

From: [Whittaker, Roberta \(EXT\)](#)
To: [Curley, Jane](#)
Cc: MatthewWilson@arnorthwest.co.uk; [Planning \(SMDC\)](#)
Subject: SMD/2021/0441 - Compton Mill - LLFA Response (Rev 2)
Date: 17 November 2021 08:37:16
Attachments: [image001.png](#)

Good Morning Jane,

Thank you for reconsulting us on application SMD/2021/0441 (Compton Mill) and for your patience with our extension of time request.

Staffordshire County Council Flood Risk Management position

We have reviewed the submission and insufficient information has been provided to demonstrate an acceptable drainage strategy. We would therefore recommend that the planning permission is not granted until this has been resolved.

I've itemised the items based on our response and removed any items which have been resolved given the developers last submission. All the points from my initial response in **bold**, [developer reply in blue](#), [LLFA response in red](#).

Drainage Strategy

Please provide a final drainage strategy (not outline) to include all the documents required to obtain FUL permission as outlined in Appendix A of the Staffordshire SuDS Handbook

(<https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Documents/SuDS-Handbook.pdf>)

The application was supported by the submission of the following relevant ARP reports/drawings, which we assume you have been able to review prior to making your comments:

- NW151/01r2a Flood Risk Assessment & Drainage Strategy report
- NW151/01/05-C Private Drainage drawing
- NW151/01/08-A External Works drawing

The above reports and drawings remain current, and represent the 'final' drainage strategy. Any previous reference to elements of the strategy being 'outline', 'indicative' or 'preliminary' was intended to convey to that it was still subject to agreement with the LLFA and LPA. However, some further supporting design drawings are also available, and there is an additional report which addresses one of your queries. I have therefore provided a comprehensive package of relevant reports, drawings and calculations for your information.

The detailed surface water drainage strategy is therefore as set out in the above report and drawings, plus the following additional drawings and calculations which are included in the file transfer:

- NW151/01/03 Section 106 Drainage
- NW151/01/04 External Construction Details
- NW151/01/07 Drainage Details
- NW151/01/12 Attenuation Tank Details
- NW151/01/12 Flow Control Manholes
- NW151/01/14 Section 106 Manhole Details
- NW151/01/15 Exceedance Flow Routing
- NW151/01 Microdrainage Calculations
- [The pipes in the drainage strategy drawing NW151/01/05-C Private Drainage are not labelled with their pipe number so we are unable to relate this to the MicroDrainage calculations.](#)
- [Please provide drawings showing location, dimensions and levels of emergency overflows provided for piped and storage features.](#)

In addition to the documents required, the Drainage Strategy

should demonstrate specific focus on the following:

- **Pre and post development flow paths for surface water (including exceedance) and a demonstration of how these flow routes will be managed.**

Based on the topography and land-use of the site and surrounding area, and with reference to the Environment Agency Risk of Flooding from Surface Water map, significant flows into the site from outside would not be expected. Any significant overland flows from areas to the east would be expected to be directed around the site by the topography of the surrounding roads.

Please refer to drawing NW151/01/15 Exceedance Flow Routing. Within the site, any exceedance flows from the drainage to the west of the building would be expected to fall away towards the site boundary and into Compton/Prospect Place, where the consequences of flooding would be less severe. Exceedance flows generated within the proposed car park would be expected to follow the proposed topography towards the north-west. A significant amount of this flow would therefore be expected to pass around the north-west and north of the building into the landscaped areas of the site, and into Cornhill Street where the consequences of flooding would be less severe. Due to the proposed topography, some exceedance flows from the proposed car park in the south-east of the site may flow towards the south-eastern side of the building. However, it should be noted that there is additional unused surface water storage potential within the sub-base of some the proposed permeable parking areas during the 1 in 100 year event. This additional volume has the potential to take up some exceedance flows once pipe capacities are exceeded, such that exceedance runoff from the car park towards the building is reduced. Also, there is an area of landscaping between the car park and the southern half of the building which has some potential to further mitigate uncontrolled runoff in this area. Some flows are able to flow around the south of the building.

The exceedance plans show FFLs that are not significantly higher than the surrounding ground levels in the areas where exceedance flows would be directed towards the building. Although cut off drains are proposed, these are not shown on plan. Please can you provide a more detailed exceedance plan in the area where flows are directed towards the building, showing a more detailed surface water routing taking into account ground levels, the proposed cutoff drains and their route.

- **A finalised management and maintenance plan for surface water drainage to ensure continued performance of the system for the lifetime of the development. Details of the maintenance arrangements should be provided, to include a schedule of activities with frequencies, together with the name and contact details of the party or parties responsible for ongoing maintenance.**

Maintenance responsibilities are outlined in Section 8 of the FRA &

Drainage Strategy report and a proposed management and maintenance plan is included for review in Appendix H of the report as a draft for the LLFA's review. The plan includes a schedule of inspection and maintenance activities/frequencies. Responsibilities for maintenance are set out in general terms in the draft document, but it is not feasible to provide specific contact details at this stage. For this reason, we would normally anticipate that the preparation of a final maintenance and management plan would be conditioned, as a pre-occupation condition.

We need to have evidence that the long-term maintenance of the SuDS system has been considered as part of the scheme. We also require, at minimum, a contact name and phone number to ensure that any issues can be managed during the construction phase. A final maintenance strategy can be set as a pre-occupation condition.

In addition it is unclear how the underground attenuation tank will be accessed for maintenance and for emergency access.

- **Finished floor levels. Building FFLs are to be set higher than key drainage levels (e.g., >150mm) so that exceedance will not cause building inundation.**

Proposed lower ground floor / ground floor finished floor levels and external levels are shown in External Works drawing NW151/01/08-A. Building FFLs have been set above the general external ground levels and external levels have been designed with falls to direct overland flows away from the building entrances where possible, but the requirement for level access at entrances and the topography of the site means that some falls towards buildings cannot be avoided. Where falls towards buildings are unavoidable, additional cut-off drainage has been provided across entrances to prevent water entering buildings during extreme events.

As per the point above regarding exceedance plans.

If you are minded to approve the application contrary to this advice, we request that you contact us again to allow further discussion.

As per the consultation email, we are happy to deal with the drainage consultant directly to resolve this application. Please direct the consultant to provide amendments to flood.team@staffordshire.gov.uk

Kind Regards

Roberta

Please note my working days are Monday to Wednesday.



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