

Consultation Response from KC, Lead Local Flood Authority		
2020/92331 Land east of, Leeds Road, Chidswell, Shaw Cross, Dewsbury		
Outline planning application for demolition of existing dwellings and development of phased, mixed use scheme comprising residential development (up to 1,354 dwellings), employment development (up to 35 hectares of B1(part a and c), B2, B8 uses), residential institution (C2) development (up to 1 hectare), a local centre (comprising A1/A2/A3/A4/A5/D1/D2 uses), a 2 form entry primary school including early years provision, green space, access and other associated infrastructure		
Date Responded: 4th September 2020	Responding Officer: Paul Farndale	Responding Ref:

Consultation Summary

As this is an outline application with all matters reserved bar access, Kirklees Flood Management & Drainage as Lead Local Flood Authority can SUPPORT this application subject to several suggested conditions and advisories.

- In order to promote a fully integrated Sustainable Drainage Network for this site it is imperative that a more detailed DRAINAGE MASTERPLAN is submitted prior to a reserved matters application. This should take into account the WATER FRAMEWORK DIRECTIVE and examine water quality of surface water discharges.
- AVOID a situation where individual planning applications as parcels of land within the red line boundary come forward without an integrated drainage approach.
- As of April 1st 2010, the Statutory Undertaker, Yorkshire Water, is able to adopt SUDS features that were excluded previously. Along with Highway Drainage, we strongly suggest the Planning Officer (LPA) organises a working group involving, Yorkshire Water, Lead Local Flood Authority, Highway Authority (Section 38/278), the Applicant and Representatives and the Local Planning Authority to ensure a scheme involving source control (from buildings), area control (from individual phases) and regional controls (within red line boundary) to achieve successful MASTERPLANNING incorporating all phases, offering water treatment and attenuation that has clear maintenance and management objectives, primarily acceptable to adoption authorities.
- A more detailed drainage and flood risk assessment will therefore be required to be submitted with the reserved matters application. This must consider the high-level flood risk assessment commissioned by the Council and produced by RES during the local plan process. The LLFA is concerned this document not referenced at this stage and highlights its importance to achieving an integrated approach.
- Maintenance and management of SUDS must be incorporated into a Section 106 unilateral undertaking as is the LPA's obligation under NPPF. Maintenance of the watercourses within the site red line boundary should also be included to better manage the risk across the site rather than rely on riparian owners.

Further Commentary on Phase 1 FRA - Advisories

- The LLFA will impose discharge restrictions based on a greenfield run-off of 5l/s/ha. This will be divided up on an existing catchment basis. A final restriction will be based on developed areas that would naturally drain to the proposed point of connection and not beyond. Areas that remain landscaped and still drain on a greenfield basis must not be double counted. As a result, the discharge estimates provided in the submitted FRA are likely to change but we are SUDS features can be accommodated.
- We agree with an 8 metres buffer from existing watercourses, but this must also consider space for overland flood routing in the final design.
- The use of surface water flood risk maps in the absence of modelling minor watercourses is accepted and building should avoid these areas.

- It is expected that above ground SUDS features will be incorporated into this development as they can now be adopted by the statutory undertaker. As this is a relatively recent change, we feel that in order to progress smoothly, a steering group should be set up as outlined in the summary.
- It is noted that watercourse B emerges from a pipe. In line with Kirklees' policies, enclosed watercourses should be opened up where practicable to do so. Please refer to this in a reserved matters FRA incorporating the RES high level assessment that supported the Local Plan.
- It is stated in the report that no correspondence has been received from Flood Risk Authorities. Kirklees LLFA submitted a pre-application response in June 2020 and this has not been included. We attach the pre-planning comments in addition to the official consultation response.
- Various pollution prevention aspects are required to be incorporated into the scheme. These include mitigating risk of pollution from large car parking areas and for schools and potentially come commercial buildings, a scheme to mitigate the risk of fats, oils and grease entering the system.
- A construction phase flood and pollution prevention plan will be required before commencement on site.
- All drainage and watercourses should be subject to a maintenance and management plan based on a risk assessment and appropriate mitigation. A management company needs to be set up under a section 106 unilateral undertaking to carry out designated tasks at appropriate intervals. There is an obligation for the LPA to ensure SUDS are maintained and managed for the life of the site. Such an obligation will cease where specific installations are subsequently adopted by Yorkshire Water or the Highway Authority.

