

Public Document Pack



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Monday 27 November 2023

Notice of Meeting

Dear Member

Overview and Scrutiny Management Committee

The **Overview and Scrutiny Management Committee** will meet in the **Council Chamber - Town Hall, Huddersfield** at **2.00 pm** on **Tuesday 5 December 2023**.

This meeting will be webcast live and will be available to view via the Council's website.

The items which will be discussed are described in the agenda and there are reports attached which give more details.

A handwritten signature in black ink, appearing to read "Julie Muscroft", on a light background.

Julie Muscroft

Service Director – Legal, Governance and Commissioning

Kirklees Council advocates openness and transparency as part of its democratic processes. Anyone wishing to record (film or audio) the public parts of the meeting should inform the Chair/Clerk of their intentions prior to the meeting.

The Overview and Scrutiny Management Committee members are:-

Member

Councillor Elizabeth Smaje (Chair)

Councillor Bill Armer

Councillor Andrew Cooper

Councillor Jo Lawson

Councillor Shabir Pandor

Agenda

Reports or Explanatory Notes Attached

Pages

1: Membership of Committee

To receive apologies for absence from those Members who are unable to attend the meeting.

2: Minutes of Previous Meeting

1 - 8

To approve the Minutes of the meeting of the Committee held on 24th October 2023.

3: Declaration of Interests

9 - 10

Members will be asked to say if there are any items on the Agenda in which they have any disclosable pecuniary interests or any other interests, which may prevent them from participating in any discussion of the items or participating in any vote upon the items.

4: Admission of the Public

Most agenda items take place in public. This only changes where there is a need to consider exempt information, as contained at Schedule 12A of the Local Government Act 1972. You will be informed at this point which items are to be recommended for exclusion and to be resolved by the Committee.

5: Deputations/Petitions

The Committee will receive any petitions and/or deputations from members of the public. A deputation is where up to five people can attend the meeting and make a presentation on some particular issue of concern. A member of the public can also submit a petition at the meeting relating to a matter on which the body has powers and responsibilities.

In accordance with Council Procedure Rule 10, Members of the Public must submit a deputation in writing, at least three clear working days in advance of the meeting and shall subsequently be notified if the deputation shall be heard. A maximum of four deputations shall be heard at any one meeting.

6: Public Question Time

To receive any public questions.

In accordance with Council Procedure Rule 11, the period for the asking and answering of public questions shall not exceed 15 minutes.

Any questions must be submitted in writing at least three clear working days in advance of the meeting.

7: Kirklees Active Leisure - Update

11 - 28

The report provides a briefing on the early analysis of the Leisure Centre Consultation. The Committee's views will be sought in respect of the Cabinet report about the future Leisure Centre offer, which will be published on 4th December 2023 and considered by Cabinet on 12th December 2023.

Contact:

Adele Poppleton – Service Director for Culture and Visitor Economy

8: Financial Management - Update

The Committee will receive an update on the current position from the Service Director, Finance with reference to the Quarter 2, 2023-24 Corporate Financial Monitoring Report.

Contact:

Isabel Brittain – Service Director, Finance.

9: Local Flood Risk Management Strategy

29 - 294

The Committee will consider a report in respect of the new Local Flood Risk Management Strategy 2024.

Contact:

Paul Farndale – Flood Team Leader, Planning and Development

10: Communications Strategy Update 2024 295 - 310

The report introduces the Communications Strategy Update 2024 and Members comments are invited.

Contact:
Marcus Bowell – Head of Strategic Communications

11: Lead Members' Updates 311 - 322

The Lead Members for the Environment and Climate Change Scrutiny Panel and the Growth and Regeneration Scrutiny Panel will update the Committee on the work being undertaken by their panels.

Contact:
Sheila Dykes – Principal Governance Officer.

12: Work Programme 2023/24 323 - 330

The latest version of the Committee's Work Programme for 2023/24 will be considered.

Contact:
Sheila Dykes – Principal Governance Officer

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Contact Officer: Sheila Dykes

KIRKLEES COUNCIL

OVERVIEW AND SCRUTINY MANAGEMENT COMMITTEE

Tuesday 24th October 2023

Present: Councillor Elizabeth Smaje (Chair)
Councillor Andrew Cooper
Councillor Moses Crook
Councillor Jo Lawson

Apologies: Councillor Bill Armer

35 Membership of Committee

Apologies were submitted on behalf of Councillor Bill Armer.

**36 Minutes of Previous Meeting
Resolved –**

That the Minutes of the meeting of the Committee held on 5th September 2023 be approved as a correct record.

37 Declaration of Interests

No interests were declared.

38 Admission of the Public

All items were considered in public session.

39 Deputations/Petitions

A deputation was received from Carl Mason in relation to the proposed closure of Colne Valley Leisure Centre.

A response was given by the Cabinet Member with responsibility for the Finance and Regeneration Portfolio.

40 Public Question Time

Under the provisions of Council Procedure Rule 11, the following questions were received:

1. At the Kirklees Cabinet meeting of 26th September 2023 a report was presented, the title of which was “Kirklees Active Leisure Centre Offer 2024/25 – Consultation”, Section 2.3 of this report explains how KAL delivers services to over 65k registered customers and received 2.5m customer visits in 2022/23, why then does the consultation booklet produced by the Council only attribute 22,391 members to these visits, the effect of this is misleading to the public by vastly underestimating the number of customers who use these vital community assets and could be affected by any closures?

2. Section 2.8 of the same report sets out a review programme which started in June 2023, nowhere in this discovery phase does it mention reviewing the willingness and or ability for people to pay additional fees to support the centres, likewise the same question has not formed part of the consultation, why have the people of Kirklees not been asked if they are willing to financially support these vital community assets with a change in the fees structure?

Responses were provided by the Cabinet Member with responsibility for the Finance and Regeneration Portfolio.

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Leader of Council - Priorities

Councillor Cathy Scott, the Leader of Council, was welcomed to the meeting to talk about her priorities for 2023/24.

She explained that a new Council Plan was in development and would be finalised in early 2024. She set out her four core priorities as follows:

- **Address the financial position in a fair and balanced way.**
Balancing the budget was the most pressing challenge, against the background of funding issues affecting local authorities across the country and the economic pressures. This would necessitate some difficult decisions and the aim was to do this in a transparent, fair and balanced manner. There was a need to protect the most vulnerable and to continue to assist residents in respect of the cost of living. The impact of decisions would be assessed, and the Council would lobby for changes to the funding system.
- **Strive to transform Council services to become more efficient, effective and modern.**
Limited resources would be used as efficiently and effectively as possible. This would include work on early intervention and prevention, and safeguarding. The Council would continue to work with partners to avoid duplication and share knowledge and resources. The work already being done to deliver and improve services, such as in adult social care and children's services, would continue.
- **Continue to deliver a greener, healthier Kirklees and address the challenges of climate change.**
This would include the prioritisation of delivery of an environmental strategy and net-zero commitments. Progress would be pursued in respect of energy, waste, and improvements to green spaces. There would be a continued focus on prevention work in health services, alongside partners.
- **Continue to invest and regenerate our towns and villages to support our diverse places and communities to flourish.**
This priority addressed the need to build resilience for local people. Aiming to ensure the necessary infrastructure was in place to offer opportunities for the future and to bring investment into the district. It would include improving housing. This would be undertaken prudently, and the Capital Programme was flexible to allow the plans to be responsive to changing conditions and challenges.

Questions and comments were invited from Committee Members, with the following issues being covered:

- The Cabinet's agenda was 'to do with, not to' and to enable and support local communities. The Leader would own the priorities. It was important that there

was a clear vision but there had to be fluidity in the approach to facilitate a response to external pressures.

- It was suggested that there would be value in the Council looking at Climate Emergency UK's Action Scorecards as a useful tool to help demonstrate its action on climate change; the Council had been rated below average by this organisation. It was explained that the Council had responded to the score it had been given by Climate Emergency UK but this had not been reflected in the published version.
- The Council had been the first local authority to receive an award from the Royal Meteorological Society for its work in this area.
- The Carbon Disclosure Project (CDP) score was due to be published shortly and an improvement on last year's rating, of B, was anticipated. This score was widely recognised as an important measure in terms of climate impact.
- It was noted that the Environment and Climate Change Scrutiny Panel was to look at the issue of air quality at their meeting the following day.
- Reports would be submitted to Cabinet in respect of the work to achieve the priorities, including risk assessments and timelines, so that progress towards targets would be in view.
- The impact on the Council's staff of the current financial position and the negative narrative in the press was acknowledged and it was very important that they were provided with the necessary support and reassurance; systems and packages were in place to do so.
- The assurance in respect of the need to build economic resilience and to protect the most vulnerable was welcomed.
- In respect of the investment into towns and villages, there were a number of current investment zones and there had been a recent Government announcement about funding for Dewsbury of £20 million over a ten-year period. There were still opportunities to deliver on the Council's blueprints and other regeneration plans, albeit that this may have to be through a phased approach.
- The importance of effective consultation, the correct information being in place, and ensuring that everyone has a fair opportunity to respond was stressed.
- The feedback provided and the impact of each decision would be considered as part of the process.
- With regard to the continuation of ward-based budgets, no decisions had been made at this point. This funding was much valued by ward councillors and could be used as 'seed funding' in certain instances. The role of ward councillors as leaders within their communities and their ability to enable and support them, in conjunction with partners and volunteers, or in signposting to relevant funding opportunities was vital.

Resolved –

(1) That the Leader be thanked for attending the meeting and that she be invited to return to the Committee, at an appropriate time, to give an update on progress with her priorities.

(2) That it be noted that the Environment and Climate Change Scrutiny Panel will be looking at climate change and that the points raised be taken forward by the Lead Member as appropriate.

Overview and Scrutiny Management Committee - 24 October 2023

The Director of West Yorkshire Joint Services (WYJS), Andy Robson, attended the meeting and gave a presentation about the work of the organisation, with a particular focus on work within Kirklees. A briefing note had been included with the agenda for the meeting which explained that WYJS delivered a number of shared services, including a number of statutory services, on behalf of the five West Yorkshire Councils.

Information relating to specific cases within the district was provided to members as background information. This briefing note, Appendix 2 to the report, was private, in accordance with Schedule 12A Local Government Act 1972, as amended by the Local Government (Access to Information) (Variation) Order 2006, in that it contained information relating to an individual/individuals and information which is likely to reveal the identity of an individual.

The following points were highlighted in the presentation:

- Kirklees' financial contribution was based on its proportion of the West Yorkshire population and was approximately £821,000 per annum, equivalent to £1.90 per head.
- A modernisation agenda was being pursued, whilst ensuring that the core activities were maintained and linking into the priorities of the West Yorkshire districts.
- The Trading Standards service had an excellent reputation at national level, but funding was challenging; funding in other areas of the country was much higher per head.
- The current financial challenges facing many local authorities were acknowledged.
- Resources had to be prioritised and the approach was intelligence-led enforcement.
- Work was undertaken to disrupt the activities of those who targeted and scammed vulnerable people, with the aim of trying to ensure those vulnerable individuals could live independently at home for as long as possible, which would help to reduce the burden on local authorities.
- The recent challenges associated with the cost-of-living had meant that the organisation had focussed on issues in respect of fuel and food businesses, in order to protect both citizens and businesses.
- The Archives Service also had a fantastic reputation and was also a leader in the field of moving, packaging and labelling collections. There were challenges associated with the suitability of some of the current Council accommodation where archives were being housed.

Questions and comments were invited from Committee Members, with the following issues being covered:

- Work was being undertaken with the relevant Kirklees officers to address the issues with the archive accommodation but there was a need for some elements to be dealt with as soon as possible.
- The Asbestos Service provided a service to local authorities and efforts were being made to extend this to those that did not currently use WYJS. The service was also trying to compete commercially in the marketplace, where there could

be issues with economies of scale and, potentially, viability concerns in the longer term.

- In terms of the level of resourcing for the work of the Trading Standards Service, the intelligence-led approach meant that action was directed to where intelligence reports/complaints had been made. If more funding was available then this would facilitate the undertaking of more pro-active and preventative enforcement work. In respect of addressing the sale of illegal and unsafe tobacco products or vapes, that were often targeted towards young people, this could include initiatives such as the use of test purchasing by minors or a programme of surveillance across the wider business community.
- The intelligence-led core service in West Yorkshire was very effective.
- Educational work and early interventions could reap benefits in the longer term. The organisation did work with partners, within the confines of the resources available, and asked them to signpost and relay messages on its behalf.
- It was noted that the costs incurred by people who were successfully prosecuted for selling illicit tobacco did not compare to the street value of the items being sold.
- National resources were accessed in respect of specialist dogs used to sniff out illicit tobacco products, the suggestion that the service/the Police might benefit from having their own trained dog could be considered.
- Community engagement, to raise awareness and offer advice in respect of scams and fraud, was an important element and ideally there would be more capacity to do so. The impact on vulnerable victims and the barriers to reporting were recognised. Requests for engagement with particular groups could be considered and would be prioritised if there was intelligence to indicate that this may be valuable in a particular community.
- The quality of the archive service was excellent.

Councillor Davies, the relevant Cabinet Member and Portfolio Holder, gave assurances that the position in respect of the current accommodation for the archives had been discussed with WYJS and a plan was in place to address the issues.

Resolved –

(1) That the Director of West Yorkshire Joint Services be thanked for attending the meeting to report on the work of the organisation in Kirklees.

(2) That copies of the ‘Little Book of Big Scams’ be shared with the Committee.

43

Cost of Living Programme - Update

Councillor Paul Davies, the Cabinet Member and Portfolio Holder, introduced a presentation which provided an update on the work being undertaken as part of the Council’s Cost of Living Programme. He drew Member’s attention to a report recently published by the Joseph Rowntree Foundation in respect of destitution in the UK and its impacts, which provided some context for the work being undertaken in Kirklees.

The presentation, by Lucy Wearmouth, Head of Improving Population Health and Stephen Bonnell, Head of Policy, Partnerships and Corporate Planning, highlighted the following points:

- The three priorities within the programme:
 - (i) Emergency Response: focussing on those people already in crisis.
 - (ii) Resilience: focussed on building places where people look after each other.
 - (iii) Prevention: acting now to address the medium and long-term challenges and prevent future economic crisis.
- Programme Delivery and Governance, which included a Programme Board which brought together those Council services aligned to each of the priorities on a monthly basis and which reported to the relevant Portfolio Holder and Strategic Director and then fed through to Cabinet, Council and Executive Team.
- The Challenges; including the complexity of addressing the issue, the impact of persistent poverty, reaching those in need, and the pressure on resources and finance.
- The Successes; including the establishment of ten sustainable 'The Bread and Butter Thing' hubs, the use of ward budgets to support cost-of living initiatives; and the management of £14.8 million of funding through the Household Support Fund.
- A case study illustrating the impact for the community and benefits for those involved as volunteers.

Questions and comments were invited from Committee Members, with the following issues being covered:

- Existing hubs had been utilised as 'warm spaces' and although, in practice, it had appeared that people would rather have assistance to allow them to stay at home, this use had contributed to creating networks within areas which had been beneficial in building connections and knowledge of what was available. It was acknowledged that such provision worked best when it also had a purpose such as access to activities or support.
- In response to a question about whether more could be offered in the area of benefits advice/advocacy it was explained that there was a wish to develop more support and signposting, using existing facilities where possible. The Council had a small Advocacy Team and also had a contract with Kirklees Citizen's Advice Bureau and Law Centre. The ways in which advice could be delivered in the future was under consideration and the views of Members would be welcomed.
- The Council response to the impact of the increased cost of living was commended, as well as the support provided by numerous community groups. It was noted that additional benefits also resulted from some initiatives, such as the saving of food from landfill, that contributed positively to other Council priorities.
- Further extension of 'The Bread and Butter Thing' would be welcomed. In addition to its core purpose, this model was also valuable in terms of building connections and friendships between those volunteering, and it was suggested that it might also offer opportunities to provide financial advice and support.
- Prevention was a key aspect to this work; breaking the cycle of poverty, developing resilience in communities and developing community wealth building.

This approach was being actively pursued alongside the Combined Authority and the third sector.

- 98 grants, from the Household Support Fund, had been provided to local community groups via One Community; there was a broad spread across North and South Kirklees. It was recognised that some smaller groups might find it difficult to make a bid, but One Community took a relatively 'light touch' approach.
- Delivery of the initial funding from the West Yorkshire Mayor's Fund had been analysed and the Kirklees model; the way it had been allocated and used, had been found to be strong.
- There were concerns about smaller groups understanding that they were able to access funding and how to apply. In some cases, they may not be specifically labelling what they did but were nevertheless achieving appropriate goals.
- There was a need to give consideration to widening the provision of information and signposting, on the help and support available, beyond the main hubs.

Resolved –

That the comments of the Committee be taken on board in future work on the Council's Cost of Living Programme.

44 Corporate Property Strategy

The Committee received a report which provided a summary of the approach to property asset management, and the use of good practice in developing and bringing forward the Council's Corporate Property Strategy.

Councillor Graham Turner, the Cabinet Member and Portfolio Holder, introduced the presentation given by Daniel McDermott, Strategic Manager, Assets and Estates, and Joanne Bartholomew, Service Director – Development. The following points were highlighted:

- The aim of the Strategy was to provide a fit for purpose, modern, effective and efficient estate to support and facilitate Council services; promote and enable the Council's corporate priorities; and link and collaborate with key strategic partners and local interest organisations and groups.
- The approach followed good practice and the RICS professional standard for strategic asset management of local authority assets.
- The strategy was at a formative stage, and the key steps for the process to be taken in bringing it forward:
 - Definition
 - Context
 - Standards
 - Policies
 - Application
- Disposal of surplus and unused land and property assets was not only a response to the financial position but was also Government policy. A holistic review was in progress which was taking a core estate approach.

Questions and comments were invited from Committee Members, with the following issues being covered:

- The strategy being at an early stage did not prevent the authority taking considered and transparent decisions on the disposal of land and building assets, as it had done in the past. A process had been undertaken to ensure that there was an understanding of which assets were being utilised to their full effect, the necessary geographical spread in terms of service delivery, and the Capital Plan, revenue and maintenance budgets in respect of the ongoing needs of each asset, prior to proposals being brought forward. All service delivery buildings would have an Integrated Impact Assessment associated with them.
- Consultation would take place in respect of any alternative service delivery prior to decision.
- Regular reviews would be undertaken and reports taken to Cabinet as appropriate.
- It was anticipated that the strategy would be in place in 2024. There were existing, approved, policies and procedures in place that were being followed, the strategy aimed to bring these together. Assurance was given that these were fit for purpose for the decisions that had been/were being undertaken.
- Key stakeholders included both local and regional NHS, blue light services and more local organisations and partners.
- Engagement would be undertaken with local organisations and Ward Councillors about proposals for future use of building assets, where appropriate, and taking account of commercial sensitivities. Land could be more complex and may involve the Planning Authority which had a significant reach in terms of engagement with the public.
- It was noted that the Authority had a duty to seek to achieve best value in disposing of assets; this could include consideration of the end use of an asset.
- Consideration of internal need and possible future need would be taken into account when developing the core estate. The use of a building if converted, such as to meet a need for housing, would also be considered.

Resolved –

That the strategy be brought back to the Committee for further consideration at an appropriate point.

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Work Programme 2023/24

The latest version of the Committee's Work Programme for 2023/24 was considered and noted.

KIRKLEES COUNCIL				
COUNCIL/CABINET/COMMITTEE MEETINGS ETC				
DECLARATION OF INTERESTS Overview & Scrutiny Management Committee				
Name of Councillor				
Item in which you have an interest	Type of interest (eg a disclosable pecuniary interest or an “Other Interest”)	Does the nature of the interest require you to withdraw from the meeting while the item in which you have an interest is under consideration? [Y/N]	Brief description of your interest	

Signed: Dated:

NOTES

Disclosable Pecuniary Interests

If you have any of the following pecuniary interests, they are your disclosable pecuniary interests under the new national rules. Any reference to spouse or civil partner includes any person with whom you are living as husband or wife, or as if they were your civil partner.

Any employment, office, trade, profession or vocation carried on for profit or gain, which you, or your spouse or civil partner, undertakes.

Any payment or provision of any other financial benefit (other than from your council or authority) made or provided within the relevant period in respect of any expenses incurred by you in carrying out duties as a member, or towards your election expenses.

Any contract which is made between you, or your spouse or your civil partner (or a body in which you, or your spouse or your civil partner, has a beneficial interest) and your council or authority -

- under which goods or services are to be provided or works are to be executed; and
- which has not been fully discharged.

Any beneficial interest in land which you, or your spouse or your civil partner, have and which is within the area of your council or authority.

Any licence (alone or jointly with others) which you, or your spouse or your civil partner, holds to occupy land in the area of your council or authority for a month or longer.

Any tenancy where (to your knowledge) - the landlord is your council or authority; and the tenant is a body in which you, or your spouse or your civil partner, has a beneficial interest.

Any beneficial interest which you, or your spouse or your civil partner has in securities of a body where -

- (a) that body (to your knowledge) has a place of business or land in the area of your council or authority; and
(b) either -

the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or
if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you, or your spouse or your civil partner, has a beneficial interest exceeds one hundredth of the total issued share capital of that class.



Name of meeting: Overview and Scrutiny Management Committee

Date: 5th December 2023

Title of report: Leisure Centre Review Update

Purpose of report: To brief the Overview and Scrutiny Management Committee about the early analysis of the Leisure Centre Consultation Programme and seek the views of the committee re the Cabinet report about the future Leisure Centre offer which will be published on 4th December 2023. The committee's views will be reported to the Cabinet when they meet to decide upon the future Leisure Centre offer to be delivered by Kirklees Active Leisure on 12th December 2023.

Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	Yes
Key Decision - Is it in the <u>Council's Forward Plan (key decisions and private reports)</u>?	Yes Private Report/Private Appendix – No
The Decision - Is it eligible for call in by Scrutiny?	Yes
Date signed off by <u>Strategic Director</u> & name Is it also signed off by the Service Director for Finance? Is it also signed off by the Service Director for Legal Governance and Commissioning?	Richard Parry – Adults and Health 23.11.2023 Isabel Brittain 23.11.23 Julie Muscroft 24.11.23
Cabinet member portfolio	Cllr Graham Turner – Regeneration and Finance

Electoral wards affected: All

Ward councillors consulted: None

Public or private: Public

Has GDPR been considered? Yes - Not applicable

1. Background

Kirklees Active Leisure (KAL) delivers leisure services across 11 sites in Kirklees to over 65k registered customers. It received 2.5m customer visits during 2022/23. It also provided swimming lessons for over 136 schools in its 8 pools, as well as 2 pools located at Huddersfield school sites.

Leisure services throughout the UK are facing unprecedented financial challenges. In November 2022, ukactive stated that “three quarters (74%) of council areas are classified as ‘unsecure’, meaning there is risk of the closure of leisure centres and/or reduced services before 31 March 2024.” In particular, the operating costs of public swimming pools have increased significantly over the past few years.

KAL is mirroring the national picture. Due to a combination of salary cost pressures that have built up over time as National Living Wage has increased and more recent inflationary, energy and other operational costs, the challenge for Kirklees Active Leisure (KAL) to operate in a financially sustainable way has increased and even with the recovery of income and membership numbers to above pre-Covid levels, there continues to be a financial challenge. From 2021/22 to 2023/24, the council has provided additional financial support of £9.96m to support KAL through these difficult periods. This is in addition to the council’s core funding of £6.08m and a Sport England Grant of £1.175m across the same periods.

As part of the council’s need to balance its budgets during the current financial situation and the cessation of the additional Covid support funding, the council has indicated that it will make available a maximum grant/subsidy of £2.55m in 2024/25 as stated in the 2023 Budget Book and that it is unable to provide additional financial support.

KAL has replied that it cannot continue to maintain its operations at the same level as twelve months ago. After temporary closures in early 2023 as an emergency response to KAL’s financial challenges, there has been a transformation programme in place to collate information about finances, health inequalities, legal issues, benchmarking information and capital investment needs. KAL proposed options for what it could afford to deliver in late July 2023 which were considered and led to a proposal about which the council chose to consult citizens during 29th September to 12th November 2023.

Whilst the consultation has been undertaken, KAL and council officers have continued to work together to collate the information which the Cabinet will need to take a decision regarding the future offer. KAL has remodelled its finances to reduce expenditure and increase charges, where appropriate.

Leisure centres form one part of the infrastructure that enable local people to be active. Some elements of the provision of a leisure centre, such as gyms and fitness classes, can, potentially, be provided through the wider market and alternative providers, although often at a significantly higher cost. Should the KAL offer be reduced, the biggest impact will be in relation to water space as there is little publicly accessible water space being provided by other operators. If the reduction in the public leisure offer is confirmed, it is important that other aspects of our built and natural environment are optimised to ensure that alternative opportunities to be physically active are accessible to all our citizens. This will be particularly important in communities affected by proposed closures. The next phase of the Leisure Centre Review Programme will focus on the future vision of sport and physical activity in Kirklees to ensure our citizens have a wide choice of activities.

2. Consultation

The Council has carried out a comprehensive consultation for a period of six weeks on proposals for the future of all sites currently operated by Kirklees Active Leisure. The consultation was open to all including non-users of KAL centres. 17,860 respondents have completed the survey. Letters of support were also received from national, regional and local organisations, as well as from individuals (Please see Appendix 1 below). The qualitative findings are currently being analysed and will be available to support the decision making at cabinet. Although the consultation results are an important part of the decision making process, they are not the only information which will determine the final decision. Also to be taken into consideration is financial data, an Integrated Impact Assessment, capital investment needs, legal issues and health inequalities data.

A brief overview of initial data is available in *Appendix 2*. The full analysis will not be completed until 30th November 2023, after the publication of this report, and so the results may change.

For the consultation, the estate was split into three categories:

1. **The core offer** - the sites that it is proposed will stay open given that they are modern buildings with a comprehensive offer and limited capital investment is required compared to other sites.
 - i. Huddersfield Leisure Centre
 - ii. Spen Valley Leisure Centre
2. **Marginal sites** – the sites which it is currently considered are most likely to remain open in 2024 whilst other funding and management options are explored because they require a low financial contribution from the council and/or have fewer capital requirements and/or there are other factors that influence decision making in the short term. If they begin to require more financial investment from the council or factors influencing their long term future change, these sites could close at a later stage. These are:
 - i. Bradley Park Golf Club
 - ii. Deighton Sports Arena
 - iii. Holmfirth Pool & Fitness Centre
 - iv. Leeds Road Sports Complex
 - v. Stadium Health & Fitness Club
3. **Potential closures** – sites which it is currently considered are least likely to remain open in 2024 because they require significant financial investment from the council to operate and/or require significant capital investment and/or there are other factors that influence decision making. These are:
 - i. Batley Sports & Tennis Centre
 - ii. Colne Valley Leisure Centre
 - iii. Dewsbury Sports Centre

To ensure inclusivity, alongside accessing the consultation online, paper copies of the consultation and supporting booklet have been available at all the KAL sites and Huddersfield and Dewsbury Customer Service Centres. Facilitated drop-in sessions were held throughout the borough, both at leisure centres and other venues to support citizens who needed support to complete the survey.

A series of discussion groups with citizens who have protected characteristics were held to identify any potential impacts that any changes to the leisure offer may have on them plus there was targeted promotion of the consultation to community and voluntary sector groups especially those who work with young people and older people.

Alongside the consultation, an Integrated Impact Assessment is being completed, informed by the consultation, to assess the impact of proposed changes to the leisure offer. This considers the equality impact, covering the nine protected characteristics as set out in the Equality Act 2010. This will be available to support decision making by the Cabinet.

3. Implications for the Council

Due to the ongoing economic pressures, sustaining the leisure offer in its current format is not financially viable for KAL or the council. To ensure financial milestones are met, the Cabinet must take a decision on the leisure centre offer on 12th December 2023.

A decision will need to be made around the future of sites once the leisure offer which KAL will deliver has been agreed. A financial picture is being collated and key stakeholders have been working to ensure all details and complexities are considered.

The changes to the estate will impact significantly on KAL staff, with the charity having to reduce significantly in size to remain viable. In order to achieve this reduction prior to the 2024/25 financial year and due to the associated cash risk attributed to uncontrollable costs and potential drop in income, KAL has begun the legally required statutory redundancy process. As part of the funding

agreement between KAL and the council, KAL must mitigate against redundancies as far as possible but the council is financially liable for the costs.

4.1 Working with People

The consultation has been about listening to the views of our citizens which will be taken into account when the Cabinet takes the decision about the future leisure centre offer. It has successfully identified future partners who want to work with KAL to ensure the financial viability of certain sites, e.g. a group of campaigners in the Colne Valley who want to work with KAL to try to identify new sources of income and to fundraise to improve the centre.

Officers have been responding to ideas proposed by consultees to check their feasibility. For example, suggestions for mitigations for centres which KAL may withdraw from included the use of community transport to support citizens to access centres further away from their usual site. Initial scoping has been undertaken. Due to how people use leisure centres, footfall and locations, it would be difficult to meet the needs of users. There are also complexities in relation to licenses or permits needed. Further work is suggested to ascertain if this is a viable option.

4.2 Working with Partners

KAL has managed the leisure stock in Kirklees since 2002. Following any changes to the offer, it remains determined to re-grow and re-develop the local leisure offer. It has highlighted its determination to work with Kirklees Council to continue to provide high quality opportunities for local people to improve their physical and mental health and wellbeing.

