Consultation Response from KC, **Lead Local Flood Authority**
2026/91775 land at, Dowker Street, Milnsbridge, Huddersfield, HD3 4JU
Discharge of details reserved by conditions 4 (C(E)MP), 5 (CEMP: Biodiversity), 6 (road survey), 7 (retaining walls), 9 (surface water features in the Highway), 10 (culvert condition survey of Longwood Brook), 11 (Drainage Strategy), 12 (Flood routeing), 13 (temp drainage), 14 (Phase 1 Report), 15 (Phase 2 Report), 16 (Remediation), 18 (Estate road specification), 19 (access specification), 20 (footpath connection specification), 21 (Boundary Treatment), 23 (Acoustic report), 24 (facing materials), 25 (roofing materials), 29 (Landscape strategy)on previous permission 2025/92728 for erection of 33 dwellings with associated car parking and landscaping
Date Responded: 28th July 2026 **Responding Officer: Paul Farndale** **Responding Ref: 1**

Condition 9 – Surface Water Features in the Highway

This is a Highways DC suggested condition and therefore we offer no comment.

Condition 10 – Culvert Condition Survey

This is an Environment Agency suggested condition as the culvert in question is an enmained watercourse.

Condition 11 – Drainage Strategy

It appears that the design is attempting to store the 1 in 30-year return period only for a system to be adoptable, with an overflow to additional drainage infrastructure that would remain private. In the spirit of the Pitt Report 2008, recommendations to manage flood risk advises of the need to solve the problem of multiple ownership of surface water assets. There is no reason with current drainage guidance that Yorkshire Water or a NAV equivalent cannot adopt the 1 in 100 + climate change event demanded through NPPF, and suitable crate storage.

Please note that hydraulic simulation shows an overflow of surface water in the M30_360 event, therefore an attempt to store the 30 years event in pipework has failed. The design is acceptable if the crate storage is adopted as well.

If the above was secured in principle the 'overflow' design could change. However, it is not clear from drawings of the tank whether the above assumption is current, with the incoming pipe not shown in cross sections. Manhole S2 is relevant here.

The type of tank is not specified.

No access is shown on the tank.

It is not clear how sediment build up is to be managed, i.e. jetting and camera.

The current design shows flooding of 10.7 cubic metres which is not acceptable.

A 300mm outlet for 5l/s is shown on drawing (which is large) but no emergency drainage down (penstock/disc valve).

40% not 45% has been used for climate change.

A full coloured contributing hardstanding drawing that shows exactly where and how much area contributes to each sewer leg, is required to be submitted

Levels for the existing combined manhole have not been verified according to drawings. As a result it is not known whether the design is buildable

We do NOT recommend that this condition is discharged at this moment in time.

Condition 12 – Flood Routing

Although a small area of road falls to flats 1-3, it appears that the building has been positioned in a cutting with the topography falling back to the lower ground floor, and against the general north to south fall in the land for the site. We advise that the applicant examine a way of designing out this risk. Can the adjacent land where the culvert runs through incorporate an alternative low spot to protect the property (road camber may need to change to achieve this).

We do NOT recommend that this condition is discharged at this moment in time.

Condition 13 – Construction Phase Pollution and Flood Risk Prevention (Temporary Drainage)

There has been no submission to attempt to discharge this condition.

We do NOT recommend that this condition is discharged at this moment in time.