.3m above ground level is.
- Detail evacuation / access / egress route during a design flood event. Whilst we are not overly concerned by the ability of users to evacuate safely, this should be included for an FRA to be compliant with planning policy.
- The proposals may require floodplain compensation, unless it can be demonstrated that the proposals are outside of the 1 in 100 year flood extents of the unnamed tributary of the Rothley Brook. The applicant has advised that the displacement is negligible, but without any flood depths or heights, we are unable to provide a view on this.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

Advice to LPA – Consult Leicestershire County Council as Lead Local Flood Authority

The proposed development is shown to be at high risk of surface water flooding and likely impacted by fluvial flooding from the unnamed tributary of the Rothley Brook. It is recommended the LPA consults Leicestershire County Council as Lead Local Flood Authority.

Environment Agency Water Quality position

We object to the proposed development as submitted because no foul drainage assessment and no assessment of the risks to the water environment has been provided by the applicant. We recommend that planning permission should be refused on this basis.

Reason(s)

The application form states that the method of disposal of foul drainage is "unknown". In these circumstances the planning practice guidance (PPG) (ref ID 34-020-20140306) advises that applications for developments relying on anything other than connection to a public sewage treatment plant should be supported by sufficient information to understand the potential implications for the water environment. In this instance no such information has been submitted.

The application does not, therefore, provide a sufficient basis for an assessment to be made of the risks of pollution of the water environment arising from the proposed development.

In particular, the submitted application fails to-

- address the following issues as set out Paragraph H1 of Schedule 1, Building Regulations 2010 in order to demonstrate that the proposed foul drainage system will be designed and sited such that
 1. it is not prejudicial to the health of any person
 2. it will not contaminate any watercourse, underground water or water supply
 3. there is adequate means of access for emptying work and future maintenance, including future replacement of any drainage field
 4. any septic tank, holding tank or cesspool is of adequate capacity and is appropriately designed

Overcoming our objection

The applicant should provide a detailed plan of how they intend to dispose of foul sewage and a foul drainage assessment. This information must satisfactorily demonstrate to the local planning authority that the risk to controlled waters has been fully understood and can be addressed through appropriate measures. This information should include-

- A foul drainage assessment justifying why connection to a public sewer isn't possible.
- A foul drainage assessment that demonstrates that the disposal of foul effluent to ground from the proposed septic tank or sewage treatment plant would be effective at this location.

- Or a foul drainage assessment that justifies the use of a cesspool over preferred alternative means of foul disposal

Yours faithfully

Mr Niall Freeman
Planning Advisor

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