Consultation Response from KC,
Lead Local Flood Authority

2025/92728 land at, Dowker Street, Milnsbridge, Huddersfield, HD3 4JU

Erection of 33 dwellings with associated car parking and landscaping

Date Responded: 31st December 2025
Responding Officer: Paul Farndale
Responding Ref: 1

K**irklees Flood Management & Drainage OBJECTS to this application in the first instance. Updated information is required and adjustments to the design are expected. We do believe however, that this objection can be overcome.**

Flood Risk Assessment

The submitted Flood Risk Assessment is out of date. National Flood Risk Maps for Planning were updated in March 2025. The FRA should reflect this for Longwood Brook and the River Colne.

Sequential Test

Although the mapping has changed the likely position of the planning application will be similar. A **Sequential Test** is required as the site falls in flood zone 2. The current FRA makes the mistake of using vulnerability classifications to justify the test passing. This is not the case. They should meet with the planning officer and planning policy officer to examine the search area in the current local plan and sites available on the open market to examine sites in flood zone 1 or of lesser risk in zone 2 that should be developed first.

Should a sequential test pass then an exceptions test will not be required in flood zone 2 for 'more vulnerable applications.

Flood Risk Assessment From Previous Applications

The LLFA accepts that adequate surveys have been done to trace **Longwood Brook** as it flows through the site culvert. This section of Longwood Brook is a main river and therefore under the jurisdiction of the Environment Agency.

The EA are likely to require a stand off distance of at least 8 metres from the edge of the culvert. Depending on the depth of the culvert, they may well be concerned about a 'rule of thumb' that requires dead loading from buildings, that is a 45-degree angle from the foundations will not impact on the structural integrity of the culvert.

The EA will need to comment if the storage tanks are to be included in this zone and whether this is acceptable as installation and renewal will require excavation in this area.

Parking and loading is not necessarily an issue, but permits will still be required, housing will be ruled out. The EA may well still require a structural loading assessment.

The LLFA is happy with the analysis of **surface water flood risk** of the are in and around the site and no flood routing for the site itself is satisfactory, see drawing DSH-AJP-XX-OO-DR-C-1400 P07.

The LLFA accepts a 5l/s connection to watercourse. The depth of the watercourse is such that with attenuation utilising depth, a gravity connection to watercourse is not feasible. The FRA does not

examine ‘chasing’ the levels off site. It is our understanding that Yorkshire Water will on this occasion accept a connection to public combined sewer but may limit it to 3 or 3.5l/s, the lowest discharge rate allowed in Kirklees to prevent the use of orifice sizes under 75mm. A 100mm orifice size is preferred as is less likely to block.

Attenuation design will alter if a 3.5l/s restriction is applied.

Attenuation

The LLFA has concern over the use of crate storage as an overflow tank. Whereas our stance on the use of crate storage has relaxed over the years, we will still look to remove objections based on the ‘adoptability’ of such structures by a statutory undertaker or NAV equivalent. Private crate storage on housing estate creates a liability for residents for guaranteed life span and maintenance.

A formal guarantee of a lifespan for the products itself and not its installation would be sought. We have not experienced any guarantee being forthcoming from any manufacturer yet.

An independent assessment of the structural integrity, such as a BBA certificate that lists an expected lifespan would be considered. Where these are not available an arbitrary 25-year lifespan will be accredited. This stance is taken because unlike an open pipe of box culvert, it is impossible to assess structural integrity periodically via cctv drain camera. Failure of lining on structural wall and ties on products is practically impossible. Therefore, this risk must be managed through a set renewal period. This would not apply if the statutory undertaker provided a technical approval to adopt as defects can be managed through the water industry regulator and Water Industry Act 1991.

We also have concerns over these systems when they are connected to combined sewers downstream as the risk of surcharging rags from such a system comes into play. The statutory undertaker is unlikely to accept Non return valves on an adoptable system.

Also, the risk of silt and spreading into a crate storage system and the difficulty in accessing to remove needs to be discussed, especially in an offline situation.

We therefore recommend a rethink as to the suitability of such a tank in this design.

We would not encourage part adoption of a system with the crate storage remaining private as this is not in the interests of the recommendation of the Pitt Report 2008 which looks to have surface water systems under the ownership of fewer parties.

We note water butts have been mentioned. Our experience is that these are unlikely to be installed in practice or maintained and not removed if they were.