

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

**2025/92161 Land adj, 17, Whitehall Road West, Birkenshaw, BD11 2LS**

**Discharge of details reserved by conditions 4-8 (intrusive investigations), 11 (Remediation Strategy and Verification Report ), 12 (CEMP), 13 (noise), 14 (Arboricultural Method Statement), 15 (CMP), 16 (highway), 17 (visibility), 18 (Safety Audit), 19 (estate streets), 20 (waste collection), 21 (surface water attenuation), 24 ( bin storage), 25 (bicycle storage), 26 (drainage), 28 (drainage), 29 (CEMP: Biodiversity),-30 (landscape), 34 (solar panel array), 35 (materials), 38 (boundary treatments) on previous permission 2024/92281 for erection of 23 dwellings**

**Date Responded: 8<sup>th</sup> December 2025**

**Responding Officer: Paul Farndale**

**Responding Ref: 2**

### **Condition 26 – Temporary Drainage**

Construction phase drainage risk assessment and method statement, resulting in an itinerary and schedule of task, are serious considerations in the planning process due to potential flooding from increased run off and pollution to watercourses. Initially the applicant stated they did not believe they needed to submit a plan. A simple plan showing two bunds and an intention to pump off site is stated on a submitted plan. This is inadequate.

The design of the bund would need to show some levels and identify a quantity of water that could be stored behind it as opposed to running round the sides. Consideration of sediment settlement is required. Water cannot simply be pumped off site especially where local gullies connect to a watercourse. Contaminated discharges have resulted in two successful prosecutions carrying 6 figure fines were dealt out to two developers by the EA in recent history.

The volume of potential run off needs to be assessed in order to size the bunds, which may well need sumps and silt fences. We would expect a 1 in 2-year storm 6 hour to be considered for the size of the site. As with any risk assessment, a back up plan will be required, and this often involves the use of silt busters/flocculation.

A second phase of construction management plan for flood risk and pollution is also required. This is where the permanent drainage has been installed by the site can still produce significant amounts of sediment from property build. In this respect, road sweeping and wheel washing should be considered. In addition, protecting silt from entering newly installed road gullies and manhole covers should be taken into account. The attenuation structure until may not be easy to clear for silt, e.g. crate storage and a bespoke plan will be needed to adequately manage this situation and discharge this condition.

### **Condition 28 – Tank Maintenance**