

From:
To: FW: SMD/2021/0441 - Compton Mill - LLFA Response (Rev 2)
Subject: 10 January 2022 15:38:34
Date:
Attachments:

LLFA response dated 10-10-22

Jane Curley (Mrs)
Senior Planning Officer (Majors & Commercial)

From:
Sent: 10 January 2022 15:37
To: >
Subject: RE: SMD/2021/0441 - Compton Mill - LLFA Response (Rev 2)

Good Afternoon Matthew,

Thank you for your email regarding Compton Mill (SMD/2021/0441).

Advice to LPA – I have copied in Jane into this email to keep her informed on progress. 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.

Advice to Applicant

For ease of reading I have removed any elements previously discussed that we are now satisfied with, or that we would be happy to condition. I have just included the relevant information for any outstanding elements – I see the previous response detailing the previous discussions is included in the email chain below for completeness.

1. MicroDrainage

- Please can you model the 100yr + 40% climate change. In February 2016 the Environment Agency issued updates to the previous climate change allowances in the NPPF. Previously a 30% increase in peak rainfall intensity was applied for 'more vulnerable' residential development (100 year lifetime). Based on the new guidelines however a 40% increase will need to be considered. Please update the proposed design to meet the current regulations.
- 7.000 is included in the Microdrainage but not shown on the drainage plan.
- 8.000 pipe diameter is different in the Microdrainage and on plan.

2. Exceedance

We understand the requirements for level access, but we just need a bit more information on exceedance plans, especially given the additional climate change allowance to be modelled, to ensure the flood exceedance routing is appropriate for the vulnerability of the development. We would request a plan showing more detailed routing accounting for ground levels and depths of water. This should include:

- Areas where water could be expected to pond in exceedance events
- The depths of additional storage (to be utilised in exceedance events) in the proposed permeable paving areas.
- Exceedance around flow control manhole S1.8 accounting for ground levels and flood depths.
- More detail where the exceedance flows are directed towards the building entrance and the capacity of proposed cut-off drainage.

Please direct any further revised information through the planning authority to flood.team@staffordshire.gov.uk

Kind Regards
Roberta

Please note my working days are Monday to Wednesday.



Flood Risk Management | Economy, Infrastructure and Skills
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From:

Sent: 10 December 2021 15:34

To:

Subject: RE: SMD/2021/0441 - Compton Mill - LLFA Response (Rev 2)

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Good afternoon Roberta,

Further to previous emails, I am writing to provide some further information which addresses the outstanding drainage issues, and therefore hopefully allows you to confirm the scheme is acceptable at this stage (with appropriate conditions).

I have provided some updated plans and documents within the attached ZIP file which supersede the previous versions provided. All other plans and calcs remain as per the previous

issue.

I have also provided further written responses to the outstanding points within the email chain below. Points from initial LLFA response in bold, ARP initial reply in blue, second LLFA response in red (17/11/21), and this further ARP response in green.

I trust this is now acceptable and look forward to your further response.

Kind regards,

Matthew Wilson
Associate Director



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Pre-planning Geotechnical Civil Engineering Structural Engineering Building Services
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From:

Sent: Wednesday 17 November, 2021 8:37am

To: J

Cc: Subject: SMD/2021/0441 - Compton Mill - LLFA Response (Rev 2)

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.

MicroDrainage pipe labels have been added to the Private Drainage drawing NW151/01/05.

- Please provide drawings showing location, dimensions and levels of emergency overflows provided for piped and storage features.

The detail of flow control manhole S1.4 (downstream of the tank) has been updated to include an emergency overflow into the downstream private surface water network.

Due to the relatively shallow depth of flow control manhole S1.8 (downstream of the large diameter pipes used for storage on the west of the building) and the design water level during the 1 in 100 year plus climate change event (which is relatively close to the cover level), it is not physically feasible to provide an emergency overflows pipe in this manhole. However, in the event that this flow control were blocked or the capacity exceeded, it can be seen that water would be expected to flood out of the manhole covers on the west of the building, and then flow away from the building towards the adjacent highways where the impact would be less severe.

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.

As noted previously, due to the need to make the development work with the existing topography of the site and surrounding area, and the need to maintain minimum gradients for pedestrian access to comply with accessibility requirements, the proposed levels are such that 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.

As noted previously, it should also be recognised that there is additional unused surface water storage potential within the sub-base of some of the proposed permeable parking areas during the 1 in 100 year event – this is indicated on the Exceedance Flows drawing NW151/01/15 and can be seen within the MicroDrainage calculations provided previously. Thus, 'exceedance' of the drainage capacity in the car park would occur later than exceedance in other areas, providing further mitigation for the building which could be susceptible to exceedance flows from this area.

Also as noted previously, 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 by absorbing some flow, although this cannot be quantified.

Notwithstanding the above, the Private Drainage drawing NW151/01/05 has been updated to include additional channel drains and gullies at the critical points around the south-east of the proposed building, to aid flows in re-entering the system, and the Exceedance Flows drawing NW151/01/15 has been updated. Although external levels adjacent to building entrances will need to rise to meet the proposed Finished Floor Level to provide level access, external footpath levels can be graded away from the building and will return to a level at least 150mm below the Finished Floor Level where feasible.

Finally, as noted previously, there is a point at the far south-east of the proposed building where flows are able to pass around the south of the building, before flowing away from the building on the east. External levels are such that any surface water beginning to pond on the south-east of the building would not be expected to reach a significant depth before flowing via the route

around the south of the building, thus limiting any potential impact on the property.

- **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.

As per our recent email exchange (copy attached for reference), we understand the draft Maintenance & Management Plan is sufficient at this stage to provide details of maintenance requirements, with a final maintenance strategy to be set as a pre-occupation condition.

In terms of the construction stage, as the Contractor will primarily be responsible for managing runoff during construction, but has not yet been appointed, this information will be provided in due course. As per our recent email exchange (copy attached for reference), we understand this can be secured by pre-commencement condition.

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

Firstly, it is noted that a catch-pit is provided upstream of the tank to reduce the amount of silt which may enter the structure in the first place; a suggested regime for maintenance of catch-pits is included in the Maintenance & Management Plan. However, taking on board your concerns, we have amended the

specification of the tank to include a requirement for an integral access channel, with additional access points within the tank structure, to allow the unit to be accessed by a vacuum unit if silt removal is required, and to be inspected by CCTV if required. The access points are within a suitable distance from the car park to enable vacuum/CCTV to take place. The suggested regime for maintenance of the tank has been updated within the draft Maintenance & Management Plan to reflect this.

- **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.

Please refer to answer 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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