Consultation Response from KC, **Lead Local Flood Authority**
2025/91370 Land at, Gynn Lane, Honley, Holmfirth, HD9 6LF
Demolition of existing dwelling and erection of 50 dwellings with associated access, infrastructure and associated works
Date Responded: 28th July 2025 **Responding Officer: Paul Farndale** **Responding Ref: 1**

Consultation Synopsis

Kirklees Flood Management & Drainage acting as Lead Local Flood Authority requires FURTHER INFORMATION before deciding on this application: -

- **Potential location and route of land drainage systems must be identified at this stage to ensure space is made for water in the layout design.**
- **Explanations/Minor Alterations around flood routing is required.**
- **The implications of Yorkshire Water's response to foul sewerage availability needs to be fully understood by the planning officer and developer.**
- **Updated knowledge of land drainage serving the former mill pond needs to be included in the FRA and the flooding to 16-18c Gynn Lane from a known adit during site investigation works. The future risk must be assessed.**
- **The developer is expected to liaise with River Holme Connections as a landowner as part of a Kirklees Council scheme to slow flows of water in this catchment. This dialogue should include an amalgamation of Flood Management, Landscape Architects and Arboriculturists specialism within the Council.**

Detailed Response

Flood Risk

The development area for the site is located in main river flood zone 1. A sequential approach has been adopted and is accepted.

Post March 25th 2025, updated flood risk maps for planning show modelling on Ludhill Dike at the entrance area (zone 3). This is effectively confined to the watercourse channel, however due diligence is required here. Given recent planning inspectorate decision on temporarily flooded access roads at Granny Lane, Mirfield. Kirklees LLFA has no objection here. However, a blockage scenario of a promoted trash screen should be assessed. The best solution being that water gets back into the watercourse and not using Gynn Lane as a conduit due to vulnerable properties downstream.

There are no concerns for catchment surface water flood risk. The design for the site's flood routing is of course important. As the route would be down the access road, getting water into the watercourse and not down Gynn Lane has to be adequately considered.

Surface Water Outfall

With a BGS rating of 4 (considerable constraints), grouting works to be executed, and a relatively steep slope with re-emergence history at nearby properties, the use of soakaways is ruled out. An overall connection to Ludhill Dike at 10.5l/s (8.5l/s for attenuation and 2l/s free discharge from the access road) is approved. A surface water connection to sewer is not required.

Foul Outfall

The LLFA is aware of Yorkshire Water's comments regarding foul discharge from the site and suggests the planning officer asks for clarity given the significant investment in CSO improvement schemes in the area over the next 5 years including a known scheme in Honley. We would also like to know about capacity issues on the local sewer network given investment by the Council is reducing flooding along Ludhill Dike is recent years.

Coal Mining

Kirklees LLFA are fully aware of an incident involving flooding to the rear of 16-18c Gynn Lane during pre-commencement investigation works on the site. It is believed that water from the adit was forced out of the system. This must be included in the flood risk assessment and the planning officer should seek advice from the relevant authorities over any risk mitigations plans.

Section 106 Contributions

We advise the planning officer of known flood risk around Gynn Lane and in the Ludhill Dike catchment. Kirklees Council, Network Rail, and Northern Power Grid have all invested in drainage and watercourse improvements in the last 5 years to combat flood risk over a 700m longitudinal section. Several properties have flooded in recent years both on Gynn Lane and New Mill Road. The sports field regularly floods as does New Mill Road (An 'A' road).

Whilst the restrictions on discharge rates for surface water will not make matters worse and therefore conform the NPPF requirement, opportunities should be taken to reduce flood risk wherever possible.

The rates of release dictate the flood risk, however a greenfield development where infiltration is not possible, the inevitable increase in volume cannot readily be combatted. As the site is dependent on the downstream system with known problems, we request that it is in the interests of the public good to request contributions to downstream improvements. This includes the consideration of improving off site flood routing ensuring that any flood route can get back into Ludhill Dike preferably using hard engineered solutions involving road levels. Overflows from manholes and the use of several new strategically place storm gullies needs to be considered as do kerb lines.

The dramatic change in direction of Ludhill Dike after crossing New Mill Road has been escalated to the Environment Agency as a potential scheme to improve flows and keep debris in suspension by forming a new outfall to the river Holme. This development can help toward the funding of such as scheme.

Section 106 – Management Company

As with all major development we expect a management company to be set up regarding drainage. For this site, a maintenance and management for surface water infrastructure plan will be agreed by condition and executed by the management company up until a point in time where it is adopted by Yorkshire Water or a NAV. We do not accept that the developer looks after this (see Flood Risk Assessment) given previous experience of developers going bust, leaving upstream users (householders) liable but with no organisation/governance.

In addition, we envisage a significant land drainage scheme separate from the above. A management company will need to produce an agreed management plan via condition and execute this plan for the lifetime of the site.

Finally, the management company must look after the watercourse, Ludhill Dike, within its site boundary. An agreed maintenance and management plan can be agreed under condition. This plan will be executed by the management company for the life of the site unless an agreement with the Council's section 38 team is reached as part of the road adoption process.

Kirklees Council Natural Flood Management Feasibility Study for Ludhill Dike Catchment– River Holme Connections

Kirklees Council are working with River Holme Connections Home - River Holme Connections with regarding to landowner engagement and feasibility studies on the potential to slow the flow of water within the catchment that included this development. This study is supported by Local Levy funding.

We politely suggest to the planning officer that the developer meets with River Home Connections and looks at opportunities to slow the flow of the land drainage network, and perimeter drainage. RHC could be engaging with adjacent landowners and need to best accommodate this development which amounts to a significant landscape change.

A section showing this consultation should be produced in an updated Flood Risk Assessment to demonstrate joined up thinking.

Landscape Drawings

Please ensure that tree planting and similar landscape solutions do not interfere with the attenuation tank and drainage pipework, as tree root ingress is a major contributing factor to flood risk in Kirklees.

Flood Routing

Submitted drawings suggest that successful flood routing has been considered. However, the access road and getting blockage scenarios and exceedance events back into the watercourse needs to be considered.

An examination of low spots and retaining walls for plots 32/33 could be problematic unless the turning area is isolated from adjacent overland flows.

Trash Screen

The final design of an upgraded trash screen and addition downstream safety screen can be conditioned for detailed design stage.

Construction Phase Drainage

Give the history of flooded in the site investigation period, a robust construction phase drainage scheme is envisaged. This can be conditioned.

Section 278

If section 278 works are considered, then addition drainage on Gynn Lane to get water back into the watercourse and protective kerbing around 30/32 if agreed by the homeowners will need to be considered in any agreed scheme.

Land Drainage Alterations

For any live feed of land drainage into the curtilage of existing properties, for example in and out of the former mill pond adjacent to the site, a re-routing to a different outfall point would need the permission of riparian owners.

Detailed Drainage Design

Finalised drainage design including the attenuation tank can be conditioned.