
From:

Sent: 13 July 2026 17:16

To: DC Admin <DC.Admin@kirklees.gov.uk>

Subject: Planning Application 2026/60/91494/E, Penistone Road, Birdsedge - Issues with the Flood Risk Assessment and Drainage Strategy

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(Now with the correct planning number on).

On reading the Flood Risk Assessment and Drainage Strategy for the above application by the consultant AMA Associates, I noted the following:

1. I see that the sub-consultant report from Eastwood (Appendix F), where 3 infiltration tests were done, but only one was successful. The report states:

“ The infiltration rates recorded in SA01 suggest that soakaway drainage may locally be a viable form of surface water drainage. However, due to the much lower rates recorded in SA02 and SA03, it appears that infiltration drainage may not be possible in all areas of the site. It is recommended that further testing is undertaken to determine which areas of the site can provide suitable infiltration rates, if the use of infiltration drainage is to be pursued. It may be prudent also to test the shallower, more weathered soils to see if shallow infiltration features such as swales or permeable paving could be considered.”

This leads the AMA Associates report to state (section 8.6.7):

“As such, infiltration methods are not deemed to be viable.”

In Yorkshire Water Pre-development enquiry (Appendix D) there is a statement on Surface Water:

“The developer's attention is drawn to Requirement H3 of the Building Regulations 2010. This establishes a preferred hierarchy for surface water disposal. Consideration should firstly be given to discharge to soakaway, infiltration system and watercourse in that priority order.”

So that would suggest that the consultant has chosen the worse of these options.

I am somewhat surprised at Consultation Response from KC Ecology Unit and also that of Natural England and I await to see what KC as LLFA response is. I am a volunteer for Riverfly Sampling on the Dearne, in Upper Dearne Woods (have been since 2019, and the Riverfly Partnership provides a simple, standardised monitoring technique to supplement routine monitoring by the EA), and have first hand experience of what pollution can be caused in surface water drains going directly to watercourses. Surface drainage can typically contain detergents from car washing, plus petrol/diesel /oil spills from residents cars.

The size of the infiltration test pits was 0.8m x 2.1m each, surely this is an insufficient number of trial pits for a site which covers 3.17 hectares. Are you able to request from the Applicant that this additional work that the sub-consultant recommended is carried out?

2. There is one other slightly confusing part of the report, section 7.4.2 states:

“.....Yorkshire Water will be required to provide the necessary upgrades to the Boroughbridge STW to allow for the additional flows from the proposed scheme.”

Surely if Boroughbridge STW is actually in Boroughbridge, North Yorkshire, (about 50 miles away from the development site), then this is likely a 'cut and paste error' and they mean Clayton West STW? Can you request clarification on this matter?

Thank you in advance for a timely response to these items.

Regards

