



YorkshireWater

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Your Ref: 2026/90232

Our Ref: B/01084

9th June 2026

Dear Sir/Madam,

New Mills, Brougham Road, Marsden, Huddersfield – (KIRK) 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)), creation of a new public square and associated hard and soft landscaping, circulation and servicing space, car parking and ancillary structures





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Thank you for consulting Yorkshire Water regarding the above proposed development. We have the following comments:

Submitted Documents:

The submitted Flood Risk Assessment & Drainage Assessment prepared by Dudleys Consulting Engineers, dated 14/01/2026 is acceptable. In summary, the report states that:

- 1) Foul water will discharge to public combined water sewer
- 2) Sub-soil conditions do not support the use of soakaways
- 3) A watercourse (River Colne) exists near to the site -- connection subject to Environment Agency
- 4) Surface water will discharge to watercourse via storage with restricted discharge of 149 litres/second

Yorkshire Water has no objection in principle to:

- 1) The proposed separate systems of drainage on site and off site
- 2) The proposed point of discharge of foul water to the public 300/225mm diameter combined sewer in Crowther Bruce Mill Road
- 3) The submitted drawing shows surface water proposed to be drained to watercourse (River Colne) at a maximum rate of 149 litres/second
- 4) The proposed use of a separator

submitted on drawing 23421-DCE-XX-XX-D-C-100 (revision P03) dated 03/12/2025 that has been prepared by Dudleys Consulting Engineers.

Existing Infrastructure:

On the Statutory Sewer Map, there is a 450 mm diameter public combined sewer recorded to cross the site. It is essential that the presence of this infrastructure is taken into account in the design of the scheme.

- 1) It may not be acceptable to raise or lower ground levels over the sewer and we will not accept any inspection chambers on the sewer to be built over.
- 2) In this instance, a stand-off distance of 4 (four) metres is required at each side of the sewer centre-line and it may not be acceptable to raise or lower ground levels over the sewer, nor to restrict access to the manholes on the sewer.
- 3) A proposal by the developer to alter/divert a public sewer will be subject to Yorkshire





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Water's requirements and formal procedure in accordance with Section 185 Water Industry Act 1991.

The work listed in the development description includes the removal of buildings and floor slabs to open up the River Colne, the 450mm diameter combined sewer recorded crossing the site appears to run either within or under the culverted section of the River Colne so may be impacted by this work, there is a risk the work may open up a new route of surface water infiltration into the public sewer. Yorkshire Water will require a CCTV survey to determine the exact route and position of the sewer, and remedial work to protect the sewer may be required. The submitted Illustrative Landscape Masterplan (PWP-847-DR-L-0001, revision 02 dated 20/04/2026 and prepared by PWP) details green space and tree planting on both the north and south banks of the River Colne. Yorkshire Water do not allow tree planting within 5 (five) metres either side of public sewers, this is due to the risk of root ingress damaging and potentially blocking the public sewer. We will need to see the site surveyed position of the public sewer with confirmation the proposed tree planting is a minimum 5 metres away from the public sewer.

Water Supply:

There are two large diameter private supply pipes within the mill complex. a 5" pipe in Brougham Road and a 100mm pipe in Warehouse Hill Road.

While these are private pipes owned by the mill; Yorkshire Water recommend that these be disconnected prior to any demolition or redevelopment of the site. In addition, two further small diameter service connection into the site were located in Brougham Road, these will require disconnecting.

Another large diameter private supply pipe runs down Crowther Bruce Mill Road to the eastern edge of the site. This is recorded as a public highway so this pipe may be affected. It may also supply additional properties. Further confirmation is required.

Our Clean Water engineers have no objection to the development provided the old supplies in to the site are disconnected prior to any development commencing.

Foul Water:

It is understood that foul water is proposed to discharge to the public 300/225mm diameter combined sewer in Crowther Bruce Mill Road, this is acceptable to Yorkshire Water.

The developer is required to consult with Yorkshire Water's Trade Effluent team (telephone





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03451 242424) on any proposal to discharge trade effluent to the public sewer network.

Foul water from kitchens and/or food preparation areas of any restaurants and/or canteens etc. must pass through a fat and grease trap of adequate design before any discharge to the public sewer network.

Under the provisions of section 111 of the Water Industry Act 1991 it is unlawful to pass into any public sewer (or into any drain or private sewer communicating with the public sewer network) any items likely to cause damage to the public sewer network interfere with the free flow of its contents or affect the treatment and disposal of its contents. Amongst other things this includes fat, oil, nappies, bandages, syringes, medicines, sanitary towels and incontinence pants. Contravention of the provisions of section 111 is a criminal offence.

Surface Water:

Yorkshire Water (YWS) encourages sustainable development, which includes ensuring appropriate surface water disposal to prevent unnecessary hydraulic loading. Volume arising from surface water flows can be many times greater than the foul flows from the same development. As a result, they have the potential to use up a significant hydraulic capacity in our infrastructure. If we can minimise surface water flows entering the public sewer, we are able to significantly manage the impact of development on wastewater infrastructure and minimise the risk of flooding.

The National Planning Policy Framework (NPPF) sets out the principle of sustainable drainage, while the National Planning Practice Guidance (NPPG) and National Standards for Sustainable Drainage Systems (SuDS) establish a hierarchy for surface water disposal. This hierarchy prioritises 1. Rainwater harvesting (non-potable use) 2. Infiltration to ground 3. Discharge to above ground SW body 4. Discharge to SW sewer 5. Discharge to combined sewer. YWS seeks to promote this hierarchy in collaboration with Local Planning Authorities and developers to improve water quality and reduce flood risk.

As detailed in the submitted Flood Risk Assessment sections 11.5-11.9, the sustainable drainage hierarchy has been addressed, with surface water disposal through infiltration having been ruled out due to the previous usage of the site and the potential presence of contaminated and made ground. Discharge to watercourse was subsequently considered, with the River Colne crossing the site. The existing development currently has multiple outfalls to the watercourse, the applicant proposes to discharge surface water to watercourse, Yorkshire Water endorse this method of surface water disposal.





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Recommendations:

If planning permission is to be granted, the following conditions should be attached in order to protect the local aquatic environment and Yorkshire Water infrastructure:

No piped discharge of surface water from the application site shall take place until works to provide a satisfactory outfall, other than the existing local public sewerage, for surface water have been completed in accordance with details submitted to and approved by the Local Planning Authority.

(To ensure that the site is properly drained and in order to prevent overloading, surface water is not discharged to the public sewer network)

No building or other obstruction including landscape features shall be located over or within 4 metres either side of the centre line of the public sewer i.e. a protected strip width of 8 metres, that crosses the site. Furthermore, no construction works in the relevant area(s) of the site shall commence until measures to protect the public sewerage infrastructure that is laid within the site boundary have been implemented in full accordance with details that have been submitted to and approved by the Local Planning Authority. The details shall include but not be exclusive to the means of ensuring that access to the pipe for the purposes of repair and maintenance by the statutory undertaker shall be retained at all times. If the required stand-off or protection measures are to be achieved via diversion or closure of the sewer, the developer shall submit evidence to the Local Planning Authority that the diversion or closure has been agreed with the relevant statutory undertaker and that, prior to construction in the affected area, the approved works have been undertaken.

(In the interest of public health and maintaining the public sewer network)

Yours faithfully

George Mullaney
Town Planning Technician

