

a) Location / Full Address	Broadwater Lake, Moorhall Road, Hillingdon, Harefield, UB9 6PE
b) Reference No.	2382/APP/2023/2906
c) Type of Application	Major Full
d) Date Reviewed	02/12/2025
e) Name of Reviewer	HO
f) Existing Site Description	Woodland/Lake and Sailing Club (Class F2) (Application Form, pg. 9/25)
g) Site Characteristics	<u>Geology / Soil:</u> According to the Soilscape soils dataset, soil conditions at the site and within the surrounding area are described as loamy and clayey floodplain soils with naturally high groundwater. BGS mapping of surface geology indicates the underlying bedrock formation comprises Chalk (Seaford Chalk Formation and Newhaven Chalk Formation), overlain by Alluvium (Clay, Silt, Sand, and Gravel) superficial deposits. The National Geoscience Data Centre's Single Onshore Borehole Index holds records of 7 boreholes within 500 m of the site. The closest boreholes indicate sandy clays and peat to a depth of 2.5 m bgl, underlain by sand and gravel comprising limestone and chalk to an approximate depth of 5.0 m bgl. The Phase II Geotechnical and Geo-Environmental Report prepared by Geo Integrity indicates ground conditions to comprise of made ground and reworked soils, underlain by alluvium to depths ranging between 1.3 - 4.5 m bgl. This was underlain by a consistent medium dense to dense granular layer of superficial gravel (Shepperton Gravel Member) to depths ranging between 6.1 - 8.0 m bgl. The superficial gravels were underlain by structureless chalk comprising layers of gravelly silt and silty gravel to the base of the exploratory holes in excess of 15.0 m bgl. According to the MAGIC website, the superficial deposits at the site are classified as a Secondary A aquifer whilst the underlying bedrock is classified as a Principal aquifer. The site is shown to be located within a designated Zone 1 Inner Protection Zone GSPZ. The Phase II Geotechnical and Geo-Environmental Report reports groundwater at 1.0 - 4.9 m bgl and standing levels between 0.7 - 4.6 m bgl. The groundwater considered to be in continuity with Broadwater Lake. Infiltration testing was undertaken in three locations in February 2023 as part of the site investigation. The results (Appendix D) indicate that infiltration is viable within the Made Ground at the site. (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 14-15/114) <u>Topography:</u> A topographic survey of the site has been undertaken by Encompass Survey (Appendix C). LiDAR data has been used to develop a digital terrain model of the site and surrounding area as illustrated in Figure 4 (site) and Figure 5 (the peninsula). Ground levels across the peninsula are indicated to range from approximately 36.8 - 40.6 m AOD, and levels along the existing access road are in the range 37.2 - 38.8 m AOD. (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 14/114) <u>Local Drainage / Watercourses:</u> The assessment demonstrates that surface water runoff from the developed site can be sustainably managed in accordance with planning policy. Surface water drainage will continue to discharge as existing, with exception of new areas of impermeable tarmac which are to drain via trench soakaways, permeable gravel and Grasscrete. (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 42/114) <u>Critical Drainage Area:</u>

h) Development Proposal	Redevelopment of the site to create the Hillingdon Watersports Facility and Activity Centre including demolition of existing Broadwater Lake Sailing Club (BSC) clubhouse at the north of the lake and erection of a building to be occupied by HOAC and BSC including changing facilities, meeting rooms, storage, Workshop and seasonal worker accommodation (sui generis), activity shelters; installation of pontoons and concrete slipways; boat shed; equipment storage huts (north of lake and at entrance); boat parking and racking areas; camping area; outdoor activity areas; ecological enhancement throughout the site; new pedestrian routes through the peninsula; landscaping including new woodland, dense vegetation screens and boundary treatment; new access and access road; localised dredging and land reclamation; relocation of existing sailing area and creation of floating and fixed islands within the lake; coach drop off and turning area; vehicle parking; cycle parking; and associated works. (Application Form, pg. 5/25)
i) Total Site Area	63000 m ² (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 112/114) Is this included within the calculations? Yes ☐ No ☐
j) Change in <u>Impermeable</u> Area	Existing = 20000 m ² (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 112/114) Proposed = 20000 m ² (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 112/114) Change = 0 m ²

