



Flood Risk Management
Derbyshire County Council
County Hall
Matlock, Derbyshire
DE4 3AG

James Stannard
Development Services
High Peak Borough Council
PO Box 136
Buxton
SK17 1AQ

Telephone
Ask for Richard Ward
Email
Our ref HPBC 2024/33
Your ref HPK/2024/0275
Date 21 August 2025

Dear James,

Proposal: Proposed change of use of agricultural land to B2 general industrial use, construction of a single building for storage and processing of sand and stone aggregate products, ancillary office space, vehicular access and turning space for HGV's, staff and visitor parking and associated hard and soft landscaping works

Location: LAND OFF , Waterswallows Lane , Green Fairfield , Buxton , Derbyshire ,

Application reference HPK/2024/0275

No objections in principle	Conditions Recommended	Objection Recommended	X
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Derbyshire County Council has reviewed the additional information submitted for this application on 07/08/2025. The LLFA recommends an objection for the reasons set out below.

REASONS FOR OBJECTION

We previously requested updated calculations to provide evidence that the updated drainage proposals submitted by the applicant would provide sufficient storage. These calculations have now been provided. However, there appear to be several discrepancies between the input parameters used and those used in calculations previously provided that result in them no longer being in accordance with guidance. We have identified the following concerns which need to be addressed to demonstrate that the proposed system will provide sufficient storage and will therefore not result in an increase in flood risk:

- *The updated drainage calculations use a contributing impermeable area of 1.16ha. This is smaller than the 1.7ha impermeable area previously assumed and stated in the flood risk*

assessment. It is not clear what the reason is for this difference as the overall site layout does not appear to have changed.

- The summer and winter Cv values, which had previously been amended to a value of 1 in accordance with Derbyshire County Council drainage guidance, appear to have been reduced to 0.76 and 0.84 respectively.*
- The calculations previously provided assumed infiltration only through the sides of the cellular storage, in accordance with the guidance in BRE Digest 365. The updated calculations now allow for infiltration through both the sides and the base of the cellular storage, which is unlikely to be realistic due to the likelihood of fine particles accumulating at the base of the storage and reducing the rate of infiltration.*
- The factor of safety applied to the cellular storage, which had previously been amended to a value of 10 in accordance with guidance provided in CIRIA C753 The SuDS Manual, has been reduced to a value of 2 in the updated calculations.*
- The time-area relationship used in the calculations assumed a time of entry for flows into the drainage system of up to 12 minutes. This does not appear to be realistic based on the relatively small site area.*

We note that the calculation results indicate that the volume of water stored in the proposed cellular storage during the 1 in 100-year with climate change event appears to be significantly below its capacity, based on the current parameters used, but require evidence to demonstrate that there will still be sufficient capacity once these parameters are amended.

Yours sincerely

Richard Ward
Senior Project Engineer

Checked by: Martin Coleman
Date 22/08/2025