
From:
Sent: 11 January 2023 12:12
To:
Cc:
Subject: SMD/2021/0491 - Land off Tenford Lane - LLFA Response (Rev 11)

Afternoon Chris,

Thank you for reconsulting us on the RM application SMD/2021/0491 – Land off Tenford Lane.

Staffordshire County Council Flood Risk Management Position

We have reviewed the submitted information and there is further information required on to demonstrate an acceptable drainage strategy, listed below. Where relevant for context I have included LLFA Rev 9, [Developer Response](#), [LLFA Rev 10](#), [Developer Response](#), [LLFA Rev 11](#)

Drainage Strategy

- Full calculations have not been provided, we have only been provided with some partial designs, we need to see the outputs as well.
 - [These calculations have gone backwards on what we discussed again, the infiltration rates should be \$1.99 \times 10^{-5}\$ m/s and the basins should have a safety factor of 10.](#)
[The calcs are using infiltration rate \$1.99 \times 10^{-5}\$ as asked, this has been converted into infiltration per hour \$0.0000199 \times 3600 = 0.07164\$ which is the figure in the calc – we cannot understand this query as we have done as asked.](#)
[Please can you have a drainage engineer look at what you're sending me. You have now resupplied what was provided at Rev 9 when I originally asked for the outputs of the modelling \(Causeway Modelling 08/11/2022 for Networks 1 and 3\) these files only show the design of the modelling and do not cover the whole network.](#)

Design of the Infiltration Basins

- The GI report is still outstanding. While you have provided summer testing results, it was the GI report relating to the winter testing (November 2021) that we need. – we need to see this to determine if groundwater is sufficiently below the base of the infiltration features to allow them to operate correctly and to look at contamination, risk of collapse,
[All site investigation has been supplied. Please see attached '00019_TEN_DOC_01_E Design Commentary Part 2' for the November 2021 report.](#)
[This attachment was not included.](#)
[This has been provided previously and the file is very large, but please refer to document 00019_TEN_DOC_01_E Design Commentary Part 2 attached again on page 12 of this document is infiltration testing dated Nov 2021.](#)

A Ground Investigation report will show a borehole log which will illustrate at what depth groundwater was encountered in each borehole (if at all), you have provided the infiltration testing results, not the GI report.

Exceedance

- We need to see further details on the landscape bund or fencing on the Tenford Lane boundary and the exceedance arrangements as per the discussions at outline stage

7.0 Flood Routing and Exceedance

Due to the topography of the site the natural failure route should the system become inundated would be towards the southern boundary.

Initially it would be proposed to try and contain as much of the runoff within the carriageway which would direct it towards the undeveloped area to the west. A cut off drain should also be positioned along the southern boundary to capture and residual runoff, preventing it running into Tenford Lane, and directing it towards the infiltration basins to the west.

A bund should be positioned around the area of the infiltration basins to provide extra volume and allow water to be temporarily stored and infiltrate at a controlled rate.

As a test for how the system would perform during an extreme event, a simulation was run for the 1 in 1000 year event with no climate change. It was found that the system generally performed well with only a small amount of flooding, 6.179m³ being present at within Pipe 2.006 and 4.807m³ in pipe 2.007. It is anticipated that this could be temporarily stored within the grassed area to the east or designed out at detailed design stage through an adequately sized collection system.

A plan showing exceedance routes is included in Appendix N and this will need to be visited once the proposed level strategy has been finalised.

As per landscaping scheme attached.

- Still no details provided showing the cut off drain along the southern site boundary.

Please see drainage drawings and in particular Southern Boundary Grips 05.01.23 attached.

This is a cut-off drain that needs to be provided along the whole southern boundary of the site to prevent residual runoff onto Tenford Lane – as requested at outline stage.

- Still no details provided on the bund around the infiltration basins.

Please see drainage drawings attached and in particular K22-001-004 Rev D.

Thank you for providing something on this, but as stated in the outline planning response that it needs to be an enclosed area.

As also illustrated in the text screenshot above, this infrastructure (bund area and cut-off drain) needs to be tested on an exceedance model run for the 1000yr with results showing on a supporting exceedance plan including ground levels, and areas of ponding to ensure that any exceedance does not flow into Tenford Lane.