School swimming is a particular area that the process has tried to consider. To deliver school swimming in its current model, a minimum of two pools are needed in North Kirklees and four in South Kirklees (this includes two school pools). KAL and the council will work with schools to mitigate the impact of any closure of pools.

4.3 Place Based Working

Other potential operating models could be asset transfers to the Community where there is interest and a viable business case can be made. This could provide opportunities for the centres to be run by the community, using their collective experience and information to allocate resources in the best possible way to achieve the best outcomes for residents. We will work with communities and Councillors to respond and support this interest if it happens at an appropriate pace.

Any such proposition, however, would have to be without financial support from the Council and, given the timescales for such a transfer to take place, would require an interim closure pending an asset transfer which would entail additional costs for the council and be only achievable if the Council has the resources to manage the process.

4.4 Financial, HR, Communications issues (including value for money)

A site by site analysis using the budget for 2023/24 of each of KAL's current facilities has been thoroughly reviewed which will support any decision made. A comparison of this budget to the pre-Covid budget for the same facilities in 2019/20 shows that reasonable assumptions have been used in constructing the latest budget (the key changes include staffing costs, which have been affected by the increase in the National Living Wage and Energy Costs which have been affected by the significant inflationary changes). Income is slightly above pre-Covid levels.

There is no statutory duty to provide swimming pool facilities, but the council has a discretionary duty to do so. However, the Council must exercise its functions with a view to securing the National Curriculum in maintained schools. Maintained schools must provide swimming instruction for pupils either in key stage 1 or key stage 2, with pupils required to be able to:

- Perform safe self-rescue in different water based situations
- Swim competently, confidently and proficiently over a distance of at least 25 metres

- Use a range of strokes effectively, for example, front crawl, backstroke and breaststroke.

Subject to the Council accepting that KAL will withdraw from some of the sites, consideration will need to be given to the future of these facilities. In the meantime, however, there will be holding costs for those sites which, inevitably, the Council will need to fund as KAL will be unable to cover these costs from their core grant.

In either case, there is no funding specifically earmarked to meet these costs at this stage. As this is the case, any decision to close the facilities needs to be supported with a clear strategy about the future of the sites so that any holding costs are minimised wherever possible.

If KAL withdraws from any sites, KAL will mitigate redundancies as far as possible but it is likely that there will need to be redundancies. In line with the funding agreement between the two parties, the council is liable for these redundancy costs. More work is required to provide a firm estimate of costs once there is clarity about which facilities will close and which staff will be affected.

5 Proposed approach:

Phase 1

Using the consultation and key stakeholder feedback, financial analysis and all other information we have been collating, recommendations and options will be discussed by Cabinet on 12th December 2023. They will decide what the leisure centre offer will be from 1st April 2024 to be delivered by KAL.

Phase 2

Once the leisure centre offer has been agreed by the Cabinet, phase 2 will continue to move towards implementation of the changes to the estate in partnership with KAL. In relation to the sites which KAL is withdrawing from, a process for disposal will be agreed. Disposal can potentially involve Community Asset Transfers or inviting expressions of interest from 3rd party operators.

Phase 3

A strategic approach to sport and physical activity will be developed in 2024, with the local leisure centre offer as part of this. Time will be given to KAL to stabilise its operations after changes have been made and to continue exploring income generating and further cost saving measures.

6 Officer recommendations and reasons

Officers recommend that the Committee notes the content of this report and the early findings of the consultation contained in Appendix 1 whilst accepting that these might change once the analysis has been completed.

The committee's views on the Cabinet report which will be published on 4th December 2023 are sought and these will be verbally communicated to the Cabinet at their meeting.

7 Contact officer

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9. Background Papers

Appendix 1 – Comments from Stakeholders
Appendix 2 - Early results from the analysis of the consultation

Appendix 1

Key Stakeholder Feedback – Summary

Organisation	Summary
Swim England	<p>Expressed concerns at 'core offer' and potential closures of swimming pools across Kirklees.</p> <p>Provided various statistics on swimming in Kirklees which included the following:</p> <p>"Of the 309 local authorities in England with responsibility for provision of swimming pools, only 23 have a larger shortage of water than Kirklees.</p> <p>The closure of additional facilities across the area will almost certainly exacerbate these inequalities, making it harder for people to take part in aquatic activities and increasing the number of children leaving Kirklees schools without this potentially life-saving skill.</p> <p>Swim England's recent Value of Swimming report identified that across the Kirklees local authority area alone, swimming generates over £16.5 million of social value each year. This includes £2 million through improved physical and mental health, and £10 million in improved wellbeing."</p>
Sport England	Offer of an opportunity for a discussion to investigate if there is any wider support that Sport England can provide as KAL and Kirklees Council consider the future leisure centre offer.
ukactive	The trade body for the physical activity sector states that KAL is a highly valued member and that now is the time when there should be investment in "...preventative measures, embracing true partnership between health and physical activity sectors to save more money."
Yorkshire Sport Foundation	Expressed their offer of support to Kirklees Council and reiterated that they have worked with the Council for over 20 years and that they have become increasingly aware that the strategic leadership for physical activity and sport within the Council has both reduced and become dispersed. This has resulted in a reduced capacity to bring in external resources and reduced time spent on long term visioning and planning. Further cemented their support in planning and decision making, especially in relation to using facility planning tools.
Yorkshire Tennis Limited	Letter of support to register appetite to support discussions on retaining the valued indoor courts at Batley Sports and Tennis Centre. YTL is keen to work with Kirklees Council to assess how they could contribute to BSTC to maintain provision
Kirklees Active Schools	Stressed the importance of the leisure centres to supporting schools to achieve aspects of the National Curriculum in relation to swimming.
Third Sector Leaders	Representing the views of their members working in the health and wellbeing field who are concerned that closure of leisure centres will impact on the delivery of their activities. They feel that the closures leading to short term savings will be at the cost of health and wellbeing in the district.
University of Huddersfield	Stated that the university has a partnership with KAL who support their students and staff to be physically active across the borough but also partner in various academic areas with KAL providing opportunities for applied practice, placements and research. Expressed concern that the reduction in provision will lead to increases to costs to other cost centres in the public realm such as health and crime prevention.
Batley & Birstall Excellence in Schools Together	<p>Collectively voicing their strong opposition to the closure of Batley Sports & Tennis Centre. Their schools have been inundated with concerns raised by worried parents regarding the fate of the centre, as many of their children and families use it for sport and leisure activities.</p> <p>Pledge of commitment to support the long term viability of BSTC through a variety of means which includes working closely with KAL, all schools and their network of 21 schools and 8000 households.</p>

West Riding County Football Association Ltd	Expressed concerns at the potential closure of BSTC and wished to start dialogue into the long term future of the site. Reinforced their previous investment of £508,987 investment made by the Football Foundation into the site towards new changing rooms, improvement of grass pitches and 3G artificial pitch, demonstrating the importance of the facility.
Batley Multi-Academy Trust	<p>Expressed concerns at the potential closure of BSTC. Batley Girls' High School use this site in the provision of their PE curriculum and extracurricular activities, as well as being an important community asset for their communities.</p> <p>If they were unable to deliver the PE curriculum from BSTC then 1300 girls would be affected. The extra costs of having to hire facilities, transport and the additional staff needed would exceed £117,000 p.a.</p> <p>Further practical consideration is the fact that utility supplies for BGHS come from BSTC building – all utilities are not separated.</p>
Howden Clough FC – Petition	<p>Howden Clough JFC alone has over 300 children using its facilities per week not to mention the other sporting clubs which include Yorkshire Elite, White Rose and Farsley Celtic. Local schools also use the site as well as the North Kirklees Schools Sports Partnership which delivers physical education to children using these facilities.</p> <p>The purpose of the petition was to tell KAL and Kirklees Council that the people of Birstall, Batley and beyond will not let a huge part of the community go without trying their hardest to save it.</p>
President, on behalf of the committee and members of Bradley Park Golf Club	<p>Submission of comments in support of keeping the golf course open for both the short and long term.</p> <p>Acknowledgment that their positive financial situation should continue in the future as the number of current annual users is maintained or even increased.</p>

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Appendix 2

Leisure Centre Review – Early results from the analysis of the consultation

OSMC
04.12.2023



The Consultation Offer

Core Offer

Huddersfield Leisure Centre
Spen Valley Leisure Centre

Marginal Offer

Bradley Park Golf Centre
Deighton Sports Arena
Holmfirth Pool and Fitness Centre
Leeds Road Sports Complex
Scissett Baths and Fitness Centre
Stadium Health and Fitness Club

Potential Closures

Batley Sports and Tennis Centre
Colne Valley Leisure Centre
Dewsbury Sports Centre



Consultation Overview

29th September to 12th November 2023.

17,860 responses with the majority of online.

Letters of support received from national, regional and local organisations, as well as from individuals

Facilitated and delivered in various forms to ensure it was accessible to all.

7 x Face to Face Drop-In sessions held at:

- Huddersfield Customer Services Centre
- Dewsbury Customer Services Centre
- Colne Valley Leisure Centre
- Batley Sports and Tennis Centre
- Holmfirth Pool & Fitness Centre
- Scissett Baths & Fitness Centre
- Spenn Valley Leisure Centre

Paper copies were available at all KAL sites.



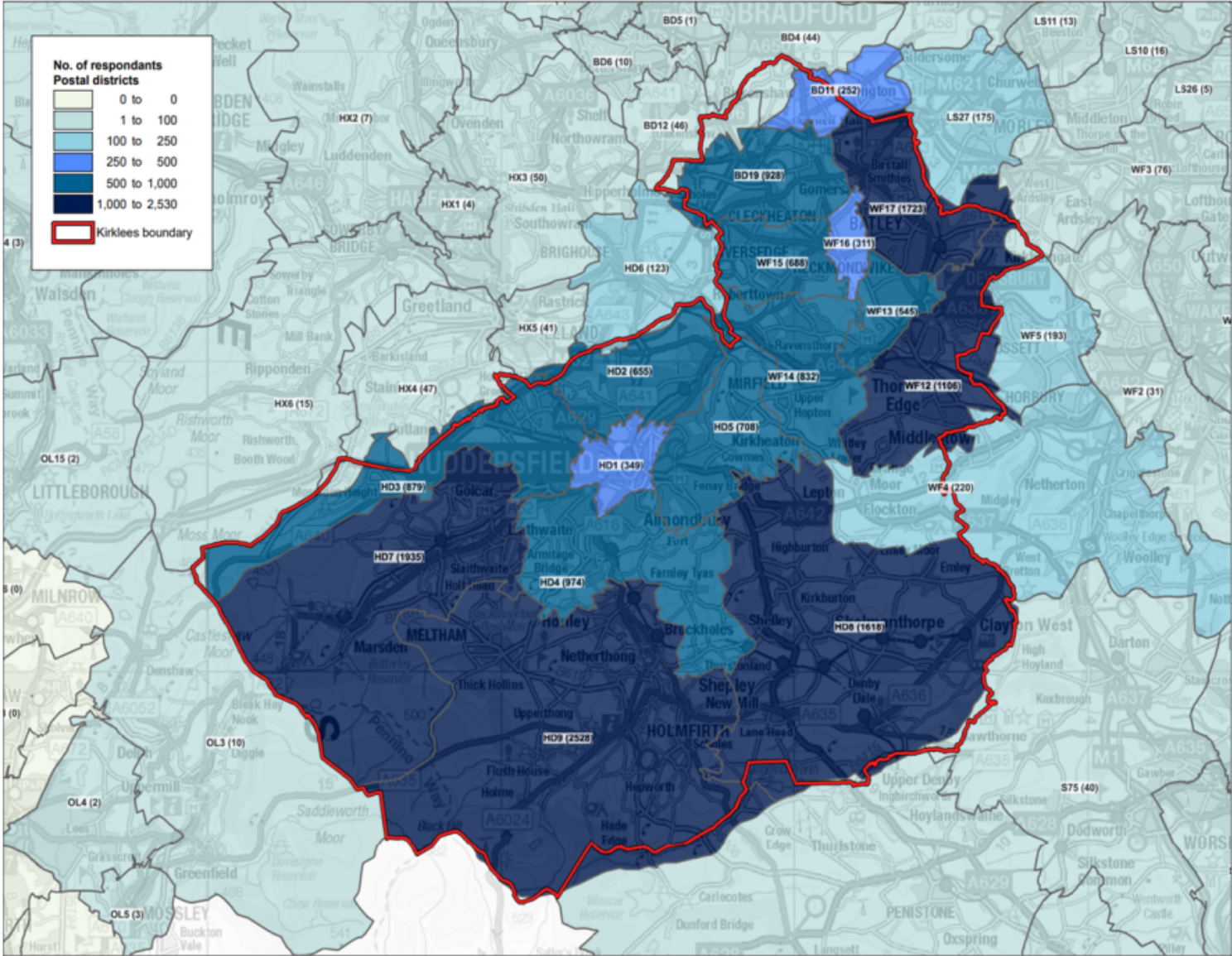
4 x Focus Groups held – Protected Characteristics

- Disability
- Carers
- BAME general
- BAME women only

Targeted promotion with citizens with Protected Characteristics – Young People, Older People



KAL 2023 Survey Respondants, Postal Districts



Data and
Insight
Service

Date:
15/11/2023

Filename:
Proj 3497.WOR

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and database right
2023. Ordnance
Survey
AC0000851069



Summary of Qualitative Analysis

17,860 citizens completed the consultation survey (17,143 online, 717 paper).

23 citizens participated in 4 discussion groups.

Of those who participated in the survey:

93% are Kirklees residents.

74% are current members of a KAL Leisure Centre.

22% are parents/carers of children who visit for school swimming.

10% are individuals prescribed exercise by their GP to support their health and wellbeing.

Further information about those who participated (reflecting Public Sector Equality Duty) includes:

66% Females, 33% Males and 1% Non-Binary/Intersex.

4% under 25, 38% over 55.

10% BAME (excluding White British, English, Welsh, Northern Irish).

19% from low-income households (below £20,000).

3% Former Armed Forces.

22% with a disability.

45% with a caring responsibility (children and/or adults).



Key Findings - Proposals

Core Offer Proposal

- 60% agreed with the proposal
- 30% disagreed
- 10% did not know

Marginal Sites Proposal

- 46% agreed with the proposal
- 36% disagreed
- 18% did not know

Closure Proposal

- 19% agreed with the proposal
- 69% disagreed
- 12% did not know

More than 47,000 individual comments were received. This includes:

- Core Proposal – over 7500 comments
- Marginal Sites Proposal – approximately 6500 comments in relation to potential barriers and over 6800 comments in relation to impacts.
- Closure Proposal – approximately 8500 comments in relation to potential barriers and over 8000 in relation to impacts.
- More than 9000 suggestions were made for reducing the deficit and attracting the investment needed.

A team of analysts are undertaking qualitative thematic analysis to identify and summarise comments.



Emerging Themes (Survey)

Impacts of Proposals

- Financial (increased costs).
- Mental health.
- Physical health (e.g. reduced fitness, mobility).
- Reduced access to/cease participation in leisure activity.
- Reduced social connectedness.

Barriers (to accessing other leisure facilities)

- Travel/transport.
- Increased costs (e.g. of travel, alternative provision).
- Overcrowding/oversubscription at other sites.
- Lack of alternative provision (e.g. no similar activity provision nearby).
- Time (also impacted by travel/transport).



Emerging Themes (Survey)

Suggestions for reducing the deficit

- Improving operation/financial management.
- Reviewing efficiency of operations (e.g. reduced staffing, energy efficiency).
- Partial closure (e.g. closing pools and keeping 'dry' activities).
- Increasing provision (e.g. more classes, wider activity provision) and rental opportunities (e.g. hire to personal trainers, sports clubs, community groups and parties).

Suggestions for attracting alternative funding

- Increasing costs (e.g. memberships, activities, parking) and increasing usage.
- Reviewing/re-directing wider Council spend (e.g. other funding received, staffing costs).
- Corporate sponsorship.
- Private investment/partnerships.
- Government/NHS funding.
- Funding bids (e.g. community, charity, sports funds).



Emerging Themes (Focus Groups)

Discussions with **carers** highlighted:

- Barriers relating to travel/transport (particularly for those with mobility issues).
- Health impacts (unspecified) for those with a learning disability.
- Suggestions to keep 'dry' activities available and increasing the provision for these.

Discussions with representatives from **Black, Asian and Minority Ethnic** communities highlighted:

- Barriers relating to costs (alternative provision and travel/transport).
- Impacts relating to physical health, social connectedness (particularly around culture and language) and halting of generational shifts around health and fitness, particularly for Asian women.
- Suggestions to increase the provision of activities, particularly for women.

Discussions with citizens with a **disability** highlighted:

- Barriers relating to overcrowding and travel/transport/parking.
- Impacts relating to health (asthma, fitness, mobility, ability to learn to swim).
- Suggestions to increase the cost of memberships.



Key Stakeholders

These are the key stakeholders who have written to us.

Organisation	Asset concern
Swim England	All sites
Sport England	All sites
Yorkshire Sport Foundation	All sites
UKactive	All sites
Kirklees Active Schools	All sites
Third Sector Leaders	All sites
University of Huddersfield	All sites
Yorkshire Tennis Limited	Batley Sports & Tennis Centre
West Riding County Football Association Ltd	Batley Sports & Tennis Centre
Batley & Birstall Excellence in Schools Together	Batley Sports & Tennis Centre
Batley Multi-Academy Trust	Batley Sports & Tennis Centre
Howden Clough FC – Petition	Batley Sports & Tennis Centre
Bradley Park Golf Club	Bradley Park Golf Club



Name of meeting: Overview & Scrutiny Management Committee

Date: 5 December 2023

Title of report: Flood Risk Management Strategy 2024 (Final)

Purpose of report: To note the new Local Flood Risk Management Strategy 2024

<p>Key Decision – A key decision is an executive decision to be made by Cabinet which is likely to result in Council spending or saving £500k or more per annum, or to have a significant positive or negative effect on communities living or working in an area compromising two or more electoral wards. Decisions having a particularly significant effect on a single ward may also be treated as if they were key decisions.</p>	<p>Yes/ no or Not Applicable No</p> <p>If yes give the reason why N/A</p>
<p>Key Decision - Is it in the <u>Council's Forward Plan (key decisions and private reports)</u>?</p>	<p>Key Decision – No</p> <p>Private Report/Private Appendix – No</p>
<p>The Decision - Is it eligible for call in by Scrutiny?</p>	<p>Not Applicable</p> <p>If no give the reason why not</p>
<p>Date signed off by <u>Strategic Director</u> & name</p> <p>Is it also signed off by the Service Director for Finance?</p> <p>Is it also signed off by the Service Director for Legal Governance and Commissioning?</p>	<p>David Shepherd</p> <p>N/A</p> <p>Julie Muscroft</p>
<p>Cabinet member portfolio</p>	<p>Cllr Graham Turner</p>

Electoral wards affected: All

Ward councillors consulted: Yes on Member's Bulletin.

Public or private: Public

Has GDPR been considered? Yes

1. Summary

The Council's new Local Flood Risk and Management Strategy (Local Strategy) is programmed to be launched in 2024 to replace our existing 2012 strategy (revised in 2019). The report is seeking the committee to note the new Local Strategy (see Appendix 1).

An Executive Summary is also attached for Member's information (Appendix 2).

2. Information required to take a decision

Background

As the Lead Local Flood Authority (LLFA), Kirklees Council is required to develop and implements a Local Strategy under Flood and Water Management Act 2010. It is required to be consistent with the Environment Agency's revised National Flood and Coastal Erosion Management Strategy (National Strategy).

The risk of flooding in England is predicted to increase due to factors such as climate change and growth in our demographic. A new strategy is seeking to adapt our approach in line with current science and thinking to give our communities the best chance.

To improve our opportunities and securing inward investment, we need to ensure alignment and best fit with the Environment Agency's National Strategy to manage flood risk.

There is a stronger need now to enhance the work we do with our Partners in a more collaborative way. We need to be focussed on encouraging more effective risk management by enabling people, communities, businesses and the private sector to work together to balance the needs of our places, environment and economy. By working together, we can increase local resilience.

The new Local Strategy need to have strengthened focus on:

- creating resilient communities with build-back better approach.
- increasing emphasis on nature based solutions.
- being adaptive in responding to new climate hazards.
- ensuring a strong focus on working inclusively with our local communities.
- our commitment in responding to severe weather events and support to our communities.

New Local Flood Risk Management Strategy 2024 (Local Strategy)

The Council's new Local Strategy is programmed to be launched in 2024.

In 2022/23 a considerable amount of time was spent in data collection and reviewing existing reports/studies. Early engagement workshops began over the 2022 summer period with relevant services in Kirklees and key partners to help shape the strategy. These partners included the Environment Agency, Yorkshire Water and Highways who are legally designated as Risk Management Authorities within Kirklees district.

These discussions have led to a set of new Strategic Objectives within the strategy as:

Evidence	Using data, research and science to better understand flood risk.
Communities	Working closely with communities and businesses to better prepare.
Adapt	Be adaptive in our approach in responding to climate change.
Sustainable	Support our economic growth and environment net gain.
Partnership	Working with partners to foster a catchment-based approach.
Innovation	Identify new technologies and opportunities to mitigate flood risk.

These objectives will support four themes identified in the new Local Strategy:

Place	Making best use of land and development choices to manage flooding.
Protect	Flood defences that improve the standard of protection in our communities.
Respond	Preparing and responding to flood incidents.
Recover	Getting back to normal and support a build back better approach.

A mixture of themes will extend across conventional flood alleviation methods integrated with community resilience at the heart. The strategy recognises the need to have a balance and a collaborative integration of these in Kirklees.

3. Implications for the Council

3.1 Working with People

The new Local Strategy has now embedded Communities in ensuring they remain part of our core strategic approach. The strategy sets a clear vision to ensure community resilience remains an integral part of managing flood risk in our district.

This new Local Strategy will be supported by our Inclusive Communities Framework in the belief that communities can support solutions to problems. Hopefully leading to a stronger and meaningful Community Flood Groups with identified roles such as Flood Wardens.

We will continue to work with communities with the aim to provide a collective response to severe weather events and support to resident preparedness. This can involve information exchange with residents and businesses and encouragement of self-help to enable householders and business to understand and manage the flood risk they face. Work dedicated around this has been identified in the development of the Action Plan (Appendix F of the Strategy (which is attached at Appendix 1)).

3.2 Working with Partners

The new Local strategy firms up the need to work with Partners by setting a new Partnership strategic objective. The Partnership approach will support local solutions but also look at flood risk mitigation outside our district boundary using a catchment-based approach.

The Council will continue to work proactively with other Risk Management Authorities, including the Environment Agency and Yorkshire Water, to share information and good practice with neighbouring authorities, develop joint initiatives and provide clarity on the responsibilities for the management of flood risk.

We will continue our important partnership arrangements with Aire River Trust, National Trust, Woodlands Trust and with the Peak District National Park Authority to work collaboratively for our communities. The strategy seeks to enhance our Partner relationships and look extend our Partner network to include health bodies. Work dedicated around has been identified in the Action Plan.

3.3 Place Based Working

The work we do continues to recognise the diversity of the district and the pledges made in the strategy pay regard to the needs of each community. The new Local Strategy will aim to prioritise the areas at higher levels of flood risk but recognise areas of social deprivation. It recognises the importance of understanding the capacity of people and places to respond to flooding.

A key focus of our approach is working with local Ward and Parish Councillors to understand the issues that exist in our communities. Going forward we will look to enhance the work around Flood Community Groups in our highest risk areas whereby regular communication lines can be maintained. Ensuring communities are best informed so they are best prepared.

3.4 Climate Change and Air Quality

The new Local Strategy notes that flooding in England is predicted to increase due to Climate Change. It recognises the unpredictability that surrounds this and therefore the need to remain innovative and adaptive in trying new ways.

A key strategic objective in the new Local Strategy is evidence to ensure we remain abreast with current climate science and research to inform decision making. It identifies the Kirklees Climate Change Risk and Vulnerability Assessment and the importance of Climate Resilience to help prepare for climate hazards.

We will deliver a county wide catchment approach to managing the impacts of climate change in relation to flooding. Development and mitigation improvement schemes will include uplift allowances for increased rainfall from the impact of future climate change.

Our approach will place further emphasis on the need for natural flood management techniques that can store and slow water running off land in response to rain to help reduce flood levels downstream. This can include ponds, tree planting and use of leaky dams which have wider sustainability benefits such as biodiversity and carbon sequestration.

3.5 Improving outcomes for children

No impact

3.6 Financial Implications for the people living or working in Kirklees

No impact.

3.7 Other (eg. Integrated Impact Assessment/Legal/Financial or Human Resources)

No impact.

Integrated Impact Assessment (IIA)

Initial screening complete with no Stage 2 IIA required.

4 Consultation

The consultation of the new Local Strategy included Parish Councillors, residents and business owners operating in the district.

The public consultation started on the 24th of July till 18th September 2023 (8 weeks). The consultation was listed on our Involve platform and on our dedicated Flood Risk Management webpage. The consultation was supported by an Online Survey which used Live Chat to provide any support to members of the public (e.g. sending out a hard copy if requested).

The consultation was promoted through our usual channels i.e. a press release, Council Bulletin, Next Door and also on our social media platforms. An Engagement and Consultation Feedback Report has been prepared (see Appendix 3) which summarise the comments received.

Known flood areas were approached directly on email or via letter to inform them of the public consultation and how to get it involved. A dedicated workshop was arranged with known flood communities to speak directly to Officers involved in the drafting the new Local Strategy.

The Flood Risk Management service will continue to consult with Members and our local communities and our partners when developing flood mitigation projects.

5 Engagement

Workshops around the four themes of Place, Protect, Response and Recover were held in 2022 with partners like the Environment Agency, Yorkshire, National Trust, River Trusts and local charities.

Separate workshops were undertaken with Kirklees services such as Planning Authority, Highways and Emergency Planning who have helped to shape the new Local Strategy.

The Flood Risk Management will continue to engage our local communities when developing flood mitigation projects/initiatives in delivery of the new Local Strategy.

6 Next steps and timelines

The new Local Strategy will set the strategic direction and will be used to inform our decision making and support our future funding applications.

Following a successful adoption at Cabinet, Officer's will promote it using our existing Partnership meetings to update our Partners of the Council's new Local Strategy.

Officer's will progress the new Action Plan starting in April 2024. Officers will provide an annual update (at the end of the financial year) at the March Overview and Scrutiny Management Committee.

7 Officer recommendations and reasons

To note and invite comments from Members to the new Local Strategy.

8 Cabinet Portfolio Holder's recommendations

Officer recommendations are supported.

9 Contact officer

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10 Background Papers and History of Decisions

None.

11 Service Director responsible

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Appendix 1 to Overview and Management Scrutiny Committee report (5-12-23)

Local Flood Risk Management Strategy

2024

Kirklees Local Flood Risk Management Strategy

2024

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EXECUTIVE SUMMARY

This Local Flood Risk Management Strategy (part of the Local Strategy) sets out how Kirklees Council undertakes its flood risk management responsibilities to meet the requirements of the Flood and Water Management Act 2010. Kirklees Council is a Lead Local Flood Authority (LLFA) and is required to establish a strategy to define how local flood risk will be managed locally.

In Kirklees, there are over 35,000 properties currently at risk or will be affected from surface water flooding in a 1 in 1,000-year rainfall event, and 9,000 at risk from main rivers in a 1 in 1,000-year fluvial event. These numbers will rise in the future due to climate change. Our vision is to make our communities more resilient to flooding both now and, in the future, to enhance the environment for future generations. A complex and changing climate requires a variety of risk management interventions like nature-based solutions such as Natural Flood Management (NFM). NFM includes slow the flow methods and adaptive land management techniques.

The objectives we set for the Local Strategy reflect those of the National Strategy and are based on a long-term approach to achieving our vision, which is to make our communities, businesses, and land more resilient to flooding both now and in the future. The objectives are delivered through a set of shorter term, measurable actions which formulate our Flood Risk Action Plan. Our overarching objectives for managing flood risk are:



This Local Strategy considers resilience a key aim in supporting existing and new communities in dealing with future flood risk. Resilience is defined in the National Strategy as:

“The capacity of people and places to plan for, better protect, respond to, and to recover from flooding and coastal change.

This Strategy is based around the four key themes of resilience:

1. **Place making** – to make our local places more climate resilient to flooding by considering land use in combination with flood risk
2. **Protect** – ensure our communities are better protected from flooding both now and in the future
3. **Response** – being adequately prepared to ensure we can better respond to a flood event
4. **Recovery** – recovering quickly and effectively from a flood event.

The Strategy identifies high risk catchments and localities based on flood risk from surface water, historic flood events, existing properties and infrastructure, and social deprivation. This has helped us to identify areas which may require more focused consideration.

A Flood Risk Action Plan has been developed so that we can implement the right measures in much needed areas and can track progress of these actions over time. The Flood Risk Action Plan will be undertaken in partnership and collaboratively with other Risk Management Authorities, to manage local flood risk across the district. The Strategy will be reviewed and monitored to ensure it is still current and measures remain applicable.

The disastrous impact flooding can have on communities is understood. Research carried out by the University of York and the Centre for Mental Health reported that the risk of long-term mental health problems was up to nine times more likely for flood victims compared to those who had never experienced flooding¹. Therefore, we strive to support communities to recover more quickly and effectively after major flood incidents.

