

**Consultation Response from KC,
Lead Local Flood Authority**

2022/91477 Land off Lindley Moor Road, Lindley, Huddersfield, HD3 3SX

Hybrid Planning Application for the erection of an industrial unit for E(g)/B2 /B8 use with associated access, parking, groundworks and landscaping in conjunction with an outline application for mixed use development use class E(a), E(b), E(g), B2 and B8

Date Responded: 21st March 2023

Responding Officer: Paul Farndale

Responding Ref:

Further to our comments of 30th September 2022, Kirklees Flood Management acting as Lead Local Flood Authority continues to OBJECT to this application on the grounds that inadequate space has been made for water in the proposed layout.

Attenuation

We welcome the updated FRA reflecting our surface water discharge restriction set at 10.5l/s. A sewer requisition across 3rd party land is possible so an outfall can be achieved.

However multiple crate storage attenuation tanks are promoted in the scheme. Whilst 2.5l/s discharge is smaller than the 3l/s absolute minimum stated in our guidelines, a 75mm orifice (absolute minimum) has been achieved in all scenarios. A 100mm orifice is however desirable to better prevent blockage scenarios. We continue to advise the planning officer that crate storage design does not offer the same inspection and maintenance opportunities as box culvert and pipe equivalents. Many manufacturers do not guarantee this product, and no BS and BBA certificate is carried on the majority of designs. We therefore advise that this is not the best solution for the LPA to fulfil their obligation on the maintenance and management of SUDS for the lifetime of the site. A replacement time period for such crates will need to be agreed with the LLFA.

The climate change scenario used when sizing these products (45%) can be reduced to the central epoch of 30% for commercial buildings. This should reduce the capacity requirements of attenuation.

We cannot accept the use of a concrete storage tank under a detention basin which then has a steep fall to the road. This produces a maintenance issue so the LPA cannot ensure adequate maintenance as is their obligation and would preclude adoption by the Statutory Undertaker. When redesigning we suggest a meeting with the planning officer and LLFA to look at hydraulics and aesthetics of local levels.

Flood Routing

Should a blockage scenario or exceedance event occur, manhole cover levels in the access road suggest safe passage of water. We would however like this confirming at detailed design stage alongside plot protection. For the latter the FRA states finished floor levels must be 150mm above adjacent ground. We would like to see evidence of deliberate channelling of water away from buildings and safely to the site boundary where water would go naturally.

The sumps and bunds of the housing estate to the south must form part of this assessment.

In a revised FRA, a coloured catchment drawing showing contributing areas to each phase/sewer leg is required and matched with the microdrainage output.

Potential Watercourse

We previously highlighted the need for an intrusive slip trench investigation for a potential watercourse crossing the site. This has not taken place.

We are also aware of existing land drainage works to protect the rear of the properties on Weatherhill Crescent. The FRA should assess whether such systems extend into site and how they are going to be incorporated into the design.

Treatment

It is recognised that some petrol/oil interceptors have been included into the design. Treatment must be discussed in the FRA as the outfall is indirectly to watercourse.

The potential use of the site for commercial food preparation will require mitigation of the effects of fats, oils, and grease on the local drainage network. This should be discussed in the FRA.

Maintenance and Management

We acknowledge provision maintenance and management itineraries in the FRA. If redesigns are acceptable a finalised itinerary and schedule can be agreed via condition. We would like to see a risk assessment and method statement produced and signed off by a Principal Designer under CDM Regulations 2015. This must include descriptions of safe access to and into these systems.

Construction Phase (Temporary) Drainage

This can be examined after a build programme has been issued and agreed under condition.

Section 106

A maintenance company is required to carry out duties of maintaining and managing SUDS as the current design has several units sharing attenuation facilities. Normal protocol for a major application therefore applied.