1. Application Information

2. Application Documents Received and Reviewed

File Name	Document Date / Revision / Version
Full application 1st submission:	
Z:\Shared\Clients\PlanningApps\Hillingdon\Broadwater Lake, Moorhall Road\1. Data in\20251124 - 2382APP20232906 - Full app 1st submission	
Application Form	06/10/2023
HWSFAC - Flood Risk Assessment - Final (August 2025)	08/2025 / V2.1
Full application 2nd submission	
Z:\Shared\Clients\PlanningApps\Hillingdon\Broadwater Lake, Moorhall Road\1. Data in\20260211 - 2382APP20232906 - Full app 2nd submission	
5784 2026-02-09 Final v1-0 Clarification Note	09/02/2026 / Rev 01

3. Review Record – Planning Application

Parameter	Requirements ¹	Review Comments / Discussion ²	Assessment & Reasoning Pass / Fail / More Information Required
a) Runoff Destination (at site boundary)	PPG – Paragraph 56 London Plan – Policy SI 13	<i>Cross the following features / destination locations proposed:</i> 1. Rainwater harvesting and/or blue roofs ☒ 2. Infiltration ☒ 3. Green infrastructure (e.g. Green roofs, rain gardens) ☒ 4. Watercourse ☒ 5. Surface water sewer ☐ 6. Combined sewer ☐ Summary of proposal:	MORE INFORMATION REQUIRED – The applicant references that rainwater harvesting and localised storage “will be explored as the proposals develop further”. However, the applicant is required to provide information at this stage regarding the proposed SuDS measures to be included on-site, as per the London Plan drainage hierarchy.

¹ ‘S’ references are to the [Non-Statutory Technical Standards for Sustainable Drainage Systems](#)

² Include clear references to documents & chapter / page numbers for evidence

Parameter	Requirements ¹	Review Comments / Discussion ²	Assessment & Reasoning Pass / Fail / More Information Required
		The applicant proposes the implementation of infiltration trenches for the new tarmac surfacing. Surface water runoff is proposed to be directed to Broadwater Lake. The applicant outlines that rainwater harvesting and other methods of localised storage “will be explored as the proposals develop further”. However, the applicant is required to provide information at this stage regarding the proposed SuDS measures to be included on-site, as per the London Plan drainage hierarchy. <i>Has on-site infiltration testing been done?</i> Yes ☒ No ☐ <i>Infiltration rate proposed: 1.95 x 10⁻⁴ m/s</i> (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 37/114) <i>How many discharge points off-site are proposed? 9 outfalls into a lake.</i> (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 112/114) The application proposes to manage rainwater via rainwater harvesting, infiltration trenches, permeable paving and basins/ponds. Infiltration tests demonstrate a suitable rate of 1.95 x 10⁻⁴ m/s with suitable ground conditions described as made ground. The SuDS features discharge into the ground through infiltration and overland flow discharge into the surrounding lake.	
b) Flood Risk Outside of Development	S1: Do S2/S3 and S4/S5 apply? (discharge to sea / estuary) Any other flood risk on or close to site? (e.g. fluvial or groundwater)	<i>Is the site draining to tidal waters?</i> Yes ☐ No ☒ <i>Is the development likely to impact upon local groundwater flood risk?</i> Yes ☒ No ☐ The JBA Groundwater Flood Risk Indicator map indicates that groundwater levels across the peninsula, most of the access road, and part of the southern parcel may be	PASS – The FRA demonstrates that the flood risk from groundwater and fluvial flood water is considered low.

Parameter	Requirements ¹	Review Comments / Discussion ²	Assessment & Reasoning Pass / Fail / More Information Required
		<0.025 m bgl during a 1.0% AEP groundwater flood event and are accordingly assessed to be at High risk from this source. The interactive web mapping for the 2018 SFRA ("Sewer, Groundwater and Artificial Flood Risk") also identifies the site as being located in an area where $\geq 75\%$ of the area may be susceptible to groundwater flooding. As part of the site investigations undertaken by Geo Integrity in February 2023, groundwater was encountered at 1.0 - 4.9 m bgl with standing levels between 0.7 - 4.6 m bgl. Due to the nature and topography of the site, emergent groundwater would be expected to be directed towards Broadwater Lake, away from the areas of proposed development and as such would not be expected to accumulate to any significant depth. It is concluded that the proposed development is at a Low risk from groundwater flooding. (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 29/114) <i>Is the site within fluvial flood zone?</i> Yes ☒ No ☐ <i>Is floodplain compensation necessary / being provided?</i> Yes ☒ No ☐ The risk of flooding to the area of proposed development (i.e. the peninsula) from all identified sources is assessed to be Negligible/Low. However, as detailed in Section 2.2, the proposals include the creation of an extension to the peninsula (refer to Figure 3), which is currently open water and classified as having a high risk of fluvial flooding (Flood Zone 3b – functional floodplain). For the purposes of flood risk mitigation, the design event is the 1.0% AEP event +20% climate change in accordance with the PPG. Accordingly, the design flood level is the maximum	