This Strategy sets out to mitigate the impacts of flooding, however, the approach set out cannot remove all the flood risks that exist in our communities.

¹ [University of York | January 2021](#)

INTRODUCTION

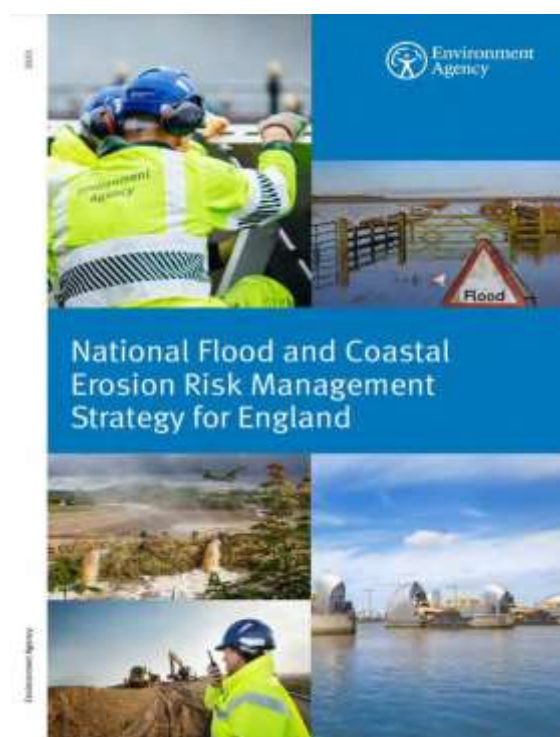
The risk of flooding in England is predicted to increase due to climate change and population growth. It is not possible to prevent all flooding but there are actions that can be taken to manage these risks, increase resilience, and reduce the impacts on communities. Climate change estimates will evolve therefore the challenge we face due to the unpredictability of climate change is unprecedented and if we are to give our communities the best chance of protection; we need to be bold, innovative and try new approaches to managing flood risk and be adaptive in our approach.

As the Lead Local Flood Authority (LLFA), we will provide strategic leadership in relation to flooding to all Risk Management Authorities (RMAs). Part of this duty is to develop, maintain, apply and monitor a strategy for local flood risk management in our area, which must be consistent with the National Flood and Coastal Erosion Management Strategy² produced by the Environment Agency for England.

The National Strategy sets out the long-term delivery objectives that we as a country should be taking over the next 10 to 30 years as well as shorter term, practical measures we should take working with partners and local communities.

Alongside traditional flood defences, there is the need for a broader range of actions for achieving climate resilient places. This includes avoiding inappropriate development in the floodplain and using nature-based solutions to slow the flow or store floodwaters. We need to better prepare for and respond to flooding incidents through more timely and effective flood forecasting, warning and evacuation. A strong theme throughout the National Strategy is concerned with helping communities and local economies recover more quickly after a flood or 'building back better' so that properties, infrastructure and key services such as hospitals and schools are more resilient to flooding in the future.

This Local Flood Risk Management Strategy (Local Strategy) for Kirklees sets out how we strategy will replace the existing 2012 Local Strategy for Kirklees.



² [National Flood and Coastal Erosion Risk Management Strategy for England. Environment Agency. 2020](#)

We will address, through the form of a targeted Flood Risk Action Plan, the management of local flood risk and how it undertakes its flood risk management responsibilities over the next five to ten years. This Local flood risk as defined by the FWMA (2010) includes risk from:

- **Surface runoff** – rainwater (including snow and other precipitation) which is on the surface of the ground (whether or not it is moving) and has not entered a watercourse, drainage system or public sewer
- **Groundwater** – all water which is below the surface of the ground and in direct contact with the ground or subsoil
- **Ordinary watercourses** – any watercourse that does not form part of a main river. Ordinary watercourses can vary in size considerably and can include rivers, streams and all ditches, the Water Industry Act 1991) and passages, through which water flows.



OUR VISION

OUR VISION IS TO MAKE OUR COMMUNITIES MORE RESILIENT TO FLOODING BOTH NOW AND IN THE FUTURE AND TO ENHANCE THE ENVIRONMENT FOR FUTURE GENERATIONS.

A changing climate requires a variety of risk management techniques with a focus on nature-based solutions such as Natural Flood Management (NFM). NFM includes the use of slow the flow methods and using adaptive land management techniques. It requires integrated catchment management and can be particularly effective within upper catchment areas with the aim to:

- Maximise water retention (in flood storage areas, wetlands)
- Slow water flows and/or the rate at which water enters a watercourse (through leaky dams, peatland restoration)
- Intercept rainfall to prevent it from reaching the watercourse (through tree planting).

NFM requires partnership working with those who use and influence the land including the Local Planning Authority, land managers and owners and water management bodies. While conventional flood prevention schemes may sometimes be preferred, NFM can be used as a longer term, more cost-effective, and multi-beneficial option (including carbon sequestrations and biodiversity gain).

In our current approach, the LLFA planning function and Land Drainage Consents are critical in how we shape and ensure future development that is climate resilient. The Local Strategy considers the planning and enforcement function of Kirklees Council in ensuring new development and infrastructure are appropriately planned and delivered. It also addresses the built environment and the importance of include community resilience. We will look to engage with landowners and developers whose roles can be important in managing and reducing flood risk in high-risk areas.

Asset management function is also critical in making sure that we are confident that drainage infrastructure is being effectively managed, monitored and maintained. This Strategy encourages more effective risk management by enabling people, communities, businesses and the public sector to work together to balance the needs of the community, environment and economy.

The Strategy also aims to ensure that we look favourably towards local flood warning systems in partnership with the Environment Agency which will ensure we are better prepared in supporting community resilience. It ensures that emergency plans and responses to floods and incidents are effective and that communities can respond properly to flood warnings. Another key part of the Strategy is ensuring we target our investment in areas most in need.

LOCAL STRATEGY OBJECTIVES

The objectives we set for the Local Strategy are based on a long-term approach to achieving our vision, which is to make our communities, businesses, and land more resilient to flooding both now and in the future. The objectives will underpin our objectives through a set of shorter term, measurable actions which formulate our Flood Risk Action Plan.

EVIDENCE

We will enhance our strategic understanding of flood risk from local sources, both in the present day and in the future considering new data, studies, research and science in climate change impacts for Kirklees.

COMMUNITIES

We will work with communities and businesses to raise greater awareness of present and future flood risk through engagement, support and education to help them to become more resilient to future flood risk.

ADAPT

We will work to implement adaptive approaches so we can continue to keep our natural and built environment resilient in response to a changing climate.

SUSTAINABLE

We will contribute positively to sustainable growth and support environmental net gain by influencing development and regeneration plans to deliver flood risk benefits, which will benefit society and the local economy whilst enhancing biodiversity in promoting measures that work with the natural processes of our catchments.

PARTNERSHIP

We will work with all Risk Management Authorities, stakeholders, landowners and developers to achieve a consistent, coordinated and catchment-based approach to flood risk management.

INNOVATION

We will seek opportunities (including funding, technological, research) to be innovative and try new approaches in making communities resilient to flooding now and in the future.

FLOOD RESILIENCE AND ADAPTION

This Local Strategy considers resilience and adaptation to be a principal aim in supporting existing and new communities in dealing with future flood risk. Adaptation is about strengthening our approach to adapting to climate change. It will reduce the potential impact that our changing climate, through flooding, storms and higher temperatures, will have on Kirklees.

There are four key areas when managing flood resilience as shown below, based on the National Strategy³.

Plan to adapt: Local choice in local places



1. PLACE MAKING

IMPROVE PLACE MAKING: MAKING THE BEST LAND USE AND DEVELOPMENT CHOICES TO MANAGE FLOODING AND COASTAL CHANGE.

Communities, planners, developers and land managers making the best land use and design choices for development and infrastructure to manage the damages from flooding and coastal change. This includes making space for water to manage risk and support wider environmental benefits.

2. PROTECT

BETTER PROTECT: BUILDING AND MAINTAINING DEFENCES AND MANAGING THE FLOW OF WATER

Sustained and long-term investment in building and maintaining flood and sea defences ensuring they provide an appropriate standard of protection, operate reliably and perform as expected when exceeded. Better protection includes nature-based solutions that manage the flow of water to reduce the risk of flooding and coastal change.

3. RESPOND

READY TO RESPOND: PREPARING FOR AND RESPONDING EFFECTIVELY TO INCIDENTS.

Organisation and communities working together to prepare for and respond to flood and coastal incidents through timely and effective forecasting, warning and evacuation.

³ [National Flood and Coastal Erosion Risk Management Strategy for England. Environment Agency. 2020](#)

4. RECOVER

RECOVER QUICKLY: GETTING BACK TO NORMAL AND BUILDING BACK BETTER

Helping people and local economies recover more quickly by clearing up the damages, returning water and power supplies or draining floodwaters from farmland. Recovery should also include building back better so that properties and infrastructure are more resilient to future events.

This combination of engineered flood alleviation schemes alongside wider catchment and community resilience actions is a vital response as flood risk increases with climate change.

. This integration to manage the risk will mean that more vulnerable communities are resilient to flooding and are able to remain sustainable and thriving places.

Resilience to flooding can be achieved through a suite of tools and services. These are aimed at homeowners and maintaining essential functions of organisations, businesses, communities, key infrastructure, services and land. Disasters are caused by extreme weather which are worsened by being vulnerable and unprepared. By reducing vulnerability and having targeted emergency flood response plans, the impacts of a flood event can be greatly reduced.

Flood resilience has several core themes, including:

- **Property Flood Resilience** – providing practical and cost-effective steps to help lower flood risk through the reduction of the impact of flooding on a building which in turn may help lower home and business insurance premiums.
- **Flood Emergency Plans** – being prepared helps to reduce, control or mitigate the impact and consequences of flooding.
- **Informing** – increasing the awareness of the risks of flooding through effective communications with communities and stakeholders.

PURPOSE OF THE LOCAL STRATEGY

Much has changed since the 2012 Local Strategy, including flood risk data and information, studies, strategies, climate change science, and the drive for natural flood management, sustainable development and resilience. The Local Strategy will take into consideration current thinking and understanding to tackling flood risk in our district. Our Local Strategy will encourage more effective risk management by enabling local communities and business owners to work together to:

- Balance the needs of the community, environment, and economy.
- Enhance and extend our partnership working between us and other key stakeholders (e.g., charities, community groups, Parish Councils and health bodies).
- Improve community awareness of flood risk, respond to their expectations and their priorities.
- Ensure a clear understanding of local flood risks and prioritise high risk catchments and communities.
- Encourage innovative flood risk management techniques.
- Support the development of emergency plans and responses to flood incidents are effective and that communities are better prepared.
- Support communities to recover more quickly and effectively after major flood incidents. Research carried out by the University of York and the Centre for Mental Health reported that the risk of long-term mental health problems was up to nine times more likely for flood victims compared to those who had never experienced flooding⁴
- Enable continued learning to ensure we remain progressive.

The Kirklees Local Strategy is a “living document” which will develop as new evidence, expertise and resources influence flood risk management in the district.

⁴ [University of York | January 2021](#)

THEMES OF OUR LOCAL STRATEGY

This Local Strategy establishes four key areas in which to focus our efforts in better protect and better supporting our communities against the risk of flooding.

PLACE-MAKING



To make our local places more climate resilient to flooding by considering land use in combination with flood risk. We will make space for floodwater, ensure buildings and infrastructure consider current and future flood risks including supporting the use of climate resilient local planning policies and avoiding inappropriate development in flood risk areas through spatial planning. We will ensure early engagement with developers in the pre-planning process.

Figure 1.1 examples of place making.



PROTECT



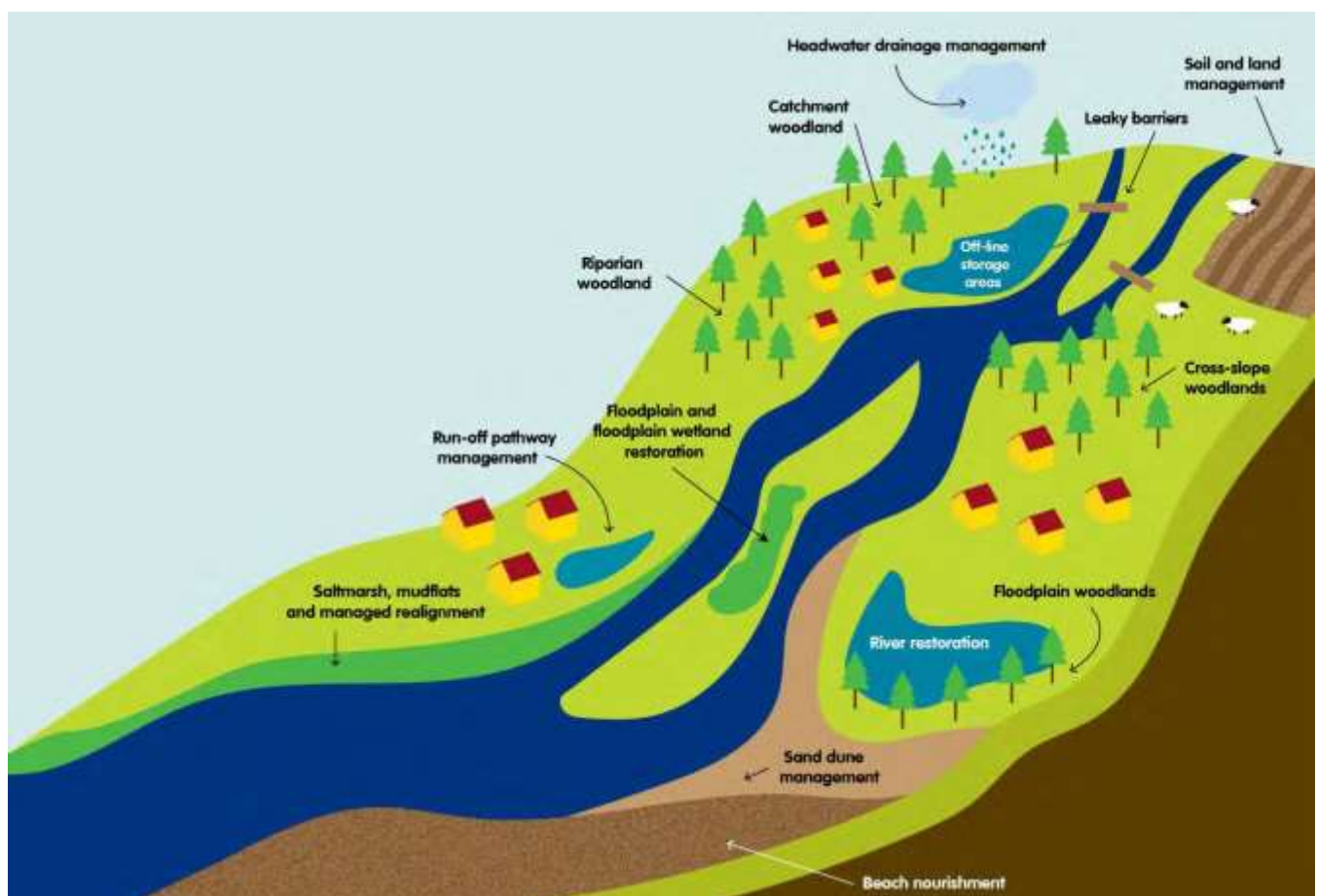
Ensure our communities are better protected from flooding both now and in the future. We will support existing communities through implementing nature-based solutions in catchments such as utilising upland water storage, better planned land management practices, de-culverting, blockage clearance of assets, construction of new defences, retrofitting to existing homes, businesses, infrastructure and key services.

Natural Flood Management – maximising water retention, slowing the flow, slowing the rate at which water enters a watercourse, rainfall interception, floodplain restoration, gully-blocking.

Environmental Land Management – Government support schemes for landowners to alter their land management practices, to enhance the local environment and provide flood risk benefits.

Adaptive pathways – allow communities to be agile to climate change where land use can easily adapt to future changes to the local environment.

Figure 1.2 examples of natural flood management

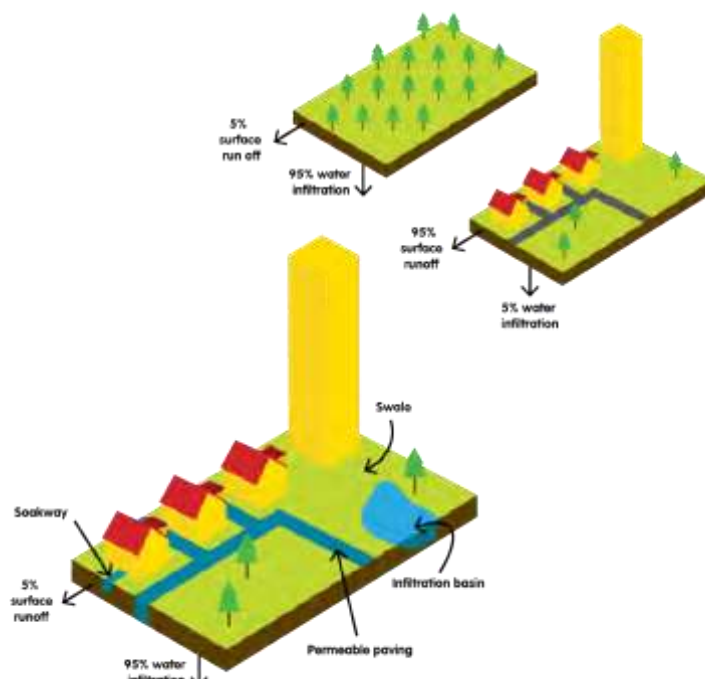


Property Flood Resilience – using various techniques to lower flood risk through the reduction of the impact of flooding on a property.



Sustainable Drainage Systems (SuDS) – used in new development or retrofitted to existing development, SuDS manage surface water and runoff as close to the source as possible and should mimic natural drainage through infiltration and attenuation following the SuDS hierarchy.

1. Rural environment where 95% of water infiltrates into the ground and 5% runs off as overland flow.
2. Urban development within the rural environment. Less infiltration and more runoff.
3. SuDS implementation including permeable paving, soakaways, infiltration basins and swales.



RESPONSE



Being adequately prepared to ensure we can better respond to a flood event. We will assist organisations and communities in ensuring they are adequately prepared for a flood event occurring, for example, through early flood warnings, emergency flood and evacuation plans, and education and training and to enable local community flood groups to become resilient.

Kirklees Council publication: information leaflet regarding the use of sandbags.



Kirklees Council publication: social media graphic with emergency contact information.



RECOVERY



Recovering quickly and effectively from a flood event. We will aim to provide post-flood event recovery support, signpost affordable flood damage insurance, support community wellbeing and implement a build back better approach. We will also aim to review and record flood impacts to increase intelligence and review flood risk assets.

Figure 1.5 examples of responses to flooding



WHAT WE HAVE BEEN DOING

THIS SECTION BRIEFLY OUTLINES THE WORK WE HAVE BEEN DOING SINCE THE PUBLICATION OF OUR PREVIOUS STRATEGY IN 2012.

Since the publication of the previous Local Strategy for Kirklees, we have been working to satisfy the objectives of the Strategy and to implement actions from the Action Plan. A substantial amount of work has been carried out which has improved both the Council's evidence base, and to help manage local flood risk.

The main headline schemes from the previous few years include:

- £1 million DEFRA Property Flood Resilience Grant Support was put in place for flood victims in 2020 following Storm Ciara and Storm Dennis in February 2020. The scheme has helped to better protect 33 properties.
- £1.3 million Kirklees Culvert Programme completed April 2022 which has better protected 800 properties. A detailed survey of over 50 culverts were highlighted to pose a risk to residential properties. The project was delivered using in-house Council resources over a 6-year programme. Some culverts were completely replaced, and some required isolated repairs / replacements and improved access points.
- A £550k Kirklees Debris Screen Study was granted approval to review our high-risk debris screen assets from 2022-2024.
- A number of flood alleviation studies have been undertaken to improve our understanding of the sources of flood risk in our communities.
- A local flood innovation programme has been developed to scale up funding for five themes:
 1. Integrated Water Management
 2. Community Voluntary Sector
 3. Property Flood Resilience
 4. Natural Flood Management
 5. Local Flood Warning Systems.
- A community flood risk education programme has been completed reaching 1,000 properties.

Many of the measures outlined in the 2012 Strategy involved establishing new Council procedures to investigate flood events, introduce more robust data collection processes and to establish the LLFA as the main point of contact for the management of local flood risk.

Other measures in the 2012 Strategy involved improving the Council's understanding of the location and size of local flood risk and developing a programme of mitigation measures to manage the risk.

Additional studies have been completed to understand the surface water flood risk in Kirklees with outline recommendations being made. From these studies, an ongoing programme of mitigation measures is in place to address the locations at highest risk with greatest impact.

KIRKLEES FLOOD RESPONSE AND RECOVERY POLICY

This policy sets out the principles that the Council follows during flooding events which have a major disruptive impact in the area.

Arrangements are in place between the Council and the Met Office to highlight forthcoming severe rainfall events as part of the Met Office's National Severe Weather Warning System (NSWWS). Advance information on extreme rainfall events is provided by several partners and service areas within the Council. Work will continue with partners and other organisations to monitor new technology and information which may help to give more certainty to forecast information.

The Flood Response and Recovery Policy complements other Council initiatives to better protect local communities from the effects of flooding, namely:

- **Flood Risk Management programme** – identifying and delivering mitigation projects in areas that have flooded or are of higher flood risk.
- **Drainage Asset Improvement** – assessing the capacity requirements for highway drainage systems and establishing effective maintenance programmes.
- **The Severe Weather Management Plan** – forms the basis of the Council's response to severe weather in maintaining a resilient network to keep Kirklees safe and operating at times of severe weather.
- **Community wide engagement** on local flood risk to help communities and individuals to better understand the flood risk they face and to encourage a self-help approach.

Post flood recovery is concerned with getting communities back to normal as quickly as possible and building back better. The Council endeavours to help people and local economies recover by providing household skips and street cleansing operations to assist with clean-up operations. To build back better, the Council ensures appropriate flood incident data capture is undertaken by encouraging the public to report flood incidents. This helps to provide more focused support to communities and infrastructure where it is most needed to help ensure increased resilience in the future.

The Council has committed operational resources to provide community support during flood events when resources permit. The level of service will be proportionate to the level of risk but will be assessed following significant flood events to determine whether it remains suitable.

KIRKLEES PRE FLOODING OPERATIONAL PLAN

The Pre-Flooding Operational Plan provides procedural and functional arrangements necessary to deliver the commitment within the Flood Response and Recovery Policy. The plan aims to deliver an appropriate series of actions to mitigate the risk of flooding from severe rainfall events in the district. Low level actions in the Plan may be implemented prior to surface water flood events but it is challenging to have "spotters", who volunteer, mobilised in the right locations at the right time during such events.

OUR FUTURE LANDSCAPES AND CALDER CATCHMENT

Our partnerships involve a range of organisations collaborating and focusing on sustainable water management in the Calder, Upper Colne and Holme Catchments, West Yorkshire. The main aims of these groups are to reduce flood risk, increase the biodiversity of habitats, carbon capture and storage, green enterprise and access and recreation.

NATIONAL POLICY, GUIDANCE AND SUPPORTING DOCUMENTS

THIS SECTION LISTS NATIONAL POLICY, GUIDANCE AND RELEVANT DOCUMENT USED TO HELP SUPPORT THE FORMATION OF THE LOCAL STRATEGY. THE STRATEGY SHOULD BE CONSISTENT AND ALIGN WITH THESE POLICIES AND SUPPORTING DOCUMENTS.

NATIONAL POLICY AND GUIDANCE

THE FLOOD AND WATER MANAGEMENT ACT

The Flood and Water Management (2010) sets out how flood risk is managed in England and introduced new powers and responsibilities to Risk Management Authorities. The Act created the role of the LLFA for Unitary Authorities (such as Kirklees Council) and County Councils and set out the requirements for an LLFA to produce Local Flood Risk Management Strategies.

NATIONAL PLANNING POLICY FRAMEWORK

The National Planning Policy Framework⁵ (NPPF) received a major update in July 2021. In terms of flood risk, this included a focus on making sure local plans account for all sources of flood risk and encourage the use of green infrastructure and natural flood management. The theme of resilience was also expanded in this version, stating that development should be flood resistant and resilient “such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment”.

FLOOD RISK AND COASTAL CHANGE PLANNING PRACTICE GUIDANCE

The Flood Risk and Coastal Change Planning Practice Guidance⁶ (FRCC-PPG) was updated in August 2022 to reflect the changes made to the NPPF in 2021. Whilst the NPPF concentrates on high level national policy, the FRCC-PPG is more detailed and advises on how planning can take account of the risks associated with flooding in plan making and the development management process.

⁵ [National Planning Policy Framework](#)

⁶ [Flood Risk and Coastal Change Planning Practice Guidance](#)

STRATEGIES, PLANS AND ASSESSMENTS

All strategies, plans and assessments listed below are available to view online.

- [River Calder Catchment Flood Management Plan](#)⁷
- [Kirklees Surface Water Management Plan](#)⁸
- [Preliminary Flood Risk Assessment](#)⁹
- [Kirklees Local Flood Risk Management Strategy](#)¹⁰
- [Humber River Basin District Flood Risk Management Plan](#)
- [Calder Catchment Level 1 Strategic Flood Risk Assessment](#)¹¹
- [Climate Change Risk and Vulnerability Assessment](#)
- [Kirklees Development Plan](#)¹²
- [National Flood and Coastal Erosion Risk Management Strategy for England](#)
- [25 Year Environment Plan](#)¹³

STRATEGIC ENVIRONMENTAL ASSESSMENT

A Strategic Environmental Assessment (SEA) is required to underpin the Local Strategy so that there is confidence that implementation of the Strategy will be sustainable and avoid adverse environmental impacts. The SEA Directive: Guidance for Planning Authorities states that the objective is “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”.

See Appendix A for the SEA.

HABITAT REGULATIONS ASSESSMENT

A Habitat Regulations Assessment (HRA) is a process that determines whether development plans could negatively impact local plans on a recognised site beyond reasonable scientific doubt. A HRA is required any time a development project is being carried out on a European site that is protected by Habitat Regulations.

See Appendix B for the HRA.

⁷ [River Calder Catchment Flood Management Plan 2009](#)

⁸ [Kirklees Surface Water Management Plan 2011](#)

⁹ [Preliminary Flood Risk Assessment for Kirklees. Kirklees Council. 2011](#)

¹⁰ [Kirklees Local Flood Risk Management Strategy. Kirklees. 2012](#)

¹¹ [Calder Catchment Level 1 Strategic Flood Risk Assessment 2016](#)

¹² [Kirklees Development Plan](#)

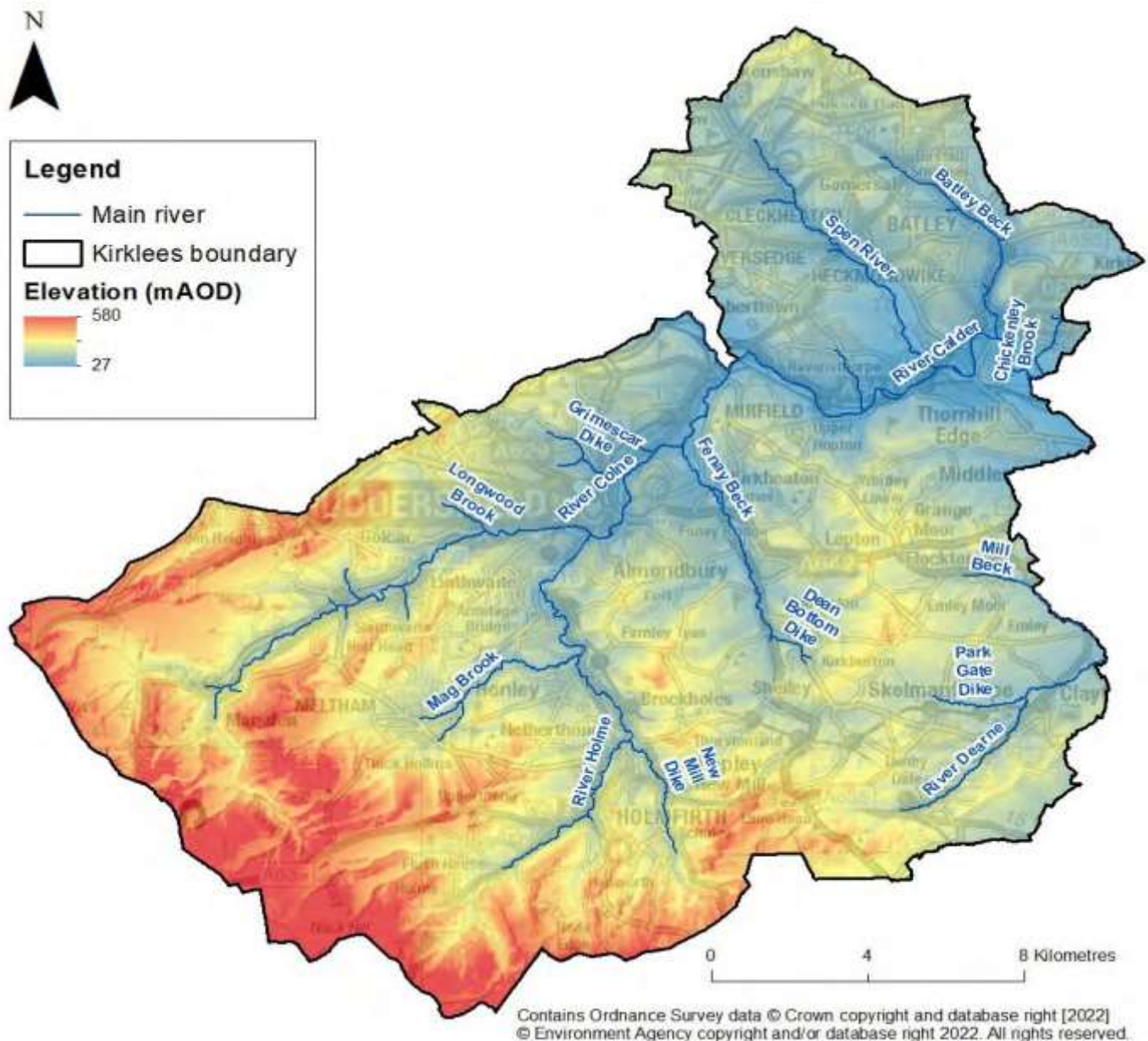
¹³ [25 Year Environment Plan](#)

FLOOD RISK IN KIRKLEES

STUDY AREA

According to the mid-2020 Office for National Statistics population estimates¹⁴, 441,290 people live in the local authority area of Kirklees. Kirklees is situated in West Yorkshire and covers an area of approximately 409 square kilometres and includes the towns of Huddersfield, Dewsbury, Batley, Heckmondwike and Cleckheaton. Kirklees is bordered by the neighbouring authorities of Bradford, Barnsley, Calderdale, High Peak District, Leeds, Oldham and Wakefield.

