

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

2023/91491 Prickleden Mills, Woodhead Road, Holmfirth, HD9 2JU

Erection of 61 age-restricted apartments with ancillary accommodation including separate residents lounge and manager facilities and associated external works, including the erection of access bridge and riverside walk featuring two pedestrian bridges (within a Conservation Area)

Date Responded: 20th December 2023

Responding Officer: Paul Farndale

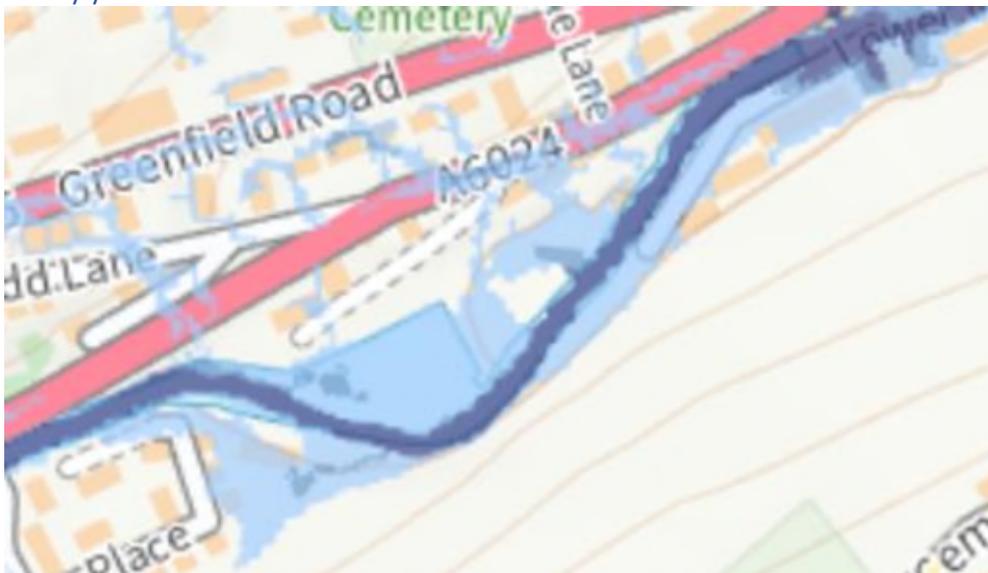
Responding Ref:

No additional information supplied. Comments from 10th June 2023 still apply.

Thank you for your comments. We will be updating the FRA and Drainage Strategy reports in due course but I want to discuss some aspects before that is completed.

We have done some provisional amendments (blue) relating to the following, which I would value your comments on.

- Surface water flood risk. I would welcome some more information on this, particularly the observed flooding mechanisms. Re the undercroft, the scheme had been revised to prevent the undercroft flooding. I am awaiting a further revision from the Architect but we are planning to revise the reports to accurately reflect the latest scheme, which will confirm this point. **Surface water flood risk maps are available on line.** We've reviewed these and note that the flows from the north (ie not along the river corridor) are relatively minor and are coming down Woodhead Road before flowing south and into the lane immediately north of the development site. The EA maps show the overland flows going through a row of terrace properties which I hope is unrealistic. Overland flows from Woodhead Road would need to traverse the slightly higher ground of the pavement / lane entrance and turn nearly 180 degrees to enter the lane; common sense suggests the overland flows are more likely to continue down Woodhead Road. The lane does fall to the south west but is mostly bordered by a wall on the southern side of the development which would direct any run-off down the lane. We therefore conclude that any surface water flows entering the land and / or generated locally to the lane are less than the EA map implies and these would flow down the lane and could be allowed to enter the mill pond (see attached), so entering the fluvial system upstream of where the EA indicate they do so now. Overland flows from the north would be allowed to pass through the site as above and any surface water run-off from the redeveloped eastern side of the site would be controlled by the surface water drainage strategy. Does this satisfy your concerns?



- **The undercroft comments stand.** To be clarified in the revised FRA.
- Surface water drainage strategy. What is the minimum orifice size acceptable to the Council. **75mm** We have amended the orifice size of the outfall to be a minimum of 75mm per outfall and calculated to associated discharge rate (see attached). This gives a total discharge rate for the site of 7.5 l/s (note we will update storage volumes etc on the drawings once the discharge rates are finalised).

- Would it be acceptable to suggest this for each of the proposed three outfalls? **We can discuss this. I look at some many now that I would need re-examine the application in relation to brownfield run off rules, a 30% reduction on buildings still standing with a direct connection to watercourse.** The buildings on site were demolished c. 10 years ago although some hardstanding remains. For context, we have calculated the brownfield run-off rate for the site when developed:

total impermeable area = 956m²

$$2.78 \times 0.0956 \times 50 = 13.28 \text{ l/s}$$

So 7.5 l/s is 56% of the rate when the site was developed. Are you happy with the 7.5 l/s?
Can we go higher?

- The client has also asked if the mill pond could be used for some of the attenuation, if we can make it work. **No, it must be independent.** **Noted.** He is suggesting that additional storage is provided by lowering the base of the pond when it is drained. This principle has been accepted by the EA to provide the necessary flood plain compensation but the Client is proposing to make it slightly deeper still to provide surface water run-off storage.

If it is easier to discuss via Teams, I am happy to do so.

Regards

Sarah Longstaff