

Consultation Response from KC, Lead Local Flood Authority		
2021/90800 Hinchliffe Mill, Water Street, Holmbridge, Holmfirth, HD9 2NX		
Redevelopment and change of use of former mill site to form seven residential units within the mill building and erection of 17 dwellings (within a Conservation Area)		
Date Responded: 29 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 assessment;
- Surface water drainage design.

Kirklees LLFA also offer the bellow additional information and comments.

Kirklees records

The site slopes from approximately 176mAOD in south, to approximately 170mAOD in north.

River Holme runs along the northern site boundary. There is also a mill pond within the site boundaries.

There is a network of combined sewers in the area, including along River Holme. There are no surface water sewers in the area.

Northern parts on the application site are within Flood Zones 2 and 3, according to the Environment Agency's *Flood Risk Map for Planning*. The southern parts of the site are within Flood Zone 1.

The area of the mill pond, and north eastern area of the site are within low surface water flood risk, according to the Environment Agency's *Long Term Flood Risk Map*. The remaining areas of the site are within very low surface water flood risk. The same map also shows that the development site is located fully within the extents of flooding due to reservoir failure, with depths over 2m and flood water speed over 2m/s.

The site is located within flood alert and flood warning area.

Records show it is unlikely that infiltration is feasible on site.

Additional comments

The applicant proposes to redevelop an existing mill building into 7 residential units, and erect 17 dwellings in the area of Holmbridge.

The applicant provided the following relevant documents:

- *Design and Access Statement*, prepared by One 17 Design, dated January 2021;
- *Flood Risk Assessment*, prepared by Collins Hall Green, reference G560-CHG-00-XX-RP-S-0003, revision A, dated February 2021;
- *Drainage Strategy*, prepared by Collins Hall Green, version 1.1, dated January 2021;
- *Drawing OS Location Plan*, prepared by One 17 Design, number 3372 (OS) 01, dated February 2021;
- *Drawing Overall Site Plan and Elevation*, prepared by One 17 Design, number 3372 (0-) 623, dated January 2021;
- *Drawing Proposed Drainage Layout (1 of 2)*, prepared by Collins Hall Green, number G560-CHG-XX-00-DR-C-0300, revision P2, dated 10.02.21; and
- *Drawing Proposed Drainage Layout (2 of 2)*, prepared by Collins Hall Green, number G560-CHG-XX-00-DR-C-0301, revision P3, dated 11.02.21.

Flood risk assessment

Kirklees LLFA reviewed the *Flood Risk Assessment* submitted and make the following comments:

- As the proposed development site is larger than 1ha and is located within Flood Zones 2 and 3,

a site-specific flood risk assessment should be carried out – the submitted document is not sufficient. A site-specific flood risk assessment should consider all types of flooding and the development's impact on them, as well as any mitigations required.

- Based on the Environment Agency *Flood map for planning* and the provided *OS Location Plan*, this proposed development is partially located within Flood Zones 2 and 3 – this is not stated in the report and should be amended accordingly.
- The document should clearly state what the design flood level is for this development.
- Section 5.6 shows the proposed finished floor levels – the LLFA have **no objection in principle** to the proposed levels. This aspect should be covered by a suitable condition once approval is given.
- Section 5.7 states the proposed safe access and egress route. The LLFA have **no objection in principle** to this proposal. This aspect should be covered by a suitable condition once approval is given. Any plans should indicate that public should not cross the Dobb Lane bridge over River Holme, and should follow Dobb Lane further south.

A revised Flood Risk Assessment should be provided for a review by the LLFA.

Mill infrastructure

Throughout the Kirklees District, history of textile mills has resulted in an extensive network of mill leats (leet, lete or millstream), culverts and redundant mill ponds. Policy 12.42 of the Local Plan has identified that redevelopment of mill sites has to also include the former infrastructure serving the mill. However, many mills have been demolished, already developed or their connections forgotten/lost. Therefore, applicants proposing to redevelop a site in close proximity of such developments are required to consider whether this infrastructure could pose risk to the development. This may include, but is not limited to, an inspection/survey of the system, drain tracing and dye testing.

Considering that the proposed development is located in an area which used to be a mill, it is recommended the applicant carries out relevant investigation to confirm existence of any underground structures.

Surface water drainage design

The LLFA reviewed the *Drainage Strategy* submitted and make the following comments:

- Section 3 states that infrastructure information would be obtained from United Utilities. The LLFA highlight that the organisation responsible for drainage in Kirklees area is Yorkshire Water.
- Section 3.7 states the peak flow estimates before and after the 30% reduction – 142.4l/s and 87.2l/s respectively. The applicant should confirm whether the area of the mill pond has been included in the calculations.
- The LLFA have **no objection in principle** to the proposed discharge points.
- The applicant should provide details of how the proposed pervious surfacing will be managed and maintained to retain its porosity and storage capability.

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.*