



Flood Risk Management
Derbyshire County Council
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Telephone
Ask for
Email
Our ref HPBC 2024/34
Your ref HPK/2024/0290
Date 22 May 2025

Dear ,

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 additional information submitted for this application, which was received on 07/05/2025, in response to our objection submitted on 04/03/2025. The applicant has addressed some of our comments; however, we have some remaining concerns which have not been addressed by the submitted information and therefore recommend an objection for the reasons outlined 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:

- We previously commented that the development proposals include significant areas of ground raising on the site and 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. The applicant's response indicates that this has not been considered due to the low risk of flooding from all sources identified in the Flood Risk Assessment. However, the Flood Risk Assessment does not assess the risk posed from*

the unnamed watercourse running adjacent to the site's north west boundary and discharging to the Black Brook. The applicant's response includes calculations to assess the capacity of the unnamed watercourse compared to existing and proposed flows. However, the following concerns have been identified with the submitted calculations and we therefore do not consider that they adequately demonstrate that the proposed ground raising will not displace exceedance flows from the unnamed watercourse which would currently be conveyed through the site:

- *The "catchment flow rates" calculated for the watercourse before and after development only account for flows from the development site itself and not the watercourse's wider catchment. They therefore do not demonstrate that the 1 in 2-year event considered will remain in channel and therefore will not be displaced by the ground raising on site.*
- *Only the 1 in 2-year event has been considered in the analysis and it is therefore not clear what the impact will be in other flood events. We would expect events up to the 1 in 100-year with climate change event to be considered as a minimum.*
- *The calculations only consider the flow capacity of the open channel part of the watercourse and do not consider the culverted reaches, which are likely to have a smaller capacity.*
- *The channel capacity calculations assume a Manning's n value of 0.4, which is higher than the normal range of values used for this parameter.*
- *No photographs have been provided to demonstrate that the assumed geometry, condition and hydraulic roughness of the watercourse are appropriate.*
- *We previously commented that no evidence has been provided to demonstrate that the adjacent unnamed watercourse and downstream 150mm pipe connecting it to the Black Brook has sufficient capacity and is in a suitable condition to convey the discharge from the site. The capacity assessment described above has been provided by the applicant in relation to this concern. As described in our comments above, the evidence provided does not adequately demonstrate that there is sufficient capacity for the discharge from the site.*
- *We previously commented that the drainage proposals previously submitted for the site indicated that only runoff from the "catchment 1" area will be attenuated and treated, with unconstrained and untreated discharge proposed from the "catchment 2" and "catchment 3" areas. The applicant has submitted an updated drainage plan with runoff from the former "catchment 2" area now pumped into the main "catchment 1" drainage system. They have indicated that the former "catchment 3" area (now labelled "catchment 2") is an area of existing impermeable surface that already drains into the existing highway drainage network. We have the following concerns in relation to this approach:*
 - *Pumping is not preferred due to the long-term additional maintenance requirements and the residual risk of failure. We would expect the applicant to consider a solution which provides separate treatment and attenuation for these areas in the first instance.*
 - *The Design & Access Statement for the development indicates that the current access to the site is via an un-tarmacked gravel path which does not extend across the full "catchment 3" (now "catchment 2") area shown and*

does not appear to be formally drained. It appears that the proposals will therefore result in an increase in runoff from this area.

- *The following issues have been identified with the updated drainage plan and calculations provided:*
 - *Maximum rainfall has been set to 50mm/hr. Derbyshire County Council guidance requires this to be set to at least 150mm/hr unless appropriate justification is provided.*
 - *The cover level and dimensions shown for the tank in the drainage calculations indicates that only 800mm of cover will be provided over the tank. It is not clear that this is sufficient cover given that the tank will be located beneath a trafficked area used for turning large vehicles. Further information should be provided to demonstrate that adequate protection will be provided and that the proposals will be feasible.*

Yours sincerely

Senior Project Engineer

Checked by:

Date 23/05/2025