

**From:** Alex Jones [REDACTED]

**Sent:** 26 June 2026 13:31

**To:** Richard Wilshaw [REDACTED]

**Cc:** Mark Krassowski [REDACTED]

**Subject:** RE: HPK/2026/0141 - Miry Meadow

Good afternoon Richard, great meeting you on site today.

Please see below and attached our further comments on the LLFA's response.

Derbyshire County Council as the Lead Local Flood Authority (LLFA) has reviewed the information submitted for this application, which was received on 14/04/2026. The LLFA recommends an objection for the reasons set out below.

The applicant has submitted an updated drainage strategy and CCTV survey; however, this information does not fully address the LLFA's previous comments.

The CCTV survey indicates that it was abandoned downstream of the site, therefore it does not demonstrate the wider connectivity of the culvert. As such, it fails to provide sufficient evidence that it's a viable outfall, at present.

The applicant has not undertaken a capacity assessment of the culvert, and therefore it has not been demonstrated that the culvert has sufficient capacity to accommodate additional flows from the site.

The updated drainage strategy fails to demonstrate that the proposals fully comply with all standards of the National Standards for Sustainable Drainage Systems (SuDS) 2025.

The applicant has discounted the use of pervious paving due to the gradients and ground conditions of the site, however the applicant hasn't considered a range other SuDS feature, including source control measures.

## **REASONS FOR OBJECTION**

We are recommending an objection on the proposed development as it is not possible to provide an informed comment until such a time that the applicant has submitted further information

- Details demonstrating the proposed culvert within the site is a viable outfall for the site including:

- o Wider network connectivity of the culvert beyond the blocked downstream manhole

- The existing culvert is has been resurveyed and can be seen to be freely flowing despite the 'blockage' shown on the previous CCTV report (see attached and below).

- The extent of the existing survey has already been taken well beyond the site boundary. As there are no known or historic issues associated with the existing culvert, it is considered that connectivity has been proven and that no further investigations are required.



o consideration to daylight the culvert and incorporate it within the proposed site layout

As per our previous response, due to the complex nature of the site levels and the limited space constraints within the site, it is not feasible to daylight the culvert.

o Capacity assessment of the culvert incorporating a catchment assessment demonstrating the culvert has sufficient capacity to accept additional volume from site.

As per our previous response, we are unable to undertake a full capacity check as we are unable to determine the extent of catchment area being served by the existing culvert. We have therefore undertaken a capacity check based upon the diameter and gradient of the existing culvert to determine its peak flow characteristics as below;

The proposed diversion to the existing culvert comprises a 65m length of 300mm diameter pipework with an average gradient of 1:20 which gives a maximum capacity of 219 l/s.

The proposed maximum discharge rate from the new development is 13.5 l/s which is only 6% of the available capacity and is therefore considered to be acceptable.

o Confirmation who will be responsible for the culverted watercourse within the site for perpetuity,

As per our previous response, it is understood that the section of the culvert within the site boundary is owned and maintained by HPBC or an appointed maintenance company on their behalf.

o A plan showing above ground flood pathways for a blockage scenario of the culvert, to ensure exceedance routes can be safely managed. This should include FFLs, external levels, highway levels, routing direction, storage areas, gully locations.

As per our previous response, please refer to page 39 of the submitted drainage strategy document ref; 10766-WML-00-XX-RP-C-0001

• Details demonstrating how the proposals conform to the 'National Standards for Sustainable Drainage Systems (SuDS)' 2025.

o Standard 2 • How the first 5mm of rainfall will be intercepted.

All large diameter primary surface water manhole will include a 500mm deep sump unit and therefore initial rainfall will be captured and fill the sumps to the underside of the incoming and outgoing pipework.

o Standard 5 • Multi-functional benefits of the SuDS in the site

Please refer to sections 35-41 of the submitted drainage strategy document ref; 10766-WML-00-XX-RP-C-0001

• Inclusion of other SuDS measure for example filter strips or rain gardens in public open spaces of the site.

As discussed within sections 35-41 of the submitted drainage strategy document ref; 10766-WML-00-XX-RP-C-0001, due the constraints of the site (primarily levels and lack of open public space) it has not been possible to incorporate any additional SUDs. The development proposals include the retention of an existing pond and trees – where possible, which will act as a form of water retention and increase the biodiversity net gain for the development.

Filter strips are ineffective for this site as the steep nature of the levels (1:23) combined with the small void capacity within the stone (30%) results in extremely little storage of surface water runoff. Sections 42-50 of the submitted drainage strategy document ref; 10766-WML-00-XX-RP-C-0001 confirm that pollution has been mitigated through the implementation of proprietary products and therefore filter strips are not necessary for this element either.

With regards to rain gardens, as previously noted there is limited public open space within the development. Where practical, levels have been designed to convey water towards existing trees, however due to the complexity of levels across the site being very steep, surface water runoff directed to these areas will be limited to;

- Rainfall that lands directly on these areas
- Exceedance flows from adjacent soft landscaping
- Small extents of footways.

Surface water runoff from the road extents will be captured via traditional road gullies as the rate of surface water runoff from these areas is considered to be too fast due to the site levels, which could result in tree pits quickly becoming saturated and overwhelmed, thus being detrimental to the life of the tree.

Thanks,

Alex Jones

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