- We also need to see FFLs on the plan

FFLs should be at least 150mm above surrounding ground level as per Condition 14 of the outline permission SMD/2016/0811 and surrounding land should be profiled to direct any residual runoff away from properties.

It is impossible on this site for runoff to be away from the properties in all locations as the levels and gradients wouldn't work for part M of building regulations.

- There are several plots that are not 150mm above surrounding ground levels, this is a condition of SMD/2016/0811.
- We do not accept this argument, it is possible for both regulations to work together, for example raising FFLs and providing ramped access if required.

Please note that this list is not necessarily exhaustive and that new revisions of documents often raise further questions.

Please re-consult us at flood.team@staffordshire.gov.uk when amended details are received. If you are minded to approve the application contrary to this advice, we request that you contact us again to allow further discussion.

Kind Regards
Roberta

Please note my working days are Monday to Wednesday.



Flood Risk Management | Economy, Infrastructure and Skills
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www.staffordshire.gov.uk

From:

Sent: 06 January 2023 10:25

To:

Subject: FW: SMD/2021/0491 - Land off Tenford Lane - LLFA Response (Rev 9)

Importance: High

CAUTION: This email originated from outside of Staffordshire County Council. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Roberta

Hope you have had a good Christmas break

Enclosed in this email and written in the email below is the responses to your latest comments. Please also refer to the email below sent to me today. Can you confirm you have received and commented on 00019_TEN_DOC_01_E Design Commentary Part 2?

I am under considerable pressure to get this to Committee later this month and would be very grateful if the drainage issues could be wrapped up by Friday 13th January and so a quick response would be very much appreciated!

Many thanks

Chris

From:

Sent: 06 January 2023 10:08

To:

Cc:

Subject: FW: SMD/2021/0491 - Land off Tenford Lane - LLFA Response (Rev 9)

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Job No.

Hi Chris

Further to my email before Christmas, please see now the full response and new attachments, so if this had not been sent to Roberta, please disregard the previous email and send this information only. The document that we wish to resend (which has already been sent - 00019_TEN_DOC_01_E Design Commentary Part 2) is too large to send over. If Roberta wishes to send a request file link again, I can resend, but believe she has this already as she has referred to the document in the Exceedance queries.

Please see responses below from our drainage and landscape teams. I presume Roberta is back from Xmas and would be grateful if she could respond quickly so as to not hold this up past the January committee providing she is happy with the responses. Some of these are again already answered and we are unsure if she is reading the correct information as it has already been provided, so have attached the documents she should need again here for clarification.

We comment below:

Drainage Strategy

- Full calculations have not been provided, we have only been provided with some partial designs, we need to see the outputs as well.
 - These calculations have gone backwards on what we discussed again, the infiltration rates should be 1.99×10^{-5} m/s and the basins should have a safety factor of 10.
The calcs are using infiltration rate 1.99×10^{-5} as asked, this has been converted into infiltration per hour $0.0000199 \times 3600 = 0.07164$ which is the figure in the calc – we can not understand this query as we have done as asked, but please do make a phone call to Keytech if clarification is required as there may just be some miscommunication.
 - The manholes numbers in the supplied calculations don't match with what is on the drainage plan so we can't cross reference.
The manhole numbers in the supplied calc we believe do match so unsure what the query is here – we have attached again the information in case LLFA are consulting the old documents in error – unsure what the query here is as this has already been answered – is the old document being referred to? If there is still believed to be an issue perhaps a quick phone call to Gareth Small at Keytech on 07592 531735 may solve the issue rather than sending a further response that requires another consultation?

- Can you resupply the source control outputs for the permeable paving as the configuration has been changed.
Could you provide a plan showing the m² area figures of the permeable paving just so we can confirm these with the calcs provided.
We do not have a plan with all the areas on, but the largest area for the permeable paving has been used for the calc supplied therefore using the worst case scenario. All other smaller areas will work with the same depth of stone.
- Please provide an updated SIA for the site.
Is this not the same as the GI already provided, or is this something else that is required?
CIRIA Simple Index Approach for the assessment of water quality treatment.
<https://url6.mailanyone.net/scanner?m=1p7I3i-0008O1-3n&d=4%7Cmail%2F90%2F1671463200%2F1p7I3i-0008O1-3n%7Cin6c%7C57e1b682%7C10609168%7C13286642%7C63A083062279DC7612B668B00ACB13DC&o=%2Fphtw%3A%2Fwtsauw.ndrisslg.osfier%2Fcs%2FrsureeoD%2FSu mnuSuoal%2Ftpt ul sidoo at trao26lf ldckx.xse &s=7Goev NU7KM NyXY5ATex7rXJ Eq>
This has now been filled in please see attached.