Parameter	Requirements ¹	Review Comments / Discussion ²	Assessment & Reasoning Pass / Fail / More Information Required
		modelled in-channel water level for the River Colne during the design flood event (37.89 m AOD). It should be noted that this level is greater than the water level would be in Broadwater Lake because of the flood storage provided by the lake and that the assessment of flood risk has confirmed that none of the peninsula would flood during the design flood event (accordingly, the access to the development is dry and hence, safe). (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 30/114)	

c) Peak Flow Control	S2 – Greenfield – 1y and 100yr peak flow must be same as greenfield S3 – Developed – 1yr and 100yr peak flow must be as close as <u>reasonably practical</u> to greenfield London Plan – New London Plan – Policy SI 13 – Aim for greenfield Revised Climate Change Allowances – Applied correctly? Local Requirements? (SFRA / SPG / Local Plan Policies)	<i>Greenfield runoff rates (l/s):</i> 1 in 1 yr: Not provided. 1 in 30 yr: Not provided. 1 in 100 yr: Not provided. <i>Existing runoff rates (if not currently a greenfield site) (l/s):</i> 1 in 1 yr: Not provided. 1 in 30 yr: Not provided. 1 in 100 yr: Not provided. <i>Proposed runoff rates (l/s):</i> 1 in 1 yr: Not provided 1 in 30 yr: Not provided 1 in 100 yr: Not provided 1 in 100 yr + CC: Not provided <i>Climate change allowance used:</i> 20% ☐ 40% ☒ <i>Justification for use given?</i> Yes ☒ No ☐ Due to shallow groundwater levels, which is expected to be in continuity with Broadwater Lake, it is not considered practicable to design to the 3.3% AEP or 1.0% AEP event as the underside of any infiltration device is likely to be below groundwater level. Accordingly, the structures have been sized to store runoff generated during the 50.0% AEP event, with exceedance flood volumes for the 3.3% AEP event and 1.0% AEP event including a 40% increase in rainfall intensity, stored on the surface or allowed to flow overland into Broadwater Lake. Outputs for the hydraulic modelling are presented in Appendix G. (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 38/114) <i>How will the runoff rate be restricted?</i> Hydrobrake ☐ Other ☒ Infiltration to the ground.	FAIL – The applicant has not provided greenfield, existing or proposed runoff rates. The applicant is required to provide proposed runoff rates, including the anticipated overland flow, to confirm that flood risk is not increased to other areas of the site.
d) Volume Control	S4 – Greenfield – Maintain same runoff volume for 100yr 6hr event	<i>Greenfield runoff volume (m³):</i> 1 in 100 yr 6 hr: N/A	MORE INFORMATION REQUIRED – The applicant is required to specify the proposed attenuation volume; the

	S5 – Developed – Achieve greenfield volume as close as <u>reasonably practical</u> and not exceed existing S6 – No adverse flood risk to others <u>Revised Climate Change Allowances</u> – Applied correctly? Local Requirements? (SFRA / SPG / Local Plan Policies)	<i>Existing runoff volume (if not currently a greenfield site) (m³):</i> 1 in 100 yr 6 hr: N/A <i>Proposed runoff volume (m³):</i> 1 in 100 yr 6 hr: N/A <i>Volume of proposed attenuation feature(s) (m³):</i> 363 m³ Infiltration swales: 227 m³ Basins/ponds: 136 m³ (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 113/114) Additionally, proposes 12.7 m³ in report and micro drainage calculations.	report states 12.7 m³ and the SuDS proforma proposes 363 m³.
e) Flood Risk	S7 – No flooding occurs on site for 30yr rainfall event S8 – No flooding of buildings in 100yr rainfall event S9 – Flooding in excess of 100yr rainfall managed to minimise risks* (<i>including management of exceedance flow paths</i>) S7 to S9 - Refer CIRIA <u>Designing for Exceedance</u>. *NB: Exceedance flooding should cover 100yrFlooding plus climate change allowance Local Requirements? (SFRA / SPG / Local Plan Policies)	<i>Any flooding predicted on site in a 1 in 30 yr event?</i> Yes ☒ No ☐ <i>Any flooding predicted on site between a 1 in 30 and 1 in 100 yr event?</i> Yes ☒ No ☐ <i>Where on site is flooding and how deep?</i> Maximum flood depth 0.427m for the 1in100 year return period (+40%CC), 30 min duration. (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 87/114) <i>Have calculations been submitted to support S7 and S8 alignment?</i> Yes ☒ No ☐ <i>How is exceedance being managed?</i> Noted to be diverted away from buildings and into the lake, however, no drawing with exceedance flow routes provided. (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 38/114)	FAIL – As per non-statutory technical standard S7, no flooding should occur in the 1 in 30-year event. MORE INFORMATION REQUIRED – A drawing showing exceedance flows should be provided to demonstrate that any overland flows going directly to the lake will not increase flood risk to buildings or elsewhere on site.
f) Maintenance	<u>Ministerial Statement – 18 Dec 2014</u> – Clear arrangements for adoption and ongoing maintenance	<i>Does each proposed drainage component have numerous routine</i>	FAIL – The applicant should provide maintenance tasks for the proposed