Figure 4.1 Topography and main rivers in Kirklees



RIVER BASIN DISTRICTS AND CATCHMENTS

Kirklees is within the Humber River Basin District (RBD). There are 18 Environment Agency (EA) management catchments within the Humber RBD, three cover parts of Kirklees, namely:

- Aire and Calder
- Don and Rother
- Upper Mersey.

As can be seen in Figure 4.2 the majority of Kirklees is within the Aire and Calder management catchment with the exception of the upper catchment of the River Dearne which is in the Don and Rother management catchment in the southeast of Kirklees. The Upper Mersey management catchment almost forms the southwestern boundary of Kirklees at the ridge of the Pennine Mountains.

There are 19 Water Framework Directive (WFD) catchments, Figure 4.3, within or partially within Kirklees that will have an influence on flood risk within the district, the majority of which flow into the Calder catchment in the north of the district. The WFD catchments loosely align with the Council's local catchments which are in place to enhance local flood warning systems by setting virtual flood alerts.

Figure 4.2 EA management catchments

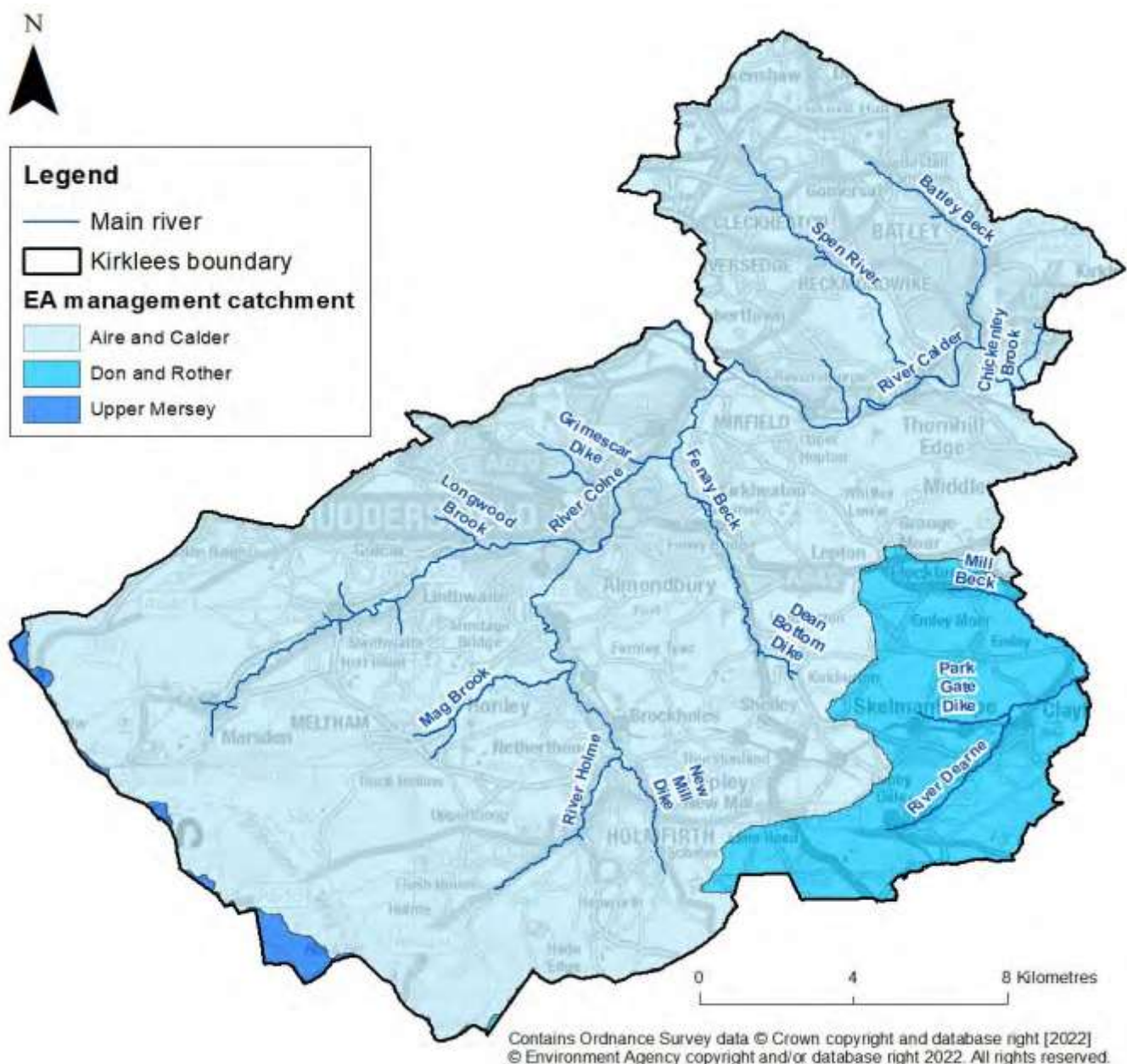
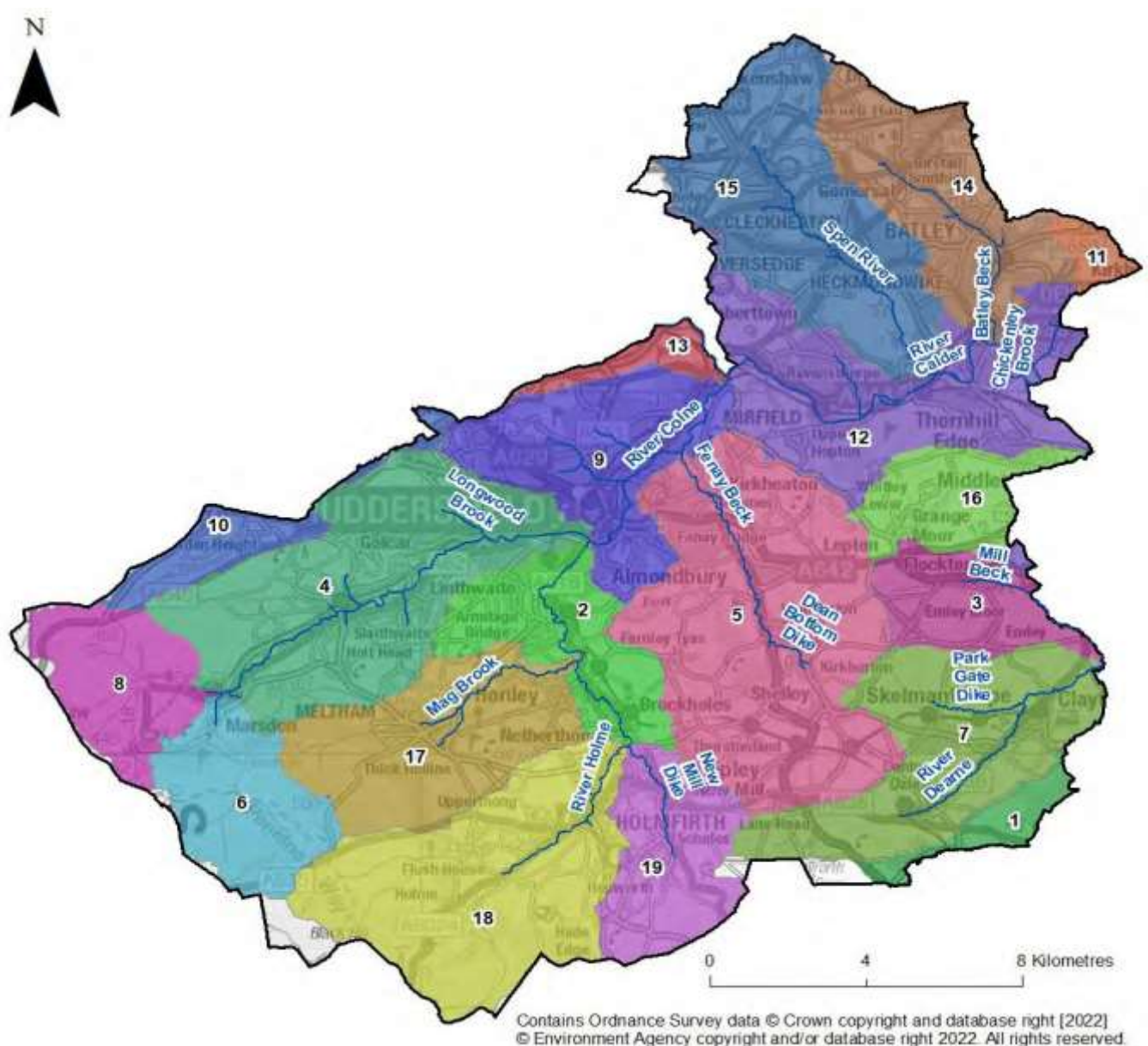


Figure 4.3 WFD catchments influencing flood risk in Kirklees



Legend

— Main river

□ Kirklees boundary

WFD river catchments

1 - Cawthorne Dyke from Source to River Dearne

2 - Holme from New Mill Dike to R Colne

3 - Bentley Brook from Source to River Dearne

4 - Colne from Wessenden Brook to R Holme

5 - Fenay beck from Source to River Colne

6 - Wessenden Bk from Butterly Resr to River Coln

7 - Dearne from Source to Bentley Brook

8 - Colne from Source to Wessenden Brook

9 - Colne from River Holme to River Calder

10 - Black Brook from Source to River Calder

11 - Chald from Source to River Calder

12 - Calder from River Colne to River Chald

13 - Calder from Ryburn Confluence to River Colne

14 - Batley Beck from Source to River Calder

15 - Spen Beck from Source to River Calder

16 - Smithy Brook from Source to River Calder

17 - Mag Brook from Source to River Holme

18 - Holme from Source to New Mill Dike

19 - New Mill Dike from Source to River Holme

RAPID RESPONSE CATCHMENTS

The Environment Agency has a Rapid Response Catchment (RRC) register which was prepared using a combination of flood event factors such as time to peak, flood depths and velocities and the amount of debris carried in the floodwater. Potential property numbers affected and vulnerable sites such as care homes and camp sites were also considered.

The RCC register states the following for Kirklees:

- **Very High-Risk catchments** – Brockholes (River Holme), Holmfirth (River Holme), Oakenshaw (Hunsworth Beck)
- **High Risk catchments** – Marsden (River Colne), New Mill (New Mill Dyke), Ravensthorpe (River Spen)

These Rapid Response Catchments are shown in Appendix C.

Many communities in the Colne/Holme catchment, with its steep sided valleys, small watercourses draining off hillsides and through urban areas, could be vulnerable to flash flooding if subject to particularly intense rainfall over a sustained period.

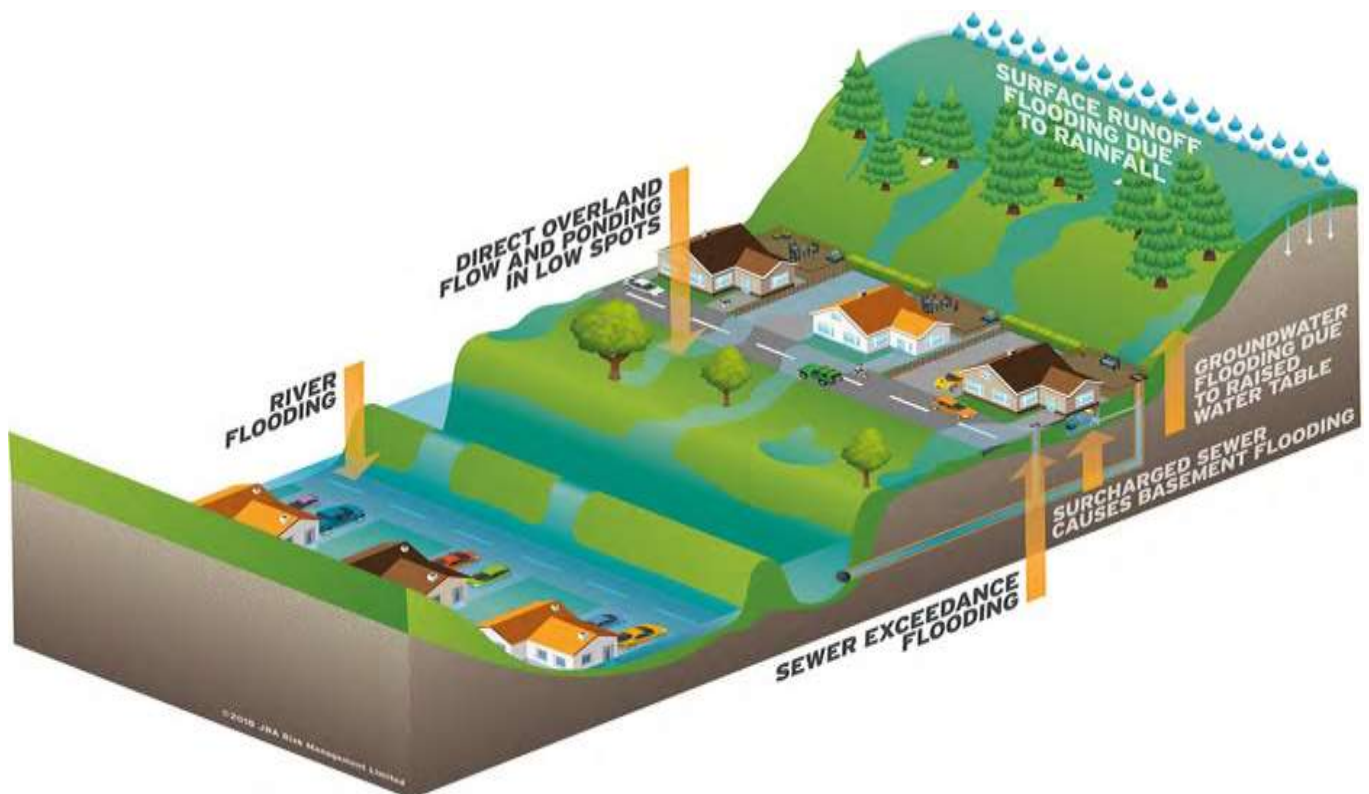
Along with other high-risk communities, we will look to provide appropriate support to the communities affected by these rapid response catchments.

FLOOD RISK

Flooding is a natural process and can happen at any time in a wide variety of locations. It constitutes a temporary covering of land not normally covered by water and presents a risk when human or environmental assets are present in the area that floods. Assets at risk from flooding can include housing, transport and public service infrastructure (including vulnerable services such as hospitals and schools), commercial and industrial enterprises, agricultural land and environmental and cultural heritage. Flooding in Kirklees can occur from many different and combined sources such as fluvial (from main rivers and ordinary watercourses), surface water, groundwater, sewers or indirectly from infrastructure failure, as illustrated in Figure 4-4 below.

Different types and forms of flooding present a range of different risks and the flood hazards of speed of inundation, depth and duration of flooding can vary greatly. With climate change, the frequency, pattern and severity of flooding are expected to change and become more damaging.

Figure 4-4 examples of flood risks in Kirklees



The different examples of flood risks in Kirklees are:

- Surface runoff flooding due to rainfall
- River flooding
- Direct overland flow and ponding in low spots
- Groundwater flooding due to raised water table
- Sewer exceedance flooding
- Surcharged sewer causes basement flooding.

FLOODING IN KIRKLEES

An important aspect of the strategy is to assess the local flood risk within the administrative area constituting risk from surface water, groundwater, and ordinary watercourses.

To assess the potential impacts of surface water flooding, property counts (both residential and non-residential) have been derived based on the Risk of Flooding from Surface Water (RoFSW) dataset. The counts revealed that Kirklees has approximately 6,600 residential properties and 3,700 non-residential properties at risk of flooding during a 1 in 100-year (1% Annual Exceedance Probability (AEP)) rainfall event. This is predicted to increase to approximately 11,600 residential and 5,500 non-residential properties as a result of the impact of climate change (based on the 45% climate change uplift as advised by the EA for the Aire and Calder Management Catchment, based on UKCP18 local projections).

HISTORIC FLOOD EVENTS

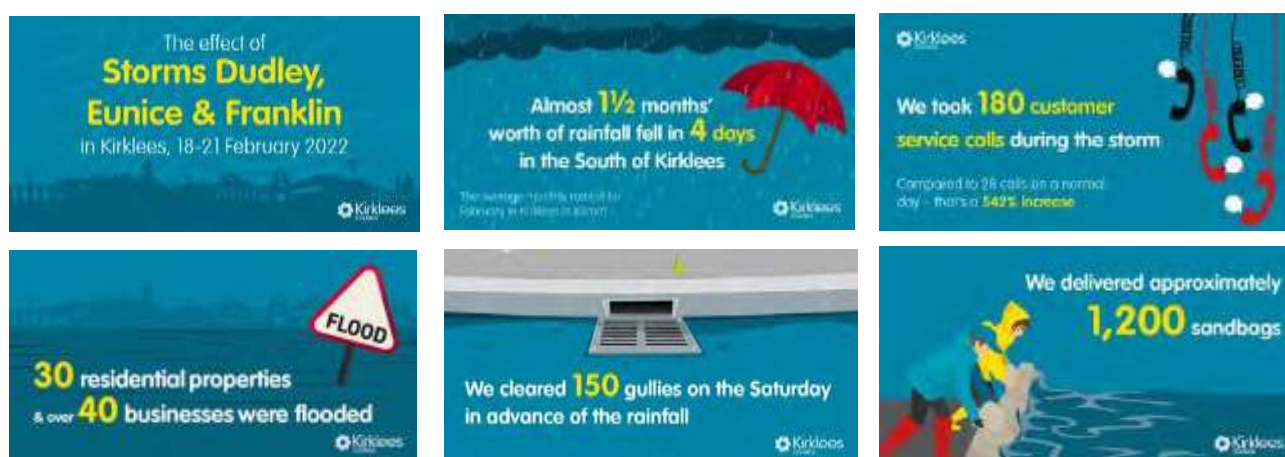
Kirklees has a history of flooding in many different locations from fluvial, surface water and sewer sources. Information on incidents of flooding is recorded by the EA and Kirklees Council. The following information sources were assessed to understand historic flooding in the district:

- EA Recorded Flood Outlines dataset.
- Kirklees Council historic floods database.

Figure 4.5 below shows flood incidents, from any source, recorded as locally significant by Kirklees since 2007. These incidents include internal and external flooding of properties and businesses, and also roads, footpaths and gardens. The major flooding events within Kirklees have mainly occurred around the main rivers; the River Colne, River Calder and Spen River. Also shown is the Recorded Flood Outlines Dataset which is associated with fluvial flooding from main rivers, such as the River Calder and its tributaries.

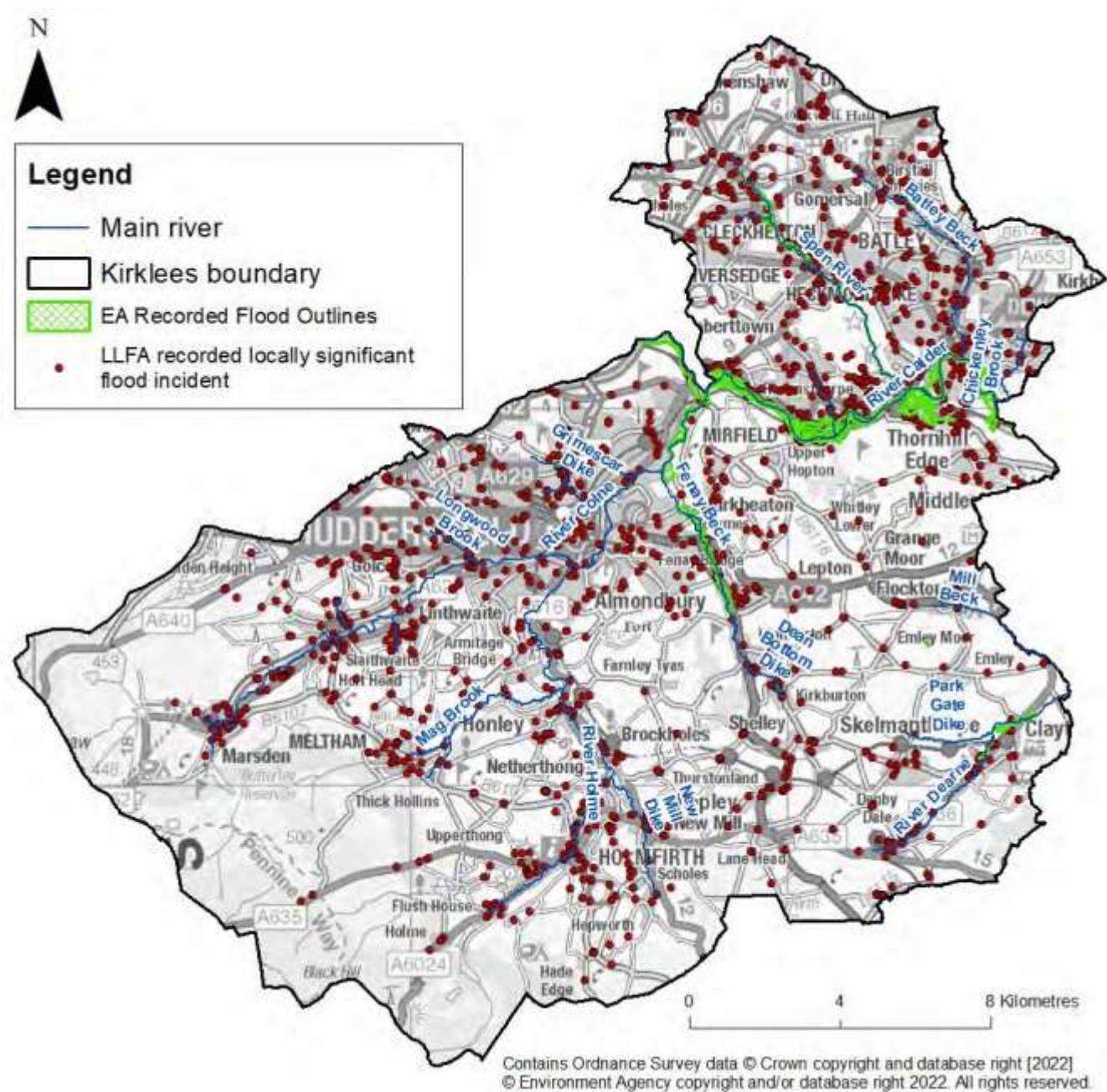
Notable recorded historic flood incidents include:

- February 2022 – Storm Dudley, Eunice and Franklin; triple storm week brought strong winds and rain to the district. A number of internal property flooding was reported to both residential properties and businesses.



- February 2020 – Storm Ciara and Storm Dennis; channel capacity exceeded on main rivers, including the River Calder, and ordinary watercourses.
- December 2015 – Channel capacity exceeded on the River Calder upstream of Sands.
- June 2007 - Estimated 500 properties flooded due primarily to surface water where rainwater was unable to enter drainage systems due to design capacity being exceeded. The flooding was widespread across the district, but hotspots occurred around Ravensthorpe, Liversedge, Cleckheaton, Chickenley, Mirfield, Milnsbridge, Brockholes, New Mill, Denby Dale, Scissett and Clayton West.

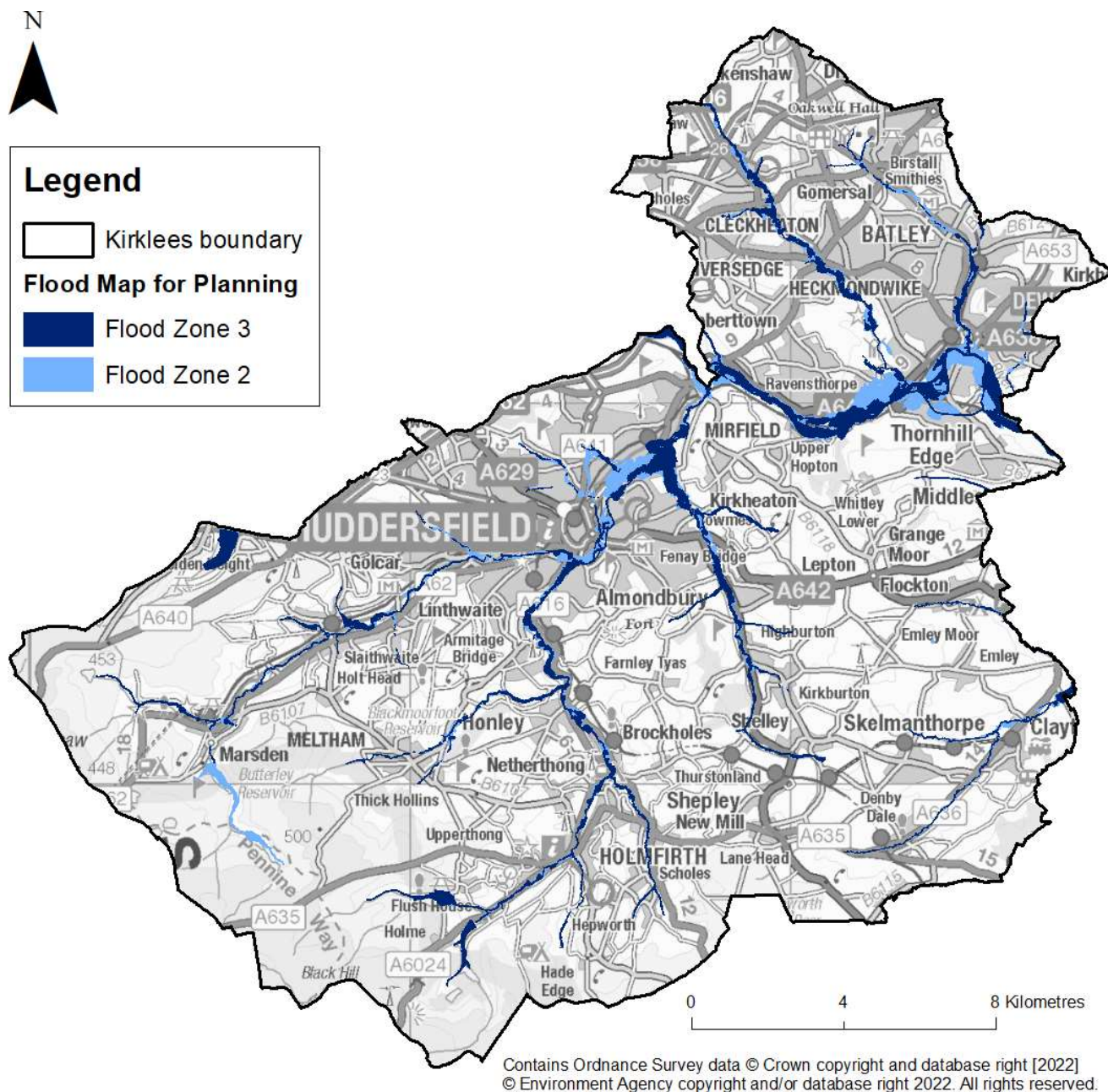
FIGURE 4.5 HISTORIC FLOODING EVENTS IN KIRKLEES



RIVER FLOODING

Figure 4.6 highlights the areas at risk of flooding from main rivers within Kirklees, as indicated by the Environment Agency's Flood Map for Planning dataset. Note that the Flood Map for Planning is based on an undefended, worst-case scenario and does not include for the effects of climate change. Flooding from main rivers is the management responsibility of the Environment Agency.

Figure 4.6 Flood risks from main rivers, Environment Agency Flood Map for Planning



MAIN RIVER

Main rivers are generally major watercourses for which the EA have a regulatory responsibility with permissive powers to carry out maintenance, improvement or construction work to manage flood risk. The hydraulic characteristics of the main rivers in Kirklees are generally well understood with computer modelling of flood risk having been carried out over the past 15 years. The Environment Agency also regulate development or works in, on, over, under or within 8 metres of fluvial main river watercourses under the Environmental Permitting (England and Wales) Regulation 2016. This also includes within the floodplain if works do not have planning permission and require quarrying or excavation within 16 metres of any main river, flood defence or culvert.