Swales

Please provide further detail on the proposed swales:

- We assume they are conveyance swales?
Yes they are conveyance swales but do incorporate an allowance for infiltration.
What rate of infiltration will be used? And how have the swales been modelled in the microdrainage?
1.99x10⁻⁵ has been used. The swales have been modelled in Flow using the 100year + 40% climate change storm event. Please refer to attached calculations.
- Material for the swales (e.g. grass).
This has been provided on drawing no K22-001-002 Rev C
The swales have not been included on the landscaping plan. As per infiltration basins, we just need to see design in line with the recommendations in the SuDS Handbook to prevent operation and to ensure the material is appropriate for successful long term operation of the swale.
K22-001-002 REV E (previously supplied) and K22-001-019 (new drawing attached with more detail)
- Can we see detailed swale design and cross sections.
This has been provided on drawing no K22-001-002 Rev C
What we're asking to see here is the detailed designs of the swales showing dimensions and cross sections through the swale including the modelled water levels as you have provided for the infiltration basins.
Provided on drawing K22-001-019 attached

Design of the Infiltration Basins

- The GI report is still outstanding. While you have provided summer testing results, it was the GI report relating to the winter testing (November 2021) that we need. – we need to see this to determine if groundwater is sufficiently below the base of the infiltration features to allow them to operate correctly and to

look at contamination, risk of collapse / other things in the SuDS manual listed below.

The following issues should be assessed as part of the design process for infiltration systems:

- risk of ground instability, subsidence or heave due to infiltration

Part D: Technical detail

CIRIA SuDS Manual 2015

- risk of slope instability or solifluction due to infiltration
- risk of groundwater pollution from mobilising existing contaminants on the site
- risk of pollution from infiltrating polluted surface water runoff from the site
- risk of groundwater flooding due to infiltration
- risk of groundwater leakage into the sewers, basements, tunnels or other structures due to promoting infiltration on the site.

All site investigation has been supplied. Please see attached '00019_TEN_DOC_01_E Design Commentary Part 2' for the November 2021 report.

This attachment was not included.

This has been provided previously and the file is very large, but please refer to document 00019_TEN_DOC_01_E Design Commentary Part 2 on page 12 of this document is infiltration testing dated Nov 2021. I can send this again if a request link is sent to me as before.

- How will erosion be prevented in Basin 3 and how will pre-treatment be provided given there is no corresponding swale associated with this basin?
Slopes are limited to a max gradient of 1/3 to reduce the potential of landslips/
suitable vegetation to be provided to improve structural stability.
While we accept that some of the water from the private network will be filtered
through the porous paving, the remaining roof water, requires (as per the
SUDS Manual) a minimum of catch pits for pre-treatment.
Catch pits have been incorporated on plan K22-001-REV D attached
- Need to see landscaping plans for the swale to ensure infiltration potential is
optimised with planting and to show how erosion will be prevented.
Landscaping scheme has already been provided with planting scheme, but
please see this attached again.
We're looking for something like this example in the SuDS Manual:
Please see attachment LDS517(B)-LS, LDS517-01 RevB and LDS517-02 Rev B
attached

