

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

Consultation on Application Number: 2017/90620

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

Proposal: Hybrid application - Planning application for demolition of existing buildings and erection of 2no workshop and ancillary office buildings (B1c/B8 use class) comprising a floor area of 880m² including mezzanine space, parking, access details and ancillary works. Outline planning application for the erection of up to 75no dwellings (Amended Description)

DC Officer: Matthew Woodward

Drainage Officer: Paul Farndale

Further to my comments on 16th October 2017, 20th September 2017, July 19th 2017 and 27th March 2017. As the latest revisions relate to a specific area of the site, please see these comments as peculiar to that area and an addendum to the above dated comments for the full site

Comments Summary for Planning Officer

Kirklees Flood Management as LLFA OBJECTS to the latest revision on the grounds of flood risk. Further information may satisfy concerns and we invite a discussion with the LLFA and Environment Agency alongside the LPA.

As a new build is shown in flood zone 3 – High Risk, a sequential test is now required.

Detailed Comments - FLOOD RISK ASSESSMENT

Main River Flooding – Jackson Bridge Dike

An addendum to the FRA has been provided. The Environment Agency should comment on the flood levels given for a 1D analysis which suggests that the model for Jackson Bridge Dike is incorrect.

The Environment Agency have provided 1 in 100 and 1 in 1000 year flood levels along Jackson Bridge Dike. The proposed FFL for both buildings is at least 3m higher than these levels.

We politely suggest to examine upstream of this area to see if main river flooding would escape out of channel and have a chance of running overland (2D modelling) providing a flood risk not discussed in the FRA. The Environment Agency may deem this unnecessary.

The proposal is to demolish 3250 m² of building and replace with 880 m² of new building on the site, so the overland flow volume available would be considerably improved.

A tributary to Jackson Bridge Dike, Dean Dike also has basic modelling (National General). Although this is an ordinary watercourse the model data is owned by the Environment Agency. No calculations have been provided to demonstrate that the culvert(s) in this area that runs under the development would be kept in channel for various return periods.

We believe a sequential approach should be adopted in this location and the siting of new buildings be clearly out of flood zones associated with BOTH watercourses.

Ordinary Watercourse, Dean Dike and Surface Water Flood Risk

An assumed route is plotted for a single line of ordinary watercourse, Dean Dike, that is a tributary to Jackson Bridge Dike. Dean Dike directly feeds the mill ponds on site and has a sluice gate and separates flows into the existing mill complex that needs to be explored. There may be multiple structures/culverts.

As this building is now to be demolished, Kirklees' policy aims to open up and decanalise culverted systems. Clearly this is not promoted.

Where this is not reasonably practicable Kirklees Flood Management would look not to site new buildings directly over the top of existing or indeed renewed culverts to provide access for maintenance and renewal in the lifetime of the development in addition to minimising flood risk.

A survey is necessary to fully assess flood risk (but has not taken place) regarding exact location, size, span and condition of Dean Dike structures under the site. An analysis on the inlets is also needed to understand how flows may be restricted.

We accept that a condition survey of the existing culverts is required to ensure their structural adequacy. No alterations to the culverts are proposed. In addition a maintenance plan will be produced to ensure that regular cleaning of obstructions is carried out.

We suggest these items are conditioned in the planning approval.

Kirklees Flood Management looks to avoid building over ordinary watercourses with new buildings and insists on an appropriate stand-off distance based on depth, span and condition of the said culvert. A survey is

required to inform appropriate guidance. Additional stand-off and elevation above adjacent ground levels may be required for safe flood routing.

New building floor levels are over 1m higher than existing buildings to be demolished and the developed area reduced by 2370 m2 so the risk of flooding to property is significantly reduced from the current layout.

Assuming blockage scenarios or exceedance events for Dean Dike creating overland flows, it would be prudent to include a safe flood route by repositioning and elevating buildings appropriately and utilising car parking for the route itself. This will also mitigate any surface water flood risk identified on risk mapping. We wish for this to be examined in more detail before supporting this revision.

Highways Adoption

Where structures are located under the proposed public highway, particularly those with a span 1500mm and greater, we strongly suggest early dialogue with Highways DC and Section 38 departments within the Council. It should be noted that a watercourse located under the public highway will become Council responsibility if the road is adopted.

We suggest this is conditioned as part of the planning approval

Surface Water Drainage

Although the final surface water drainage design for the wider site can be dealt with by condition, we must point out that making space for attenuation as shown on the Flood Risk Drawing submitted on 15th January 2018 shows a clash with the positioning of new buildings depicted in the Flood Risk Assessment addendum submitted on 21st February 2018.

The exact position and size of the attenuation tank required for the whole development will be confirmed at detailed design stage.

We suggest this is conditioned as part of the planning approval

Kirklees Flood Management advises that there is a new assessment alongside the advice above to ensure attenuation can be accommodated.

Signed: Paul Farndale

Date: 1st March 2018