Although flooding from main rivers falls under the remit of the Environment Agency, we will work closely in partnership with the Environment Agency to understand and help to reduce risk from main rivers to our communities.

The range of activities subject to regulation are listed online at <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits#check-if-the-activity-is-on-a-main-river>. Figure 4.7 below illustrates the main rivers within Kirklees.

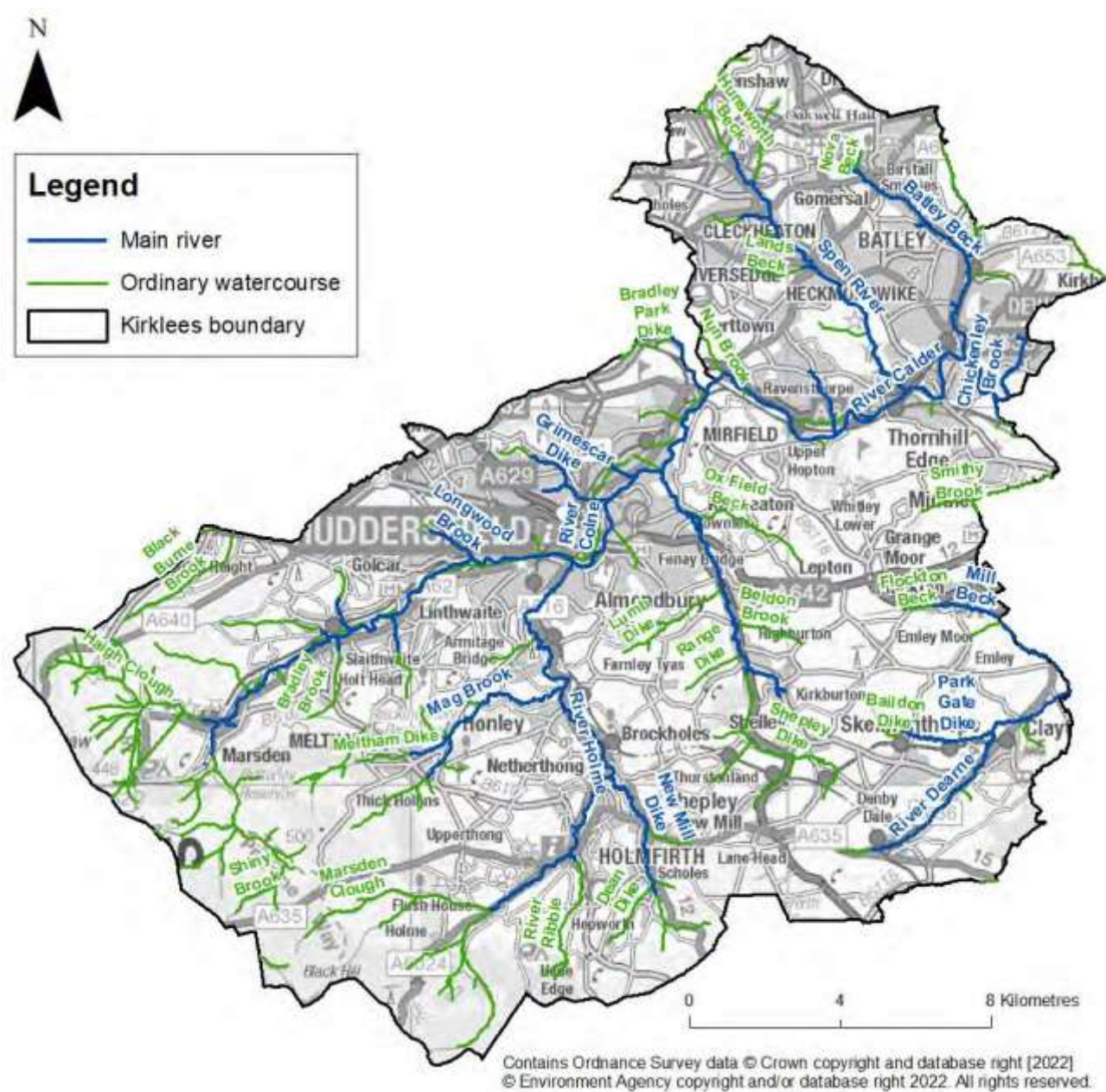
ORDINARY WATERCOURSES

Ordinary watercourses are any watercourse that is not designated main river. These watercourses can vary in size considerably and can include rivers, streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows. Ordinary watercourses do not always contain flowing water all year long; there may be times where the watercourses run dry, particularly over prolonged dry spells. Such watercourses can be described as ephemeral watercourses.

Ordinary watercourses come under the regulation of Kirklees Council as Lead Local Flood authority, which has permissive powers to carry out works, should this be deemed necessary, and has regulatory control over certain development activities within the watercourse channel. Many ordinary watercourses exist across the district (see Figure 4.7 below), the condition and capacity of which has not historically been recorded hence limited information is available on culverted sections.

As ILFA, we aim to increase our understanding of flood risk from ordinary watercourses and the impacts such flooding is having and/or could have in the future as a result of climate change on our communities.

Figure 4.7 Main rivers and known ordinary watercourses within Kirklees

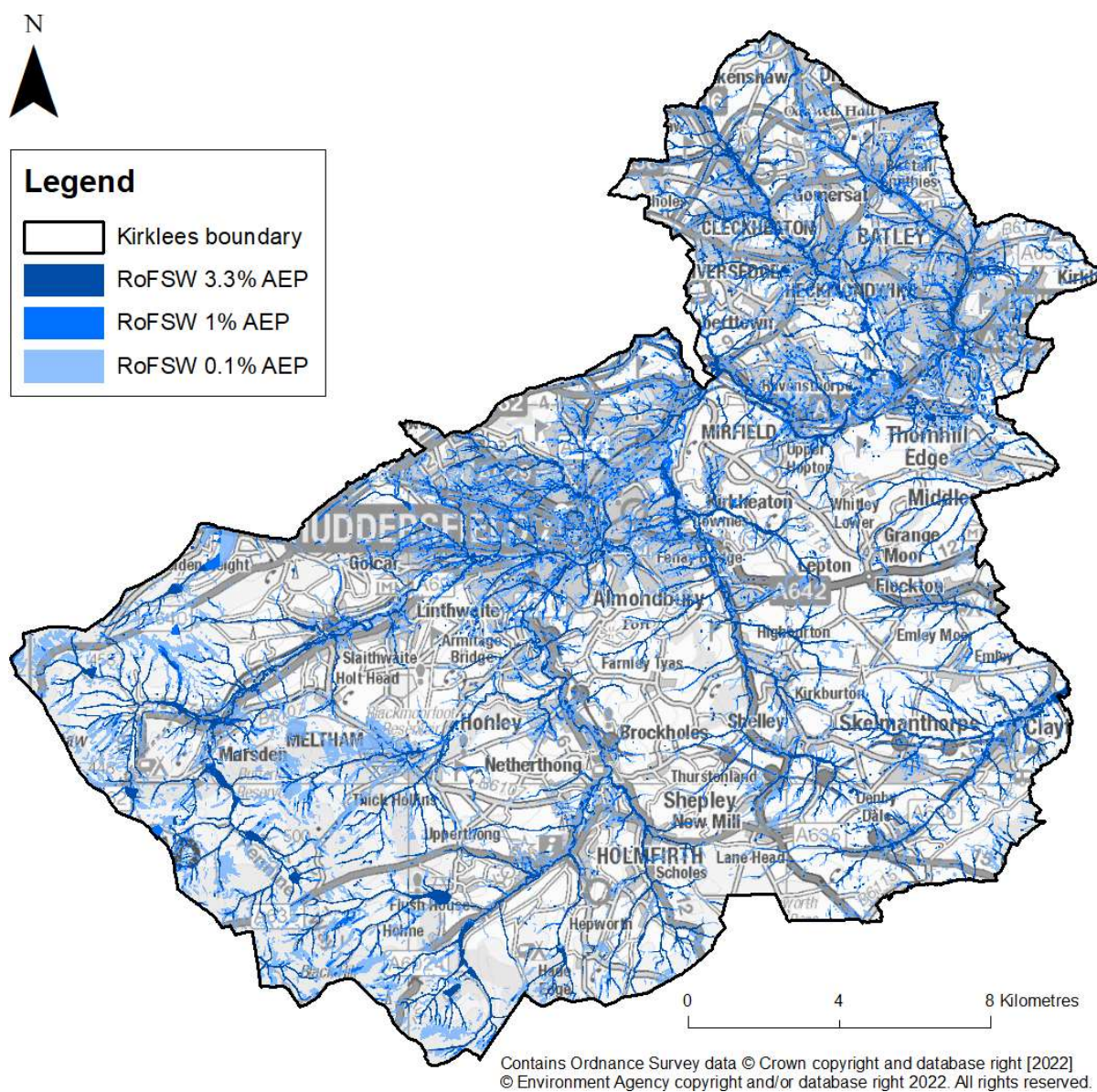


SURFACE WATER FLOODING

Surface water flooding is caused as a result of periods of high rainfall intensity or rainfall occurring when the ground is already saturated. Impermeable surfaces in urban areas are likely to heighten the risk of surface water flooding due to water not being able to infiltrate the surface. In addition, significant periods of heavy rainfall in areas with poor drainage systems may lead to blocked drains and sewer flooding. High summer temperatures can also harden the ground which can limit infiltration and cause problems during convective thunderstorms which often follow hot weather.

Figure 4.8 illustrates the Risk of Flooding from Surface Water (RoFSW) dataset which shows significant risk in the more urban areas of Huddersfield and Dewsbury and Batley in the north of the district. The more significant risk is apparent in these areas due to the greater proportion of less permeable and impermeable land surfaces. Surface water flood flows generally mimic the topography, following the watercourse channels and floodplains with areas of isolated ponding in topographic low spots.

Figure 4.8 flood risk from surface water, based on the EA Risk of Flooding from Surface Water dataset



EA RISK OF FLOODING FROM SURFACE WATER DATASET

The national Risk of Flooding from Surface Water (RoFSW) dataset identifies areas where localised flooding can cause problems even if main rivers are not overflowing. The RoFSW presents a worst-case scenario; therefore, any location identified to be at risk from surface water flooding according to the RoFSW should be assessed in more detail, usually through an appropriate Flood Risk Assessment (FRA). The RoFSW is the primary dataset available to the LLFA for assessing surface water flood risk in the district.

The RoFSW includes surface water flood outlines, depths, velocities and hazards for the following events:

- Greater than 1 in 30-year event (3.3% AEP) – high-risk
- Between 1 in 30-year event and 1 in 100-year event (1% AEP) – medium risk
- Between 1 in 100-year event and 1 in 1,000-year event (0.1% AEP) – low risk
- Less than 1 in 1,000 year (0.1% AEP) – Very low risk (not shown).

At the time of writing, the EA is also carrying out a national update of the RoFSW as part of the National Flood Risk Assessment 2 (NaFRA2) project which is due for completion in 2024.

As LLFA, we will continue to manage surface water flood risk and will work in partnership with local communities to raise awareness and encourage the participation in local flood risk management. Such awareness of local flood risk and participation in flood risk management will become increasingly more important in our changing climate.

GROUNDWATER FLOODING

Groundwater flooding is caused by the emergence of water from beneath the ground, either at point or diffuse locations. The occurrence of groundwater flooding is usually local and unlike flooding from rivers, does not generally pose a significant risk to life due to the slow rate at which the water level rises. However, groundwater flooding can cause significant damage to property, especially in urban areas and can pose further risks to the environment and ground stability.

Warmer, wetter winters and hotter, drier summers due to climate change are likely to have significant impacts on groundwater levels within Kirklees. Increased periods of rainfall within the district are likely to increase the susceptibility of groundwater flooding in areas currently at risk. It is considered unusual to see groundwater breaking through the surface of the ground but the high number of basements in older properties, means that groundwater flooding to “below ground” rooms is increasingly common.

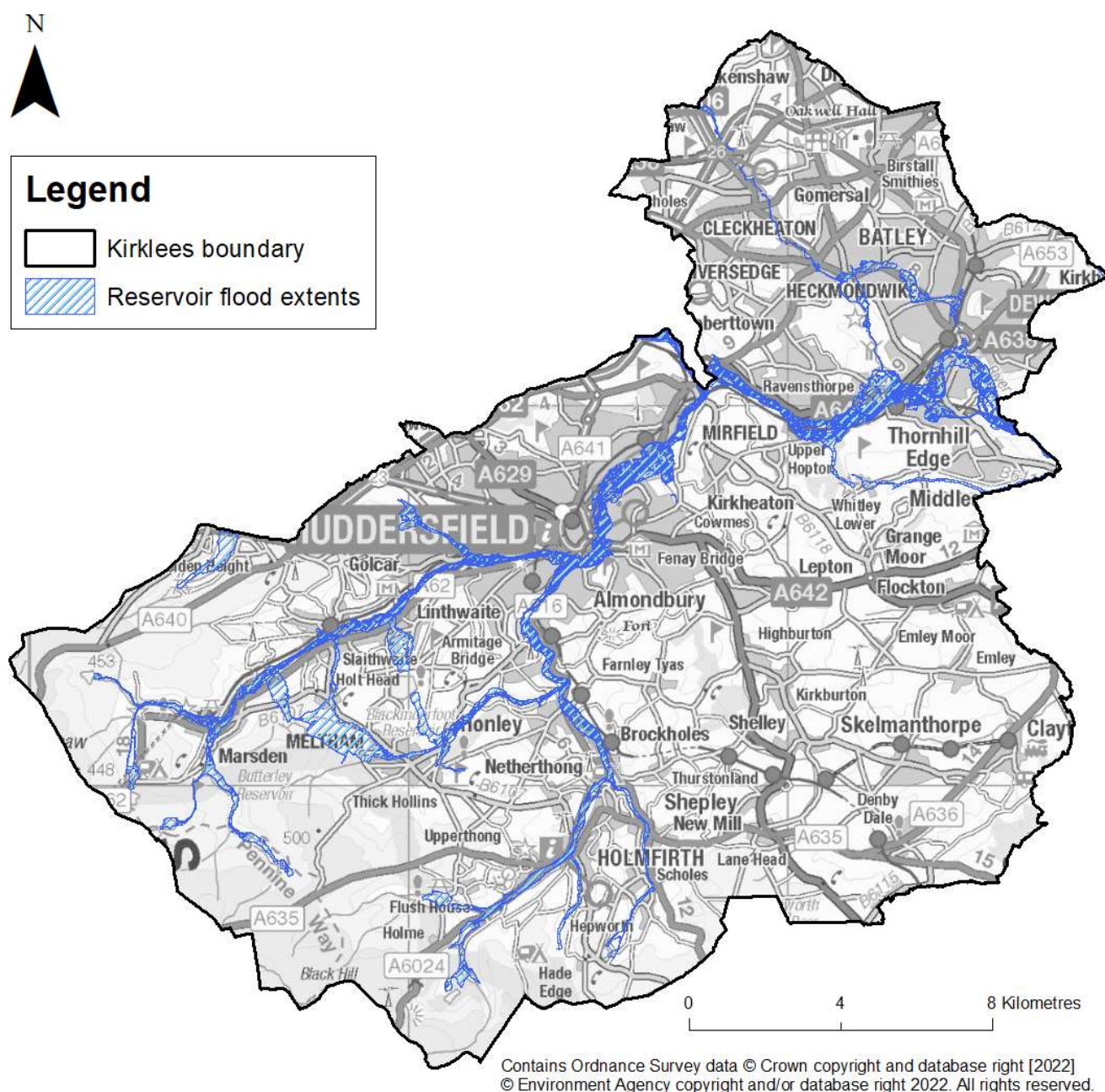
Development within areas that have a periodic high-water table will generally not be suited to infiltration SuDS. However, this is dependent on a detailed site investigation and at the Flood Risk Assessment A stage. Within Kirklees there are a high number of older properties containing cellars and basements, which can be particularly prone to rising water tables and therefore groundwater flooding. We will continue to work with homeowners concerning possible groundwater flood risk to existing properties.

Recorded incidents of groundwater flooding in Kirklees are rare. However, we will continue to raise awareness in local communities of the risks associated with groundwater flooding and how such risks can be mitigated.

RESERVOIR FLOODING

The EA has produced Reservoir Flood Maps (RFM) for all large, raised reservoirs that are regulated under the Reservoirs Act 1975 (reservoirs that hold over 25,000 cubic metres of water). Figure 4-9 highlights the risk of reservoir flooding across Kirklees in the event of a dry day i.e., when it isn't raining. The RFM extent shows the worst credible area that is susceptible to dam breach flooding. The map should be used to prioritise areas for evacuation/early warning. The RFM shows that there are 51 large-raised reservoirs which have the potential to impact Kirklees in the event of a breach. 32 of these large-raised reservoirs are located within the Kirklees boundary.

Figure 4.9 risk of flooding from reservoirs (EA Reservoir Flood Map)



We will work with and support reservoir owners to ensure the risk of flooding from reservoirs remains very low.

SEWER FLOODING

Sewer flooding has the potential to occur where significant amounts of intense rainfall overload the sewer system capacity causing water to back up through the sewers and surcharge through manholes. This has the potential to flood both road infrastructure and property. Pinch points and failures within the drainage network may also restrict flows.

Yorkshire Water owns the majority of the combined and surface water sewers within the district. Since 1980, sewer systems have been designed not to flood during a 1 in 30-year (3.3% AEP) rainfall event. However, higher magnitude events, e.g., a 1 in 100 chance of occurring in any given year (1% AEP), can still overwhelm the sewerage system through both surface water and fluvial sources. Existing sewerage systems can be placed under additional pressure where development reduces the permeable area within a catchment and through the impacts of climate change. This can lead to increased overland flows and therefore can occur in any location across Kirklees.

The Council continues to work in partnership with Yorkshire Water, the Environment Agency and other parties to better understand the interaction of the sewerage and drainage networks and provide improvements that will help further reduce the risk of flooding from sewers.

FLOOD MITIGATION

EXISTING FLOOD DEFENCES

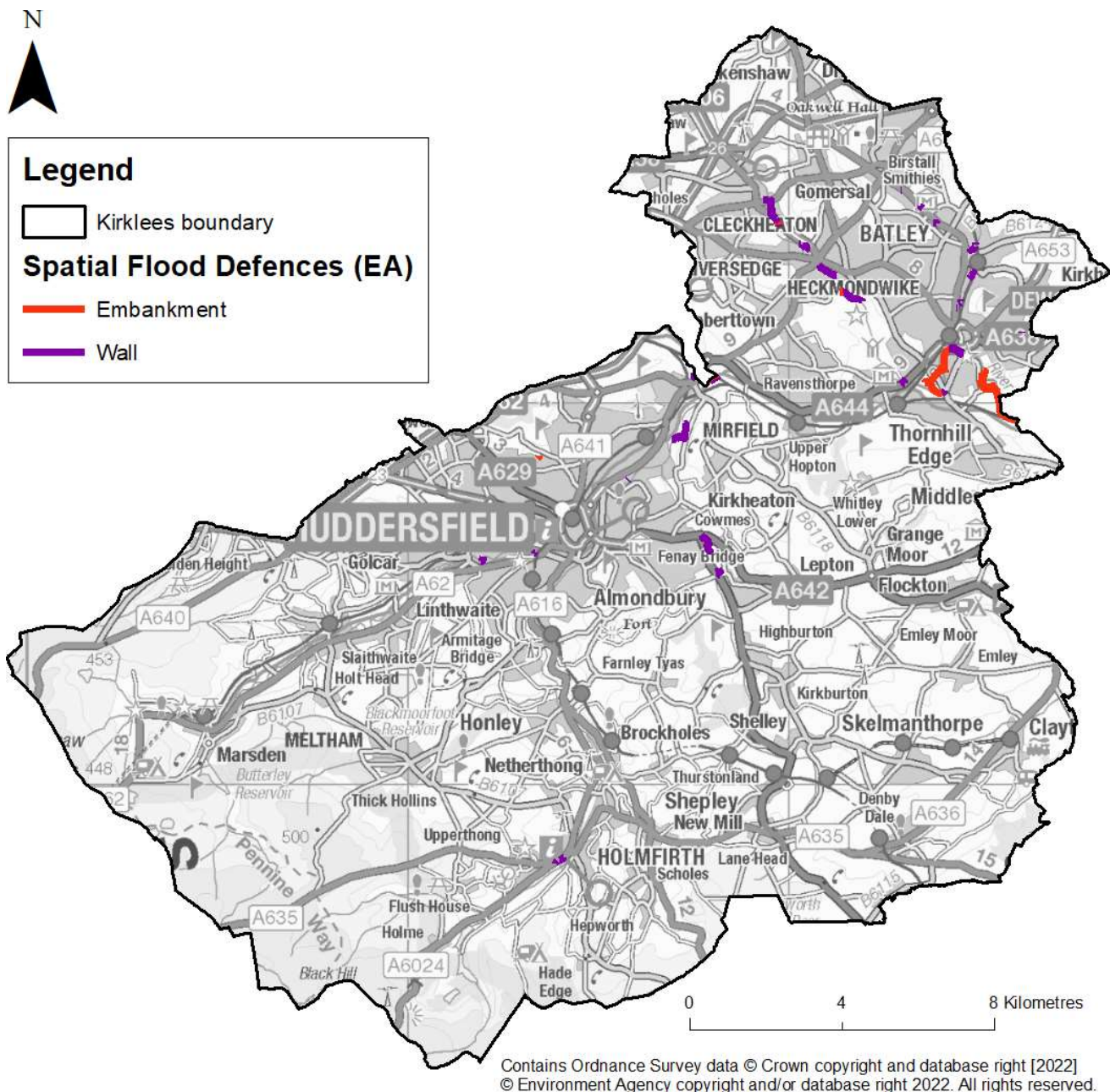
The EA's Spatial Flood defences dataset shows major flood defence walls and embankments currently owned, managed or inspected by the EA (Figure 4-10). Flood defences can be structures, buildings or parts of buildings, and can include manmade defence assets such as flood walls or embankments, or natural defences such as high ground.

Most main rivers within Kirklees have some form of flood defence along their reaches. These consist mostly of areas of natural or engineered areas of high ground which are not shown on Figure 4-10. Manmade defences include embankments, flood walls and flood gates. Flood defences are given a standard of protection and asset condition rating. An assessment of flood defences within the district highlights the majority of assets have a standard of protection to an annual exceedance probability of between 20 and 50 years, meaning protection is provided until a flood event exceeds a 1 in 50-year (2% AEP) flood event. The condition rating of the flood defence assets is mostly either 2 or 3, rated as good or fair when they were last inspected between 2021 and 2022.

ASSET MANAGEMENT

Kirklees own and maintains assets across the district, which includes culverts, bridge structures and trash screens. We are also responsible for its highway drainage systems such as highway gullies and carrier drains which are required to drain the public highway. The Council maintains these in accordance with the Well Managed Highway Infrastructure Code of Practice.

Figure 4.10 EA Spatial Flood Defences dataset indicating major flood walls and flood embankments within Kirklees



WORKING WITH NATURAL PROCESSES

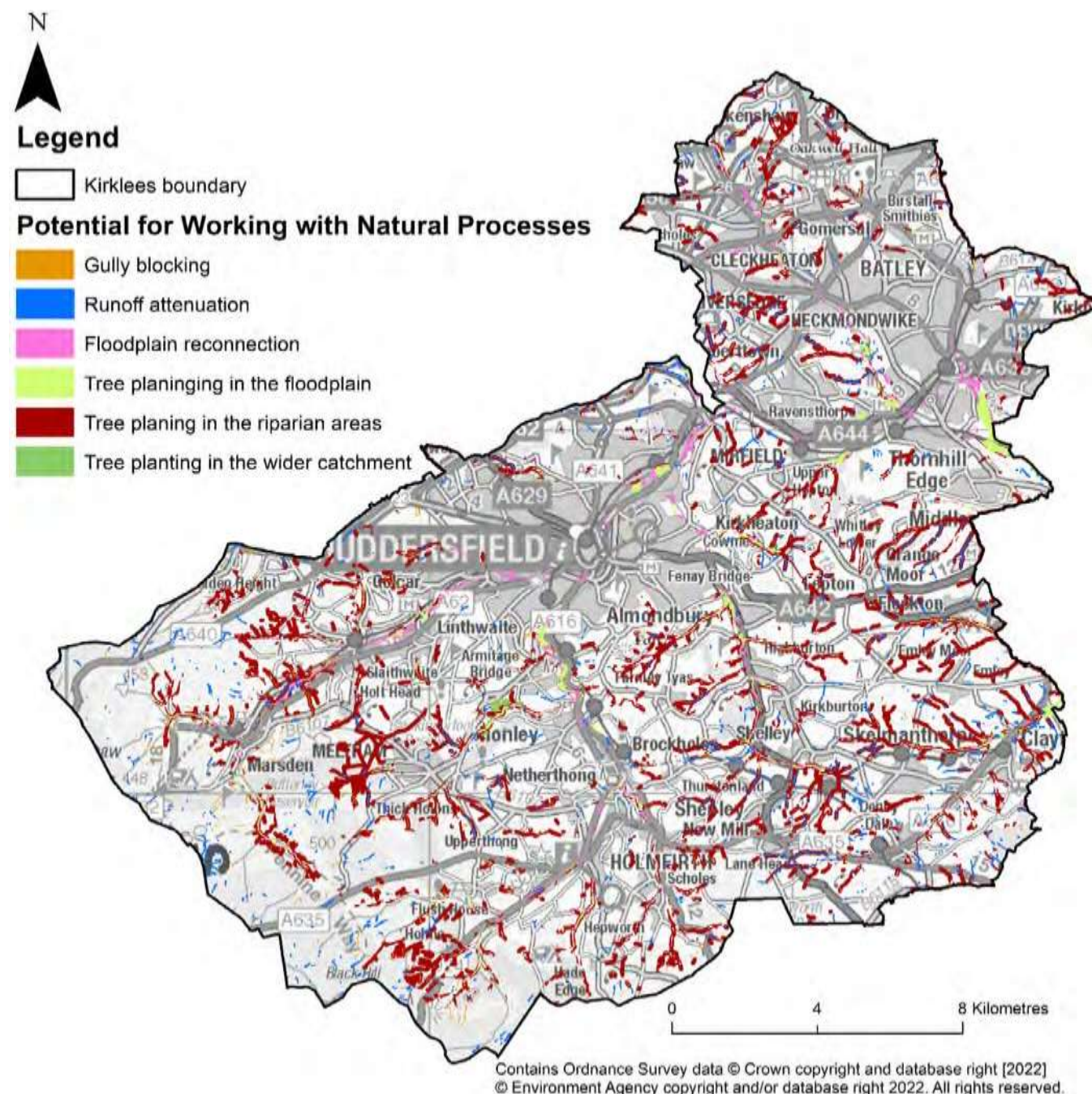
Working with Natural Processes (WwNP) or Natural flood management (NFM) is a type of flood risk management used to protect, restore and re-naturalise the function of catchments and rivers to reduce flood and coastal erosion risk. WwNP has the potential to provide environmentally sensitive approaches to minimising flood risk, to reduce flood risk in areas where hard flood defences are not feasible and to increase the lifespan of existing flood defences.

A wide range of techniques can be used that aim to reduce flooding by working with natural features and processes in order to store or slow down flood waters before they can damage flood risk receptors.

(e.g. people, property, infrastructure, etc.). WwNP involves taking action to manage flood and coastal erosion risk by protecting, restoring and emulating the natural regulating functions of catchments, rivers, floodplains and coasts.

Figure 4.11 illustrates the EA's Working with Natural Processes dataset. There is considerable opportunity across Kirklees for tree planting along flow pathways within smaller floodplains to attenuate flooding. The opportunities for tree planting are mainly confined to less urban areas.

Figure 4.11 Working with Natural Processes



Within Huddersfield the only opportunity for WwNP is floodplain reconnection, which aims to reconnect a watercourse and its natural floodplain, especially during high flows, to reduce the rapid propagation of flows downstream. These opportunities have been identified in areas of low risk where there are no existing developments but where natural river features or landscape modifications, such as historic embankments, disconnect the channel from the floodplain.

CLIMATE CHANGE – UK CLIMATE PROJECTIONS

THIS SECTION OF THE REPORT HIGHLIGHTS THE POSSIBLE IMPACTS OF CLIMATE CHANGE ON SURFACE WATER IN KIRKLEES AND THEREFORE WHY BUILDING RESILIENCE INTO OUR COMMUNITIES IS SO IMPORTANT.

Following on from the UK Climate Projections 2009 (UKCP09), the UK Climate Projections 2018 (UKCP18) delivered a major upgrade to the range of UK climate projection tools designed to help decision-makers assess their risk exposure to our changing climate.

The UKCP18 project used cutting-edge climate science to provide updated observations and climate change projections up to the year 2100 across the UK. The project builds upon UKCP09 to provide the most up-to-date assessment of how the climate of the UK may change over the 21st century.

UKCP18 updates the projections over land and provides a set of detailed future climate projections for the UK at a 12km scale. Models of high impact events such as from localised heavy rainfall in summer months were created. UKCP18 enables the UK to adapt to the challenges and opportunities presented by climate change.