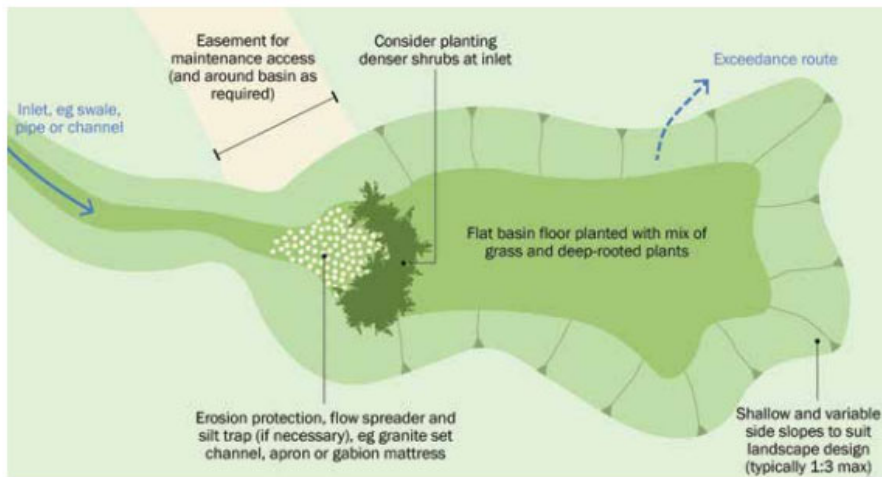


Figure 13.4 Plan view of **infiltration basin**

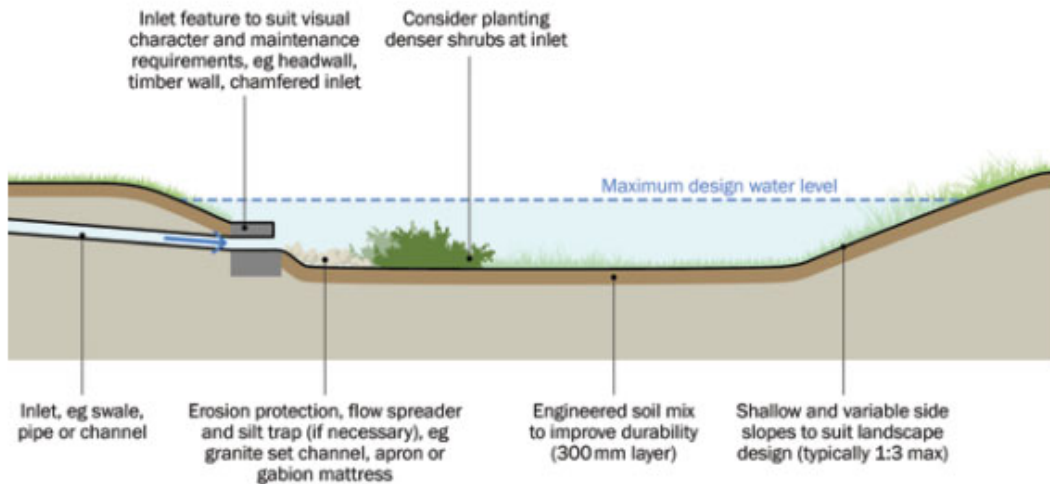


Figure 13.5 Elevation of **infiltration basin**

Exceedance

- We need to see further details on the landscape bund or fencing on the Tenford Lane boundary and the exceedance arrangements as per the discussions at outline stage

7.0 Flood Routing and Exceedance

Due to the topography of the site the natural failure route should the system become inundated would be towards the southern boundary.

Initially it would be proposed to try and contain as much of the runoff within the carriageway which would direct it towards the undeveloped area to the west. A cut off drain should also be positioned along the southern boundary to capture and residual runoff, preventing it running into Tenford Lane, and directing it towards the infiltration basins to the west.

A bund should be positioned around the area of the infiltration basins to provide extra volume and allow water to be temporarily stored and infiltrate at a controlled rate.

As a test for how the system would perform during an extreme event, a simulation was run for the 1 in 1000 year event with no climate change. It was found that the system generally performed well with only a small amount of flooding, 6.179m³ being present at within Pipe 2.006 and 4.807m³ in pipe 2.007. It is anticipated that this could be temporarily stored within the grassed area to the east or designed out at detailed design stage through an adequately sized collection system.

A plan showing exceedance routes is included in Appendix N and this will need to be visited once the proposed level strategy has been finalised.

As per landscaping scheme attached.

- Still no details provided showing the cut off drain along the southern site boundary. Please see drainage drawings and in particular Southern Boundary Grips 05.01.23 attached
- Still no details provided on the bund around the infiltration basins. Please see drainage drawings attached and in particular K22-001-004 Rev D.
- We also need to see FFLs on the plan
FFLs should be at least 150mm above surrounding ground level as per Condition 14 of the outline permission SMD/2016/0811 and surrounding land should be profiled to direct any residual runoff away from properties.
it is impossible on this site for runoff to be away from the properties in all locations as the levels and gradients wouldn't work for part M of building regulations. – The FFL's have already been provided previously, but for clarification they are detailed on drawing K22-001-006 attached.