	S12 – Pumping should only be used where gravity is not <u>reasonably practical</u> Local Requirements? (SFRA / SPG / Local Plan Policies)	<i>maintenance tasks and frequencies proposed?</i> Yes ☐ No ☒ <i>Has a maintenance owner been stated?</i> Yes ☐ No ☒	basins/ponds and rainwater harvesting features. MORE INFORMATION REQUIRED – The applicant is required to provide the maintenance owner.
g) Any other matters?	Local Requirements? (SFRA / SPG / Local Plan Policies)	<i>Is pollution of receiving waters likely?</i> Yes ☒ No ☐ <i>Have mitigation methods been proposed (e.g. a petrol interceptor)?</i> Yes ☒ No ☐ Table 26.2 of The SuDS Manual identifies non-residential car parking with infrequent change and commercial roofs as having a low pollution hazard level and indicates that the pollution hazard indices for non-residential car parking and commercial roofs for total suspended solids, hydrocarbons and metals are 0.5, 0.4 and 0.4, and 0.3, 0.2 and 0.05 respectively. Table 26.3 of The SuDS Manual indicates that the SuDS mitigation indices for infiltration trenches (filter strips) and permeable gravel/Grasscrete (permeable pavements) for total suspended solids, hydrocarbons and metals are 0.4, 0.4 and 0.5, and 0.7, 0.6 and 0.7 respectively. (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 38/114)	PASS – The applicant has suitably demonstrated that proposed interventions will provide sufficient water quality benefits based on the pollution indices on site.

4. Response from LLFA

a) Review Summary

This application has not sufficiently demonstrated the use of the London Plan's drainage hierarchy and is proposing the following key items:

- **Type of development:** Redevelopment of the site to create the Hillingdon Watersports Facility and Activity Centre.
- **Flood risk:** Low
- **Types of conveyance / attenuation features:** Rainwater harvesting, infiltration trenches, permeable paving and basins/ponds.
- **Runoff rate restriction (m/s):** 1.95×10^{-4} m/s as infiltration to the ground.
- **Runoff attenuation volume (m³):** More information required.
- **Maintenance plan:** More information required.

b) Recommendation and Requests

We recommend that the following information is provided before approval of the application. To address this, the applicant should submit information which:

- Provides more information regarding the proposed SuDS measures to be included on-site, as per the London Plan drainage hierarchy.
- Justifies the proposed attenuation volume, as the report states 12.7 m³ and the SuDS proforma proposes 363 m³.
- Demonstrate that no flooding on-site will occur during the 1 in 30-year event.
- Demonstrates, via a suitably annotated drawing, exceedance flow routes to confirm no increased flood risk to other areas on site during a flood event.
- Confirms maintenance tasks for the proposed rainwater harvesting features and proposed basins/ponds and provide maintenance owner for all SuDS features.
- Confirms hydraulic calculations for all four infiltration trenches and update the provided calculations with the FEH22 rainfall data and using the whole site area.
- Confirms the maintenance owner.