KIRKLEES CLIMATE EMERGENCY¹⁶



The Council declared a climate emergency in 2019 in the knowledge that we must all take urgent action to improve and protect our environment.

Our vision is for a Net Zero and Climate Ready Kirklees by 2038. This provides us with focus on both mitigation and adaptation to climate change.

For mitigation, carbon emissions from human activities will need to be dramatically reduced to zero, with any remaining emissions safely removed from the atmosphere.



¹⁵ Met Office UKCP18

¹⁶ [Kirklees Climate Emergency](#)

IMPACTS OF CLIMATE CHANGE ON SURFACE WATER IN KIRKLEES

As part of this Strategy, we have modelled the climate change allowances for peak rainfall to give an insight into the effects of climate change on surface water flows and the subsequent impacts on communities in Kirklees.

The likely impacts of climate change are well documented and will have a significant impact on flood risk. Increases in duration and intensity of extreme rainfall events as a result of climate change will increase flood risk from multiple sources.

Surface water flooding is caused by periods of high rainfall intensity or rainfall occurring when the ground is already wet. As part of this Strategy, we have modelled the climate change allowances for peak rainfall to give an insight into the effects of climate change on surface water flows and the subsequent impacts on communities in Kirklees.

To gauge the impacts of climate change on surface water and for small scale drainage design, the Environment Agency updated their allowances for peak rainfall intensities in 2021 based on management catchments, provided in Table 5-1, which should be used as a guide for small (less than 5km²) and urbanised drainage catchments when carrying out modelling as part of a Flood Risk Assessment. The allowances are based on the high emission scenario of UKCP18, with the central allowance representing a 4°C increase by 2100.

TABLE 5.1: EA PEAK RAINFALL INTENSITY ALLOWANCES FOR MANAGEMENT CATCHMENTS IN KIRKLEES

Total potential change anticipated for peak rainfall intensities (based on a 1961-1990 baseline).

Management catchment – allowance category	3.3% annual exceedance rainfall event: 2050s (up to 2060)	3.3% annual exceedance rainfall event: 2070s (2061-2125)	1% annual exceedance rainfall event: 2050s (up to 2060)	1% annual exceedance rainfall event: 2070s (2061-2125)
Aire and Calder – Upper end	35%	40%	40%	45%
Aire and Calder – Central	20%	25%	25%	30%
Don and Rother – Upper end	35%	35%	40%	40%
Don and Rother – Central	20%	25%	20%	25%
Upper Mersey – Upper end	35%	40%	40%	45%
Upper Mersey – Central	20%	30%	25%	30%

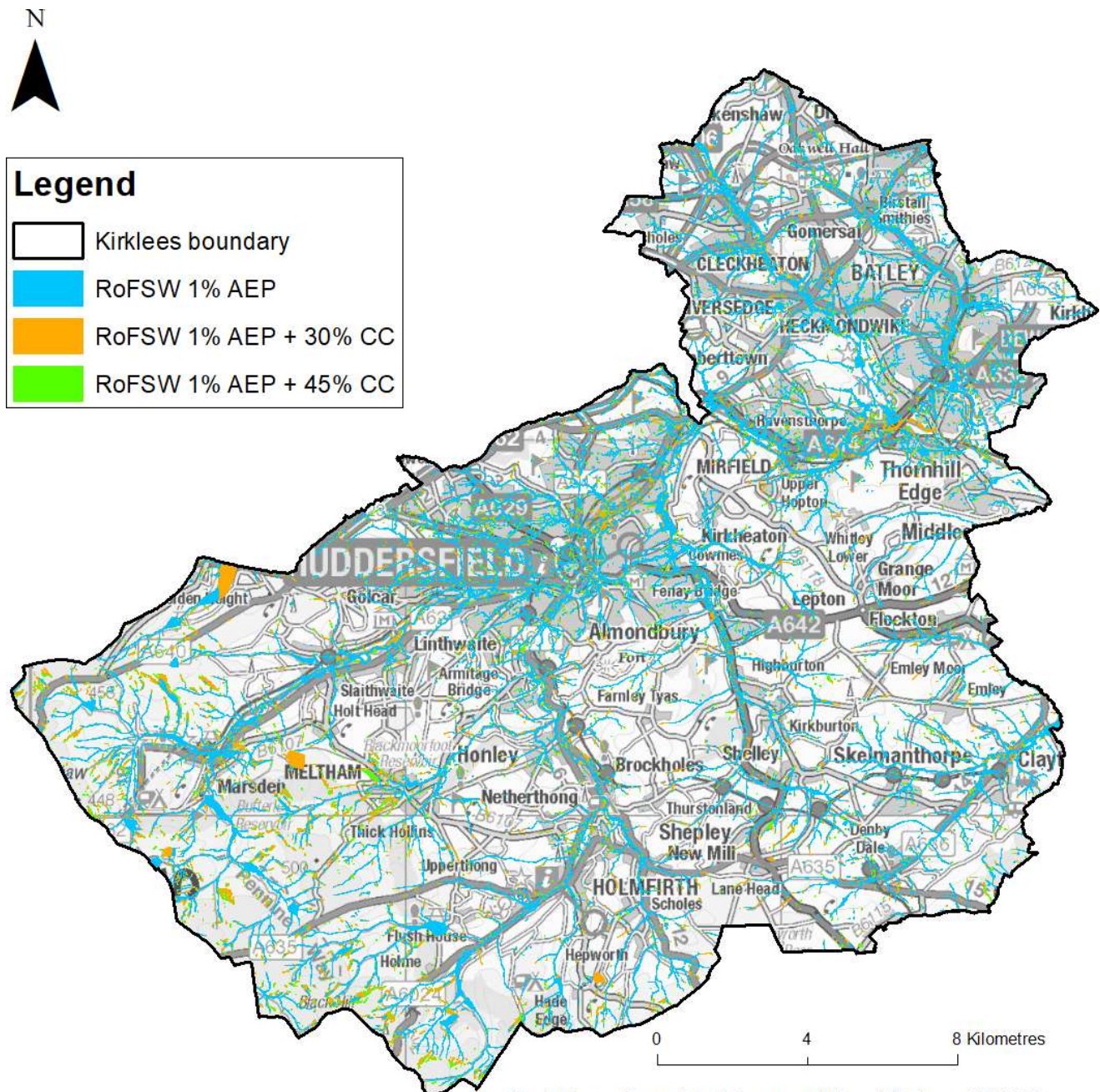
To assess the impacts of climate change on surface water flood risk, the Risk of Flooding from Surface Water (RoFSW) 1 in 100-year (1% AEP) mapping has been updated with 30% (Central) and 45% (Upper End) uplifts.

Figure 5-1 shows that the extent of surface water flooding is likely to increase with climate change across Kirklees, particularly within the low-lying floodplains of the River Colne and River Calder and along topographical flow paths of existing watercourses and their tributaries. Across the whole of the

district, it is predicted that there will be a 36% increase in the number of properties at risk of surface water flooding in a 1% AEP event as a result of a 30% increase in rainfall intensity.

This Local Flood Risk Management Strategy sets out how it plans to manage the flood impacts of Climate Change. It recognises the importance of addressing the causes of climate change by promoting nature-based solutions like tree planting and peatland restoration initiatives with our partners. In restoring and adapting our landscapes, we are mitigating the impact of Climate Change.

Figure 5.1 Flood risk from surface water with 30% and 45% climate change allowances, based on the Risk of Flooding from Surface Water dataset



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FLOOD INVESTIGATION AND ASSET RECORDING

THIS SECTION BRIEFLY OUT THE ROLES AND RESPONSIBILITIES OF THE KEY RISK MANAGEMENT AUTHORITIES IN KIRKLEES, UNDER THE PROVISIONS OF THE FLOOD AND WATER MANAGEMENT ACT 2010 (FWMA). APPENDIX D INCLUDES A MORE COMPREHENSIVE LIST.

In relation to Kirklees, the Risk Management Authorities in the district include:

- Lead Local Flood Authority – Kirklees Council
- Environment Agency
- Water and sewerage companies – Yorkshire Water
- Highways Authority – Kirklees Council and National Highways (strategic roads e.g., motorways)

Under the provisions of the Flood and Water Management Act the following duties and powers are common to all risk management authorities:

- Duty to cooperate with other risk management authorities.
- Duty to act consistently with the national and local strategies.
- Powers to take on flood risk functions from another Risk Management Authority
- Duty to contribute towards the achievement of sustainable development.
- Duty to be subject to scrutiny from the LLFA's democratic process.

This underpins our understanding that the very same rainwater passes through our drainage assets as it continues along its water cycle journey. The LLFA will therefore ensure it continues to work collaboratively in partnership with all partners to reduce flood risk.

SCHEDULE 3 SUSTAINABLE DRAINAGE (FWMA)

The future enactment of Schedule 3¹⁷ of the FWMA means there is a requirement for the inclusion of SuDS in all new development which must be approved by the Council as the 'approving body'. The Council may be required to adopt and maintain SuDS for new developments once the development is complete. It is expected that legal, statutory guidance will be produced which will provide a more consistent approach to SuDS design and approval. The Council will engage with Government and its partners to ensure it will offer an effective approach to managing flood risk for our communities.

KIRKLEES FLOODING RESPONSIBILITIES



- Kirklees Council Lead Local Flood Authority (LLFA) – manage flood risk from ordinary watercourses, surface water and groundwater.
- Environment Agency – responsible for main rivers and regulate operation of large raised reservoirs.
- Highways Authority (Kirklees Council and National Highways) – responsible for providing and managing highway drainage and some roadside ditches/gullies.
- Yorkshire Water – responsible for public water supply and sewerage systems.

¹⁷ [Schedule 3 Flood and Water Management Act 2010](#)

FLOOD INVESTIGATIONS

We have a duty to investigate and publish reports on significant flood incidents (where appropriate and necessary) to identify which authorities have relevant flood risk management functions, and what they have done or intend to do (FWMA 2010).

We will endeavour to investigate flood incidents which meet the following criteria:

- where one or more residential or business property suffers internal flooding
- where there is a risk to life as a result of the depth and / or velocity of floodwater
- where critical infrastructure (e.g. emergency services buildings, utility company infrastructure, schools, day centres, hospitals and main transport routes) suffer flooding or obstruction, or were in imminent danger of flooding
- where five or more properties were in imminent danger of flooding, or
- where local democratic pressures from elected members, committees, or other elected bodies, might be considered as a factor in determining whether a formal investigation should be carried out.

Note: we will only formally publish details if considered appropriate.

ASSET RECORDING

The LLFA has a duty to maintain a register of structures or assets that have a significant effect on flood risk (FWMA 2010). The LLFA has discretion to set a local indication of “significance” to determine which assets it records on the register, which is available for inspection.

The Council's register of drainage assets aims to include the following structures or features:

- Pipes and culverts:
 - Where the diameter is greater than 600mm or cross-sectional area is greater than 0.3m², or
 - Where the pipe/culvert has a recorded history of flooding, or
 - Where the pipe/culvert is within 20m of a cluster of 5 or more recorded flood incidents (non-cellar) – excluding pipes of 225mm diameter or less.
- Debris screen:
 - where a debris screen is blocked.
- Others:
 - reservoirs
 - mill ponds
 - environment Agency assets.
- SuDS:
 - all new SuDS adopted by Kirklees.

HIGH RISK CATCHMENTS

Kirklees Council has carried out a high-level strategic study into which are the highest risk hydrological catchments in the district based on surface water flood risk and flood risk from main rivers to existing properties and infrastructure.

At a strategic level, this will help us to identify the communities within these high-risk catchments that may be in greatest need of action on flood risk management.

STRATEGIC APPROACH

To identify areas that may be at the highest risk of flooding from surface water and main rivers, an assessment of surface water and fluvial flood risk has been undertaken for Kirklees. We have identified the top ten catchments where risk to existing properties and critical and vulnerable infrastructure is highest from both surface water and main rivers. We have also considered recorded historic flood events and levels of social deprivation to help to help us to prioritise our flood risk management actions to less well-off communities to ensure they receive the same consideration as more affluent areas where damages as a result of flooding may be higher in monetary terms.

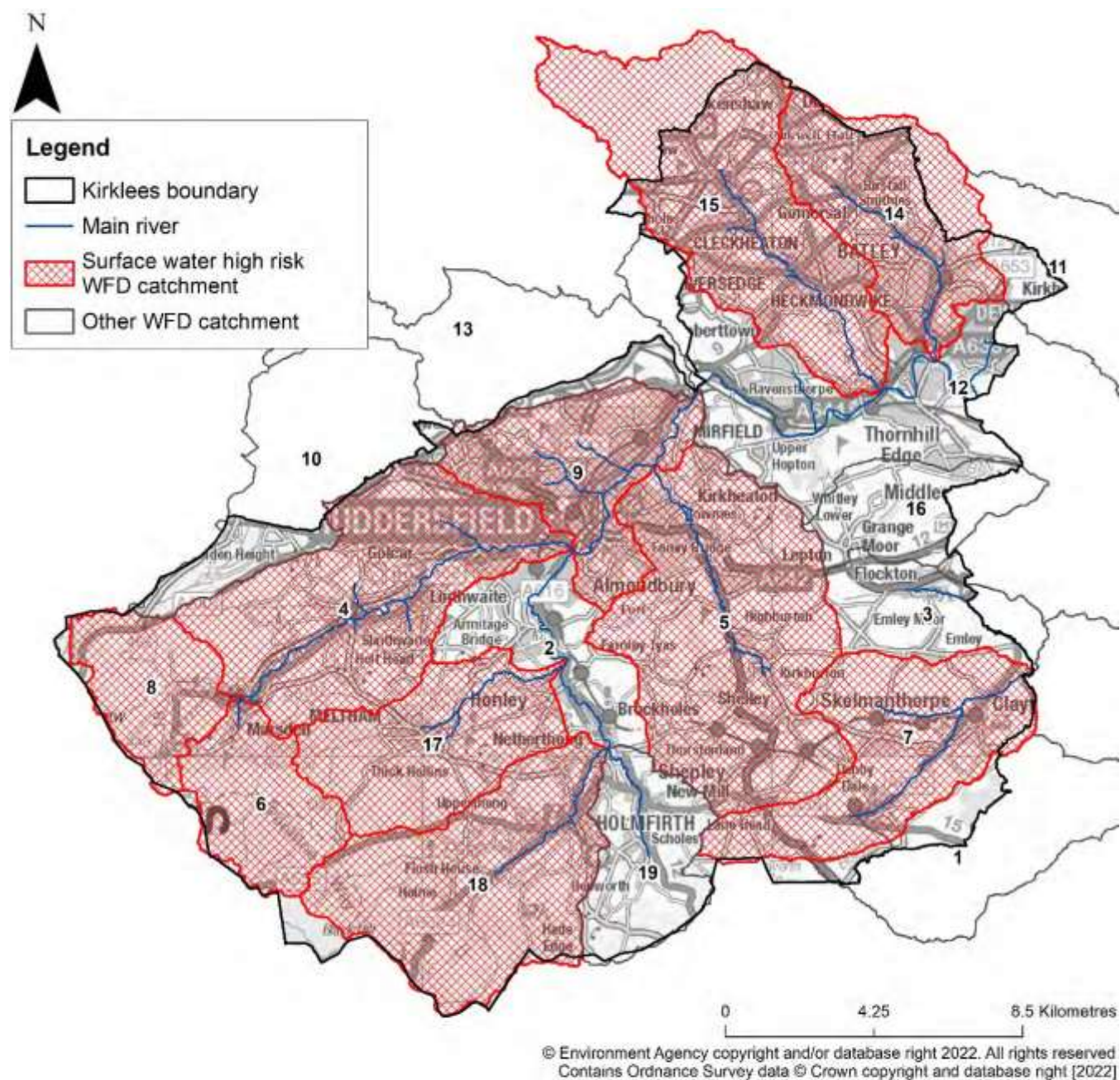
Note this is a strategic approach to identifying those areas most at risk. It is not a detailed investigation designed to target locations where specific flood risk management schemes are required.

For the purposes of this assessment, the district has been split into 19 areas based on the Water Framework Directive (WFD) watercourse catchments to allow a catchment-based approach to be taken. To identify the high-risk surface water catchments the RoFSW dataset and modelled surface water climate change data have been used. The Flood Map for Planning has been used to identify the high-risk fluvial catchments. We have also used property and critical infrastructure data, historic flood event information recorded by Kirklees and social deprivation data. The methodology process is detailed in Appendix E.

Figures 7.1 and 7.2 show the top ten WFD catchments with the largest number of receptors (residential properties, non-residential and infrastructure) at risk from surface water and main river flooding respectively, within Kirklees. The historic flood event data has been used to help corroborate the catchments shown to be at highest risk. Figures 7-3 and 7-4 show a comparison of the high-risk catchments with the social deprivation data.

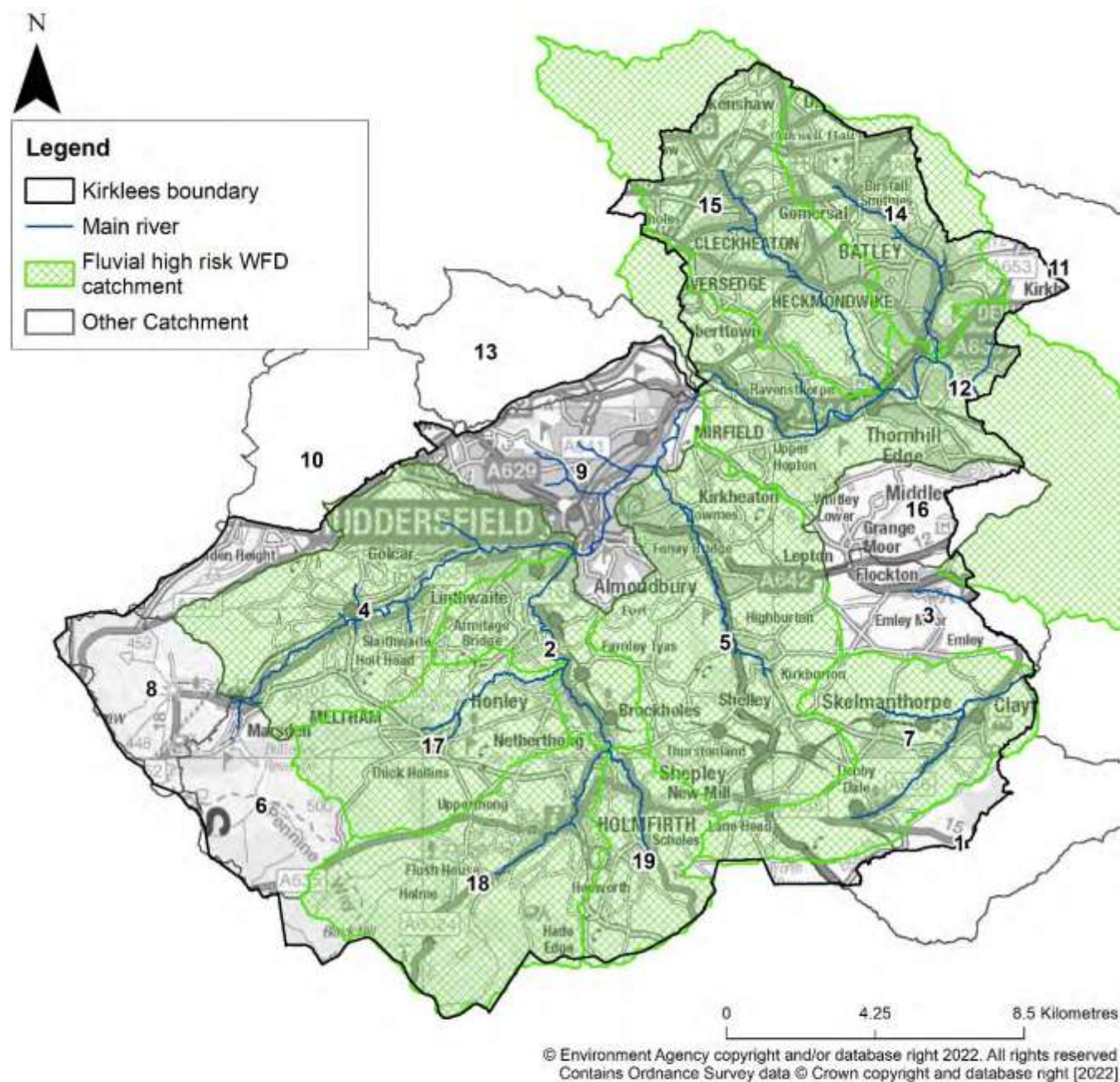
We will ensure all communities are afforded the required support that is proportionate to risk and consequence.

Figure 7.1 Top ten WFD catchments with the largest number of receptors at risk from surface water



- | | | |
|--|---|---|
| 1 - Cawthorne Dyke from Source to River Dearne | 8 - Colne from Source to Wessenden Brook | 15 - Spen Beck from Source to River Calder |
| 2 - Holme from New Mill Dike to R Colne | 9 - Colne from River Holme to Wessenden Brook | 16 - Smithy Brook from Source to River Calder |
| 3 - Bentley Brook from Source to River Dearne | 10 - Black Brook from Source to River Calder | 17 - Mag Brook from Source to River Holme |
| 4 - Colne from Wessenden Brook to R Holme | 11 - Chald from Source to River Calder | 18 - Holme from Source to New Mill Dike |
| 5 - Fenay beck from Source to River Colne | 12 - Calder from River Colne to River Chald | 19 - New Mill Dike from Source to River Holme |
| 6 - Wessenden Bk from Butterfly Resr to River Coln | 13 - Calder from Ryburn Confluence to River Colne | |
| 7 - Dearne from Source to Bentley Brook | 14 - Batley Beck from Source to River Calder | |

Figure 7.2 Top ten WFD catchments with the largest number of receptors at risk from main rivers



- | | | |
|---|---|---|
| 1 - Cawthorne Dyke from Source to River Dearne | 8 - Colne from Source to Wessenden Brook | 15 - Spen Beck from Source to River Calder |
| 2 - Holme from New Mill Dike to R Colne | 9 - Colne from River Holme to River Calder | 16 - Smithy Brook from Source to River Calder |
| 3 - Bentley Brook from Source to River Dearne | 10 - Black Brook from Source to River Calder | 17 - Mag Brook from Source to River Holme |
| 4 - Colne from Wessenden Brook to R Holme | 11 - Chald from Source to River Calder | 18 - Holme from Source to New Mill Dike |
| 5 - Fenay beck from Source to River Colne | 12 - Calder from River Colne to River Chald | 19 - New Mill Dike from Source to River Holme |
| 6 - Wessenden Bk from Butterly Resr to River Coln | 13 - Calder from Ryburn Confluence to River Colne | |
| 7 - Dearne from Source to Bentley Brook | 14 - Batley Beck from Source to River Calder | |

Figure 7.3 Top ten WFD catchments with the largest number of receptors at risk from surface water compared to social deprivation

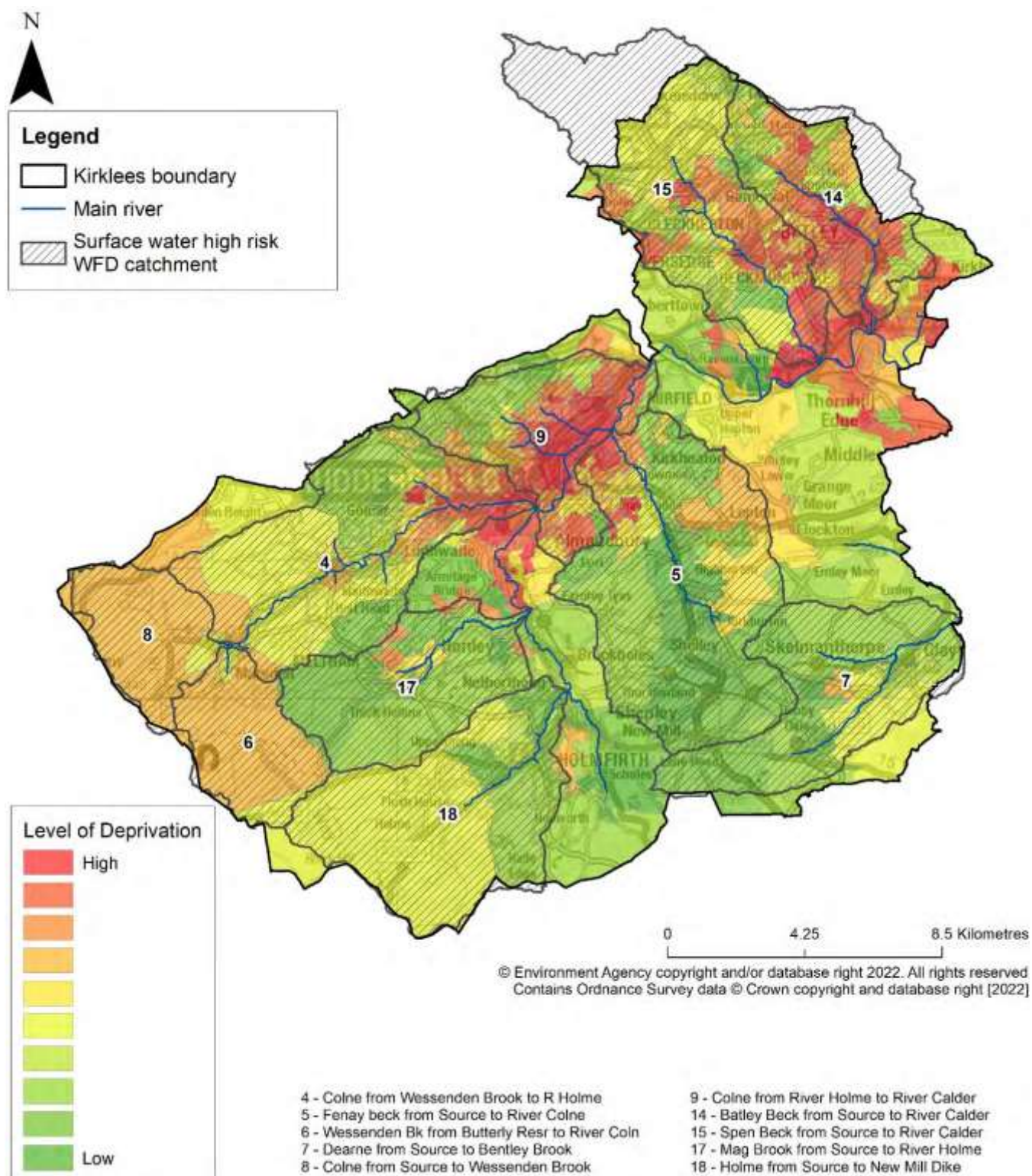
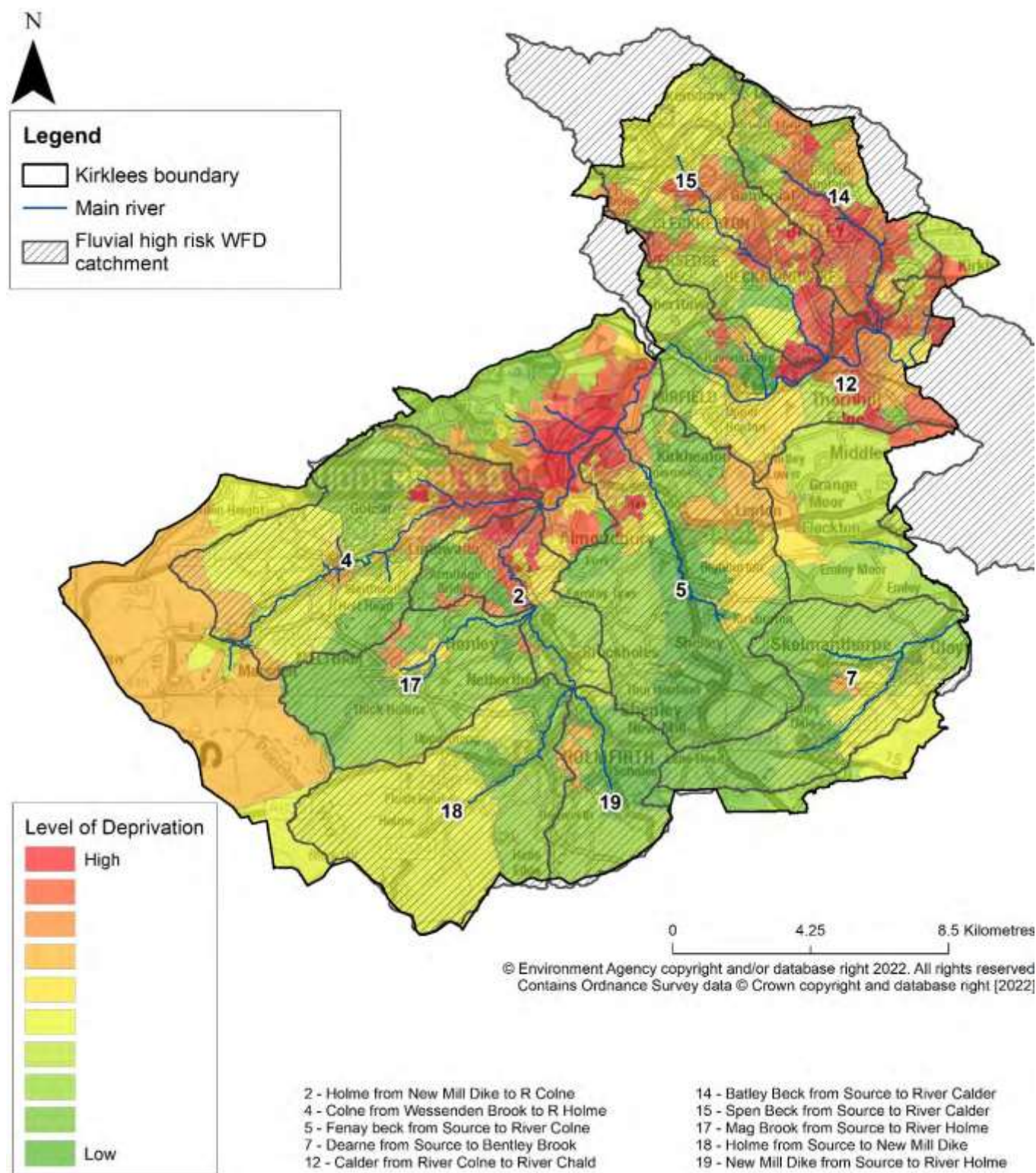


