

**Consultation Response from KC,
Lead Local Flood Authority**
2020/92345 Former North Bierley Waste Water Treatment Works, Oakenshaw, BD12 7ET
Discharge condition 26 (demolition and enabling works) on previous permission 2016/92298 for outline application for re-development of former waste water treatment works following demolition of existing structures to provide employment uses (use classes B1(c), B2 and B8)
Date Responded:
04/08/2020

Responding Officer:
Alex Fraser

Responding Ref:
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Kirklees LLFA Summary

Kirklees Flood Management and Drainage, as the Lead Local Flood Authority (LLFA), **OBJECT to the discharge of condition 26 as there is insufficient information to adequately assess the proposals.**

The applicant provided the below listed documentation for review-

- *Temporary Surface Water Drainage Strategy*, provided by Professional Remediation Ltd, dated July 2020, Issue 01

Condition 26 states:

"Prior to the commencement of each phase of development, details of the disposal of surface water from the development through the construction phase for that phase shall be submitted to and approved in writing by the Local Planning Authority. Each phase of the development shall then be implemented in accordance with the approved details.

Reason: This is a pre-commencement condition to ensure the risk of flooding does not increase during this phase and to limit the siltation of any on site surface water features, in accordance with Policy BE1(i) of the Kirklees Unitary Development Plan PLP 28 of the Publication Draft Local Plan and guidance in part 14 of the National Planning Policy Framework."

Kirklees LLFA Technical Comment

The applicant states that a discharge to the watercourse will not be required, Kirklees LLFA do not see how this is possible. If rain is to fall on the site following demolition or topsoil strip how will water leave the site? If the applicant is proposing for this overland flow to naturally infiltrate into the ground then they need to confirm how this will be done as commonly the removal of topsoil and vegetation increases runoff and requires an infiltration trench to be provided. The presence of the watercourse suggests that there is limited infiltration on adjacent soils and underlying geology.

It would not be suitable for any overland flow from areas following site strip/demolition to enter the existing drainage network or to runoff to the watercourse without interception and storage to prevent sediment washing off the site.

Kirklees LLFA Requirements

Kirklees LLFA understand that the tools and techniques listed in the *Temporary Surface Water Drainage Strategy* can be used, however, this does not constitute a commitment to deploy them in the right areas in the correct way, therefore ensuring compliance to documents during construction would not be possible. The applicant must produce a proposal report and a plan that shows exactly what they intend to use on the site, where it will be located and the function/operational arrangements of each technique. Kirklees LLFA would expect a plan/proposal to include an indication of the site phasing, where temporary measures are required and how they will be constructed, managed and

maintained as well as a plan for phasing them out to move across to the newly constructed drainage. This could be sequenced so that only some of the temporary detail are produced upfront, but more information will be required.

As part of the plan Kirklees LLFA require the applicant must show where the different techniques will be used, the size/scale of the measures, contributing area to each measure and the indicative frequency of maintenance/inspection including compliance with manufacturers guidance. If infiltration is proposed then testing must be provided to demonstrate that disposal of surface water is suitable, testing to BRE Digest 365 standard must be provided with infiltration features located where testing is undertaken and sized to meet the rates produced. Depending on the design additional information may be required that Kirklees LLFA cannot comment on at this time.

As part of the proposal report Kirklees LLFA require the applicant outline the technical components of the plan, considering the site-specific conditions and how this will build into the final site drainage. The report must consider the protection of the final drainage including any cleansing requirements. Depending on the design additional information may be required that Kirklees LLFA cannot comment on at this time.

The *Temporary Surface Water Drainage Strategy* mentions the proposal to develop a surface water storage lagoon and a discharge consent they **may** require. Given this is a potential need at this time Kirklees LLFA request this is considered in the report and an indicative location provided on the plan but that this is not worked through at this stage, however, final details could be agreed should it need to be incorporated by a variation of condition application.