



Flood Risk Management
Derbyshire County Council
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Telephone 01629 535487
Ask for Richard Ward
Email
Our ref HPBC 2024/34
Your ref HPK/2024/0290
Date 04 March 2025

Dear James,

Proposal: New Industrial Storage Unit (B8) on land at Bowden Hey Road including associated earthworks, hardstandings, landscaping and provision of future Phase 2 plot

Location: Land Off , Bowden Hey Road , Chapel-En-Le-Frith , Derbyshire

Application reference HPK/2024/0290

No objections in principle		Conditions Recommended		Holding Objection Recommended	X
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Derbyshire County Council as the Lead Local Flood Authority (LLFA) has reviewed the information submitted for this application, which was received on 11/07/24. We have now reviewed the flood risk assessment provided with the application, which was omitted in error from our previous review (response dated 10/01/25), and have amended our comments to take account of this additional information. The LLFA recommends an objection for the reasons set out below.

REASONS FOR OBJECTION

We are recommending an objection to the proposed development as it is not possible to provide an informed comment until such a time that the applicant has submitted further information. In particular, we would expect the following points to be addressed:

- The development proposals include significant areas of ground raising on the site. No assessment has been provided of the impacts of this on floodplain storage and conveyance of the adjacent watercourse, which runs along the site boundary. An assessment should be provided to demonstrate that the proposed ground raising does not result in increased flood risk to nearby properties.*

- *The applicant has proposed discharge of surface water to the adjacent watercourse via an existing drainage ditch and 150mm connecting pipe. No evidence has been provided to demonstrate that this has sufficient capacity and is in a suitable condition to convey the discharge from the site.*
- *The drainage proposals for the site indicate that only runoff from the “catchment 1” area will be attenuated, with unconstrained discharge proposed from the “catchment 2” and “catchment 3” areas. Further information is required to demonstrate that total discharge from the site will not exceed greenfield conditions.*
- *The flood risk assessment provided states that greenfield rates for catchment 1 have been calculated based on only the 0.5ha area that is to be drained to this system (i.e. “catchment 1”). This is not correct as an area of 1.18ha has been used, which also takes into account the surrounding raised grassed area. As this area is connected to a separate drainage system, with a separate outfall, this should not be included in the estimate of greenfield rates.*
- *The flood risk assessment and drainage calculations indicate that runoff from the 1 in 100-year with climate change event will be discharged at QBAR, which is acceptable in principle although the rate itself will need to be amended to address the comment on contributing area above. However, it is not clear at what rate the runoff from the 1 in 1-year event is proposed to be discharged. In accordance with the national non-statutory technical standards for sustainable drainage systems the discharge rate for this event should not exceed the 1 in 1-year greenfield rate.*
- *The drainage proposals predominantly rely on underground storage, which does not provide opportunities for multi-functional benefits or integration with open space within the development site. Further evidence is required to explain why such approaches were not considered at this site.*
- *The flood risk assessment indicates that sufficient treatment will be provided by the proposed petrol interceptor. However, this interceptor only serves part of the area to be drained and it is not clear that sufficient treatment will be provided for other drained areas.*
- *In the drainage calculations provided, CV values of 0.75 (winter) and 0.84 (summer) have been used. Derbyshire County Council guidance states that these values should be set to 1.*
- *The drainage calculations do not include a climate change allowance for the 1 in 30-year event, as required by local and national guidance.*
- *In the Drainage Planning Strategy, the development area is stated as 1.18 ha under “Proposals” but 1.256 ha under “Areas”. 1.18 ha was used to calculate greenfield discharge. Please confirm which is correct.*

As a statutory consultee for surface water the minimum details required on all major 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
- 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
- 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). A range of sustainable drainage techniques must be considered prior to or in conjunction with the planning layout.
- How the sustainable drainage systems integrate with the open space and green infrastructure should be described and what multifunctional benefits they provide should be stated, as per paragraph 59 of planning practice guidance (Aug 2022).

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.

Yours sincerely

Richard Ward
Senior Project Engineer

Checked by: Alex Back
Date 05/03/2025