

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

Consultation on Application Number: 2018/92686

Address: land adj, 127, Westgate, Heckmondwike, WF16 0EW

Proposal: Outline application for erection of retail (A1) and drive thru restaurant (A3) development and associated car parking, landscaping and infrastructure

DC Officer: Glenn Wakefield

Drainage Officer: Paul Farndale

Summary

Kirklees Flood Management and Drainage as Kirklees Lead Local Flood Authority, OBJECTS to this application and requires significant FURTHER INFORMATION to support layout and flood risk mitigation for an application seeking approval for LAYOUT.

- A higher level flood risk assessment is now required to take initial assessment by Trevor Haigh forward and fully justify the layout design as submitted or provide a layout that avoids risk and where this is not reasonably practicable, adequately mitigates it again with justification.

Detailed Comments on Flood Risk and Drainage Requirements for Further Information

There is an ordinary watercourse flowing under Westgate and the site before discharging to the river Spen. An access manhole is available in Westgate according to Kirklees records. The size, depth, condition and exact location of this watercourse must be surveyed prior to considering layout approval.

Diversions can only be agreed with the Lead Local Flood Authority and may not be suitable. Flood routing associated with escape from this system upstream and within the site must also be considered. A suitable stand-off distance will be set by the LLFA depending on size, depth and condition. The LPA will be advised accordingly after the survey has taken place. The applicant needs to be aware that this enclosed watercourse, whether in pipe or culvert may not be considered fit for purpose and may require renewal as part of this scheme.

The LLFA will object to any proposals to build over this watercourse.

There is a 525mm public combined sewer crossing the site west to east inside the northern boundary. A significant stand-off should be expected and we advise dialogue with Yorkshire Water over recommended distances and whether diversions of such a system is feasible or desirable within the proposed layout which may need alter as a result.

In addition an addition combined sewer runs north to south for the full length of the site. Similar advice should be sought from Yorkshire Water prior to making a decision on layout.

A 300mm public combined sewer is located close to the southern boundary. Although this may be outside the site (exact location of all three sewers should be defined and depicted on plans), a suitable stand-off distance should be dictated. This is highly unlikely to affect layout design however.

We agree with the submitted Flood Risk Assessment with regard to ground conditions with the addition of BGS data showing significant constraints for infiltration techniques in the area. As Land Drainage Authority we therefore rule these techniques out. Connections to watercourse should therefore be considered next.

With an ordinary watercourse flowing through site and the river Spen to the south of the site we feel that opportunities are available to drain the site. Public sewers should not receive surface water drainage from the site as a result. We do not disagree with the Flood Risk Assessment setting a flat rate of 5.6l/s for this site. With no identified formal drainage system, Trevor Haigh is correct in determining this as 'greenfield' in drainage terms.

A sequential test has been submitted for the planning officer to consider.

We support a sequential approach where no buildings are placed in flood zone 3. We politely remind the applicant that flood zone 2 is not a 1 in 1000 year storm event but represents events between 1 in 100 and 1 in 1000, i.e. between a 0.1 and 1% annual probability of flooding. Flood zone 2 should also be avoided if practicable in a sequential approach. The proposed garden centre is located in Flood Zone 2.

A sequential test should not be confused with an exceptions test. What is suitable in terms of a vulnerability classification in relation to a specific flood zone with considering an exceptions test should not be used to bypass the sequential test process or indeed a sequential approach within the site. The sequential test is a flood risk avoidance tool as is a sequential approach. Not avoiding risk required justification on both counts.

Surface water flood maps show a clear route of flooding from all systems and overland flows above the site, crossing Westgate and flowing through the site. It also shows ponding based on current LIDAR data for the existing site of upto 900mm. A full survey of levels within Westgate and the proposals should clearly identify the area of entry and from this building must not only be protected but a clear flood route

identified and maintain through the road and parking areas. Artificial means should as walls which could change at future data are not recommended. A full assessment and justification of building position in relation to this aspect is required. Some ponding is acceptable but clearly 900mm would be vulnerable to parked cars. A before and after assessment to show how the site is designed around a flood route and a maximum of 300mm depth ponding is required.

Flood routing should not be pushed to neighbouring land making the risk greater for others.

Any raising of ground levels in flood zone areas needs to be offset along a contour so flood risk is not made worse elsewhere should defences fail in the future.

Additional Comments

A suitable oil/petrol interceptor and SUDS treatment alternative will be required for this site dependent on the approved outfall. This can be conditioned.

A temporary drainage plan will be required to prevent pollution and sediment entering watercourses and local drainage network in the construction phase. Again this can be conditioned.

A methodology to protect local drainage networks from release of fats, oils and grease from food preparation, that can settle in and restrict capacity of receiving infrastructure must be devised. Again this can be conditioned.

Signed: Paul Farndale

Date: 21st September 2018