

Consultation Response from KC, Lead Local Flood Authority		
2019/93738 Springfields, Mill Moor Road, Meltham, Holmfirth, HD9 5JY		
Discharge condition 3 (materials), 8 and 9 (drainage) on previous permission 2019/90811 for erection of 10 dwellings		
Date Responded: 21/02/2020	Responding Officer: Alex Fraser	Responding Ref: R01

Kirklees LLFA provided comments on this application on 13th December 2019, the applicant has provided the following updated information dated 21/01/2020-

- ***Surface Water Longitudinal Section and Manhole Schedules***, provided by jnpgroup, dated 16/01/2020, Drawing Ref. B23080-D-102, Rev. A
- ***Maintenance and Management Report***, provided by jnpgroup, dated January 2020, Document Ref. B23080/R004

Kirklees LLFA Comment

Kirklees LLFA **OBJECT** to this discharge of conditions application for the following reasons;

- Deep chamber in Plot 3 was identified as a CDM hazard appears to be classified as 'New private Surface Water Drain' the chamber is around 5m deep and should form part of the Management Company's responsibility
- Two conflicting drainage plans have been provided showing tank storage and twin oversized pipes;
- Incomplete MicroDrainage calculations

Conditions for review by Kirklees LLFA

Condition 8

Notwithstanding the submitted details, a scheme detailing separate foul and surface water drainage, (including off site works, outfalls, balancing works, plans and longitudinal sections, hydraulic calculations, manhole and pipe schedules and the proposed land drainage diversion) shall be submitted to and approved in writing by the Local Planning Authority before works to construct the superstructure of any dwelling commence. None of the dwellings shall be occupied until such approved drainage scheme has been provided on the site to serve the development. The drainage scheme so approved shall thereafter be retained.

Reason: To ensure the provision of adequate and sustainable systems of drainage in the interests of amenity and environmental well-being and to accord with Policies LP27 and LP28 of the Kirklees Local Plan and guidance in the National Planning Policy Framework.

Condition 9

A scheme restricting the rate of surface water discharge from the site at a maximum discharge rate of 3 litres per second shall be submitted to and approved in writing by the Local Planning Authority before works to construct the superstructure of any dwelling commence. The drainage scheme shall be designed to attenuate flows generated by the critical 1 in 100 year storm events, with an appropriate allowance for climate change (30%). The scheme shall include a detailed maintenance and management regime for the storage facility including the flow restriction. There shall be no piped discharge of surface water from the development and no part of the development shall be brought into use until the flow restriction and attenuation works comprising the approved scheme have been completed. The approved maintenance and management scheme shall be implemented thereafter.

Reason: To ensure the provision of adequate and sustainable systems of drainage in the interests of amenity and environmental well-being and to accord with Policies LP

Kirklees LLFA Technical Comments

Comments from the previous consultation response remain outstanding also, a copy of these comments with additional comments added in **red** are provided at the end of this consultation response

Regarding Surface Water Long sections

Kirklees LLFA have no objection to the principal of these sections, however, this should be provided for the entire drainage network not just the storage tank/oversized pipes and incoming pipe work. This information can be exported from MicroDrainage so it is necessary to provide both to ensure the MicroDrainage and CAD networks are the same.

The longsection shown on drawing B23080-D-102 represents the drainage system that is to be maintained by the appointed management company and that is included within JNP's microdrainage calculations. Should you require additional information, this would only include 100mm dia. pipes around plots that are to be privately managed by homeowners.

Where a deep chamber with backdrop is proposed the applicant should consider using a more resilient concrete for the chamber to resist scour. Similarly the chamber will need to be resilient to loading of adjacent soil mass.

A Type 'A' manhole has been specified for manhole S8 (deep chamber) on drawing B23080-D-104, which is in accordance with Sewers for Adoption 6th Edition

Regarding Maintenance and Management Report

The plan '**Maintenance and Management Plan**', provided by jmpgroup dated January 2020, ref B23080-D-108 at the end of the report does suggests that the 5m deep chamber in Plot 3 and associated pipework would not be managed and maintenance by the management company. This is not suitable as a 5m deep chamber will require specialist maintenance that should not be left in the responsibility of the homeowner. Kirklees LLFA would expect the site management and maintenance company to take responsibility for this chamber and incoming pipework up to the next upstream chamber.