Figure 7.4 Top ten WFD catchments with the largest number of receptors at risk from main rivers compared to social deprivation



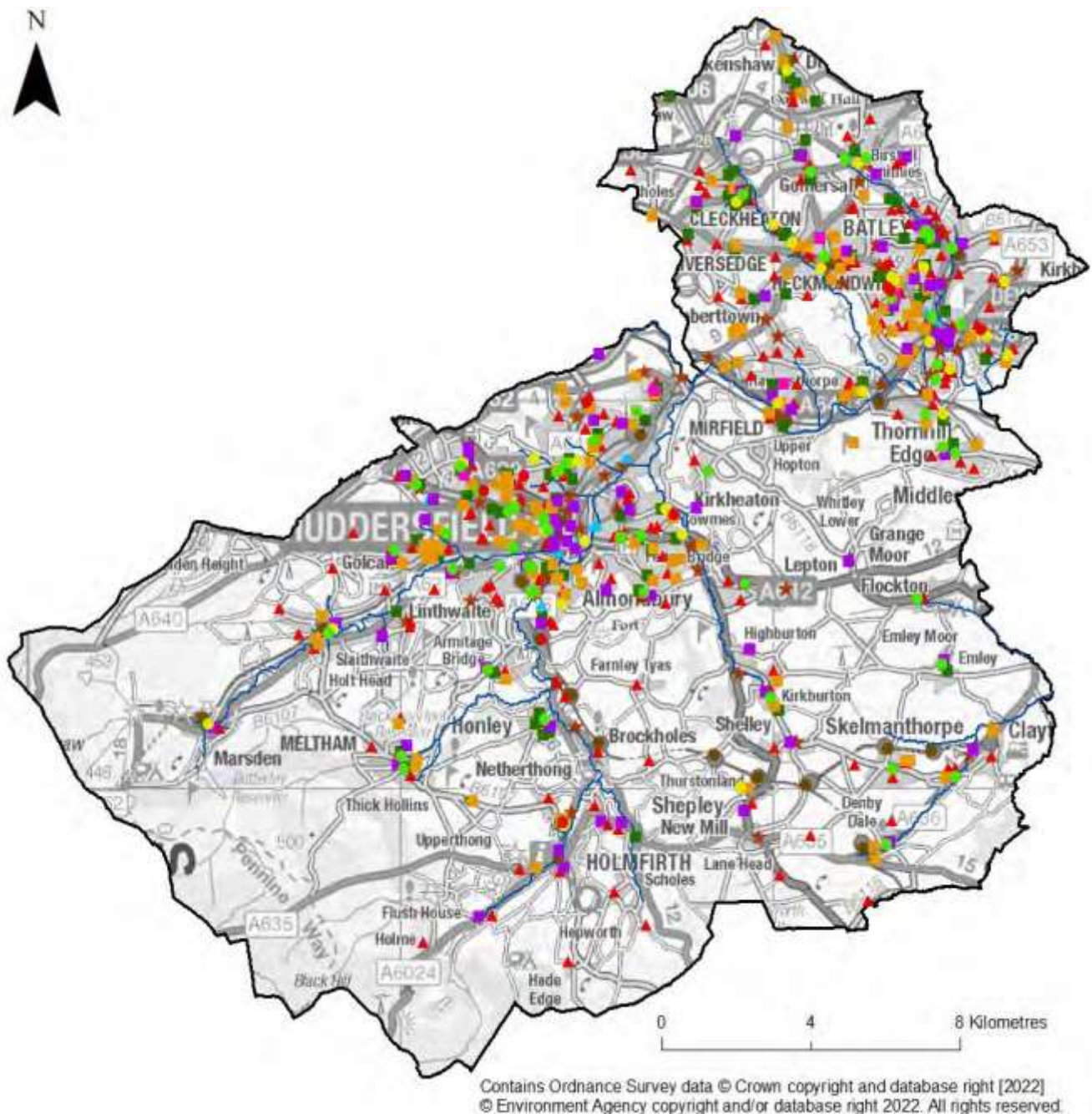
There are a number of critical and vulnerable infrastructure sites in Kirklees where the consequences of being flooded would impact on a large number of people and also the vulnerable people in society. It is therefore important that such infrastructure is protected and resilient to the impacts of climate change on flooding. Such critical and vulnerable infrastructure includes the following:

- hospitals, clinics and GP surgeries
- care homes and rest centres
- sheltered housing centres
- schools, colleges and universities

- children's homes
- bus and train stations
- petrol stations.

Figure 7.5 shows the locations of the critical and vulnerable infrastructure which are mainly centred around Huddersfield, Dewsbury and Batley. These communities are located in the high-risk surface water catchments and areas of high social deprivation based on the above figures. Tables 7.1 and 7.2 list the number of ground floor residential properties, ground flood non-residential properties, and critical services at risk within each high-risk surface water and high-risk fluvial catchment respectively.

Figure 7.5 Critical and vulnerable infrastructure in Kirklees



Legend

Kirklees boundary	Hospital / hospice	Children's home	Sheltered housing	Bus / rail stations
Main river	GP surgery	Rest centre	School	Petrol station
	Clinic	Care home	College / university	

TABLE 7-1 RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES, AND CRITICAL SERVICES AT RISK FROM SURFACE WATER IN THE 1 IN 1,000-YEAR EVENT IN HIGH-RISK SURFACE WATER CATCHMENTS

WFD high risk catchment ID	WFD high risk catchment name	Main communities at risk	Number of residential properties at risk	Number of non-residential properties at risk	Number of critical/vulnerable infrastructure at risk
8	Colne from Source to Wessenden Brook	Rural, Marsden	114	30	1
6	Wessenden Bk from Butterly Resr to River Coln	Rural, Marsden	225	68	0
4	Colne from Wessenden Brook to R Holme	Marsden, Slaithwaite, Huddersfield, rural	3749	1085	41
17	Mag Brook from Source to River Holme	Meltham, Honley, rural	1376	293	9
7	Dearne from Source to Bentley Brook	Marsden, rural	948	357	8
9	Colne from River Holme to River Calder	Huddersfield	3343	1295	50
18	Holme from Source to New Mill Dike	Holmfirth	830	354	11
15	Spen Beck from Source to River Calder	Heckmondwike, Liversedge, Cleckheaton	4554	1193	39
14	Batley Beck from Source to River Calder	Dewsbury, Batley, Gomersal, Birstall Smithies	2966	1435	53
5	Fenay beck from Source to River Colne	Dalton, Fenay Bridge	3309	601	25

Total at risk:

- Residential properties = 21,414
- Non-residential properties = 6,711
- Critical/vulnerable infrastructure = 237

Note: Some properties straddle two or more catchment boundaries.

TABLE 7-2 RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES, AND CRITICAL SERVICES AT RISK FROM RIVERS IN THE 1 IN 1,000-YEAR EVENT IN HIGH-RISK FLUVIAL CATCHMENTS

WFD high risk catchment ID	WFD high risk catchment name	Main communities at risk	Number of residential properties at risk	Number of non-residential properties at risk	Number of critical/vulnerable infrastructure at risk
12	Calder from River Colne to River Chald	Dewsbury, Mirfield	1446	1024	14
15	Spen Beck from Source to River Calder	Dewsbury, Cleckheaton, Heckmondwike	1401	504	11
7	Dearne from Source to Bentley Brook	Denby Dale, Skelmanthorpe, rural	50	80	1
5	Fenay beck from Source to River Colne	Dalton, Fenay Bridge	461	174	2
2	Holme from New Mill Dike to R Colne	Brockholes, Newtown, Honley, Lockwood	238	282	4
14	Batley Beck from Source to River Calder	Dewsbury, Batley	115	556	6
4	Colne from Wessenden Brook to R Holme	Huddersfield, Marsden	276	279	4
18	Holme from Source to New Mill Dike	Holmfirth	128	148	2
19	New Mill Dike from Source to River Holme	Hepworth, New Mill, rural	61	33	0
17	Mag Brook from Source to River Holme	Meltham	36	45	0

Total at risk:

- Residential properties = 4,212
- Non-residential properties = 3,125
- Critical/vulnerable infrastructure = 44

Note: Some properties straddle two or more catchment boundaries.

FLOOD RISK ACTION PLAN

Together with the longer-term Local Strategic themes, we have also formulated a set of shorter term, measurable actions which formulate our Flood Risk Action Plan (Appendix F)

The Action Plan is to remain a live document and be continually updated as and when new measures and actions are defined, when new funding sources or delivery partners are found, and when the action has been delivered or a programme for delivery has been formulated. The Strategy is to be in place for the next five to ten years, during which the measures in the Action Plan will be delivered.

The measures making up the Flood Risk Action Plan have been developed from the following sources:

- Rollover actions from the current Implementation Plan where still appropriate.
- Feedback and suggestions from stakeholders following the stakeholder engagement workshops carried out as part of this Local Strategy.
- The Humber Flood Risk Management Plan 2 (2021 – 2027) consultation responses on measures included in the latest FRMP update.
- Identified high flood risk catchments and communities.

The measures listed within the Flood Risk Action Plan shows how it aligns with the following:

- Resilience themes:
 - Place making
 - Protect
 - Respond
 - Recover
- Geographical areas where actions are required.
- Key delivery partners for delivering the action.

FUNDING FOR IMPLEMENTING THE FLOOD RISK ACTION PLAN

In the flood industry there are number of funding streams that are available to support the development and delivery of capital flood measures. These include:

- Flood and Coastal Erosion Risk Management Grant in Aid (FCERM GiA)
- Local Levy
- Council's Flood Management Capital Programme
- Central government grants
- Private / local funding.

The Council will remain abreast with alternative funding sources and work with its partners to support bids to increase investment within the district.

IMPLEMENTATION, MONITORING AND REVIEW

THIS SECTION SETS OUT THE PROCESS BY WHICH THE COUNCIL WILL IMPLEMENT, MONITOR AND REVIEW THIS STRATEGY. OUR LOCAL STRATEGY HAS BEEN DEVELOPED TO SUPPORT OUR UNDERSTANDING AND MANAGEMENT OF LOCAL FLOOD RISK OVER THE NEXT TEN YEARS AND THEREFORE WILL REQUIRE PERIODIC REVIEW TO ENSURE IT REMAINS CURRENT AND IN LINE WITH LOCAL AND NATIONAL POLICY, CHANGES IN CLIMATE CHANGE SCIENCE AND LOCAL FLOOD RISK

IMPLEMENTATION AND MONITORING

Our Local Strategy sets out the roles, responsibilities, objectives, and the priorities of all the organisations that have a statutory role in managing flood risk. In partnership with these organisations and key stakeholders, we will use this Strategy to guide our approach to local flooding issues across Kirklees.

The overarching objective of the Strategy is to reduce local flood risk to residents, businesses, key infrastructure, and communities by increasing resilience in our communities. This will be achieved through the implementation of our Flood Risk Action Plan with a focus on nature-based solutions and helping communities to be more resilient. The measures and actions will be delivered over the next five to ten years. The successful implementation of the Strategy will be influenced by external factors such as funding and resource availability. Funding of capital works may prove to be a challenge in Kirklees, particularly where schemes must receive partnership contributions. Where appropriate, we will seek to fund schemes through multiple routes.

Additionally, the Council will continually seek new sources of funding to support our flood risk management objectives. Where required, we will still look to carry out improvements to flood defence infrastructure to address known local flooding problems from surface water, ordinary watercourses and groundwater. However, it may be that in many areas the risk of flooding is managed through early flood warnings and local resilience measures. The Council will act as enablers to help communities take action to help themselves and carry out their own riparian responsibilities.

We will also seek to reduce flood risk through other actions such as planning and development control, working with landowners and land managers, progressing investment and increasing resilience. We will seek to retain and develop the expertise already present in the Council as well as increasing capacity where required. Through collaborative working and addressing issues at the appropriate authority level, we will make the best use of the resources and funding available.

Our partners are committed to delivering the objectives of the Flood Risk Action Plan to reduce flood risk to the communities of Kirklees over the next five to ten years. We will continue to take responsibility for implementing the Strategy and will lead on developing and continuing existing relationships with partners and stakeholders.

REVIEW

The Local Strategy will be reviewed and updated as and when required, specifically when there is a material change to legislation, the National Strategy, or the approach to flood risk in the district which may not be compatible to the Local Strategy. The Flood Risk Action Plan will be reviewed annually to check that the measures and actions taken undertaken continue to be appropriate and achievable. It should be noted that this Strategy represents the current situation (at the time of publishing) based on the current evidence base.

APPENDIX

A – Strategic Environmental Assessment

B – Habitat Regulation Assessment

C – Rapid Response Catchments

D – FWMA Roles and Responsibilities

E – High Risk Catchments

F – Flood Risk Action Plan

Local Flood Risk Management Strategy

2024

www.kirklees.gov.uk/flooding



LFRMS SEA Environmental Report

Final Report

2024

KIRKLEES LOCAL FLOOD RISK MANAGEMENT STRATEGY

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ABBREVIATIONS

Acronym	Description
BAP	<p>Biodiversity Action Plan</p> <p>Plans developed by organisations to protect and enhance the biodiversity of an area.</p>
EA	<p>Environment Agency</p> <p>Non-departmental public body responsible for protecting and improving the environment.</p>
FCERMS	<p>Flood and Coastal Erosion Risk Management Strategy</p> <p>The strategy describes what needs to be done by all risk management authorities involved in flood and coastal erosion risk management for the benefit of people and places.</p>
HER	<p>Historic Environment Record</p> <p>Information service that provides access to comprehensive and dynamic resources relating to the archaeology and historic built environment of a defined geographic area.</p>
IMD	<p>Indices of Multiple Deprivation</p> <p>The Index of Multiple Deprivation measures relative deprivation in an area. It is a combined measure of deprivation based on 37 separate indices of deprivation, grouped into seven key domains reflecting different aspects of deprivation.</p>
LCA	<p>Landscape Character Assessment</p> <p>The process of identifying and describing variation in character of the landscape, the assessment identifies and explains the unique combination of elements and features that make landscapes distinctive by mapping and describing character types and areas.</p>

Acronym	Description
LFRRMS	<p>Local Flood Risk Management Strategy</p> <p>Strategies produced by lead local flood authorities, considering local issues and policy. It should also consider the extent and severity of flood risk and the geography of the authority area including the environmental or social setting.</p>
LGeoS	<p>Local Geological Site</p> <p>Geological sites that are important for historical, scientific research or educational reasons.</p>
LLFA	<p>Lead Local Flood Authority</p> <p>County councils and Unitary Authorities which lead in managing local flood risks.</p>
LNR	<p>Local Nature Reserve</p> <p>Local Nature Reserve are statutory designation under the National Parks and Access to Countryside Act 1949. These can be declared by Parish and Town Councils, but these must be delegated to by principle local authority.</p>
NCA	<p>National Character Area</p> <p>National Character Area is a natural subdivision of England based on a unique sense of place. The Character Area framework is used to describe and shape objectives for the countryside, its planning and management.</p>
NFM	<p>Natural Flood Management</p> <p>The utilisation of natural processes to reduce the risk of flooding and coastal erosion</p>
NNR	<p>National Nature Reserve</p> <p>Reserves established to protect some of our most important habitats, species, and geology, and to provide outdoor laboratories for research.</p>
NPPF	<p>National Planning Policy Framework</p> <p>The National Planning Policy Framework constitutes all policy statements and guidance documents into one document which forms a core part of the national planning system.</p>
ODPM	Office of the Deputy Prime Minister

Acronym	Description
	Central department to bring together key responsibilities for regional and local government, fire, housing, planning and regeneration, social exclusion, and neighbourhood renewal.
ONS	Office of National Statistics The Office for National Statistics is the executive office of the UK Statistics Authority, a non-ministerial department which reports directly to the UK Parliament.
RBMP	River Basin Management Plan River basin management plans set the locally specific environmental objectives that underpin water regulation (such as permitting) and planning activities.
RIGS	Regionally Important Geological Sites Regionally Important Geological Sites are designated by locally developed criteria, and are important educational, historical, and recreational resources. The designation aims to recognise and protect earth science and landscape features.
SAC	Special Area of Conservation Special Areas of Conservation are protected in the UK under, the Conservation of Habitats and Species Regulations 2017 (as amended) in England and Wales. The purpose of this designation is to conserve the habitat and species identified in the EU Habitats Directive.
SEA	Strategic Environmental Assessment Strategic Environmental Assessment is a decision support process which aims to promote sustainable development by assessing the extent to which the emerging plan will help achieve relevant environmental, economic, and social objectives.
SPA	Special Protection Areas Special Protection Area are protected areas are protected areas for birds in the UK, under the Wildlife & Countryside Act 1981 and the Conservation Regulations 2010.
SPZ	Source Protection Zones Areas defined around large and public potable groundwater abstraction sites, to provide additional protection to safeguard drinking water though constraining the proximity of an activity that may impact upon a drinking water abstraction.

Acronym	Description
SSSI	<p>Sites of Special Scientific Interest</p> <p>Sites of Special Scientific Interest is a conservation designation legally protected under the Wildlife and Countryside Act 1981 (as amended). These sites are selected for wildlife and natural features in England.</p>
SuDS	<p>Sustainable Drainage Systems</p> <p>Drainage solutions that provide an alternative to the direct channelling of surface water through networks of pipes and sewers to nearby watercourses.</p>
SWMP	<p>Surface Water Management Plan</p> <p>A plan which outlines the preferred surface water management strategy in each location. In this context surface water flooding describes flooding from sewers, drawings, groundwater and runoff from land small water course and ditches that occurs because of heavy rainfall.</p>
WFD	<p>Water Framework Directive</p> <p>The Water Framework Directive is a European Union directive which aims to get polluted waters clean again, and ensure they stay clean.</p>
WRMP	<p>Water Resources Management Plan</p> <p>Plan developed by water companies which sets out how they intend to achieve a secure supply of water for customers and protect and enhance the environment.</p>

NON-TECHNICAL SUMMARY:

Kirklees Council is developing a comprehensive Local Flood Risk Management Strategy (LFRMS) that covers the risks associated with local flood risk sources, as required by Section 9 of the Flood and Water Management Act 2010. The LFRMS update is required to bring the document in line with the National Flood and Coastal Erosion Risk Management Strategy (NFCERM) for England, published by the Environment Agency in 2020 to set out the principles for flood risk management and which organisations are responsible for implementation.

As the Lead Local Flood Authority (LLFA), the council is responsible for maintaining, applying and monitoring this strategy. The strategy document will be available for public consultation.

To identify any potentially significant environmental effects resulting from the implementation of the LFRMS, a Strategic Environmental Assessment (SEA) has been conducted. This assessment forms stage 'B: Environmental Report' of the SEA process. The report will summarise how the SEA has been conducted and how it informs the current emerging LFRMS; the likely significant effects on the emerging LFRMS on people, communities, the economy, and the environment; and how the SEA will continue to inform the implementation of the emerging LFRMS. The Environmental Report evaluates the SEA objectives based on three management approaches: Do Nothing, Maintaining the Current Kirklees Council Local Flood Risk Strategy (2012), and Manage and Reduce Local Flood Risk. The report analyses the potential environmental impacts of these three approaches.

The Do-Nothing approach is deemed unsuitable for managing flood risk and is likely to have overall negative impacts on the environment. This approach would not align with Kirklees Council's responsibilities as LLFA under the Flood and Water Management Act.

Maintaining the current flood risk management outlined in the existing Kirklees Council Local Flood Risk Management Strategy (2012) is unlikely to result in significant changes to baseline levels. However, this strategy does not fully account for adaptation to climate change and the associated increase in flood risk. Therefore, this approach is also considered inappropriate.

The implementation of the Local Flood Risk Management Strategy (LFRMS) will have positive impacts on several objectives in the SEA by improving water management and reducing flood risks. This will help to preserve the quality of ecological, visual, heritage, water, and geological receptors in the council area. The majority of LFRMS actions will not impact many SEA objectives, but most will positively affect SEA objectives relating to population and human health and material assets by actively managing flood risks and promoting community involvement and resilience.

The LFRMS presents opportunities for environmental enhancements through the implementation of natural flood management and sustainable drainage schemes. Which may have broad, long-term positive benefits to many SEA objectives.

There are significant uncertainties around actions relating to the implementation of flood alleviation schemes, as the exact location, nature, and scale of these schemes are uncertain, and as such the potential effects on SEA objectives cannot be determined without a specific implementation methodology.

The majority of LFRMS actions do not directly contribute to climate change objectives. It is important to consider the impacts of climate change in decision making around flood alleviation.

INTRODUCTION

OVERVIEW

Kirklees Metropolitan Borough Council as Lead Local Flood Authority (LLFA) is working to produce an updated Local Flood Risk Management Strategy under the Flood and Water Management Act 2010, and in accordance with the National Flood and Coastal Erosion Risk Management Strategy for England published by the Environment Agency in 2020. The current LFRMS, which was adopted in 2012, has been reviewed and is being updated to provide an overall strategic approach to the management of flood risk in Kirklees.

The aim of a LFRMS is to guide the management of local flood risk, reflecting local circumstances such as the level of risk and the potential impacts of flooding. Kirklees' updated LFRMS must assess local flood risk, set out measures for managing local flooding and determine the costs and benefits associated with the implementation of such measures.

When preparing a flood management plan that will inform decision making and identify actions to be taken to reduce the risk of flooding, it is a statutory requirement to conduct a Strategic Environmental Assessment (SEA) in accordance with the SEA Regulations (implementing the European SEA Directive into UK law).

Due to the scale of the changes proposed in the updated LFRMS and the potential for significant environmental effects, it was considered appropriate that an update to the SEA be undertaken.

The SEA process, culminating in the preparation of this Environmental Report, will inform the preferred long-term flood risk management strategy through the identification of likely significant impacts upon the environment, resulting from the implementation of the LFRMS.

This SEA Environmental Report will outline how objectives, measures and options have been appraised.

SEA PROCESS AND METHODOLOGY

The Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations, were originally transposed from the European Directive 2001/42/EC (the SEA Directive) into English Law, prior to the UK's departure from the EU. The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (the 'SEA Regulations') now apply to this work. These Regulations require a SEA to be undertaken for certain types of plans or programmes that could have a significant environmental effect.

The SEA Regulations form the basis by which all SEAs are carried out to assess the effects and impacts of certain plans and programmes on the environment. Detailed practical guidance on these regulations can be found in the Office of the Deputy Prime Minister (ODPM) Government publication, A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005). This document has been used as the basis for undertaking this environmental report, in conjunction with the SEA Regulations.

SEA involves the systematic identification and evaluation of the potential environmental impacts of the LFRMS. This information is then used to aid the selection of a preferred option(s) for the strategy, which are those that best meet its economic, environmental and social objectives, and legal requirements. Carrying out an SEA in conjunction with developing the LFRMS helps influence flood risk management at an early stage and influences the selection of preferred measures or ways forward where alternatives exist.

Schedule 2 of the SEA Regulations sets out the scope of information to be provided by the SEA. This is described in Table 2-1 below, which also identifies where in the SEA process for the LFRMS that the relevant requirement will be met.

Table 2-1 Stages in the SEA Process as Identified within Schedule 2 of the SEA Regulations

SEA Regulations Requirements	Where Covered in the SEA Process
a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	SEA Scoping Report (Section 3, 4 and 5); SEA Environmental Report (Sections 3, and 5 and Appendix A).
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	SEA Scoping Report (Section 4); SEA Environmental Report (Section 5).
() the environmental characteristics of areas likely to be significantly affected;	SEA Scoping Report (Section 4); Environmental Report (Section 5).
(a) any existing environmental problems	SEA Scoping Report (Section 4); Environmental Report (Section 5).
(b) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	SEA Scoping Report (Sections 3 and 4); Environmental Report (Section 5 and Appendix A).

SEA Regulations Requirements	Where Covered in the SEA Process
(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors;	SEA Environmental Report (Section 8)
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	SEA Environmental Report (Section 8)
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	SEA Environmental Report (Section 7)
(i) a description of the measures envisaged concerning monitoring in accordance with regulation 17.	SEA Environmental Report (Section 9)
(j) a non-technical summary of the information provided under the above headings.	SEA Environmental Report (Non-technical Summary)

STAGES IN THE SEA PROCESS

This report has been produced in conjunction with the SEA Regulations and follows the guidance contained within the OPDM *A Practical Guide to the Strategic Environmental Assessment Directive* (ODPM, 2005). The guidance outlines the stages that should be carried out in the SEA process; these are outlined in Table 2-2. In accordance with this process, this report addresses 'Stage C' of the SEA process; wherein the predicted environmental effects of the plan, including alternatives, are presented, to be used by decision-makers and in public consultation.

Table 2-2 Stages in the SEA Process

SEA Stages and Tasks	Purpose	Where Covered in the SEA
Stage A	Setting the context and objectives, establishing the baseline, and deciding on the scope	SEA Scoping Report
(A1) Identifying other relevant plans, programmes and environmental protection objectives	To establish how the plan or programme is affected by outside factors, to suggest ideas for how any constraints can be addressed and to help to identify SEA objectives.	SEA Scoping Report
(A2) Collecting baseline information	To provide an evidence base for environmental problems, prediction of effects, and monitoring; to help in the development of SEA objectives.	SEA Scoping Report
(A3) Identifying potential environmental problems	To help focus the SEA and streamline the subsequent problems, prediction of effects, and monitoring; to help in the development of SEA objectives.	SEA Scoping Report
(A4) Developing SEA objectives	To provide a means by which the environmental performance of the plan or programme	SEA Scoping Report

SEA Stages and Tasks	Purpose	Where Covered in the SEA
	and alternatives can be assessed.	
Stage B	Developing and refining options and assessing effects	Options development phase
Stage C	Preparing the Environmental Report	SEA Environmental Report
Stage D	Consulting on the draft LFRMS and the Environmental Report	Consultation phase
Stage E	Monitoring the significant effects of implementing the LFRMS	Monitoring phase

Stage A of the process (scoping) was carried out in October 2022 and a SEA Scoping Report was submitted for consultation in November 2022. An updated Scoping Report was then produced in November 2022 to incorporate responses from statutory consultees. Further details on the scoping process are provided in Section 4 of this report.

The purpose of this Environmental Report is to report the findings of the SEA of the Kirklees LFRMS. This Environmental Report summarises;

- how the SEA has been conducted and how it informs the current emerging LFRMS;
- the likely significant effects on the emerging LFRMS on people, communities, the economy, and the environment; and
- how the SEA will continue to inform the implementation of the emerging LFRMS, such as through recommended mitigation and monitoring.
- This report documents Stage B of the SEA process and fulfils the requirements of Stages C and D.

HABITATS REGULATIONS ASSESSMENT (HRA)

Due to the potential for the LFRMS to have significant effects on sites of international nature conservation importance (Ramsar sites, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), a Habitats Regulations Assessment (HRA) has been undertaken in parallel with this SEA. This has been produced a separate standalone report, details of which are summarised in Section 5.3.3 of this report.

BACKGROUND TO THE KIRKLEES LFRMS

OVERVIEW

The Flood and Water Management Act (2010) determined the need for flood risk to be managed within the framework of National Strategies for England and Wales and within Local Strategies for each Local Flood Authority Area.

The National Flood and Coastal Erosion Risk Management Strategy for England, published by the Environment Agency in 2020, sets out the principles for flood risk management and which organisations are responsible for implementation.

In accordance with the national strategy for England, LLFAs have been allocated responsibility for developing independent LFRMSs to address sources of local flooding.

Local flooding is defined by the Flood and Water Management Act 2010 as flood risk derived from:

- surface runoff,
- groundwater, and
- ordinary watercourses.

Groundwater flooding occurs when the water table within the underlying rock or soil rises above ground level or interacts with properties or infrastructure below ground level. The level of the table varies as a result of seasonal changes in precipitation, recharge, and groundwater abstraction. When the water level reaches ground level, water can start to emerge causing flooding, which can result in significant property damage.

Flooding from ordinary watercourses occurs when water levels in a non-main river, canal, sewer, lake, ditch, reservoir, or stream rises and overflows onto the neighbouring land.

Flood risk from the sea, main rivers and large reservoirs is therefore not defined as local flood risk and is the concern of the Environment Agency. Such sources of flood risk do, however, need to be considered insofar as they may interact with those flood risks defined as “local”, to ensure that all joint risks of flooding are assessed at the local scale.

