

Kirklees Flood Management – Lead Local Flood Authority Consultation – STATUTORY CONSULTEE

Consultation on Application Number: 2016/93243

Address: Thirstin Mills, Thirstin Road, Honley, Holmfirth HD9 6JG

Proposal: Erection of 17 Dwellings

DC Officer: Farzana Tabasum

Drainage Officer: Paul Farndale

Kirklees Flood Management & Drainage OBJECTS to this application due to inadequate assessment and mitigations of flood risk.

- Should a sequential test be passed by the LPA we expect the layout to adopt a sequential approach where position of property should be in areas of lowest risk (curtilage)
- Kirklees Flood Management as LLFA would set an appropriate stand off distance based on size and depth of the culvert and potential flood flows. No consultation was made prior to this submission.
- A previous diversion of the culvert a decade ago in line with proposed road layouts (see 2011/92197) incorporated the long term management of the structure via road adoption. Property owners would be liable as riparian owners under this proposal for this significant system.
- A clear analysis of watercourse and surface water flood routing is required before a layout can be supported. This has not been done yet a layout is proposed. It is likely therefore that any attempt at justifying the currently layout will be requesting a compromise and include risk. This would not be satisfactory. Risk should be avoided through design.
- The site has been demolished over a decade. We consider therefore that brownfield run off calculations no longer apply. The site should be considered 'greenfield' in terms of drainage. A discharge restriction of 5l/s/ha should apply for the built area. Attenuation will therefore be required and assessed so that it can be safely accommodated within the layout.

Signed: Paul Farndale

Date: 10th November 2016