I hope this extra information will be what is required, but please can I request that if there is a minor query could the LLFA consultee ask a question rather than sending back another full email which will delay it for another month. It really could be as simple as speaking to someone to confirm an item. Many thanks and we look forward to hearing back from the LLFA swiftly next week.

Kind regards

Hewitt&CarrServices

Lisa

LISA CARR

Project Manager

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From:

Sent: 19 December 2022 18:55

To:

Subject: FW: SMD/2021/0491 - Land off Tenford Lane - LLFA Response (Rev 9)

From:

Sent: 19 December 2022 15:28

To:

Cc:

Subject: RE: SMD/2021/0491 - Land off Tenford Lane - LLFA Response (Rev 9)

Good Afternoon Chris,

Thank you for reconsulting us on the RM application SMD/2021/0491 – Land off Tenford Lane.

Staffordshire County Council Flood Risk Management Position

We have reviewed the submitted information and there is further information required on to demonstrate an acceptable drainage strategy, listed below. Where relevant for context I have included LLFA Rev 9, [Developer Response](#), [LLFA Rev 10](#).

Drainage Strategy

- Full calculations have not been provided, we have only been provided with some partial designs, we need to see the outputs as well.
 - These calculations have gone backwards on what we discussed again, the infiltration rates should be 1.99×10^{-5} m/s and the basins should have a safety factor of 10.
 - The manholes numbers in the supplied calculations don't match with what is on the drainage plan so we can't cross reference.
- Can you resupply the source control outputs for the permeable paving as the configuration has been changed.

Could you provide a plan showing the m² area figures of the permeable paving just so we can confirm these with the calcs provided.

- Please provide an updated SIA for the site.
Is this not the same as the GI already provided, or is this something else that is required?

CIRIA Simple Index Approach for the assessment of water quality treatment.

<https://url6.mailanyone.net/scanner?m=1p7I3i-0008O1-3n&d=4%7Cmail%2F90%2F1671463200%2F1p7I3i-0008O1-3n%7Cin6c%7C57e1b682%7C10609168%7C13286642%7C63A083062279DC7612B668B00ACB13DC&o=%2Fphtw%3A%2Fwtsauw.ndrisslg.osfier%2Fcs%2FrsureeoD%2FSu mnuSuoal%2Ftpt ul sidoo at trao26lf ldckx.xse &s=7Goev NU7KM NyXY5ATex7rXJ Eg>

Swales

Please provide further detail on the proposed swales:

- We assume they are conveyance swales?
Yes they are conveyance swales but do incorporate an allowance for infiltration.
What rate of infiltration will be used? And how have the swales been modelled in the microdrainage?
- Material for the swales (e.g. grass).
This has been provided on drawing no K22-001-002 Rev C
The swales have not been included on the landscaping plan. As per infiltration basins, we just need to see design in line with the recommendations in the SuDS Handbook to prevent operation and to ensure the material is appropriate for successful long term operation of the swale.
- Can we see detailed swale design and cross sections.
This has been provided on drawing no K22-001-002 Rev C
What we're asking to see here is the detailed designs of the swales showing dimensions and cross sections through the swale including the modelled water levels as you have provided for the infiltration basins.

Design of the Infiltration Basins

- The GI report is still outstanding. While you have provided summer testing results, it was the GI report relating to the winter testing (November 2021) that we need. – we need to see this to determine if groundwater is sufficiently below the base of the infiltration features to allow them to operate correctly and to look at contamination, risk of collapse / other things in the SuDS manual listed below.

The following issues should be assessed as part of the design process for infiltration systems:

- risk of ground instability, subsidence or heave due to infiltration

Part D: Technical detail

CIRIA SuDS Manual 2015

- risk of slope instability or solifluction due to infiltration
- risk of groundwater pollution from mobilising existing contaminants on the site
- risk of pollution from infiltrating polluted surface water runoff from the site
- risk of groundwater flooding due to infiltration
- risk of groundwater leakage into the sewers, basements, tunnels or other structures due to promoting infiltration on the site.

All site investigation has been supplied. Please see attached '00019_TEN_DOC_01_E Design Commentary Part 2' for the November 2021 report.

This attachment was not included.

