Consultation Response from KC, Lead Local Flood Authority
2021/94719 Land Off, Burn Road, Birchencliffe, Huddersfield, HD3 3BT
Reserved Matters application pursuant to outline permission 2018/91838 for erection of a residential development formed of 22 dwellinghouses
Date Responded:17th September 2022 Responding Officer: Paul Farndale Responding Ref:

Kirklees COUNCIL

Further to our comments of 1st March 2022,

Kirklees Flood Management & Drainage acting as Lead Local Flood Authority OBJECTS to this application until it is clearly demonstrated space has been made for water whilst complying with several drainage and flood risk based conditions to be discharge following submission of information.

Kirklees LPA has received an application for condition 12 for which there are outstanding matters such as sizing box culverts for the diverted watercourse. A full response can be found here.

https://www.kirklees.gov.uk/beta/planning-applications/search-for-planning-applications/filedownload.aspx?application_number=2021/94706&file_reference=914830

No application has been submitted for conditions 14 or 15, that involves sizing and incorporating a sustainable drainage scheme into the layout and demonstrating safe flood routing from roof and road drainage and the watercourse through layout design. This must avoid curtilage.

Condition 16 is to be answered by Yorkshire Water as to whether a proposed layout demonstrates suitable standoff distances from their existing infrastructure.

To approve this reserved matters application for layout, it must incorporate a demonstration that the final design can accommodate and satisfy several conditions yet to be discharged.

- We require sizing and justification of box culverted sections of the watercourse, including an assessment of the size and appropriate trash screens on flows for the 1 in 100 + climate change event demonstrating that afflux is avoided/premature flooding does not occur with the culverts capacity not yet reached.

- We discourage the use of crate storage as the LPA must ensure the maintenance and management of all SUDS systems for the lifetime of the site. Camera inspections are impossible for most manufactured systems to periodically examine for defects and siltation and clearance can be issues. No guarantee from the manufacturers on longevity is known to exist. We would accept a specific manufacturer's crate storage on a private housing estate only where 'technical approval' has been given for adoption under section 104 by the statutory undertaker (Yorkshire Water) for adoption purposes.

- In addition to the above, whatever the final design, no maintenance plan has been submitted.

- We initially advised a maximum discharge of 5l/s would be allowed; 7l/s has been used for this site.

- Flood routing arrows are shown flowing in completely the wrong direction around the lowest plots on site. Spot heights suggest a flow in the opposite direction that shown. Retaining walls have not been taken into account. This will have to be reproduced with cross sections showing how water may escape before a weir point is reached. Area and depth of flooding should be shown for complete analysis.

- Yorkshire Water needs to comment on stand off distances to public sewers.

- A hardstanding area of 0.392ha from a site over 1 hectare is indicated on the microdrainage simulations. This should be supported by a contributing area map for each sewer leg.

- On sizing tanks on microdrainage, noting comments already made about cellular tanks, area of storage provided at a given depth should show a zero return for 1mm above the soffit of the tank. At the moment 100mm is used, e.g., depths of 1.300 instead of 1.201. this would artificially create extra storage that is not present.

- Culvert condition surveys should be included for condition discharge and this application as the reserved matters needs to demonstrate conditions can be discharged.