

Strategic Drainage Consultation

Consultation on Application Number: 2017/90620

Address: Dobroyd Mills, Hepworth Road, New Mill, Holmfirth, HD9 1AF

Proposal: Planning permission for demolition of existing buildings, change of use of existing building to mixed uses comprising B1a (offices), B1c (light industrial), A3 (food and drink) and C3 (up to 18 dwellings) and outline permission for erection of 75 dwellings

DC Officer: Matthew Woodward

Drainage Officer: Paul Farndale

In addition to the comments below from 27th March 2017 (black ink) no further comment on the mill ponds has been supplied after the Jacobs assessment has been provided.

No surveys of the culverted sections of watercourses has been carried out.

A revised layout and topography has been supplied. A narrative on flood routing is required to ensure a design has been submitted that utilises road network and public open space for overland routes, and protects property and curtilage. No evidence has been submitted that this has been considered.

Paul Farndale 19th July 2017

Comments Summary for Planning Officer

Kirklees can LARGELY SUPPORT this application, however crucial FURTHER ASSESSMENT needs to be included in the application with regards to FLOOD RISK. Namely

- Independent assessment of the mill pond structures commissioned by Kirklees Council and carried out by Jacobs need to be included and expanded upon.
- Existing topography and a discussion of overland flow routing within the Flood Risk Assessment should inform any proposed layout so exceedance flows and blockage scenarios utilise road networks and public open spaces and avoid the use of curtilage, i.e. demonstrate how risk is to be avoided.
- Surveys of culverted sections of watercourse to be retained in the development needs to be carried out to understand flood risk.

Detailed Comments - FLOOD RISK ASSESSMENT

Main River Flooding

The Environment Agency should comment on main river flood risk with regard to the existing building to be retained, the uses proposed and their acceptability and whether safe access and egress can be maintained.

We note that more vulnerable classifications occupy the upper floors.

We disagree with the wording of the EA suggested condition.

Surface Water Flood Risk

It is noted that a suggested EA condition relates to the Flood Risk Assessment and relates to surface water. This is no longer under the jurisdiction of the Environment Agency and should be commented on the by Lead Local Flood Authority alone.

Care should be taken in utilising suggested conditions by an organisation that appears to 'approve' an FRA. Different organisations examine different areas of flood risk and information may be lacking or result in an objection from the LLFA or Yorkshire Water.

Kirklees Flood Management expects further information to be provided in the FRA.

Mill Ponds

The flood risk assessment has included a small section relating to the mill pond. However there is no mention of the Lead Local Flood Authorities independent survey. (attached). There appears to be a significant disparity in the observations listed.

Top Pond and Bottom Pond – rated poor and recommends amongst other aspects, tree removal, removal of sandbags and re-forming embankment with designed spill.

These walk over assessments should be expanded upon, re-analysed and include a specific assessment of ancillaries such as sluices, drain downs and associated pipework so a clear understanding of the operation and current condition is achieved.

To avoid and mitigate flood risk of burst and failure it is expected that a list of remedial work is issues for the structure and the ancillaries prior to the development.

This so that the pond can operate safely post development and a management company can maintain it and manage it with an appropriate plan, e.g. routing maintenance such as grass cutting, litter picking etc. and also regular inspections and periodic desilting and structural assessment with repair/renewal as required and a plan for an emergency draw down. A safe area of spill should be included in the proposals post development.

Watercourse - Culverted Sections

We would not object to the continued build over by existing buildings but would not wish to add to this risk and always recommend a suitable stand-off distance for flood risk and maintenance requirements in line with industry standards.

However understanding the current condition and the part it plays in risk is necessary as part of any flood risk assessment. Appropriate renewal/mitigation is expected where appropriate.

Flood Routing

For surface water exceedance events and blockage scenarios we are concerned that properties should not be located in low spots and that road networks and public open spaces are used to convey water safely off site. There is no evidence that this has been taken into account in the indicative road layout to date.

Surface Water Drainage

In line with Kirklees standards there should be a 30% reduction in peak 1 in 1 year flows from the existing development. To achieve this an existing drainage plan is necessary. Areas that are not positively drained should be discounted from the assessment.

Suggested Conditions

Once further information has been provided we envisage that we will support the application onto detailed design with the following conditions (or amalgamation thereof) to follow up the initial work. We request that the planning officer engages with us to formulate appropriate wording.

DR01 Drainage Details

DR04/5 Flow Restriction & Surface Water Attenuation

DR07 Overland Flows and Flood Routing

DR10 Temporary Drainage Provision

MILL POND CONDITION

WATERCOURSE

ADVICE NOTES

Signed: Paul Farndale

Date: 27th March 2017