

**Consultation Response from KC,
Lead Local Flood Authority**
2026/90232 New Mills, Brougham Road, Marsden, Huddersfield, HD7 6AZ

Redevelopment of mill complex of 11,584sqm for mixed use development, including building demolition, site clearance, site remediation works, the removal of buildings and floor slabs to open up the River Colne, repairs to retained buildings, conversion of lower ground floor of western mill to Class E (food and non-food retail, restaurant and cafe), new buildings providing light industrial / R&D uses (limited to Use Classes Eg(ii)(iii)), the alteration and repair of an office building (Use Class Eg(i)), the creation of a new public square and associated hard and soft landscaping, circulation and servicing space, car parking and ancillary structures

Date Responded: 12/05/2026
Responding Officer: Martin Stephenson
Responding Ref: 1
Documents reviewed by the LLFA:

Dudley Consulting Engineers:

- 23421-DCE-XX-XX-D-C-100, Drainage Strategy, Rev P03 dated 03/12/2025.
- 23421-DCE-XX-XX-D-C-129, Flood Exceedance Route, Rev P03 dated 03/12/2025.
- 23421-DCE-XX-XX-T-C-002, FRA & Drainage Strategy, Rev P03 dated 14/01/2026.

Drainage Summary:

The LLFA confirms acceptance of the flood exceedance route shown on drawing 23421-DCE-XX-XX-D-C-129 and therefore this requirement does not need to be conditioned.

The LLFA also accepts the proposed surface water discharge rate of **149l/s** into the river Colne as indicated on the Drainage Strategy drawing, however the LLFA would prefer that the flow control device is of the vortex type (e.g. HydroBrake) rather than an orifice plate as these are less prone to blockages and have a better flow vs head performance at lower flow rates.

The LLFA also accepts the proposed geocell type attenuation tank with a low flow perforated pipe in its base, however the upstream MHs (SW1.08 & SW5.04) should be of the silt trap type to reduce the risk of siltation within the tank.

It is noted that the CL of MH SW1.08 (177.82) is 0.95m lower than the minimum CL of adjacent Attenuation Tank (178.77) and only 0.47 above the Tank's SL (177.35). The developer is requested to review the site GLs in the vicinity of the Tank to ensure there is adequate cover to the tank in accordance with the tank manufacturer's recommendations.

Generally, rainwater run-off should not be discharged through an oil separator to prevent the flushing out of oil in heavy rainfall, however the LLFA understands separation of the RWP drainage from the hardstanding drainage is difficult with a constrained site. The LLFA requests that consideration be given to draining the two parking areas (East Mill Car Park and the one at the site entrance) and the slot drain across the entrance directly to the oil separator on a dedicated drainage system excluding RWP drainage (if possible).

The LLFA welcomes the recommendations in the Section 13 of the FRA and request that an Emergency Escape Plan be prepared and published so that, if flooding of the site is predicted by the Environment Agency, procedures to ensure the safety of customers and staff are included in the Plan together with an identified safe place of refuge.

Kirklees Flood Management & Drainage as Lead Local Flood Authority SUPPORTS this application SUBJECT to the comments above and the recommended conditions set out below.

DR01 Drainage Details

Development shall not commence until a detailed design scheme detailing foul, surface water and land drainage, including the agreed surface water discharge rate with the LLFA of **149l/s** indirectly or directly to watercourse, attenuation for the critical 1 in 100 (plus an allowance for climate change)

rainfall event, attenuation construction details /design, plans and longitudinal sections, hydraulic calculations and phasing of drainage provision has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include a risk assessment and method statement, in accordance with CDM Regulations 2015, for access to and into the attenuation structure, and the scheme shall include a maintenance and management plan for surface water infrastructure. No part of the development shall be occupied until such approved drainage scheme has been provided on the site to serve the development or each agreed phasing of the development and retained thereafter.

DR10 Construction Phase Surface Water Flood Risk and Pollution prevention plan.

Development shall not commence until a scheme, detailing temporary surface water drainage for the construction phase (after soil and vegetation/site strip) has been submitted to and approved in writing by the Local Planning Authority. The scheme shall detail:

- phasing of the development and phasing of temporary drainage provision.
- include methods of preventing silt, debris and contaminants entering existing drainage systems and watercourses and how flooding of adjacent land is prevented.
- the strategy shall include a plan showing the location of the attenuation storage and supporting calculations, which shall be based on the critical 1 in 2-year storm. It should be assumed that once the site has been stripped that the percentage run-off will be 100 %. The maximum allowable off-site discharge rate shall not exceed 2.5 litres per second per ha, unless otherwise agreed with the LLFA.

The temporary works shall be implemented in accordance with the approved scheme and phasing. No phase of the development shall be commenced until the temporary works approved for that phase have been completed. The approved temporary drainage scheme shall be retained until the approved permanent surface water drainage system is in place and functioning in accordance with written notification to the Local Planning Authority.

DR20 Interceptor

Development shall not commence until a scheme demonstrating surface water from vehicle parking and hard standing areas passing through an oil/petrol interceptor of adequate capacity prior to discharge. Roof drainage should not be passed through any interceptor.