

Consultation Response from KC, Lead Local Flood Authority		
2020/92546 Land off, Blackmoorfoot Road and Felks Street, Crosland Moor, Huddersfield, HD4 7AD		
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.		
Date Responded: 14th March 2021	Responding Officer: Paul Farndale	Responding Ref:

Further to our comments of 3rd November 2020 FURTHER INFORMATION IS REQUIRED.

On-site drainage

It is noted an indicative drainage/layout plan has been provided showing that with previously agreed discharge rates of 27l/s and 61l/s, surface water attenuation can be provided on site incorporating the stated number of properties/units. Detailed design conditions for drainage can therefore apply.

Off-site drainage

We strongly advise the planning officer to engage with Highways DC regarding Felks Stile Road, the proposed access and the existing drainage regime for the highway. Kirklees has records of a drainage ditch only to the south side of Felks Stile Road. Levels shown in the submitted Flood Risk Assessment suggest there is natural drainage from FI into the field.

We require information on the potential road upgrade for Felks Stile Road (section 38/278) and any modernisation of the drainage of the existing highway.

Flood Routing

The inclusion of an entrance at this point is likely to allow a surface water flood route into the site that currently does not occur. This must be fully assessed in the initial flood risk assessment as access is to be decided upon. In the first instance we would look for such a route from outside the site to be avoided if practicable and flood risk will not increase elsewhere.

We agree that localised depression showing surface water ponding are minor and can be eliminated by simple re-profiling. However, the FRA must examine general topography and look at the exiting fall of the site and therefore overland flow on saturated land. This should inform even an indicative site plan to ensure that if gullies were blocked or we experienced an exceedance events for gullies, drains and attenuation, that water would flow safely via the road network and open space and NOT through curtilage. This piece of work must go on to inform the final design and NOT have the design dictate and compromise flood routing. There is no evidence this has been considered. This cannot be conditioned at the moment.

Other matters

The use of Fat, Oil and Grease interceptors for any commercial/large scale food preparation aspects of the development can be conditioned.

A plan to minimise increased flood risk and pollution post site strip and through various construction phases can be conditioned.

The need for an interceptor in parking areas 800 sq m and over or 50 spaces and over can be conditioned.

Section 106

As with all major applications the LPA has an obligation to ensure the maintenance and management of SUDS systems for the lifetime of the developed site. It is practice in Kirklees to ensure a maintenance company is set up to carry out this task.

Details of a suitable maintenance and management risk assessment and method statement including

safe access to and into any attenuation features, an itinerary, schedule and assignment of responsibility is expected to be produced and bolted on to the section 106 agreement before development commences. A clause to make the maintenance aspect of drainage carried out by the management company void upon adoption of the infrastructure by Yorkshire Water should be included in the agreement.