SUGGESTED CONDITIONS

DR01 Drainage Details (adapted)

Prior to submitting a reserved matters application, a scheme detailing foul, surface water and land drainage, (including integrated sustainable drainage masterplan, off site works, outfalls, balancing works with discharge rates agreed with the LLFA, plans and longitudinal sections, hydraulic calculations, phasing of drainage provision, existing drainage to be maintained/diverted/abandoned, water quality improvements etc.) has been submitted to and approved in writing by the Local Planning Authority. None of the dwellings or buildings shall be occupied until such approved drainage scheme has been provided on the site to serve the development or each agreed phasing of the development to which the dwellings and buildings relate and retained thereafter.

DR02 Watercourse De-Culverting

Prior to the submission of a reserved matters application, a scheme detailing the removal of piping and culverts on the site and opening up of watercourse, shall be submitted to and approved in writing by the Local Planning Authority. Where culverting is required, an assessment of design including the potential inclusion of trash or safety screens should also be submitted to the LPA. The schemes shall include a

detailed maintenance and management regime for the piped watercourse and works for the lifetime of the site. No part of the development shall be brought into use until watercourse de-culverting comprising the approved scheme have been completed. The maintenance and management regimes shall be implemented thereafter.

DR07 Overland Flows and Flood Routing

The development shall not commence until an assessment of the effects of 1 in 100 year storm events, with an additional allowance for climate change, exceedance events and blockage scenarios on drainage infrastructure and surface water run-off pre and post development between the development and the surrounding area, in both directions, has been submitted to and approved in writing by the Local Planning Authority. No part of the development shall be brought into use (dwellings shall not be occupied) until the works comprising the approved scheme (avoiding property and curtilage) have been completed and such approved scheme shall be retained thereafter.

DR08 Fats, Oils, & Grease

Development shall not commence until a scheme to prevent fats, oils, and grease entering the drainage network serving commercial food preparation and dish-washing areas has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented prior to first operation of the development and shall be retained thereafter.

DR08A Rainwater Pipes

Rainwater pipes (drain pipes) serving the roof of commercial buildings and schools shall be sealed at ground level.

DR10 Construction Phase temporary drainage and pollution avoidance scheme.

Development shall not commence until a scheme, detailing temporary surface water drainage for the construction phase (after soil and vegetation strip) has been submitted to and approved in writing by the Local Planning Authority. The scheme shall detail:

- phasing of the development and phasing of temporary drainage provision.
- include methods of preventing silt, debris and contaminants entering existing drainage systems and watercourses and how flooding of adjacent land is prevented.

The temporary works shall be implemented in accordance with the approved scheme and phasing. No phase of the development shall be commenced until the temporary works approved for that phase have been completed. The approved temporary drainage scheme shall be retained until the approved permanent surface water drainage system is in place and functioning in accordance with written notification to the Local Planning Authority.

DR12 Interceptor for Car Parks

Development shall not commence until a scheme, detailing the treatment of all surface water flows from parking areas and hardstandings through an oil interceptor, **(or a full petrol oil interceptor)**

reedbed or alternative treatment system, has been submitted to and approved in writing by the Local Planning Authority. Use of the parking areas/hardstandings shall not commence until the works comprising the approved treatment scheme have been completed. Treatment shall take place prior to discharge from the treatment scheme. The treatment scheme shall be retained, maintained to ensure efficient working and used throughout the lifetime of the development. Roof water shall not pass through the interceptor.