

**Consultation Response from KC,  
 Lead Local Flood Authority**
**2021/93621 Land off, Fullwood Drive, Golcar, Huddersfield, HD7 4JH**
**Erection of 10 dwellings and associated works (Within a Conservation Area)**
**Date Responded:  
 7 October 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 management of surface water on site.

Kirklees LLFA also offer the below additional information and comments.

**Kirklees records**

Site slopes from approximately 191mAOD in the north, to approximately 176mAOD in the south.

There are no watercourses within the site boundaries. There is a culverted watercourse along Victoria Lane (approximately 100m west of the site), which discharges into an open watercourse located approximately 50m south of the site.

There is a network of public sewers in the area, including combined sewers along Clay Well (approximately 50m north of the site), Victoria Lane, and Brook Lane (approximately 50m south of the site). There are also surface water sewers along Fullwood Drive (immediately north of the site) and Victoria Lane.

The site is located within Flood Zone 1, according to the Environment Agency's *Flood map for planning*, and within low to very low surface water flood risk area, according to the Environment Agency's *Long term flood risk map*.

Records show that this area is probably compatible for infiltration features. However, considering the steep nature of the site, these would not be advised.

**Additional comments**

The applicant submitted the following relevant documents:

- Drawing *Existing Site Plan*, prepared by Acumen, number 01, dated Oct 20;
- Drawing *Proposed Site Plan*, prepared by Acumen, number 03, dated Aug 21;
- Drawing *Proposed Site Sections*, prepared by Acumen, number 04, dated Jul 21;
- *Flood Risk Assessment*, prepared by Build Vision, revision First Issue, dated August 2021.

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

- Section 1.5.2 – the applicant should confirm the date of the site visit. Springs can be seasonal so it should be investigated in both summer and winter months.
- Section 2 – Kirklees LLFA have no comments on the assessment of flood risk to the site.
- Section 3.3 – the Environment Agency's *Flood risk assessments: climate change allowances* guidance has been updated in July 2021. The applicant should review this update and ensure that the climate change allowances used are still correct. If they're not, the design should be amended.
- Section 3.4.5 to Section 3.4.8 – it is unclear whether the applicant proposes to discharge surface water into the open watercourse or the combined sewer. This should be confirmed.
- Section 3.4.8 comments:
  - o The applicant states that a developer on neighbouring site agreed to connect this site's surface water and foul sewers into their proposed network. This would only be possible if the sewerage network on the adjacent site has been designed to accommodate the flows of both sites. The applicant should in first instance confirm whether that is true, and provide

a drainage layout and MicroDrainage (or similar) outputs showing that the design satisfies current guidance/requirements.

- The minimum surface water discharge rate used within Kirklees is 3l/s. Therefore, considering the discharge rates stated in section 3.1.2, the LLFA object to the proposed discharge rate of 5l/s, unless it can be proven that a lower rate cannot be achieved.
- Appendix B, drawing *Outline Drainage Layout* (prepared by Build Vision, number 1296-900, revision P1, dated 23.08.21) – the proposed attenuation is an offline system therefore, the incoming/outgoing pipes should be oversized to limit the possibility of blockage.
- Appendix B, MicroDrainage outputs (prepared by BV Consulting, dated 23/08/2021) – MADD factor for the system should be 0.000.

### **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.*

