From: Nick Willock <nick@roberthalstead.co.uk>
Sent: 07 April 2017 12:50
To: Matthew Woodward
Subject: Huddersfield Road, Thongsbridge - 2017/90207
Attachments: Flood map with red line boundary overlaid.pdf

Hi Matthew,

With regard to the above, we can provide the following responses to the various outstanding queries.

Sequential flood risk assessment

I enclose a plan showing the latest EA flood map with the application red line superimposed by hand. As you will see, only part of the entrance apron and a tiny part of the site to the right of the access is within flood zones 2 /3. No actual development would be affected – all being within flood zone 1, particularly as there would be insufficient width / depth to accommodate new development on the right hand side as you enter the access into the site – please see indicative layout plan

In these circumstances, I would hope you'd agree a sequential flood risk assessment would be a fruitless exercise. As the NPPF states (para 101): "The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding." All our development would be Zone 1.

Paragraph 033 of the PPG also calls for a pragmatic approach, stating: "When applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken. For example, in considering planning applications for extensions to existing business premises it might be impractical to suggest that there are more suitable alternative locations for that development elsewhere."

In this case, it would not make any sense to try to locate the development to another area of flood zone 1, and the pragmatic view would perhaps conclude that as we are in zone 1, the requirement for a sequential assessment should be surplus to requirements.

Trees surrounding the site removed

The applicant has commented that the trees in question have been pollarded rather than removed. These are pollarded every 5 / 6 years and then grow back very well as thick bushes. This currently acts well as a linear wooded area and a screen to the terraced houses opposite (more so when in full leaf next month), and particularly when combined with the differences in levels of the application site compared to where the terraced houses are (which help hide the site well).

Landscaping is a reserved matter in this case, and the applicant would be happy to agree a scheme through a suitably worded condition if deemed necessary, although the extent of such landscaping will perhaps need to be balanced alongside the need to maximise the use of this brownfield site for employment purposes ?

Levels

We can confirm that the site levels were not raised to facilitate flood risk, as the area for this application was the area of the mill dam, as such it had and still has the structure of a 3.5 metre high embankment wall. This is why this area of the site has always been excluded from the EA flood maps, unlike the lower part of the site. The dam wall acted to keep water in (reservoir) , and out – i.e. river water (!) Some infilling has occurred within the former dam structure however the infill is on average 375mm below the top of existing embankment and cannot act to displace

additional flood water because flood water could not have got into the site previously anyway, as a result of the mill dam wall. The infill simply replaces some of the previous mill pond water depth.

The remediation statement was written for the residential development that was previously approved on this site – 750mm clean cover for gardens, which won't apply in this case as there are no gardens / residential properties.

In respect of more infill, we envisage that the development can be achieved without increase in the height existing ground levels, save for road construction depths, which won't be significant.

Kind Regards

Nick

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Latest EA flood map, also showing red line boundary of planning application

Key: dark blue = FZ3; light blue = FZ2

