Dated: **18-Nov-2024**

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Consultation Response from KC, **Lead Local Flood Authority**
2024/91007 adj, 208, Yew Tree Road, Birchencliffe, Huddersfield, HD2 2EQ
Discharge of conditions 6 (Phase II report), 7 (Remediation Strategy), 10 (affordable housing), 11 (public open space), 12 (education), 13 (sustainable transport), 14 (temporary drainage), 16 (drainage scheme), 17 (attenuation and discharge rate), 18 (access point), 19 (estate roads), 21 (footway details), 23 (construction management plan), 24 (noise report), 25 (ecological design strategy) and 26 (electric vehicle charging) of previous permission 2018/90151 for outline application for erection of residential development
Date Responded: 6th December 2024 **Responding Officer: Paul Farndale** **Responding Ref:**

Condition 14 – Temporary Drainage Plan

The use of silt busters and tankers as a back plan is noted. There is no mention beyond gulley cleaning, of protection of manholes and gullies, such as hessian/straw or a proprietary method. This should be considered/assessed.

Evidence that the sumps provided are adequate for the 1 in 1 year 6 hour run off is required.

We do NOT recommend that this condition is discharged at this moment in time.

Conditions 16 and 17, Drainage and Attenuation – OBJECTION

The resubmitted drainage design has serious flaws and inconsistences. Should this development have commenced this must immediately be brought to the attention of Planning Enforcement.

The outfall for the surface water drainage is now showing connecting to the public combined sewer. A watercourse is available and therefore this is rejected as out of kilter with the surface water hierarchy of disposal list in NPPF and Building Regulations.

If a connection to watercourse was made, the following comments apply.

The tank appears to only have 400mm of cover. Whilst located in a private driveway, this has to be out of the road construction and assessed by a competent person (structural engineer) with regard to loading onto a detailed design of the tank.

It is noted that the flow control is allowing 3.9l/s discharge with a 2.7m head. We note that the tank will not be 100% utilised with the above head flow ratio located in S12.

A 2.7m head at S12 gives a water level of 175.45m AOD. The lowest connecting cover level shown for private drainage (ACO drain levels not given adjacent to plots 5 and 7) is 174.60m AOD. The actual maximum head allowed without flooding from connecting drainage is 1.85m above the invert level of 172.75m AOD.

The maximum flow allowed by condition is 3.0l/s. This is exceeded in the 1 in 30, 1 in 100 and 1 in 100 + climate change events, with a maximum discharge of 4.0l/s being shown.

The depth of water at S12 is shown as 2.17m and 2.85m for the 1 in 100 and 1 in 100 + cc events which although will not surcharge the main drainage system, significant flooding will occur on the contributing private networks around the properties.

ACO drains adjacent to plots 5 and 7 are not shown connected the main drainage.

A comparison of impermeable area drawings and private drainage drawings show inconsistences in where specific drainage is connected to. E.g. Plots 1 and 2 shown connected to S7 but indicated as S10 on the impermeable area drawing. Plots 10, 11, 12, 16, and 17 are also inconsistent with the connections shown, alongside driveways for plots 14 and 15.

Plots 21 and 22 potentially has missing hardstanding from the parking spot highlighted to the areas including the bin store.

The gulley adjacent to plot 25 needs to be clearly shown connecting to S3.

Please confirm whether the private drive and turning head serving plots 18-20 is formally drained or otherwise.

The road gullies adjacent to S5 and S11 appear to show a proportion of their catchment area draining to the incorrect sewer leg.

The above list may not be exhaustive. Please correct and provide consistent drawings.

The input area for the nodes on the hydraulic calculations are also erroneous. It is not clear what system is being used for the design and simulation model. Full details may be required.

Plots 3-5 Flood Routing can be accepted due to the amount of hardstanding contributing being akin to a small scale minor application. Gullies in addition to ACO drainage are advised to be considered. Are the drains on shared driveways going to be managed by a management company?

The altered flood routing shown for the private driveway serving plots 6 and 7, does not work when examined against manhole cover levels on the private drainage drawing. Alterations in this area will need to be examined and work in conjunction with private drainage design and boundary treatments with Burn Road and the rear of plots 3-5 which will require alterations for the ‘step up’.

A joint discussion needs to be had with the LLFA and Section 38 due to a potential change in configuration at the end of the adoptable highway adjacent to manhole S12. The design must be agreeable to all parties. We are still concerned over plots 6 and 7 in particular and full details of contours and cross sections will be required to include driveways, garage thresholds and finished floor levels.

No additional information has been supplied showing full tank design and a bespoke site maintenance plan for the period prior to adoption, including previous advice for flow control devices.

We do NOT recommend that either of these conditions are discharged at this moment in time.