From: abdul.gaffar@environment-agency.gov.uk
Sent: 10/05/2013 12:02:50
To: Bill Topping
Subject: Environment Agency Response to: 2013/62/90497/E
Signed By:

Attachments: PlanningProposal.rtf

The proposal has been reviewed and I enclose the Environment Agency's comments on:
Little Royd Mills, Low Road, Earlsheaton, Dewsbury, WF12 8BU

LPA ref: 2013/62/90497/E
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Mr Bill Topping
Kirklees Metropolitan Borough Council
Planning Services
PO Box B93
Huddersfield
West Yorkshire
HD1 2JR

Our ref: RA/2013/125049/01-L01
Your ref: 2013/62/90497/E

Date: 10 May 2013

Dear Mr Topping

ERECTION OF NEW INDUSTRIAL UNITS LITTLE ROYD MILLS, LOW ROAD, EARLSHEATON, DEWSBURY, WF12 8BU

Thank you for consulting us on the above application, which we received on 23 April 2013.

Environment Agency position
We **object** to the application and recommend refusal of planning permission on the basis for the following reason:

Reason
The submitted FRA identifies a culverted watercourse running through the site but the submitted plans fail to identify its route and location.

We would normally object to any proposal to build over a watercourse due to the additional loading which could be placed on the culvert. Such proposals will also cause difficulties accessing the culvert for maintenance and repair. It will also remove the potential to re-open this watercourse in future.

Overcoming our objection
The route of the culvert must be identified and shown on the proposed layout. Buildings should not be located over the culvert and an appropriate easement (dependent on depth and size of the culvert) must be provided to allow provision for access and maintenance.

If the above objection can be overcome after re-consulting us, we also have the following advice to offer which includes conditions that should be imposed on any grant of planning permission:

Water Quality

Condition
Surface water draining from areas of hardstanding shall be passed through an oil interceptor or series of oil interceptors, prior to being discharged into any watercourse, soakaway or surface water sewer. The interceptor(s) shall be designed and constructed to have a capacity compatible with the area being drained, shall be installed prior to the occupation of the development and shall thereafter be retained and maintained throughout the lifetime of the development. Clean roof water shall not pass through the interceptor(s). Vehicle washdowns and detergents shall not be passed through the interceptor.

Reason
To reduce the risk of pollution to the water environment.

Condition
All downpipes carrying rain water from areas of roof shall be sealed at ground-level prior to the occupation of the development. The sealed construction shall thereafter be retained throughout the lifetime of the development.

Reason
To prevent the contamination of clean surface water run-off.

Condition
Inspection manholes shall be provided on all foul and surface water drainage runs such that discharges from individual units can be inspected/sampled if necessary. All manhole covers shall be marked to enable easy recognition. Foul will be marked in red. Surface water will be marked in blue. Direction of flow will also denoted. Where more than one discharge point is proposed, manholes will also be numbered accordingly to correspond with their respective discharge point.

Reason
To allow pollution incidents to be more readily traced.

For further information and advice about pollution prevention please refer to the Environment Agency's website to access Pollution Prevention Guidance Notes (http://www.environment-agency.gov.uk/business/topics/pollution/39083.aspx) and advice on how to get your site design right (http://www.environment-agency.gov.uk/static/documents/Business/pp_pays_booklet_e_1212832.pdf).

You may also wish to contact our National Customer Contact Centre on tel. 08708 506 506 for site-specific advice on pollution prevention.

Land Contamination

Advice to LPA
We do not consider this site a priority, therefore we will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

The developer should address risks to controlled waters from contamination at the site, following the requirements of the National Planning Policy Framework Planning Policy and the Environment Agency 'Guiding Principles for Land Contamination'.

Cont/d..

Advice to applicant
We recommend that developers should:

1) Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.

2) Refer to the Environment Agency Guiding Principles for Land Contamination for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.

3) Refer to our guiding principles on groundwater protection are set out in our document GP3 - Groundwater Protection Policy and Practice, which is intended to be used by anyone interested in groundwater and particularly those proposing an activity which may impact groundwater. GP3 is available on our website at: http://www.environment-agency.gov.uk/research/library/publications/40741.aspx

4) Refer to our website at www.environment-agency.gov.uk for more information.

Foul Drainage

A mains connection has been proposed for foul drainage disposal. You are strongly advised to satisfy yourself, prior to determination, that there is capacity in both the receiving sewer and sewage treatment works to accommodate the discharge proposed. Please contact the sewerage undertaker, Yorkshire Water, to attain this information. If capacity is not available, an alternative means of foul drainage disposal may need to be explored or improvement works to resolve the capacity issue secured as part of the planning permission. If a non-mains solution is to be considered we should be re-consulted, prior to determination, and given the opportunity to comment further.

If you have any queries or require any additional information, please do not hesitate to contact me on the details below.

Yours sincerely

Abdul Gaffar
Sustainable Places - Planning Advisor

Direct dial 0113 819 6381
Direct e-mail abdul.gaffar@environment-agency.gov.uk

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