

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

2025/90372 Land at, Edgerton Road, Edgerton, Huddersfield, HD3 3AA

Discharge of details reserved by conditions 6, 7, 8, 9 (drainage), 11 (lighting scheme), 14 (Arboricultural Method Statement), 19 (Construction Method Statement), 21 (estate road), 22 (highway works), 23 (boundary treatments) on previous permission 2017/91916 for variation condition 23 (highway works) on previous permission 2014/93014 (APP/Z4718/W/15/3002523) for outline application for residential development comprising of 41 dwellings plus associated works (within a Conservation Area)

Date Responded: 3rd August 2025

Responding Officer: Paul Farndale

Responding Ref: 3

Due to several discrepancies between submitted drawings, further information required, and flood risk not acceptably mitigated in the design, we request a meeting with the developer, , relevant consultants, and the planning officer, to help move this application forward.

WE DO NOT SUPPORT THE DISCHARGE OF CONDITIONS 6,7,8, & 9 AT THIS POINT IN TIME.

These comments are in addition to those made on 16th March 2025 and 23rd April 2025.

Conditions 6 and 7, Drainage Details and Attenuation

Previous submission showed 4 flow controls and four attenuation tanks. Some of the drawings related to this are still active as part of this application. Layout drawings have subsequently been submitted that show two pre cast concrete tanks but only one flow control. From the levels given, the upper tank and many of the oversized pipes will not fill if this was the case.

There are no detailed drawings of the tanks, cross sections, plans, manufacturing type etc. No flow control manhole details have been submitted. No flow control designs have been submitted.

No maintenance and management plan in accordance with CDM regs 2015 for the tanks including risk assessments, method statements (including itinerary and schedule of tasks) have been submitted. This should include access to and into tanks and be bespoke for this site, not generic.

Hard standing drawings should be submitted that relate to areas connected to each leg of pipe in the sewerage design so it can be cross referenced to the latest simulation wizard when that is updated and submitted.

There are no updated longitudinal sections, and the original ones do not show pipe sizes or indicate where backdrop manholes are located.

No outfall drawing has been submitted.

Yorkshire Water will need to comment on stand off distances to existing public sewers on site, some of which are critical sewers.

Yorkshire Water will need to comment on the drainage layout that indicates a hard standing area of 1893m² drains to the public sewer. Using simple Lloyd-Davies calculations at 50mm peak rainfall, this represents 26l/s free discharge way above the 10.5l/s allowed for the site to watercourse only. Kirklees LLFA OBJECT to this method outright regardless of Yorkshire Water comments yet to be made. This sewer also appears to have a legal status of FOUL ONLY on the statutory record and a connection can be denied under section 106 of the Water Industry Act 1991.

Permeable drives are shown yet the site is being drained to watercourse suggesting that permeability is low and soakaways were not a viable option.

F11 on the submitted drawings shows an erroneous cover level of 129.547m AOD.

The adoptable drainage plan 1 (Section 38) has manhole labelled with an invert level for 900mm pipe when 825mm is labelled against the sewer leg.

No 100mm pipes should be used for surface water sewers on main runs or laterals.

Condition 8 – Flood Routing

Flood routing is shown but there has been no consideration of flood routing in the design of the layout. It simply shows where water will go and not how the estate should be safely designed around this. It is not clear how the area around plot 37 and the omitted plot 38 will steer water safely to the watercourse avoiding property curtilage. A raised platform is used but it has not been demonstrated the pavement area and back of pavement levels do not continue to steer overland flows along the road. A second such raised platform is located outside plot 41, does this steer water to plot 41 endangering it, or allow water to continue toward Queens Road and existing properties?

Plot 26 is extremely vulnerable at the low spot for overland flows on blockage scenarios and exceedance events. Safety and the constraints around overland flow routing have clearly been ignored.

Condition 9 - Construction Phase Drainage Plan (Temporary Drainage)

The restriction of water on site for a 1 in 2-year 6 hour storm has not been demonstrated.

The use of a bund and filled trench is shown to take water to an unsized catchpit manhole, yet arrows indicate flows to the river at a different location.

Silt fences appear on a drawing in random locations along a contour suggesting limited filtering of run off.

Partial vegetation clearance has not been considered. This site may well have been totally stripped already according to local observations, and this should be raised with **PLANNING ENFORCEMENT** due to the risk of pollution of a watercourse from run off post vegetation and soil strip.

There is no phasing to this plan, which at the very least should have a pollution and flood risk plan based on before and after attenuation is connected and the site is still under construction. Further phasing may be required dependent on the build programme and constraints around path flows as the site is constructed.