

From: [James Browne \(Place\)](#)
To: [Planning \(HPBC\)](#)
Subject: RE: Rev Plans General External Consultation 21 Days - App ref HPK/2021/0019
Date: 13 August 2021 15:41:42

Good Afternoon

Thank you for consulting the Lead Local Flood Authority (LLFA) on the above planning application. I apologise for the delay in replying to the consultation. The LLFA are unable to provide an informed comment and recommend a holding objection until the applicant/LPA has provided further information. The LLFA would not normally comment on a minor application however, for this site I think it is appropriate due to the potential flood risk.

As previously commented the EA have not set a formal easement distance between the main river and edge of the property. It would normally be 8 m as a minimum.

The properties will be in flood zone 3. As the FFL are being raised this could displace more flood water and increase the flood risk in the area. Additionally, what flood resilient measures are being proposed as the houses are still below the forecast flood level which could have an impact on insurance for the buyers? Have the EA commented on this application, I would highly recommend that they are consulted on this application.

A flood evacuation and information plan would also need to be provided to the residents.

As a statutory consultee for surface water the minimum details required on planning applications are as follows:

- Site plan and impermeable area
- Topographic survey of the site
- Appropriate evidence to support how the site will drain, including confirmation of where the surface water will outfall to (photographs / maps / a confirmation letter from a water company)
- Basic calculations of the greenfield/brownfield runoff and discharge rates, (refer to Point J in the Advisory Notes)
- A quick storage estimate to show the required storage volume of surface water on site and an indication of the likely location
- Calculations should include allowances for the current Environment Agency guidance for climate change and urban creep (Refer to Point J in the Advisory Notes)
- Basic ground investigation (desktop survey as a minimum)
- Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate (as per National Planning Policy Framework 165). A range of sustainable drainage techniques must be considered prior to or in conjunction with the planning layout.

These details are required at the early planning stage to demonstrate that the proposed site is able to drain and that due consideration has been given to the space required on site for surface water storage.

Please note the level of detail submitted should be proportionate to the size and scale of the development.

Advisory/Informative Notes (It should be noted that the information detailed below (where applicable), will be required as an absolute minimum in order to discharge any of the drainage conditions set by the LPA):

- A. Any works in or nearby an ordinary watercourse may require consent under the Land Drainage Act (1991) from the County Council. For further advice, or to make an application please contact Flood.Team@derbyshire.gov.uk.
- B. No part of the proposed development shall be constructed within 5-8m of an ordinary watercourse and a minimum 3 m for a culverted watercourse (increases with size of culvert). It should be noted that DCC have an anti-culverting policy.
- C. The County Council would prefer the applicant to utilise existing landform to manage surface water in mini/sub-catchments. The applicant is advised to contact the County Council's Flood Risk Management team should any guidance on the drainage strategy for the proposed development be required.
- D. On Site Surface Water Management;
- The site is required to accommodate rainfall volumes up to the 1% probability annual rainfall event (plus climate change of 40%) whilst ensuring no flooding to buildings or adjacent land.
 - An appropriate allowance should be made for urban creep throughout the lifetime of the development as per 'BS 8582:2013 Code of Practice for Surface Water Management for Developed Sites' (to be agreed with the LLFA).

Peak Flow Control

- For greenfield developments, the peak run-off rate from the development to any highway drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event, should never exceed the peak greenfield run-off rate for the same event.
- For developments which were previously developed, the peak run-off rate from the development to any drain, sewer or surface water body for the 100% probability annual rainfall event and the 1% probability annual rainfall event must be as close as reasonably practicable to the greenfield run-off rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development, prior to redevelopment for that event.
- The Greenfield runoff rate which is to be used for assessing the requirements for limiting discharge flow rates and attenuation storage for a site should be calculated for the whole development area (paved and pervious surfaces - houses, gardens, roads, and other open space) that is within the area served by the drainage network, whatever the size of the site and type of drainage system. Significant green areas such as recreation parks, general public open space, etc., which are not served by the drainage system and do not play a part in the runoff management for the site, and which can be assumed to have a runoff response which is similar to that prior to the development taking place, may be excluded from the greenfield analysis.

Volume Control

- For greenfield developments, the runoff volume from the development to any highway drain, sewer or surface water body in the 6 hour 1% probability annual rainfall event must not exceed the greenfield runoff volume for the same event.
- For developments which have been previously developed, the runoff volume

from the development to any highway drain, sewer or surface water body in the 6 hour 1% probability annual rainfall event must be constrained to a value as close as is reasonably practicable to the greenfield runoff volume for the same event, but must not exceed the runoff volume for the development site prior to redevelopment for that event.

Note:- If the greenfield run-off for a site is calculated at less than 2 l/s, then a minimum of 2 l/s could be used (subject to approval from the LLFA).

Kind Regards

James Browne | MEng, GMICE
Flood Risk Management

The Flood Risk Management team at Derbyshire County Council are currently receiving large number of flooding enquiries and planning application consultations. In order to manage our workload with the resources currently available to us, and also maintaining our statutory functions, we are prioritising our work according to risk. We are currently managing our statutory functions and responding to internal residential and business property flooding. All other enquiries will be responded to, in as timely a manner as possible.

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