

**Consultation Response from KC,
Lead Local Flood Authority**
2021/90605 land at, Vanguard Processing Equipment, Spa Fields Industrial Estate, Slaithwaite, Huddersfield, HD7 5BB
Erection of an industrial building (B1(c) use)
**Date Responded:
31 March 2021**
**Responding Officer:
Aleksandra Tomczyk**
Responding Ref: 0
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 the following:

- Flood risk to the site; and
- Surface water drainage management.

Kirklees LLFA also offer the below additional information and comments.

Kirklees records

The side slopes from approximately 132mAOD in the north, to approximately 130mAOD in the south. Huddersfield Narrow Canal runs along the southern site boundary, and River Colne further south. Canal Lock number 20 is located along the north eastern site corner.

There is a public surface water and combined sewer along Spa Fields – northern site boundary.

The western part of the site is located within Flood Zone 2 and 3, according to the Environment Agency's *Flood map for planning*. The north western part of the site is located within up to medium surface water flood risk, according to the Environment Agency's *Long term flood risk map*. The south western part of the site is located within the extents of reservoir flood risk, according to the same map.

Records show that this location is unlikely to be suitable for infiltration features.

Additional comments

The applicant proposes to develop an industrial building in the area of Slaithwaite.

The applicant submitted the following relevant documents:

- Drawing *OS / Location Plan*, prepared by Farrar Bamforth Associates, number 20C21-FBA-ZZ-XX-DR-A-0101, revision P02, dated 12.02.21;
- Drawing *Existing Site Layout*, prepared by Farrar Bamforth Associates, dated May 2016;
- Drawing *GA Site Layout Plan*, prepared by Farrar Bamforth Associates, number 20C21-FBA-ZZ-XX-DR-A-9001, revision P05, dated 12.02.21; and
- *Flood Risk Appraisal*, prepared by Farrar Bamforth Associates, undated.

Flood Risk Assessment

Kirklees LLFA reviewed the *Flood Risk Appraisal* document and make the following comments:

- Taking into consideration the different flood risks highlighted above, the applicant should carry out a site-specific flood risk assessment, in accordance to the National Planning Policy Framework and Planning Practice Guidance. This document should assess all types of flooding and the development's impact on them, as well as any mitigations required. The submitted document does not provide sufficient level of detail.

Kirklees LLFA require an analysis of flow routing for the site to be provided, including any inflows from offsite and any flows originating on site, such as drainage exceedance or gully bypass. Short, intense storms may bypass road gullies, particularly on steep ground, common across Kirklees. The designed flow route should avoid property curtilages where reasonably practicable, utilising roads and open spaces.

Flow routing from attenuation should also be considered, in case of an exceedance event. The applicant should use *Designing for Exceedance* guidance to inform this design and safe management

of any exceedance volumes.

Surface Water Drainage Design

The only information on the management of surface water on site has been provided within the Application Form, which states that the flows will be accommodated within the existing surface water drains on site.

The applicant should confirm the location and condition of these drains. The discharge point of the system should also be confirmed. This information should be provided to the LLFA for review.

If any increase of impermeable area on site is proposed, the applicant should also provide an assessment of how this increase will impact the existing system.

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 Undertakes to adopt SuDS features and facilities.*