

**Consultation Response from KC,
Lead Local Flood Authority**
2020/91896 Pentlands, New Mill Road, Holmfirth, HD9 7LN
Demolition of existing dwelling and erection of 15 dwellings with associated access and external works
**Date Responded: 21st
November 2021**
**Responding Officer: Paul
Farndale**
Responding Ref:
Summary

Further to our comments in April 2021 and subsequent advice to Planning Officer Christopher Carroll on 19th September 2021, we cannot offer finalised comment until all plans, reports and calculations have matching details.

- Carlow or Pre-cast concrete tanks are mentioned on plans, but cellular storage is provided for the calculations. The latter provides maintenance issues that the LPA has an obligation to ensure are absent. This should be removed along with 95% void ratios and mimic the plan.
- A discharge rate of 3.5l/s is now settled upon.
- Flood routing on the roads is accepted in principle but if the tank blocked or an exceedance event occurred the route would be to the retaining wall with Glenn View. Whilst that might not be a problem an assessment of potential spill points and what happens thereafter should be part of an assessment of flood risk.
- The plans indicate outfall levels are to be agreed and 174.22m AOD is a minimum requirement (shown on previous drawings as 175.190m). Simulation models have a free outfall of 175.448m and other information shows the invert level at 175.606m
- Plans show contributing hard standing areas with a sum of 3998 sq m yet the Microdrainage calculations only input 3520 sq m.
- Connecting drainage shows a 225mm pipe leading from the flow control device but connecting to a 150mm pipe.
- No half drain down time is shown and therefore cannot be ratified against design standards.

Further Advice

- We advise the planning officer that foul water is marked as 'indicative' and subject to change. Currently there are 5 separate private pump stations on site and their associated rising mains cross other properties' boundaries. The LLFA doesn't approve or object on foul drainage matters, but if this is acceptable in terms of building regulations, we advise that the planning officer might wish to consider future maintenance and access issues.
- There are no longer any oversized boxed culverts under the highway and therefore the issues of 'structures' in this location is now omitted.
- The LPA has an obligation to ensure maintenance and management of all SUDS features for the life of the site. A unilateral undertaking to set up a management company for this purpose

will be required using section 106 of the Town & Country Planning Act 1990. This should include an assessment of safety overseen by the Principal Designer under CDM regulations 2015 and describe methods of access to and into attenuation tanks. A site-specific method statement including an itinerary and schedule of maintenance activities is required to be submitted. Advice can be found in CIRIA SUDS Manual C753.

- A surface water connection is now shown into the private drainage of Glen View, see advice notes on maintenance and management obligations which could be complicated as a result. Any approval of such a connection in planning does not equate to approval by the owner which must be sought separately.
- Construction phase flood risk and pollution plans (temporary drainage) is not required at this stage and can be conditioned.