Consultation Response from KC, **Lead Local Flood Authority**
2025/91370 Land at, Gynn Lane, Honley, Holmfirth, HD9 6LF
REVISED AND ADDITIONAL INFORMATION RECEIVED: Demolition of existing dwelling and erection of 50 dwellings with associated access, infrastructure and associated works
Date Responded: 22nd March 2026 **Responding Officer: Paul Farndale** **Responding Ref:2**

Kirklees COUNCIL

Further to our comments of the 28th July 2025:-

Land Drainage

Pipework connecting to the former mill pond, even if it appears abandoned must be picked up further up the site and diverted to Ludhill Dike. This is to manage risk of discovery and usage upstream in the future.

Flood Routing :-

- Potential issues around plots 32 and 33 have been addressed.
- A blockage scenario is currently a potential risk in theory under where the site entrance is proposed. The culvert is to be realigned to reduce the risk immediately downstream.
- A trash screen has been proposed, and this can be determined under condition. However, a high-level overflow reduces risk of flooding and is accepted.
- Additional drainage is proposed on Gynn Lane to benefit a return to Ludhill Dike of flood waters generated by overflow of watercourses and sewer surcharges.
- Double storm gullies are to be installed either side of the bridge.

We would like some clarification on flood routing drawings around manhole S9 where a private drive is shown as is a continued pavement. Flows need to be directed along the main estate highway and the private drive isolated from main flow routes. We would accept isolated flow routes as shown on the private drive.

Surface Water Outfall:-

This has already been accepted and rate restrictions agreed.

Foul Outfall:-

A meeting has been held between the LLFA and Yorkshire Water. Comments attributed to this site are based on concerns for relatively large, planned developments in North Yorkshire in comparison to the current settlement size, a serious concern for current infrastructure.

Whilst sewage capacity is a concern for the LLFA as a risk management authority, it is our understanding that all sewers identified as being over capacity should be declared to the regulator and Yorkshire Water has a duty to ‘effectually drain the area’. This means that business cases are developed for flood reduction schemes in a 5-year Asset Management Plan. This process aims to provide a plan remove over capacity sewers from the declared register.

Yorkshire Water is also a consultee on the local plan process.

We advise the planning officer that we believe therefore that allocated site in Kirklees’s local plan with no such comment from Yorkshire Water at the time (for foul water), or undeclared over capacity systems, effectively established a ‘right to connect’. Yorkshire Water can advise on a reasonable point of connection based on submitted plans.

Kirklees Council will be working with Yorkshire Water and other West Yorkshire Councils on integrated water management as a group.

Yorkshire Water may wish to comment separately on the above.

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.

Subsequent to our comments, a further 'significant' incident occurred from the pipe believed to drain mine water causing flooding to rear gardens where water levels were close to thresholds and air bricks.

Whilst soakaways are rules out and surface water will be collected and discharged at a controlled rate to Ludhill Dike, the effects of the development, particularly in the construction phase, and any remediation to mine workings, on this drainage system, either temporarily or permanently needs to be assessed.

We advise the planning officer to get a statement from the National Coal Authority.

In addition, we advise the planning officer that for due diligence, an assessment or view from a suitably qualified person (geotechnical/hydro geological experience), independent of the applicant, is commissioned to examine risk for this aspect of development.

Section 106 Contributions – Work Outside the development

Our comments remain the same.

We would like a discussion with the planning officer on how best to secure/fund/execute works off site and whether there is any overlap with potential section 278 work.