

Further to our comments of 5th August 2025, updates can be found below in red.

Condition 6 – Construction Phase Flood Risk and Pollution Plan (temporary drainage).

A narrative has been supplied but drawings still show one phase. At the very least pre and post attenuation installation phases are required. However, in this case some land is not to be soil stripped straight away so such phases should be detailed in description and plan. **Plans will be considered for phase 1 with details on phase 2 to come so that the condition can be considered for each phase in isolation.**

Understood

Latter phases should include how drainage infrastructure is protected from sediment ingress from gullies and manholes for example. **For phase one, the LLFA accepts the plan and narrative for construction phase drainage after the drainage infrastructure has been installed. This does not mean just the attenuation tank but all connecting manholes and gullies.**

As discussed in the attached email, Muck stock will be installed to reduce the amount sediment that enters the SW system. These will be installed in all gullies.

Please see attached email with Muckstop details

We also believe water stored by bunds is likely to require sediment to settle out before discharging to watercourse. A tanker should be the last resort. Klargesters or similar are often used as a back up where dealing with sediment proves to be an issue. **Methodology of silt removal has been promoted with back of plans where this proves inadequate.**

Within Attached Email, details about the proposed Silt filtration system (ACO StormSed Vortex_Hydrodynamic Separator) has been attached. Within our temporary water runoff management plan, note is made that in extreme circumstances tankering of SW will be used to alleviate SW.

It is not clear from levels of bunds and topography where the 1 in 2 6 hours storm will site on site. This capability needs to be shown and this space's place in the development programme considered. **Prior to full drainage infrastructure going in, run off will still move away from any attenuation tank installed. Despite bunds being shown, that areas to store water do not appear to make sense as the contours are different and water will be conveyed to a low spot. A 1 in 2 6 hours event was discussed with Harron Homes, this does NOT appear to have been considered in the latest submissions.**

Currently, the attenuation tank has been installed. All bunds will divert surface water towards the crate system that has 1573m³ of storage allowance. The manhole before the crate which is currently installed will have a Vortex_Hydrodynamic Separator which has a maintenance schedule within the attached temporary water runoff management plan

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

Condition 16 – Attenuation, Flow Control and Maintenance & Management

There is no objection to headwall details for inlet to the detention basin and outfall to watercourse. The outlet from the pond does require a trash screen in accordance with modern standards/current thinking. This means a horizontal section of bars before a 45 degree or 60 degree fall to within 150mm clearance of the invert of the outgoing pipe. This allows for an overspill even when the angled screen is blocked and free passage of small sized debris. The Principal Engineer should oversee the health and safety aspects of this design including maintenance as part of CDM Regs 2015. For further

information on acceptable design please contact floodmanagement@kirklees.gov.uk. It has been agreed that the discharge of condition for phase 2 will be considered separately to phase 1. Understood further submission will follow shortly

Maintenance and Management tasks should include descriptions of how they are carried out including access to detention basins and tanks with correct plant and equipment. It is recognised that there has been an update to the narrative on phase 2, but this will be considered separately at a later date when full details for discharge of condition for phase 2 has been submitted.

Understood further submission will follow shortly

The flow control device should be included in the maintenance and management regime for SUDS, clearing sumps, penstock and bypass plate maintenance, and the replacement of the neoprene seal if the flow control device is ever removed. The replacement of neoprene seal has been omitted for phase 1. Please ensure all the above in incorporated.

Understood this will be incorporated.

There are no plans and cross section details of the tanks which may be crate storage. One tank has no access shown. It is unclear how this can be inspected or cleared of silt (method of silt prevention). No manufacturer has been selected and therefore there is no guarantee for lifespan of a product that can't readily be inspected. Without this and with no independent accreditation, such as a BBA certificate, Kirklees will impose a nominal 25 year replacement interval on such tanks that needs to be included in the maintenance and management regime. Such an agreement can cease upon adoption by Yorkshire Water or a NAV equivalent who will have their own maintenance regimes as a Statutory Undertakers. There are still no plans and cross sections of tanks for phase 1. Access to an overflow tank is not shown on the main drainage layout. Channels incorporated into a design will need to be jetter from both sides. A 73mm orifice is below the minimum standard accepted in the industry and therefore constitutes an refusal on flood risk grounds. No BBA certificate has been produced and a 25 year replacement cycle must be stated in the maintenance and management manual. We still recommend adoption of both tanks. As discussed early diaglog with our section 38 team is required as highway drainage will overspill in this private tank.

Understood. Drainage conversations will be picked up in next submission of S38 drawings in the coming weeks.

The maximum depth show on the detention basin is over the recommended 1.5m in an accessible locations. However, 5% appears to be added for urban creep, this is unnecessary if the 1 in 100 year + climate change storm is catered for. Kirklees will also honour the original agreed climate change allowance of 30%. It has been indicated on plans that this has been adhered to. Revised calculations will be required when the submission for discharge of condition for phase 2 is submitted.

Please find attached email in relation to this condition

Kirklees LLFA advises the planning officer and highways department that a second storage tank (crates) is designed for an overspill of events greater than a 1 in 30 return period and will remain private. Full adoption is encouraged to protect residents and any highway authority should a developer cease trading or a management company not be set up and tied to the sale of properties. A management company is expected to manage this until such time as adoption takes place. This tank has no access shown or silt prevention mechanisms and no plan or cross section has been supplied for either tank. This has still not been supplied for phase 1.

A flow control for the western drainage system has a 73mm orifice. The absolute minimum required of 75mm with a preference for 100mm to prevent blockages. The design must be revisited. **As stated above, this is unacceptable for phase 1.**

Please find attached email in relation to this condition requesting altered discharge rate to accommodate the increased orifice size

The connection point to sewer or overflow pipe (agreed with Yorkshire Water) should clearly be shown on layout drawings. Yorkshire Water approval is required. **This has not been shown and is relevant to phase 1**

As discussed, this information will follow pending discussions on discharge rate.

Gradients of the sides of the attenuation basin need to be shown and proven as 1 in 3 at steepest. 1 in 4 or flatter is preferable as is a step up from the lowest level before a 1 in 3 gradient. **This will need to be demonstrated when considering discharge of conditions of phase 2.**

As discussed, this information will follow pending discussions on discharge rate.

Key lengths and widths of the irregular shaped pond should be listed so that it can be compared to volumes stated in the hydraulic simulation. **This will need to be demonstrated when considering discharge of conditions of phase 2.**

As discussed, this information will follow pending discussions on discharge rate.

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

Condition 17 – Northern Swale/Ditch

Again, there has been no submission for this aspect of onsite drainage and the LLFA is concerned that it is being neglected. **The above circumstances remain unchanged.**

Please find attached email in relation to this condition which state,

Further to our discussions please find attached *48867-ECE-XX-XX-RP-C-0001 - Merchant Fields - Drainage Maintenance Schedule - Issue 2*. This schedule includes our maintenance schedule that will be adopted to make sure that the swale is well maintained and free of blockage. this document will be provided within management company tender and also provided in the landscape management pack during handover of the open space.

Within our planning approved layout, a strip of land down the side of the swale has been allowed for and placed into management company land. This will make sure that the maintenance of the swale is not within ant plot curtilage and therefore will not fall on any resident.

As discussed any necessary communications with adjoining landowners will be held between harron and the residents to discuss back garden access.

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