

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

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

Erection of 35 dwellings with associated access and landscaping (within a Conservation Area)

Date Responded: 12th November 2024

Responding Officer: Paul Farndale

Responding Ref:

Kirklees Flood Management & Drainage OBJECTS to this application.

We are now satisfied that surveys have identified the line of the culvert and a stand off distance has been imposed, we assume, by the Environment Agency.

We advise that the planning officer checks that the EA are happy with the positioning of storage manholes and attenuation within this easement. Inside this easement we advise that the distance of the attenuation is very close and should be labelled on a map seeking EA approval.

We are satisfied that the layout can provide a safe flood route for both a culvert or surface water blockage and/or exceedance event.

The drainage plans show a connection to combined sewer. Given the availability of a watercourse within the site, this does not comply with the hierarchy of disposal.

The use of crate storage is not advised given the LPA's obligation to ensure the maintenance and management of SuDS for the lifetime of the site. A lack of guarantees over longevity and difficulties in accessing the system for inspection demonstrates that there are better options to be considered. As with all residential developments, our position would be reconsidered should a technical approval letter from the statutory undertaker or NAV equivalent for such storage to be adopted under section 104 of the Water Industry Act, be provided.