- How will erosion be prevented in Basin 3 and how will pre-treatment be provided given there is no corresponding swale associated with this basin? Slopes are limited to a max gradient of 1/3 to reduce the potential of landslips/ suitable vegetation to be provided to improve structural stability. While we accept that some of the water from the private network will be filtered through the porous paving, the remaining roof water, requires (as per the SuDS Manual) a minimum of catch pits for pre-treatment.
- Need to see landscaping plans for the swale to ensure infiltration potential is optimised with planting and to show how erosion will be prevented. Landscaping scheme has already been provided with planting scheme, but please see this attached again. We're looking for something like this example in the SuDS Manual:

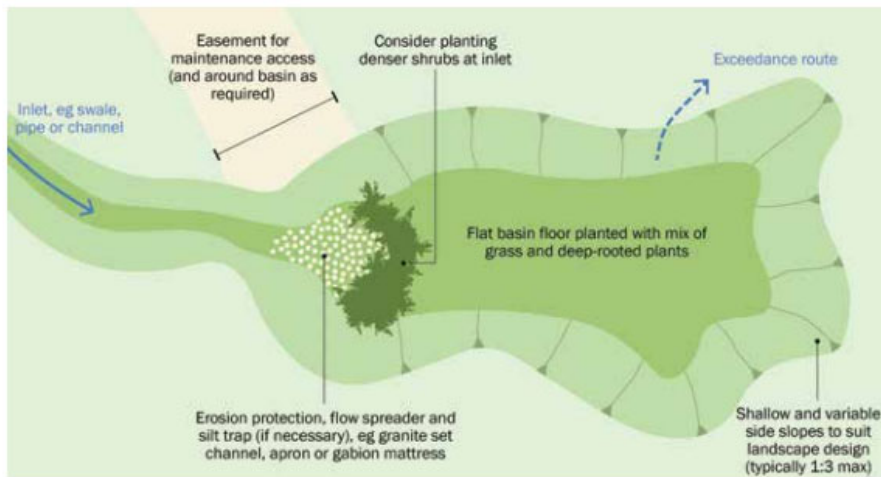


Figure 13.4 Plan view of **infiltration basin**

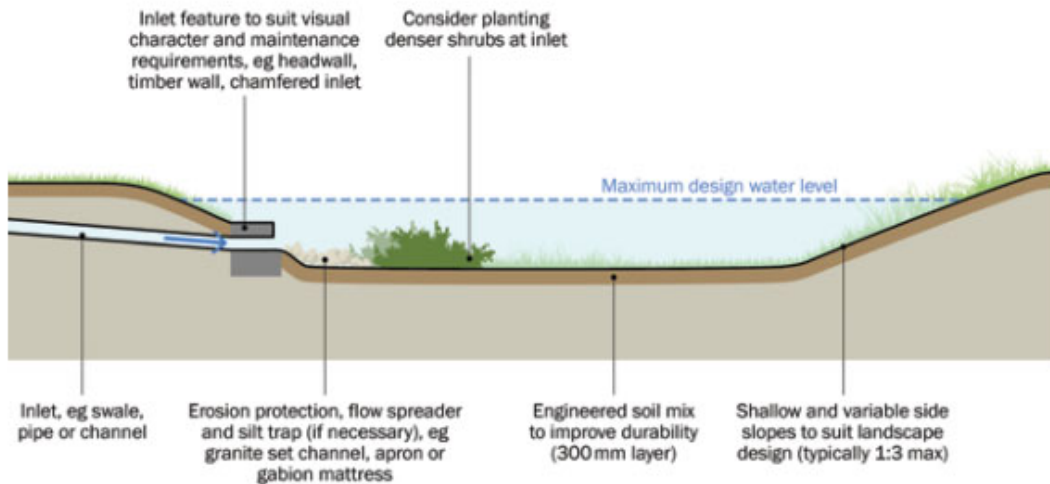


Figure 13.5 Elevation of **infiltration basin**

Exceedance

- We need to see further details on the landscape bund or fencing on the Tenford Lane boundary and the exceedance arrangements as per the discussions at outline stage

7.0 Flood Routing and Exceedance

Due to the topography of the site the natural failure route should the system become inundated would be towards the southern boundary.

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A plan showing exceedance routes is included in Appendix N and this will need to be visited once the proposed level strategy has been finalised.

As per landscaping scheme attached.

- Still no details provided showing the cut off drain along the southern site boundary.
- Still no details provided on the bund around the infiltration basins.
- We also need to see FFLs on the plan
FFLs should be at least 150mm above surrounding ground level as per Condition 14 of the outline permission SMD/2016/0811 and surrounding land should be profiled to direct any residual runoff away from properties.

