

Kirklees Flood Management & Drainage (Lead Local Flood Authority) – Statutory Consultation

Consultation on Application Number: 2016/91573

Address: Cellars Clough Mill, Manchester Road, Marsden, Huddersfield, HD7 6LY

Proposal: Demolition of existing redundant mill buildings and erection of 55 dwellings with associated parking and access from Manchester Road

DC Officer: Farzana Tabasum

Drainage Officer: Paul Farndale

Comments

The following comments are an update from previous comments dated 22nd September 2016 and 21st December 2017 after receiving additional material in Flood Risk Assessment (Revision C) E15/6518/FRA001C by Trevor Haigh.

Previous versions should be clearly marked as superseded.

We SUPPORT this application subject to appropriate conditions and an acceptable unilateral undertaking to set up a management company and agree lifetime maintenance of SUDS and the mill pond in order to avoid/mitigate flood risk.

Summary

The following points are follow ups to those made previously. Whilst a more comprehensive assessment of the mill pond via drain down would be advised, the Planning Officer may wish to proceed with conditions.

- The Planning Officer has indicated that there is no objection to filling in the eastern pond from amenity and biodiversity perspectives.
- The FRA states the downstream culvert from the eastern pond will be part grouted with the outfall and some length retained for the site's surface water drainage. We are satisfied with this proposal subject to a final survey to determine if remaining infrastructure is fit for purpose.
- It is undecided currently how surface water attenuation is to be designed. A full SUDS treatment scheme is viable for this application, maintained via a management company (secured under section 106 agreement). If sewer and road adoption is required, an alternative plan may need to be promoted.

There is sufficient scope in the design to make space for water, we are happy for this aspect to be conditioned.

- The mill pond sections of the FRA suggest minor remedials and pointing. The submitted 'Structural Appraisal' by Spire Associates dated February 2014 recommends that the mill pond is drained and inspected by specialists. It also recommends the mill race is demolished. This has not been taken into account. The Planning Officer may however wish to proceed with conditions and back up plans via a section 106 agreement.

An desktop assessment of the operation of the mill ponds, ancillary structures, inlets and outlets in relation to Kirklees Council independent survey has been carried out. A lot of these have been considered in revision C of the submitted FRA. However the repairs do not go into detail for some aspects.

A formal plan is required to renew, repair, operate, including an emergency drain down, provide safe overflows etc, for a reduced pond area within the proposed layout is required to enter into a Section 106 agreement.

We envisage this should include but is not exhaustive to :-

- Stopping the leaking dam through grouting and pointing. However a back up plan is needed if this proves insufficient. Responsibilities need to be clearly established in a section 106 Unilateral Undertaking.
- No plan has been mentioned to remove trees from embankments and channels and make good. This must be included.
- Spillway repairs raised by Jacobs and the inlet channel by the Applicants own Structural Engineers needs addressing as part of the agreement.
- The sluice gate between ponds will be made redundant and I assume a permanent barrier to fill in any orifice. Or as suggested in point 2.9 in FRA revision C, a new draw down positioned at this or an alternative point. The ability to draw down the pond is seen as essential in the flood risk management of the site.
- We welcome statements to inspect walled structures annually and implement works within 3 months. An emergency situation should also be considered
- Any penstocks or sluice gates to remain must be examined operationally and replaced if required as part of an agreement. Ancillaries that are deemed fit for purpose or renewed must form part of an annual inspection/maintenance plan.

- We welcome statement on grass cutting and litter picking. Any additional routine maintenance suggestions included in CIRIA guides for ponds should be included.

Suggested Conditions/ Section 106 Agreement

A meeting with the planning officer is now required to discuss the next actions and appropriate conditions.

Signed: Paul Farndale

Date: 2nd August 2018