

Consultation Response from KC, Lead Local Flood Authority
2023/93704 land northwest of, Urban Terrace, Denby Lane, Grange Moor, Huddersfield, WF4 4EB
Erection of 12 dwellings and associated works
Date Responded: 15 th November 2024 Responding Officer: Paul Farndale Responding Ref:

THE LLFA OBJECTS TO THIS APPLICATION.

Advice to the planning officer on archiving documents that are now superseded.

We advise the planning officer to remove the Flood Risk Assessment by RWO, dated November 2023 ref: FRA/RWO/Y20054.100 Version 1 as this has now been superseded.

We advise the planning officer to remove the SUDS Management Plan, submitted on 12/7/24, created by RWO and dated July 20204, 'SUDS Management Plan ref SMP/RWO/Y22054/2 Version 1, incorporating Engineering Layout Y22054/D900 Rev 1. This has now been superseded.

Both documents are not approved. They contain drawings showing additional connections after the flow control and therefore increased discharged to the allowed 3.5l/s. They mention Durham County Council not Kirklees Council. They state that a 50 year lifespan for cellular products should be achieved but provide no evidence of this attainment and not plans to replace the storage during the lifetime of the site.

Off site exiting road gullies are shown connected to the new surface water pipe which is unacceptable.

Permeable paving is mentioned.

Maintenance plans mention aspects not associated with the type of drainage shown on plans.

Advice to the planning officer on subsequent comments made by the developer.

In relation to comments made in response the LLFA consultation dated 22nd October, we advise the planning officer that the All SNRS record for Yorkshire Water consists of the public sewer record and additional drainage assets known to Yorkshire Water. It cannot therefore be ignored by the applicant by simply producing a map showing the statutory sewer record only with the soakaway not depicted.

The depiction of a soakaway serving existing properties on urban terrace but located within the site where a plot is to be built, is an additional private asset on the All SNRS record.

The applicant claims that the soakaway depicted is non-existent and surface water from these properties connects to the public combined sewer running across the site. No evidence of this survey is available. The planning officer should therefore contact Yorkshire Water prior to a decision being made on the planning application of this site to ensure protection of the drainage of existing properties, i.e. an investigation into the claim that YW records are inaccurate.

The applicant misunderstands the obligation of the LPA which is to ensure the maintenance and management of SUDS systems for the life of the site. This does not mean the LPA adopts the drainage. The adoption of crate storage by Yorkshire Water has been accepted by Kirklees in the past with the production of a section 104 technical approval letter, as an assurance for the maintenance of management of these systems. However, there is no intention to have the storage adopted.

In addition, it is unlikely that Yorkshire Water would consider adoption of the downstream pipework from a private attenuation and flow control system. Their decision may into account that the downstream pipework takes predominantly highway drainage. Early dialogue is advised. Non adoption would result in private pipework being constructed in the existing public highway. Highways DC and

Section 38 should be made aware and asked for comment as to the likely procedures involved in this scenario.

Alterations to drainage drawings are mentioned and further points clarified. This will be picked up in our commentary on revised plans/documents below.

Updated SuDS Management Plan dated 1st October 2024

This document still refers to Durham County Council.

This document still mentions that the attenuation should have a 50 year lifespan but fails to produce any evidence of this in the form of guarantee and does not have a replacement plan as part of the management regime. No specific design is mentioned and therefore any maintenance plan cannot guarantee the inspection regime referred to as the majority of such systems cannot be observed by CCTV. Our advice that privately maintained cellular storage places the LPA in a vulnerable position for fulfilling its obligation to ensure the adequate maintenance and management of SUDS (surface water) infrastructure for the lifetime of the site.

The document still references permeable paving (3.0) despite the claim it is not being used on site.

The Engineering Layout Y22054/D900 has been updated with revision 2. This still shows existing public highway gullies connected to the new pipework. We continue to deem this unacceptable to the Council as the Highway Authority.

The drawing continues to show both new highway, existing highway and house drainage (plots 3 and 4) connecting to the proposed surface water system after the flow control device and therefore will exceed the allowed 3.5l/s. As this system ultimately connect to watercourse the LLFA has the final say in this matter as Land Drainage Authority and we maintain our objection.

The planning officer should be made aware of potential level rises over the attenuation tank mentioned on this drawing to provide adequate cover, i.e. land levels raised in this area in relation to the surroundings.

The submission of 'Impermeable Area Plan Y22054-D204-Rev1 (uploaded 31/10/2024)

This plan confirms that the road network and plots 3 and 4 connect downstream of the flow control device and allow a greater discharge than has been recommend. Please note that connections from plots 3 and 4 have altered position and is therefore out of kilter with previously submitted drainage plans as part of the SUDS Management Plan. The SUDS maintenance plans will need updating but we recommend this is done when a drainage layout can be agreed.

The submission Revision 3 of Engineering Layout Y22054/D900

This drawing's layout replicates the impermeable area plan but not to the previous revisions in the Suds Management Plan. All aspects of drainage mentioned regarding maintenance and adoption, and flows greater than the allowed 3.5l/s, still stand. No microdrainage calculations or equivalent have been provided. However as we object to the drainage drawing these should not be submitted until such a time that an update is agreed in principle.