Please note that this list is not necessarily exhaustive and that new revisions of documents often raise further questions.

Please re-consult us at flood.team@staffordshire.gov.uk when amended details are received. If you are minded to approve the application contrary to this advice, we request that you contact us again to allow further discussion.

Kind Regards
Roberta

Christmas leave between 21/12/22 – 03/01/23

Please note my working days are Monday to Wednesday.



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From:**Sent:** 02 December 2022 14:31**To:****Subject:** FW: SMD/2021/0491 - Land off Tenford Lane - LLFA Response (Rev 9)

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Afternoon Roberta

In response to your most recent comments, please find answers to your questions and further information as set out in the email below.

I would be grateful for your further comments by the end of Tuesday.

Thanks

Chris

From:**Sent:** 02 December 2022 14:27**To:****Cc:****Subject:** RE: SMD/2021/0491 - Land off Tenford Lane - LLFA Response (Rev 9)

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Job No.

Hi Chris

Thank you for your comments and thoughts and I appreciate your guidance. We have been as quick as possible in getting these responses to you in the hopes that you can ask the LLFA to review this before you need to compile the report for the December meeting. I also wonder if you are able to come back to us on all the other elements that needed approving from yourselves and arboricultural so that we can ensure all comments have been addressed. The responses to LLFA are detailed below in red and the Wetransfer link below contains all the documents as they are quite large:

WeTransfer Link: <https://we.tl/t-8rvCCjnxBn>

Please see our written response in red to staffs county:

Staffordshire County Council Flood Risk Management Position

We have reviewed the submitted information and there is further information required on to demonstrate an acceptable drainage strategy, listed below.

Drainage Strategy

- Full calculations have not been provided, we have only been provided with some partial designs, we need to see the outputs as well. **Full calculations have been reissued**
- Can you resupply the source control outputs for the permeable paving as the configuration has been changed. **Source control outputs for permeable paving have now been supplied**

- Please provide an updated SIA for the site. **Is this not the same as the GI already provided, or is this something else that is required?**
- Any maintenance strategy should be commensurate with the requirements in the SuDS Manual for infiltration features and include name and contact details for the person(s) responsible for each activity, please also include swale maintenance within any strategy. **Suds maintenance plan has been amended see drawing No, K22-001-004 REV C**

Swales

Please provide further detail on the proposed swales:

- We assume they are conveyance swales? **Yes they are conveyance swales but do incorporate an allowance for infiltration**
- Are they non-infiltrating and if so how will this be achieved? **They are infiltrating, see response to comment above.**
- Material for the swales (e.g. grass). **This has been provided on drawing no K22-001-002 Rev C**
- Can we see detailed swale design and cross sections. **This has been provided on drawing no K22-001-002 Rev C**

Design of the Infiltration Basins

- The GI report is still outstanding. While you have provided summer testing results, it was the GI report relating to the winter testing (November 2021) that we need. – we need to see this to determine if groundwater is sufficiently below the base of the infiltration features to allow them to operate correctly and to look at contamination, risk of collapse / other things in the SuDS manual listed below. **All site investigation has been supplied. Please see attached '00019_TEN_DOC_01_E Design Commentary Part 2' for the November 2021 report.**
- How will erosion be prevented in Basin 3 and how will pre-treatment be provided given there is no corresponding swale associated with this basin? **Slopes are limited to a max gradient of 1/3 to reduce the potential of landslips/ suitable vegetation to be provided to improve structural stability.**
- Need to see landscaping plans for the swale to ensure infiltration potential is optimised with planting and to show how erosion will be prevented. **Landscaping scheme has already been provided with planting scheme, but please see this attached again.**

Exceedance

- We need to see further details on the landscape bund or fencing on the Tenford Lane boundary and the exceedance arrangements as per the discussions at outline stage – **As per landscaping scheme attached.**
- We also need to see FFLs on the plan – **please see amended drawing K22-001-006 Rev C**

If you could kindly let me know whether this will be able to be reviewed for comment prior to the report deadline, and whether all other elements are now approved (or require further input) that would be appreciated.

Kind regards

Hewitt&CarrServices

Lisa

LISA CARR

www.hc-services.uk

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