

<b>Consultation Response from KC, Lead Local Flood Authority</b>		
<b>2020/92546 Land off, Blackmoorfoot Road and Felks Street, Crosland Moor, Huddersfield, HD4 7AD</b>		
<b>Outline application (with details of points of access only) for the development of up to 770 residential dwellings (Use Class C3), including up to 70 care apartments (Use Classes C2/C3) with doctors surgery of up to 350 sq m (Use Class D1); up to 500 sq m of Use Class A1/A2/A3/A4/A5/D1 floorspace (dual use), vehicular and pedestrian access points off Blackmoorfoot Road and Felks Stile Road and associated works.</b>		
<b>Date Responded: 3<sup>rd</sup> November 2020</b>	<b>Responding Officer: Paul Farndale</b>	<b>Responding Ref:</b>

## Summary

**Kirklees Flood Management & Drainage acting as Lead Local Flood Authority, statutory consultee for surface water management, OBJECTS to this application on the grounds that flood risk and drainage strategy goes against advice previously given under application 2018/90748 and pre-application advice.**

## Detailed Response

Whilst it is recognised that this application is outline with all matters reserved, we feel we cannot condition this application due to the submission of flood risk assessments and drainage strategies that we cannot approve and go against previous advice and instruction given.

Kirklees Flood Management and Drainage is the Land Drainage Authority and Lead Local Flood Authority for Kirklees.

As such we advise against the use of soakaways on a sloping site of this nature that will be reprofiled to create steeper sections. Re-emergence of soakaways cannot be readily tested and should be viewed in the context of a cautionary approach.

Large parts of the site are not suitable for soakaways with clay soils. British Geological Survey data confirms that a significant proportion of the site will have severe constraints for infiltration.

Where declarations have been made for a limited number of tests, these are on higher parts of the site that which differs by circa 50m in levels from west to east. As a footnote, many of the tests are interpolated and should be rejected in line with CIRIA guidance.

In this respect, a suggested condition by Yorkshire Water, is both Ultra Vires and contradictory, first ruling out connections to sewer and then giving a limited discharge in a second paragraph. Connections to sewer cannot be ruled out where a process is to be followed with assessment of infiltration and watercourse connection through consultation with the LLFA only.

It should be noted that on previous application 2018/90748 as stated in the Flood Risk Assessment that Yorkshire Water previous advised that despite large areas of the existing site proven to discharge to the public sewer network, a reduced allowance in excess of Kirklees Brownfield Drainage policy and guidelines was advised simply due to the limitation of the existing pipe sizes that would cause on site flooding above a given flow rate. The LLFA agrees with this on its comments under the same application where discharge rates of 27l/s and 61l/s (88l/s in total) were set out. This should be adhered to on this application.

An indicative drainage plan showing infiltration swales, detention ponds and crate storage should therefore be ignored. Despite being indicative Kirklees LLFA are concerned that no indication of overland flow routes for the existing site has been assessed in the FRA and therefore shown how this would change potentially through development. In terms of flood risk management, a developer should always look at potential mains drainage and attenuation location and examine blockage scenarios and exceedance events. These should be confined to road networks and open space avoiding property and curtilage. As a result, the FRA is incomplete and should include all the above and other pre-application advice as an official consultation with the LLFA which is also missing from the document.

Treatment of water quality can be considered for this application but is less important given connections need to be to public combined sewer and ultimately will reach a treatment works as

opposed to a connection to a watercourse. Where there are 50 or more concentrated parking spaces and interceptor, or SUDS alternative will be required for this specific area. Any end use that has a canteen or commercial food preparation areas will require Fats, Oils and Grease mitigation.

Section 106 Unilateral Undertaking to ensure maintenance and management of any accepted surface water scheme will apply to this site.

**Kirklees LLFA would like to be reconsulted when the above information is taken into account in a submitted FRA.**