



YorkshireWater

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Your Ref: 2025/90517

Our Ref: A/01470

17th July 2025

Dear Sir/Madam,

Land off Forge Lane, Thornhill Lees, Dewsbury - (KIRK) Outline application, including the consideration of access and layout, for two commercial units (use class B2 and/or B8) and associated works

Thank you for consulting Yorkshire Water regarding the above proposed development. We have the following comments:

Waste Water

Yorkshire water objects to the application, specifically 'Drainage Feasibility' 2465/01/SK01





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dated 15/11/2024 as prepared by ARP Associates. This drawing shows foul water to discharge to public combined water sewer. The public sewerage network does not have sufficient available capacity to accommodate a development of the size proposed. Foul water discharge from the proposed scheme, in the current arrangement, would likely be detrimental to the normal operation of YWS assets.

Should the local authority be minded to recommend this scheme for approval against the advice of Yorkshire Water and guidance contained within Policy LP4 of the Kirklees Local Plan Strategy and Policies, we would recommend the following conditions:

Development shall not commence on any phase of the development until a scheme to ensure that on-site and off-site foul water sewerage and the receiving waste water treatment works, designed to serve the whole development, is of adequate capacity to ensure proper disposal has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be fully implemented and subsequently maintained, in accordance with the timing and phasing arrangements embodied within the scheme and the number of properties to be constructed within that phase, or within any other period or number of properties as may subsequently be agreed in writing, by the Local Planning Authority. Furthermore, occupation of the development shall not commence until the approved drainage works have been constructed in accordance with the approved plans.

(To ensure the site can be properly drained without risk of flooding/pollution to the local aquatic environment, public health and public amenity).

Further to this, it appears from the submitted site layout (drawing number 2776(1)003 (revision J) dated 28/05/2025 that has been prepared by KS Architects) that building 1 will be sited in close proximity/ over the 450mm diameter public surface water sewer located within the site. This could seriously jeopardise Yorkshire Water's ability to maintain the public sewerage network and is not acceptable. We therefore OBJECT to the development layout as currently shown.

- 1) At present the sewer network does not have sufficient available capacity to support the size of development proposed. It is understood that the site is not allocated within the adopted Kirklees Local Plan and as such the site has not been considered within the current Yorkshire Water Asset Management Plan (AMP) period.
- 2) The submitted Drainage Strategy prepared by ARP, dated 25/11/2024 is generally acceptable. In summary, the report states that:
 - a) Foul water will discharge to public combined water sewer





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- b) Sub-soil conditions do not support the use of soakaways
- c) A watercourse exists near to the site -- connection subject to Environment Agency / Local Land Drainage Authority / Internal Drainage Board requirements
- d) Surface water will discharge to watercourse

3) On the Statutory Sewer Map, there is a 225 mm diameter public combined sewer, a 225 mm diameter surface water and 375mm, upsizing to 450mm diameter surface water sewer recorded to cross the site. It is essential that the presence of this infrastructure is taken into account in the design of the scheme.

- a) It may not be acceptable to raise or lower ground levels over the sewer and we will not accept any inspection chambers on the sewer to be built over.
- b) In this instance on the 225mm diameter public surface water sewer, Yorkshire Water would look for this matter to be controlled (by Requirement H4 of the Building Regulations 2010).
- c) Regarding the 225mm diameter public combined sewer, a stand-off distance of 3 (three) metres is required at each side of the sewer centre-line and it may not be acceptable to raise or lower ground levels over the sewer, nor to restrict access to the manholes on the sewer.
- d) Regarding the 375mm diameter, upsizing to 450mm diameter public surface water sewer, a stand-off distance of 3.5 (three point five) metres is required at each side of the sewer centre-line and it may not be acceptable to raise or lower ground levels over the sewer, nor to restrict access to the manholes on the sewer.
- e) A proposal by the developer to alter/divert a public sewer will be subject to Yorkshire Water's requirements and formal procedure in accordance with Section 185 Water Industry Act 1991.

4) Yorkshire Water promote the surface water disposal hierarchy and the developer must provide evidence to demonstrate that surface water disposal via infiltration or watercourse are not reasonably practical before considering disposal to public sewer.

- a) It is noted from the submitted planning application that surface water is proposed to be drained to watercourse.
- b) The developer should note that further restrictions on surface water disposal from the site may be imposed by other parties. The developer is strongly advised to seek advice/comments from the Environment Agency/Land Drainage Authority/Internal Drainage Board with regard to surface water disposal from the site. The landowners consent will be required for the construction of a new outfall structure.
- c) As surface water from the site is not proposed to discharge to the public sewer network, no assessment of the capacity of the public sewers to receive surface water has been undertaken. Should the surface water disposal proposals change, further consultation with





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Yorkshire Water will be required.

Yours faithfully

George Mullaney
Town Planning Technician

