

**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: 10<sup>th</sup> June 2023**

**Responding Officer: Paul Farndale**

**Responding Ref:**

### **Sequential Test - LPA**

If this site has not been allocated for housing in the local plan, it should be subject to a sequential test. This site is partly in flood zone 2 and 3 and the footprint of the buildings falls into this area. We would therefore expect a sequential test to fail given that the local plan promotes sites at low risk.

A sequential approach within the site, which would potentially negate the need for a sequential test, whereby buildings are placed in flood zone 1 within the site is also not adhered to.

An exceptions test including mitigation measures should not be used as an excuse not to perform a sequential test.

### **Consultation Summary - LLFA**

**Beyond the sequential test debate Kirklees LLFA OBJECTS to this application on the grounds of inadequate flood risk assessment and incorporating unnecessary risk in the design.**

### **Detailed Response**

#### ***Mill Pond***

No assessment of the mill pond has been included. Previous surveys including the Council's assessment of risk from mill ponds are available but are now 10 years old and need to be updated by the applicant. As a result, no mitigation plan to upgrade the pond is forthcoming including emergency drain down methods.

#### ***Surface Water Flood Risk***

No adjustment of design to avoid and mitigate risk has been included. No measure of existing surface water flood risk from outside the site has been assessed and therefore has not been considered in the design. There is a statement that risk would largely cover an area based on main river flooding but the entry into the site would be different and mitigation techniques such as building walls on the river bank will not reduce this risk.

The LLFA has previously observed surface water emergence through a boundary wall and the ground adjacent to the pond. No site walkover reports such weaknesses.

The potential flooding of under crofts is unacceptable. It introduces a flood risk not currently present and could be life threatening.

***Surface Water Drainage Strategy***

Several tanks are promoted but these have discharge rates and therefore orifice sizes below the minimum allowed by Kirklees Council

***Main River Flood Risk***

The inclusion of new bridges represents a potential risk of trapping debris and must be assessed by the Environment Agency.

Any attempts at compensatory storage must be assessed by the Environment Agency.

Wall defences are promoted to mitigate flood risk from main river which could inundate the under-croft parking area. We should assume that defences fail when looking at main river flood risk because of potential (ineffectiveness) and long-term maintenance requirements. We would object to this and request the planning officer discusses with the Environment Agency. The risk of flooding the under croft is life threatening. Such defences would only be considered for residual risk after standing avoidance and mitigation practices. Given the basement location and potential rapid inundation this may need to be considered for the 1 in 1000-year event to avoid serious risk to life.

An assessment of new buildings finished floor levels rests with the Environment Agency. This should include dry walkways. This is assuming a sequential test or approach has been passed. The submitted FRA, although it has addendums, should be withdrawn as it is misleading and relates to a different design.

***Additional Comments***

Comments and advice on section 106 inclusions, the use of structures under adopted roads, and construction phase drainage plans will be included if the above objection can be addressed.