

**Consultation Response from KC Lead Local Flood Authority**
**2019/92587 Wheelwright Centre, Birkdale Road, Dewsbury, WF13 4HG**
**Alterations and partial demolition to convert existing building to form 65 residential units, installation of mezzanine floors, associated landscaping works (soft & hard landscaping) and car parking layout (within a Conservation Area)**
**Date Responded:**  
 01/11/2019

**Responding Officer:**  
 Alex Fraser

**Responding Ref:**  
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**Summary**

Kirklees Flood Management and Drainage as the Lead Local Flood Authority **OBJECT** to this planning application on the following grounds;

- **Unacceptable Surface Water Drainage Plans: Access road not included in ;**
- **CCTV survey required;**
- **Incomplete flow routing.**

The following documents have been reviewed to form this response-

- **Drainage Strategy, submitted by Jameson Consulting, Dated 16<sup>th</sup> September 2019 (uploaded 25/09/19).**

**Additional comments**

The applicant seeks permission for partial demolition and conversion of an existing building (former school) to 65 flats, in the area of Dewsbury.

**Site information (Kirklees Records)**

The site slopes from north west to south east with a level change of approximately 10m.

The proposed development is located within Flood Zone 1, according to Environment Agency's *Flood map for planning*. There are two watercourses in this area of Dewsbury, Batley Carr Beck and Batley Carr Dyke, records indicate neither of these watercourses run through the site. Ground levels indicate there is no interaction between the site and these watercourses.

There is a surface water sewer and a foul sewer running along Halifax Road (eastern edge of the development) and there also is a combined sewer recorded in the south east corner of the site.

The Environment Agency's *long term flood map* shows there are areas of surface water flood risk on site, up to a high risk. There is an existing flow path around the building flowing from land to the north pooling between the Block C and Block B, as well as to the north and west of the Block C. It appears these areas then flow south-east towards Block A and towards the gate discharging onto Halifax Road.

Kirklees LLFA holds no records of flooding events within or proximal to the site.

Kirklees LLFA records show that the ground conditions may be suitable for infiltration SuDS. However, considering the development has a lower ground floor which is to be occupied, Kirklees LLFA accept infiltration features may not be suitable.

## **Kirklees Assessment of Drainage Strategy**

### Section – Preamble-

*Site lies within Flood Zone 1 therefore no FRA has been performed, although Surface Water flood risk has been considered.*

**Kirklees LLFA Response – acknowledge there are no recorded watercourses in the immediate vicinity of the site. Therefore, an assessment focussing on surface water flood risk is suitable.**

*Underlying ground conditions are Clay and therefore the use of infiltration SuDS are unsuitable*

**Kirklees LLFA Response – acknowledge this and agree that infiltration could pose risks to the site.**

### Flood Risk

The Drainage Strategy identifies that the site is in Flood Zone 1 and therefore no watercourse flood risk is considered. Reviewing Kirklees LLFA records there is no information to suggest there are any watercourses or culverts in the site vicinity. The closest recorded watercourse is over 250m away from the site.

The applicant's drainage consultant identifies that there is elevated surface water flood risk on site. They state this is connected to the building footprint being cut into the hillslope, effectively creating a constrained area between the slope and the building. The applicant identifies that there is drainage in this area of the site. In assessing the drainage, the applicant has identified (section 2) that the current drainage network reaches capacity in the 1 in 20 return period event (no climate change) or the 1 in 4 (with 40% climate change). **The applicant's new drainage network will need to be designed to prevent such restrictions on the network.**

Flow routing from the development captures only areas to the side and south of the site, the primary area of concern is to the North of the site where the building construction could impound overland or exceedance flow. **The applicant is required to investigate this and identify whether landscaping or similar is required.**

### Surface Water Drainage

It is stated within section 2.2 that a CCTV survey has been performed. **Kirklees LLFA require this to be submitted for review as part of the planning application.** If the file is too large for file transfer, then a hard copy could be sent on a disc.

It is stated in section 2.4 that a section of roofing discharges surface water into the Foul Sewerage network and has therefore been removed from 'existing contribution' surface water calculation. **Kirklees LLFA agree to this being omitted from calculations to determine permissive discharge rate. It is also agreed that this discharge should be diverted into the surface water network at a restricted rate.**

Kirklees LLFA acknowledge that the most suitable point of connection for the site is to the Yorkshire Water surface water sewer. The applicant's drainage consultant proposes a restricted discharge rate of 68.5 l/s (section 3.5). **Kirklees LLFA require the full calculations and input data used to justify this rate including an impermeable contributing area plan.** Without this evidence Kirklees LLFA cannot

approve a rate. The permissive discharge rate should be confirmed with Yorkshire Water, they may be aware of operational issues on the network that may justify another rate.

It is note in section 3.14 that it is proposed for the existing access road serving the development to discharge unrestricted to the surface water network by running onto the carriageway. **Kirklees LLFA object to this proposal; the applicant should capture all surface water originating onsite and manage it's discharge safely into the surface water network. The applicant is required to provide a 30% reduction on all site contributions.**

#### Management and Maintenance

Kirklees LLFA make note of the maintenance specification provided in section 6, Kirklees agree in broad accordance with this strategy.