5. Further Information Submitted/ Additional Reviews

Date	Reviewer	Previously Outstanding Matters	Further Information Received ³	Review Comments / Discussion	Assessment & Reasoning Pass / Fail / More Information with justification
13/02/2026	HO	MORE INFORMATION REQUIRED – The applicant references that rainwater harvesting and localised storage “will be explored as the proposals develop further”. However, the applicant is required to provide information at this stage regarding the proposed SuDS measures to be included on-site, as per the London Plan drainage hierarchy.	(5784 2026-02-09 Final v1-0 Clarification Note, pg. 2/4)	The applicant notes: “Rainwater harvesting will be included to flush toilets. Other methods of localised storage to manage surface water run-off close to its source, such as green roofs, water butts, and rain gardens, will be explored as the proposals are developed further.” However, the applicant is required to provide further information explaining how the rainwater harvesting system will function to supply water to toilets. Additionally, the applicant is required to provide information at this stage regarding the proposed SuDS measures on-site, including the mentioned green roofs, water butts and rain gardens.	MORE INFORMATION REQUIRED – The applicant is required to provide further information on how rainwater harvesting will be included, including indicative locations of water butts etc. at this stage regarding all the proposed SuDS measures.
13/02/2026	HO	FAIL – The applicant has not provided greenfield, existing or proposed runoff rates. The applicant is required to provide proposed runoff rates, including the anticipated overland flow, to confirm that flood risk is not increased to other areas of the site.	(5784 2026-02-09 Final v1-0 Clarification Note, pg. 2/4)	The applicant notes: “The part of the site that will be redeveloped is brownfield and will continue to drain as existing. As such, greenfield runoff rates are not relevant to the proposal.” However, the proposed runoff rates are still needed, as the applicant should aim to achieve greenfield runoff rates, and should confirm that flood risk is not increased to other areas of the site.	FAIL – The applicant has not provided greenfield, existing or proposed runoff rates. The applicant is required to provide proposed runoff rates, including the anticipated overland flow, to confirm that flood risk is not increased to other areas of the site.
13/02/2026	HO	MORE INFORMATION REQUIRED – The applicant is required to specify the proposed attenuation volume; the report states 12.7 m3 and the SuDS proforma proposes 363 m3.	(5784 2026-02-09 Final v1-0 Clarification Note, pg. 2/4)	The applicant notes: “The only proposed attenuation is in the trench soakaways. These provide an attenuation storage volume of 12.7 cu m as stated in Section 7.2.3 of the 2025 FRA report (refer also to	PASS – The applicant has clarified the discrepancy in attenuation volumes provided.

³ Include clear references to documents & chapter / page numbers for evidence

Date	Reviewer	Previously Outstanding Matters	Further Information Received ³	Review Comments / Discussion	Assessment & Reasoning Pass / Fail / More Information with justification
				Appendix G of the 2025 FRA report for the 30 year critical storm event, highlighted in red). The attenuation volume provided in the SuDS Proforma has now been superseded. It should be noted that the reason the trench soakaways are included are not principally to provide attenuation but to replace the existing mechanism of surface water infiltrating through cracks in the slab, as these cracks would be sealed by the proposed surfacing."	
13/02/2026	HO	FAIL – As per non-statutory technical standard S7, no flooding should occur in the 1 in 30-year event.	(5784 2026-02-09 Final v1-0 Clarification Note, pg. 2/4) (HWSFAC - Flood Risk Assessment - Final (August 2025), pg. 42/114)	The applicant notes: "The proposed drainage discharge situation replicates the existing site drainage as summarised above and in the 2025 FRA report, the 3.3% probability storm event was not specifically considered however given the design flood level is the maximum modelled in-channel water level of the River Colne during the design flood event is 37.89 m AOD and much of the site is above this level no flooding is expected during the 1 in 30 event." As the design flood event is based on the 1.0% AEP event + 20% climate change with levels of 37.89mAOD, the hydraulic calculations are required to be updated for the 1 in 30-year rainfall event, based on the correct level, mAOD.	FAIL – As per non-statutory technical standard S7, no flooding should occur in the 1 in 30-year event. Please update the hydraulic calculations for the 1 in 30-year rainfall event based on the correct level in mAOD for the event.
13/02/2026	HO	MORE INFORMATION REQUIRED – A drawing showing exceedance flows should be provided to demonstrate that any overland flows going directly to the lake will not increase flood risk	(5784 2026-02-09 Final v1-0 Clarification Note, pg. 2/4)	The applicant notes: "Given that proposed levels across the areas of existing/proposed hardstanding are remaining the same as existing there	MORE INFORMATION REQUIRED – A drawing showing exceedance flows should be provided to demonstrate that any overland flows going directly to the lake will not increase flood risk