Deep manhole chamber added to maintenance report. See B23080/R004 RevA

Comments from Previous response with annotations in red

Kirklees LLFA reviewed the following documents submitted by the applicant:

- Drawing *proposed Drainage Strategy*, prepared by JNP Group, number B23080-SK-101, revision A, dated March 2019;
- Drawing *Proposed Drainage Layout*, prepared by JNP Group, number B23080-D-101, revision B, dated September 2019;
- Drawing *Manhole Schedules*, prepared by JNP Group, number B23080-D-102, dated September 2019;
- Drawing *Proposed Drainage Details Sheet 1 of 3*, prepared by JNP Group, number B23080-D-103, dated September 2019;
- Drawing *Proposed Drainage Details Sheet 2 of 3*, prepared by JNP Group, number B23080-D-104, dated September 2019;
- Drawing *Proposed Drainage Details Sheet 3 of 3*, prepared by JNP Group, number B23080-D-105, dated September 2019;
- Drawing *Temporary Surface Water Drainage*, prepared by JNP Group, number B23080-D-106, revision A, dated October 2019;

- Drawing *MicroDrainage Pipe Numbers*, prepared by JNP Group, number B23080-D-107, October 2019; and
- *Addendum to Drainage Strategy*, prepared by JNP Group, reference B23080/R002 Rev. A, dated March 2019.

Kirklees LLFA make the following comments on the documents submitted:

- Kirklees LLFA acknowledge and have no objection to the proposed surface water discharge point presented through an analysis of hierarchy of surface water discharge within section 3.1 *Surface Water* of the *Addendum to Drainage Strategy* (p. 5).
- Kirklees LLFA acknowledge and have no objection to the applicant discharging surface water at a rate of 3l/s.
- Appendix C of the *Addendum to Drainage Strategy* (p. 11) presents comments for application number 2018/90941 (outline application of the site). These comments are relevant to the application. However, the applicant should refer to comments made by Kirklees LLFA on the application number 2019/90811 (full application for the site), which they propose to discharge conditions for. Kirklees LLFA refer the applicant to the comments made for application number 2019/90811, dated 16 April 2019.
- The above-referenced comments should be considered in the design and any associated documents.
- Appendix G of the *Addendum to Drainage Strategy* (p. 23) contains the MicroDrainage outputs for the proposed surface water drainage design. Kirklees LLFA have the following comments on this:
 - The applicant provided summary outputs for the 1 in 100 + 30% climate change event. It is an industry good practice to also provide outputs for the lower order events – 1 in 1 year and 1 in 30 year events. **These must be provided and approved by Kirklees LLFA to remove this objection.** [Full microdrainage calculations have been provided previously. Please see B23080-MD01 RevA](#)
 - The output should include a pipe and manhole schedule, corresponding with appropriate design drawing. **This must be provided and approved by Kirklees LLFA to remove this objection.** [Full microdrainage calculations have been provided previously. Please see B23080-MD01 RevA](#)
 - The applicant should provide a complete pipe and manhole schedule from MicroDrainage for validation against the plans produced (as provided by Hamish Gledhill via email on 21/10/2019); **This must be provided and approved by Kirklees LLFA to remove this objection.** [Full microdrainage calculations have been provided previously. Please see B23080-MD01 RevA](#)
 - Additional information that the applicant should provide to discharge these conditions include-
 - Area summary for each pipe. **This must be provided and approved by Kirklees LLFA to remove this objection.** [Full microdrainage calculations have been provided previously. Please see B23080-MD01 RevA](#)
 - Summary of critical results for 1 in 1 year, 1 in 30 year, 1 in 100 year and 1 in 100 year plus climate change events;
- It is stated in the *Addendum to Drainage Strategy* that oversized pipes were discounted as a way of storing surface water (paragraph 3.1.6, section 3.1 *Surface Water*, p.5). However, drawings *Proposed Drainage Layout* and *MicroDrainage Pipe Number* show oversized pipes as a way of storing the additional flows. The drawing *Proposed Drainage Strategy* shows a storage tank as the attenuation solution. The applicant should review the design and provide updated drawings and documents as necessary. **Confirmation and a detailed design drawing must be provided and approved by Kirklees LLFA to remove this objection.** [Detailed design drawing been provided previously. Please see drawing B23080-D-101 RevB](#)

In addition to the above-noted documents and changes, the applicant should also provide the following:

- Longitudinal sections of the proposed surface water drainage, as required by the Condition 8 placed on application number 2019/90811, which the applicant wishes to discharge. **Provided, no objection to the principles but full network is required.**

The longsection shown on drawing B23080-D-102 represents the drainage system that is to be maintained by the appointed management company and that is included within JNP's microdrainage calculations. Should you require additional information, this would only include 100mm dia. pipes around plots that are to be privately managed by homeowners.

- Hydraulic calculations for the proposed surface water design, including calculations for the required storage size, as required by the Condition 8 placed on application number 2019/90811, which the applicant wishes to discharge.

[See B23080-MD01 RevA](#)

- Detailed maintenance and management plan for the storage facility, including the flow restriction, as required by the Condition 9 placed on application number 2019/90811, which the applicant wishes to discharge. This should include any special maintenance requirements for the deep manhole chamber at the upstream end of the drainage system. **Provided, Kirklees object due to private ownership of deep manhole chamber.**

[Deep manhole chamber added to maintenance report. See B23080/R004 RevA](#)

Kirklees LLFA highlight that any changes to the proposed design must be applied across all the documents related to the design.

[JNP Response to LLFA comments in blue](#)

[Dated 16.04.2020](#)