

**Consultation Response from KC,
Lead Local Flood Authority**
2020/92385 Hb Food Services, Vulcan Works, Vulcan Road, Eightlands, Dewsbury, WF13 2NA
Erection of warehouse
**Date Responded:
20 October 2020**
**Responding Officer:
Aleksandra Tomczyk**
Responding Ref: 02

Kirklees LLFA have previously responded to this planning application on 11 August 2020 – responding reference 01.

Summary

Kirklees Flood Management and Drainage, as the Lead Local Flood Authority (LLFA), OBJECT to this planning application and require FURTHER INFORMATION is provided on surface water drainage design, as per the comments below.

Kirklees LLFA also offer the below additional comments.

Additional Comments

The applicant submitted the following documents:

- *Proposed Drainage Calculations*, prepared by Haigh Huddleston, reference E20/7766, dated September 2020, which include MicroDrainage outputs for the design;
- Drawing *Preliminary Drainage Feasibility*, prepared by Haigh Huddleston, number E20/7766/01A, revision A, dated 25.09.20;
- Drawing *Existing Impermeable Area*, prepared by Haigh Huddleston, number E20/7766/18/01, dated September 2020; and
- Drawing *Proposed Impermeable Area*, prepared by Haigh Huddleston, number E20/7766/18/02, dated September 2020.

Kirklees LLFA make the following comments:

- Kirklees LLFA have **no objection in principle** to the proposed discharge rate of 5l/s, as shown in drawings *Preliminary Drainage Feasibility* and *Proposed Impermeable Area*.
- Kirklees LLFA have **no objection in principle** to the proposed discharge point – a public surface water sewer along Vulcan Road (immediately east of the site).
- It is stated in the drawings that storage crates will be used for attenuation. The LLFA have no objection to that in principle. However, it is stated that 15x5x1.2m crates will provide approximately 90m³ of storage. Considering the MicroDrainage results state that the porosity of the proposed attenuation is to be 95%, the attenuation would provide approximately 85.5m³ of storage. This should be amended in the drawings.
- The applicant should also confirm the required attenuation sizing.
- In the MicroDrainage simulation for the 180 minute 100 year winter Q+30% storm, it appears there is flooding in pipe number S1.004 (upstream manhole S5). This pipe is downstream of the flow control and connects to the public surface water sewer. This is concerning and should be reviewed as it's unusual for flooding to appear after flow control.
- Kirklees LLFA also highlight that this pipe appears to be located outside the red line boundary of the development, and the applicant is required to contain flooding up to and including the 1 in 100 + 30% climate change storm event within the development, without posing risk to users. This can be done by storing water above surface, in non-critical areas – car parking, landscape etc.

Informative

Section 38 road adoption by Kirklees as a Highway Authority cannot take place unless sewerage located under the carriage way is adopted first. Therefore, all structures under an adoptable carriageway would need to meet the standards as set out by the statutory undertaker, including but not limited to *Design & Construction Guidance** and Yorkshire Water local guidance and any subsequent

updates.

As part of a Section 106 agreement the Council are required to ensure the site is managed in a safe and suitable way up until adoption by a regulatory body. This requirement should also apply to drainage on the site, during the build out a management and maintenance plan including responsible management company must be secured. This should be enforced until adoption **and continued for the life of the development if adoption fails**. Adoption can fail at any step in the development process from concept design to site inspection post construction.

**Design & Construction Guidance has replaced 'Sewers for Adoption' giving provision for Sewerage Undertaker to adopt SuDS features and facilities.*