Date	Reviewer	Previously Outstanding Matters	Further Information Received ³	Review Comments / Discussion	Assessment & Reasoning Pass / Fail / More Information with justification
		to buildings or elsewhere on site.		would be no increase in flood risk off site." Regardless of the condition of the existing surface, the applicant must provide a drawing showing exceedance flow routes. This is required to demonstrate that any overland flows discharging directly to the lake will not increase flood risk to buildings or other areas of the site.	to buildings or elsewhere on site.
13/02/2026	HO	FAIL – The applicant should provide maintenance tasks for the proposed basins/ponds and rainwater harvesting features.	(5784 2026-02-09 Final v1-0 Clarification Note, pg. 2/4)	The applicant notes "Rainwater harvesting would be utilised to flush toilets and will be maintained by the site owner/operator. The details relating to basins/ponds referenced in the GLA SuDS <i>pro forma</i> has been superseded – refer to swales/basins/ponds in Appendix J of the 2025 FRA report. Full details of the rainwater harvesting and SuDS features would be provided at the detailed design stage. As such, we would expect details of ongoing maintenance of all SuDS features to be secured by a suitably worded planning condition. " However, the applicant needs to include maintenance task for the proposed rainwater harvesting measures and all SuDS features at this stage, including the discussed rainwater harvesting measures to flush toilets and the green roofs, water butts and rain gardens.	FAIL – The applicant should provide maintenance tasks for the proposed rainwater harvesting measures and the discussed green roofs, water butts and rain gardens.
13/02/2026	HO	MORE INFORMATION REQUIRED – The applicant is required to provide the maintenance owner.	(5784 2026-02-09 Final v1-0 Clarification Note, pg. 2/4)	The applicant notes that the SuDS/drainage will be maintained by the site owner/operator.	TO BE CONDITIONED – The applicant is required to provide details of the maintenance owner.

Date	Reviewer	Previously Outstanding Matters	Further Information Received ³	Review Comments / Discussion	Assessment & Reasoning Pass / Fail / More Information with justification
13/02/2026	HO	Confirms hydraulic calculations for all four infiltration trenches and update the provided calculations with the FEH22 rainfall data and using the whole site area.	(5784 2026-02-09 Final v1-0 Clarification Note, pg. 3/4)	The applicant notes: "Indicative attenuation storage volume calculation for the infiltration trenches are provided in Appendix G of the 2025 FRA report. These calculations are provided for feasibility/agreement in principle purposes only and detailed design calculations will be provided at detailed design stage. It should be noted that the infiltration trenches have only been provided to drain the new areas of hardstanding only. The remainder of the site will continue to drain as existing." The calculations in Appendix G of the 2025 FRA report only include three infiltration trenches and uses the FEH13 data. Please update the calculations for all four infiltration trenches and using the FEH22 rainfall data.	MORE INFORMATION REQUIRED – Include all four infiltration trenches in the hydraulic calculations, showing no flooding in the 1 in 30-year event, and using the most recent rainfall data (FEH22). MORE INFORMATION REQUIRED – The calculations should include the full site area, to ensure flood risk is not increased on-site or off-site, and to maximise the amount of storage provided.

6. Response from LLFA

a) Review Summary

This application has changed from the previous application submitted in the following way(s):

- **Type of development:** N/A
- **Types of conveyance / attenuation features:** Rainwater harvesting, infiltration trenches, permeable paving and discussed green roofs, rain gardens and water butts.
- **Runoff rate restriction (l/s):** N/A
- **Runoff rate restriction per hectare (l/s/ha):** N/A
- **Runoff attenuation volume (m³):** 12.7
- **Maintenance plan:** N/A

b) Recommendation and Requests

We recommend that the following information is provided before approval of the application. To address this, the applicant should submit information which:

- Demonstrate how the rainwater harvesting will be included and provide information, including indicative locations, at this stage regarding all the proposed SuDS measures.
- Provide the proposed runoff rates, using the full-site area.
- Update the hydraulic calculations for the 1 in 30-year rainfall event based on the correct levels in mAOD, to demonstrate no flooding on-site.
- Demonstrates, via a suitably annotated drawing, exceedance flow routes to confirm no increased flood risk to other areas on site during a flood event.
- Provide maintenance task for the rainwater harvesting measures and all discussed SuDS features.
- Includes all four infiltration trenches in the hydraulic calculations, showing no flooding in the 1 in 30-year event, and using the most recent rainfall data (FEH22).
- Includes the full site area, to ensure flood risk is not increased on-site or off-site, and to maximise the amount of storage provided.

We recommend that the following information is provided via a suitably worded condition.

- Details of the maintenance owner.

Condition wording will be provided upon satisfactory provision of remaining information above.