

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

2023/92490 Former Dowker Works, Dowker Street, Milnsbridge, Huddersfield, HD3 4JX

Erection of 38 dwellings with associated access and landscaping (within a Conservation Area)

Date Responded: 13th October 2023

Responding Officer: Paul Farndale

Responding Ref:

Summary

Kirklees Flood Management & Drainage OBJECTS to this application on the grounds that the drainage strategy does not represent a sustainable approach and the flood risk assessment is inadequate.

Sequential Test

A sequential test has been submitted including discounting several sites allocated in the local plan but with no assessment of comparable flood risk. We ask that the planning officer notifies the LLFA and EA as to whether this site passes a sequential test.

A sequential approach (site specific flood risk avoidance) is not viable for this site in that most of the site falls into flood zone 2, medium risk and only a small percentage of the site is at lower flood risk (zone 1), which should be developed first.

Should a sequential test be passed, and exceptions test would not be required. A site-specific flood risk assessment that is considered adequate would however be required.

Detailed Response (assuming that a sequential test has not failed).

Main River

Local mapping indicates that Longroyd Brook, an enmained watercourse, runs across the site. We believe these indicative maps are not wholly accurate. An historical OS map shows an open section of the watercourse close to the north boundary and parliamentary boundary appears to follow the route of the watercourse upstream and downstream. This is every chance therefore that the watercourse runs the full length of the site from north to south. Its position on this submission is assumed.

A full survey of location, size, depth, and condition is required.

The Environment Agency will need to stipulate suitable stand off distances to avoid negative impacts of loading on this structure and that of flood risk and potential flood routing within the site.

Connections to this watercourse are envisaged which would mean that any backing up of flows could come out on site. This would need to be assessed in the flood risk assessment.

Surface Water Flooding

Risk maps do not identify as particular concern for the site itself. However historic road flooding of George Street and Market Street has been identified, as had localised cellar flooding in the immediate vicinity of the site. A level survey for the surround streets from these incidents needs to be submitted

for areas that surround the site. This is additional to those already submitted. Please contact the LLFA for further guidance.

Surface Water Drainage Design

Given the presence of a watercourse through the site and evidence of localised cellar flooding, the LLFA rules out the use of infiltration techniques as a precautionary approach.

As Longwood Brook runs through the site, as a watercourse this is preferable in the hierarchy of surface water disposal to that of the combined sewer that is proposed. A redesign is required using a 3.5l/s connection to watercourse ensuring a minimum orifice size of 75mm.

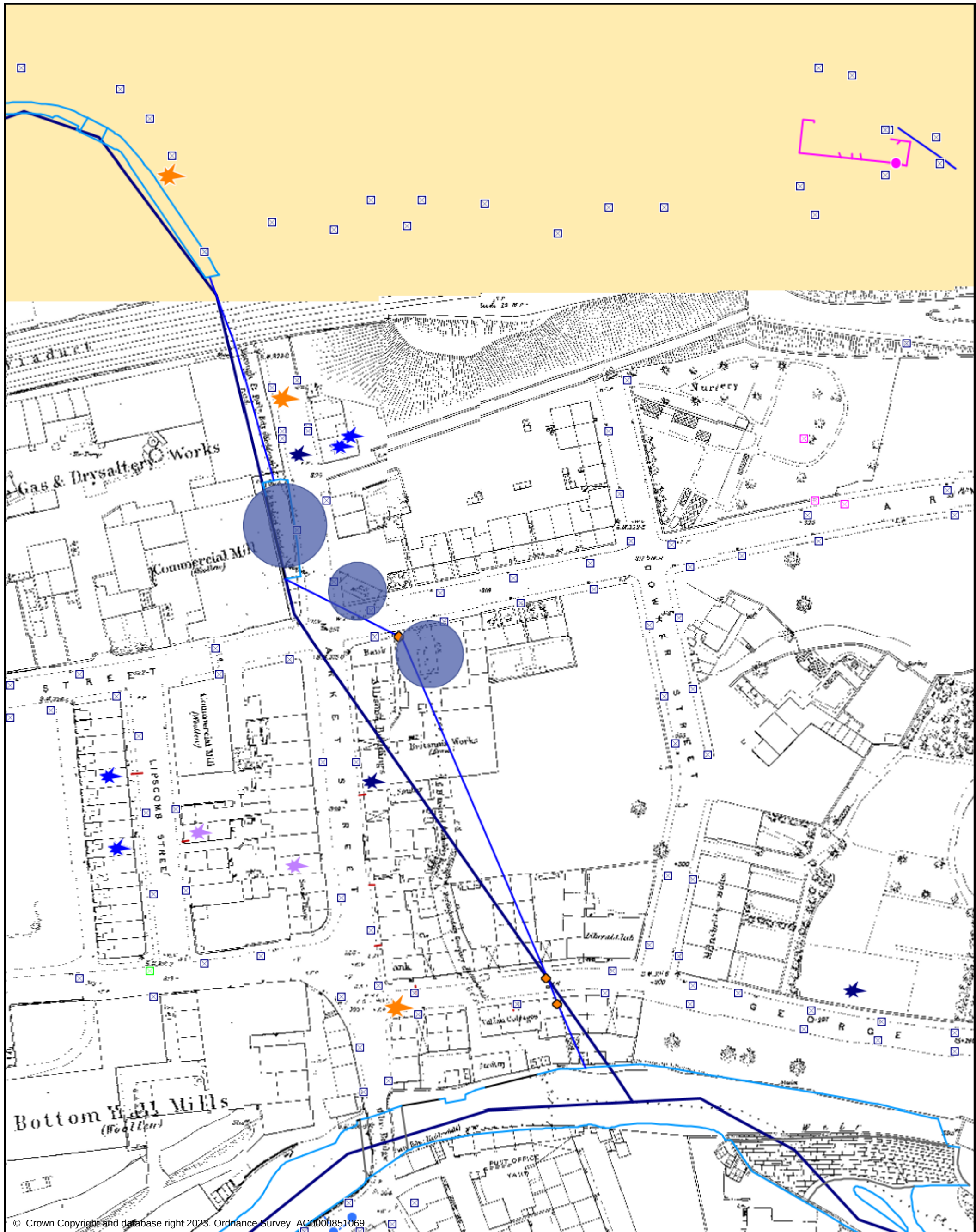
We advise that pipes over 900mm located under proposed adoptable highways could lead to a rejection in a section 38 application to adopt the road. Please contact Farhad Khatibi in Highways Structures for guidance.

The LLFA will advise against the use part use of cellular crate storage on this housing development. Many such products are inaccessible for maintenance and inspection, do not conform to a water industry standard, often have no independent assessment from bodies such as the BBA, and have no time guarantees from the manufacturer over lifespan. As such the LPA cannot fulfil its duty to ensure the adequate maintenance and management of surface water attenuation systems for the lifetime of the site. We advise the LPA that should Yorkshire Water, who review adoptions of such systems on case-by-case basis, produce a technical approval under section 104 of the Water Industry Act 1991, we will alter our advice.

Additional Information

The FRA does recognise the presence of a 300mm public combined sewer within the site that follows old street patterns. An attribute change is shown at the head of the system on the statutory record. This means that this sewer could extend further into the site and needs to be surveyed for remaining live connections. Any closure or diversion of this system must have full agreement from the Statutory Undertaker.

Should this application meet with approval going forward, the LLFA would suggest conditions be attached including that of a 'construction phase drainage plan'. We appreciate that this would come after detailed design and a construction phase programme.



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Kompass
Kirklees Mapping Service

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