Each LFRMS identifies which local organisation is accountable for managing flood risk and establishes roles and responsibilities and partnership agreements, as well as undertaking an assessment of flood risk and developing plans / actions for tackling these risks.

As stipulated by the Flood and Water Management Act 2010, Kirklees Council as a LLFA has a responsibility to develop, maintain, apply and monitor a strategy for local flood risk management, considering flood risk from surface water, groundwater and ordinary watercourse.

STUDY AREA

Kirklees Metropolitan Borough is a local authority located in West Yorkshire in the northeast region of England. The urban areas in the borough are concentrated to the north and west, the most significant of which is Huddersfield. The south of the borough is more rural and located within the Peak District National Park. According to mid-2020 Office for National Statistics population estimates, 441,290 people live in the local authority area of Kirklees (ONS, 2021).

As part of the LFRMS update, a flood risk appraisal was undertaken to identify and prioritise the areas of Kirklees most at risk of surface water flooding and to help inform where actions should be focussed. The district has been spilt into 19 areas based on the Water Framework Directive (WFD) watercourse catchments to allow for a catchment-based approach to be taken. 10 priority catchments were identified using the EA's Risk of Flooding from Surface Water dataset, modelled surface water climate change impacts, as well as a series of secondary flood risk datasets (Environment Agency, 2021). The secondary datasets included historic flood incidents and flood risk from other sources (fluvial and groundwater). The catchment priority is shown in both Table 3-1 and Figure 3-1.

Table 3-1 Catchments across Kirklees and their associated prioritisation in the LFRMS.

Catchment Affected by Flooding	Priority
Colne from River Holme to River Calder	1
Spen Beck from Source to River Calder	2
Calder from River Colne to River Chald	3
Batley Beck from Source to River Calder	4
Colne from Wessenden Brook to River Holme	5
Fenay beck from Source to River Colne	6
Wessenden Beckk from Butterly Reservoir to River Colne	7
Holme from New Mill Dike to River Colne	8
Calder from Ryburn Confluence to River Colne	9
Colne from Source to Wessenden Brook	10
Mag Brook from Source to River Holme	11
Holme from Source to New Mill Dike	12

New Mill Dike from Source to River Holme	13
Dearne from Source to Bentley Brook	14
Chald from Source to River Calder	15
Bentley Brook from Source to River Dearne	16
Cawthorne Dyke from Source to River Dearne	17
Smithy Brook from Source to River Calder	18
Black Brook from Source to River Calder	19

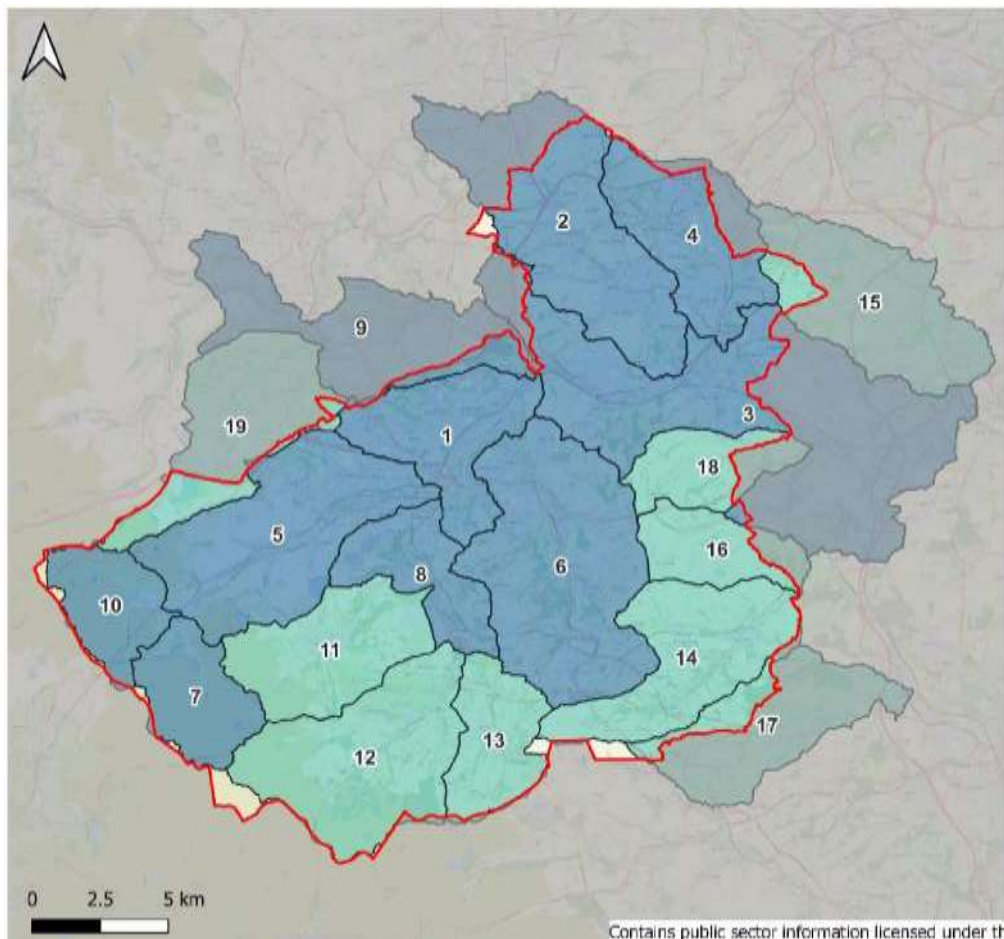


Figure 3-1 Catchments in Kirklees Metropolitan Borough.

HISTORIC FLOODING IN THE STUDY AREA

Kirklees has a history of flooding in many different locations from fluvial, surface water and sewer sources. Information on significant incidents of flooding is recorded by the EA and the LLFA. The following information sources were assessed to understand historic flooding across the borough:

- EA Recorded Flood Outlines dataset (2022) which is mainly associated with fluvial flooding from main rivers, such as the River Calder and its tributaries.

The major flooding events within Kirklees have mainly occurred around the main rivers: the River Colne, River Calder and Spen River.

Notable recorded historic flood incidents include:

- February 2022 – Storms Dudley, Eunice and Franklin; three storm week brought strong winds and rain to the borough. A considerable number of internal property flooding was reported to both residential properties and businesses.
- February 2020 – Storm Ciara and Storm Dennis; channel capacity exceeded on main rivers, including the River Calder, and ordinary watercourses.
- December 2015 – Channel capacity exceeded on the River Calder upstream of Sands.
- June 2007 – An estimated 500 properties flooded due primarily to surface water where rainwater was unable to enter drainage systems due to design capacity being exceeded. The flooding was widespread across the district, but hotspots occurred around Ravensthorpe, Liversedge, Cleckheaton, Chickenley, Mirfield, Milnsbridge, Brockholes, New Mill, Denby Dale, Scissett and Clayton West.

FUTURE FLOOD RISK

There is considerable uncertainty regarding the localised impact of climate change, but it is likely that the risk of flooding will increase under climate change scenario. This increased risk could manifest itself as more frequent flooding; an increase in flood extent; and increase in flood depth.

The climate in the UK is generally anticipated to shift toward warmer, wetter winters and hotter, drier summers (Met Office, 2022). Climate change is increasing the frequency and magnitude of hazardous weather events such as floods and heatwaves. A review of recent evidence of the anthropogenic intensification of short-duration rainfall extremes concluded that heavy rainfall extremes are intensifying (Fowler et al. 2020). Combined with warmer, generally drier summers, the harder ground struggles to instantly absorb water from rainfall which in turn intensified the frequency of flood flooding (Met Office, 2022).

This increased risk could manifest itself as more frequent flooding, increase in flood event and increase in flood depth.

STAGE A: SCOPING STAGE FINDINGS

Stage A of the SEA process involves gathering evidence to help set the context and objectives, establish the environmental baseline, and determine the scope of the SEA.

The Scoping Report produced as part of Stage A outlined the findings of the evidence gathering and the scope of the SEA.

Table 4-1 below describes the SEA topics which were scoped into the assessment. Further details on the environmental baseline for each of the topics is provided in Section 5: Environmental Characteristics and Key Issues.

Table 4-1 Environmental Topics Scoped in

SEA Regulations Requirements	Definition in relation to this report	Relevance
Biodiversity (including flora and fauna)	Designated nature conservation sites; protected and notable species and habitats; trends in condition and status; invasive non-native species (INNS).	Potential impact on designated and priority habitats both from the LFRMS and a scenario without it. There is the potential for both positive and negative impacts as a result of the LFRMS. Potential impacts to protected species and sites must be considered throughout development and implementation of the LFRMS.
Climatic factors	As the LFRMS is a flood risk strategy, this topic will focus on greenhouse gas emissions. Flood risk and adaptation to climate change will be assessed under each of the other SEA topics.	Scope to include greenhouse gas emissions only (e.g. embodied carbon and emissions from plant and vehicles). The impact of climate change on flood risk will be considered as part of the LFRMS itself. In addition, the LFRMS is unlikely to have a significant impact on climate.
Cultural heritage	Designated and non-designated heritage assets, including historic landscapes; pressures on heritage assets (including changes to setting).	Flooding and flood risk management measures have the potential to impact sites and monuments of archaeological and historical importance, including listed buildings and Scheduled Monuments.

SEA Regulations Requirements	Definition in relation to this report	Relevance
Human health	Trends and patterns in human health, including life expectancy.	People, properties and settlements potentially affected by flood risk, as well as the community infrastructure around them. The LFRMS has the potential to provide benefits to the population of the study area by managing flood risk.
Landscape	National and local landscape character; protected and notable landscapes; key local landscape features.	Local landscape qualities and integrity across the study area could be affected by changes to the way watercourses and flood risk is managed in the area. Furthermore, impacts on locally important urban and rural landscapes and landscape features may occur, for example as a result of flood defence construction.
Material assets	Critical infrastructure (including transport and other infrastructure), community services; and Green Infrastructure	The study area contains several important infrastructure assets including motorways and railways. Flooding may compromise the function of these assets and the LFRMS must take this into account.
Population	Population trends and demographics; education; inequality and deprivation; key community facilities; recreation opportunities; trends and patterns in human health.	People, properties and settlements potentially affected by flood risk, as well as the community infrastructure around them. The LFRMS has the potential to provide benefits to the population of the study area by managing flood risk.
Soil	Variety of rocks, minerals and landforms; the quantity and distribution of agricultural land including	Flooding has the potential to affect geodiversity and soil quality, which support designated sites within the area. Flood risk management of potentially contaminating land uses or

SEA Regulations Requirements	Definition in relation to this report	Relevance
	the highest quality soils; soil health and functions; designated geological sites; land contamination.	sources of land (or water) contamination. Conversely, flooding may provide a beneficial effect through mitigation such as natural flood management processes, catchment sensitive farming and soil erosion reduction.
Water	The availability/supply and quality of water. It considers in turn surface and groundwater resources, chemical and biological water quality; surface and groundwater resources.	Flood risk management has the potential to impact on water availability and quality within the study area and WFD objectives. There is also the potential for indirect impacts on water dependent designated sites/ species. Impact on water resources and quality must be considered in developing the strategy. Effects on flood risk have not been considered as an explicit theme or topic within the SEA.
Interrelationship between the above factors	The relationship between environmental features and issues	The effect of known proposals/commitments.

The LFRMS and SEA have been influenced by many different plans and programmes. This is recognised by the SEA Regulations, which require a review of relevant plans and programmes to be completed in the preparation of documents.

Key international, national, regional and local documents were reviewed as part of the SEA Scoping stage. The full review can be found in Appendix A. The review process has provided a valuable source of information and a framework for developing different components of the LFRMS and SEA. In particular:

- At a high level, key legislation and national policies provided the planning context for the LFRMS; and
- Regional and local documents provided a valuable source of baseline information and identified local priorities and objectives as well as conditions that the LFRMS and SEA should adhere to'.

As part of the SEA process, an assessment of the integration of existing policies, plans and programmes on the LFRMS has been undertaken. This is required under Schedule 1 of the SEA Regulations:

- (i) *'The degree to which the plan or programme sets a framework for projects and other activities either with regard to the location, nature, size and operating conditions or by allocating resources.'*

- (ii) *The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.*

The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.

ENVIRONMENTAL CHARACTERISTICS AND KEY ISSUES

INTRODUCTION

This section covers information on the current environmental baseline in Kirklees and summarises the key information from policies, plans and programmes which need to be considered in the SEA for each environmental topic.

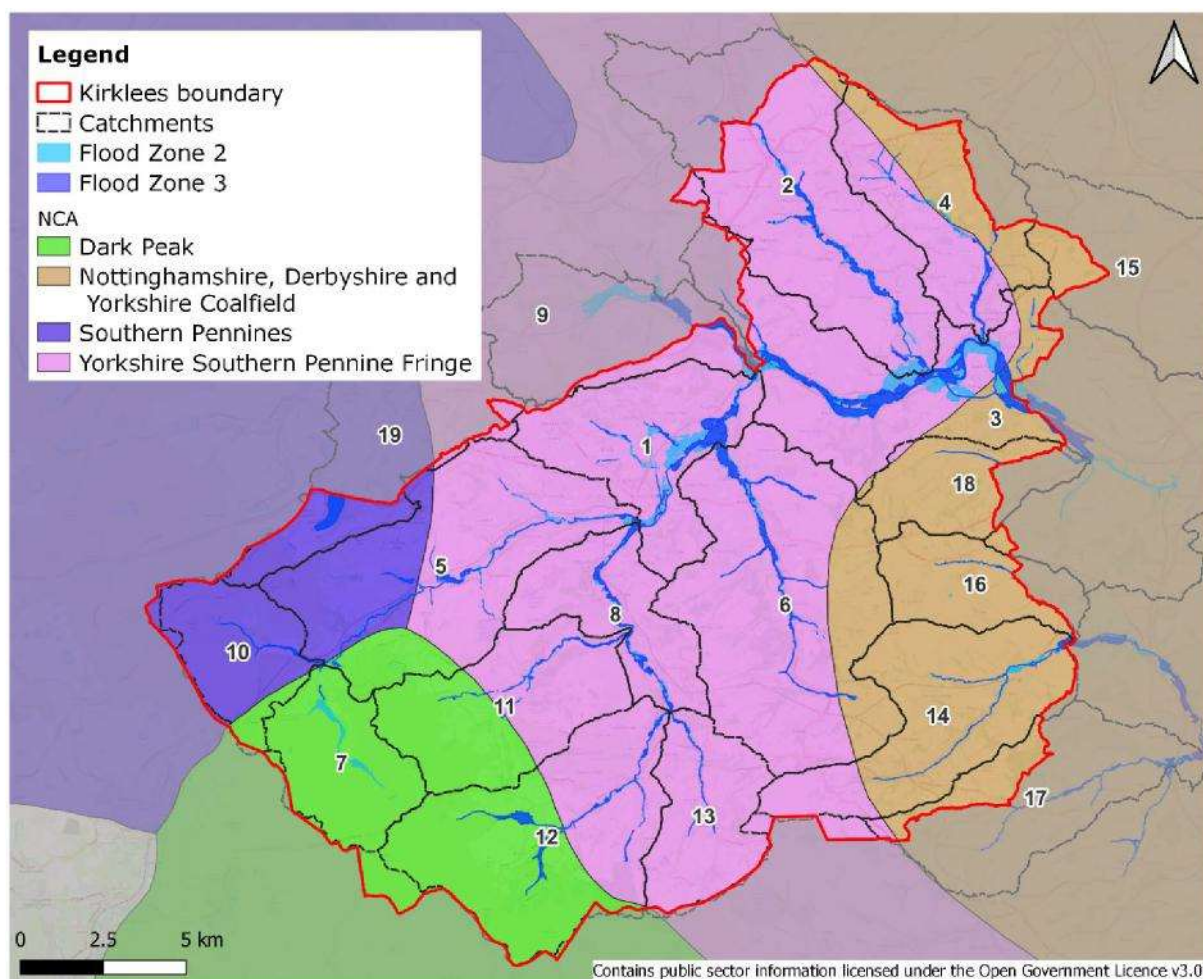
A desk-based study of baseline environmental data was undertaken to identify the key environmental characteristics, the findings of which are presented below.

The baseline information may require updating throughout the duration of the SEA process as the LFRMS is developed further and new information becomes available.

LANDSCAPE AND VISUAL AMENITY

As outlined by Natural England, Kirklees Metropolitan Borough Council falls predominantly within the National Character Area (NCA) 37 Yorkshire Southern Pennine Fringe, with areas of NCA 38 Nottinghamshire, Derbyshire and Yorkshire Coalfields, and smaller areas of NCA 51 and NCA 36. These are described as follows, and shown in Figure 5-1:

- **NCA 37 Yorkshire Southern Pennine Fringe:** comprises a landscape dominated by industrial buildings and structures from former industries, with pastoral treeless hill tops, and wooded valleys.
- **NCA 38 Nottinghamshire, Derbyshire and Yorkshire Coalfields:** over half of the NCA is designated as greenbelt land and is dotted with many pockets and patches of habitat where species find refuge. Often land which was once occupied by industry.
- **NCA 51 Dark Peak:** a landscape of large-scale sweeping moorland, in-bye pastures enclosed by drystone walls, and gritstone settlements within the Pennine chain. It forms a large part of the Peak District National Park.
- **NA 36 Southern Pennines:** part of the Pennine ridge of hills, lying between the Peak District National Park and the Yorkshire Dales National Park. A landscape of large-scale sweeping moorlands, pastures enclosed by drystone walls, and gritstone settlements within narrow valleys.



KEY ISSUES

Flooding has the potential to affect local landscape characteristics in Kirklees Metropolitan Borough Council. This includes impacts on existing character areas and on the setting of local landmarks and landscape features. The key issues relating to the landscape and visual amenity are summarised below:

- Alteration of existing landscapes due to increased flooding.
- Disturbance to existing views.

To maintain the landscape within the borough, the LFRMS should consider and take account of the key issues.

BIODIVERSITY, FLORA AND FAUNA

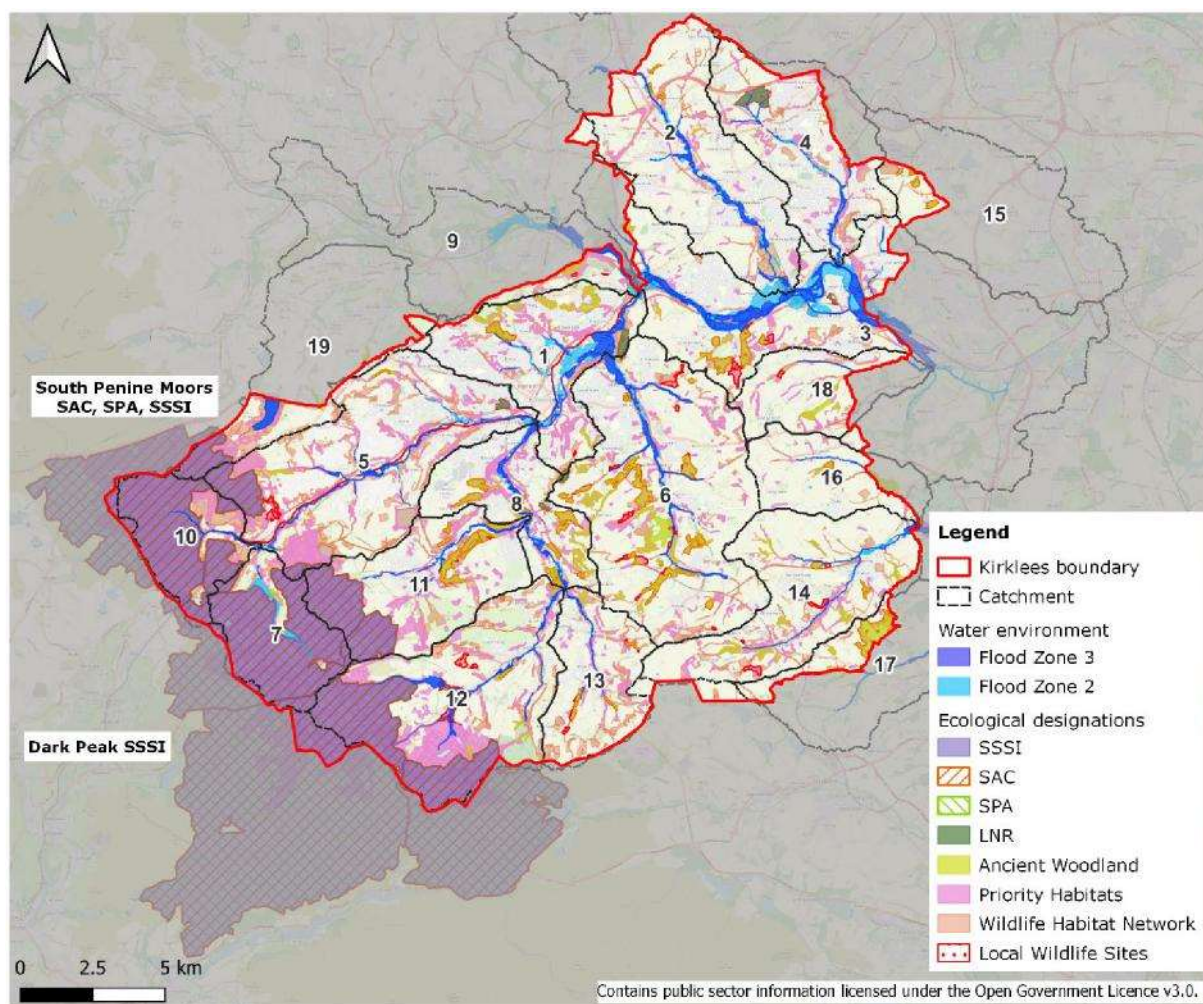
STATUTORY PROTECTED SITES

The Kirklees Metropolitan Borough encompasses many high-quality environments which have been recognised through international, national and local ecological designations. These are outlined in Table 5-1.

Kirklees Metropolitan Borough has several locally designated ecological sites such as Local Nature Reserves (LNR) and Local Wildlife Sites (LWS). There are nine LNRs and 88 LWSs across the borough. A complete list can be found in Appendix B. Ecological designations in Kirklees are outlined on Figure 5-2.

Table 5-1 Internationally and nationally designated ecological assets.

Site	Designation	Condition	Priority Catchment	Qualifying features
South Pennine Moors (Phase 1 and 2)	Special Area of Conservation (SAC), Special Protection Area (SPA), Site of Special Scientific Interest (SSSI),	Unfavourable – Recovering	5, 9, 10, 19, 22, 24, 25, 26, 27	Provides habitat for an important assemblage of breeding moorland birds and moorland fringe birds. The site is primarily designated as an SAC due to the following Annex I habitats: European dry heaths, Blanket bogs, and Old sessile oak woods with Ilex and Blechnum in the British Isles.
Dark Peak	SSSI	Unfavourable – Recovering	5, 7, 10, 11, 12, 23, 25, 27, 28, 29.	This is wild, open and more or less continuous moorland, predominantly at an altitude of 400–600 m and broken only by transpennine roads from Manchester to Sheffield, over the Snake Pass; from Manchester to Barnsley along the Longdendale valley and over the Woodhead Pass and from Oldham to Huddersfield over Wessenden Head Moor.



NOTABLE HABITATS AND SPECIES

Numerous priority species and habitats of principle importance listed in Section 41 of the Natural Environment and Rural Communities (NERC) Act are known to be present in Kirklees and are included within the LBAP (Local Biodiversity Action Plan). The species and habitats of principal importance within rivers, riverine corridors and associated habitats are summarised in Table 5-2 below.

Table 5-2 Priority species and habitats of principal importance listed in Section 41 of the NERC Act listed in the Local Biodiversity Action Plan

Priority species and habitats of principal importance within Rivers, Riverine Corridors and Associated Habitats	
Species	
Plants	Floating water plantain
Fish	Various fish species
Birds	Reed Bunting
	Bullfinch
	Song thrush

Priority species and habitats of principal importance within Rivers, Riverine Corridors and Associated Habitats	
Mammals	Otter
	Daubenton's bat
	Water Vole

HABITATS REGULATIONS ASSESSMENT

Under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, a screening assessment must be undertaken to consider the potential direct or indirect adverse effects of the LFRMS on protected habitats and species, with a Habitats Regulations Assessment (HRA) to be undertaken if there is a possibility of a significant effect. Mitigation or avoidance measures must then be applied should the HRA determine that significant adverse effects on site integrity, in view of a site's conservation objectives, are likely. HRA screening has been undertaken to consider potential direct or indirect adverse effects of the LFRMS on designated sites.

The assessment identified the potential for hydrological changes, water quality effects and impacts to habitats and species that may arise as an indirect result of the implementation of the LFRMS.

No likely significant effects arising from the KMDC LFRMS's proposed objectives that might significantly affect the European Sites identified within 15km of the District. This was largely due to the high-level nature of the LFRMS and purpose of achieving environmental gain. It was concluded that an Appropriate Assessment was not required.

KEY ISSUES

The key issues relating to ecological receptors in the Kirklees Metropolitan Borough are summarised below:

Sensitive designated sites for nature conservation, including priority habitats and species, which are at increased risk of flooding due to surface water flooding and groundwater flooding.

Many of the designated nature conservation sites within Kirklees Metropolitan Borough are dependent on specific hydrological regimes and support water-dependent habitats and species. Flooding may introduce contaminated or nutrient enriched waters to designated sites which could adversely impact on interest features.

To maintain and improve existing habitats, species and ecologically designated sites, the LFRMS must consider and take account of the issues outlined above.

Often traditional flood risk management methods can result in the physical modification of water bodies. The LFRMS should consider how to implement natural flood management methods which may deliver multiple benefits such as maintaining and restoring biodiversity whilst providing recreational green infrastructure.

WATER ENVIRONMENT

WATERCOURSES

Kirklees is located within the Humber River basin district which covers an area of 26,100 km². The Humber River Basin Management Plan (2016) outlines the significant water management issues in the region these are categories as follows:

- Physical modifications are currently affecting 42% of water bodies. Physical modifications to water bodies alter the natural flow levels causing additional sediment to build up, and loss of habitats and recreational opportunities.
- Pollution from wastewater – affecting 38% of water bodies. Wastewater or sewage can contain large amounts of nutrients, ammonia, bacteria, harmful chemicals and substances. Additional pressure is being placed on sewer networks due to population growth and changes to rainfall patterns as a consequence of climate change.
- Pollution from towns, cities and transport – affecting 16% of water bodies. Surface water which passes over roads and pavements accumulate pollutants and drains to surface waters.
- Changes to the natural flow and level of water – affecting 6% of water bodies. Reduced flow and water levels can have consequences for water abstraction, and wildlife.
- Negative effects of invasive non-native species – affecting <1% of water bodies. Invasive non-native species can have significant consequences for the natural environment. The process of controlling invasive species can have significant economic impacts.
- Pollution from rural areas – affecting 32% of water bodies. Soils and sediment are being washed off the land carrying phosphorus and nitrate from fertilisers into water bodies. Other impacts include sedimentation from erosion, and compacted fields. There are also bacteriological contaminants from faecal matter.
- Pollution from abandoned mines – affecting 4% of water bodies. Surface waters and groundwater flooding abandoned mines are becoming contaminated with dissolved metals.

At a more local level, Kirklees lies predominantly within the Calder catchment, with a small area to the southeast of the borough within the Don catchment.

The Calder Catchment Flood Management Plan (2010) describes a long history of flooding within the catchment. The most damaging floods occurred in 2007, when 1,700 properties across the catchment flooded from surface water, sewers and rivers. In June 2020, over 700 properties flooding from surface water. At present the two main sources of flood risk are flooding from rivers especially within urban communities, and surface water and sewer flooding (Environment Agency, 2010).

The Don Catchment Flood Management Plan (2010) also describes a long history of flooding. In 2007, over 6750 properties flooding across the catchment, and in 2000 over 240 properties were flooded across the catchment. The primary sources of flooding across the catchment include; rapid river flooding in urban watercourse, sewer and surface water drainage, groundwater and artificial sources.

WATER RESOURCES

Yorkshire Water is responsible for water supply across the area, water is obtained from three main water sources, reservoirs, river abstractions and boreholes. According to the Water Resources Management Plan (2019), the key challenges water resources challenges in Kirklees are as follows:

- Increasing population of Yorkshire by approximately one million by 2050;
- Increased loss of deployable output as a result of climate change;

- Environmental pressure (ongoing) to reduce the amount of water abstracted;
- Providing a resilient service.

According to the plan, climate change remains the biggest single influence on long-term future water resource prospects.

WATER QUALITY

The study area falls entirely within the Humber River Basin District which consists of eighteen management catchments. Management catchments are further broken down into operational catchments.

Kirklees Metropolitan Borough is within the Colne and Holme Operational Catchment of which there are 21 water bodies. As shown in Table 5-3, all of the water bodies are heavily modified and according to the most recent testing (2019), of moderate ecological status, and fail chemical status.

Table 5-3 Hydromorphological designation, ecological and chemical status of water bodies within the Colne and Holme operational catchment

Water Body	Hydromorpholog- ical designation	Ecologi- cal Sta- tus (2019)	Chemi- cal Sta- tus (2019)
Bilberry Res- ervoir	Heavily modified	Moderate	Fail
Blackmoor- foot Reser- voir	Heavily modified	Moderate	Fail
Blakeley Reservoir	Heavily modified	Moderate	Fail
Brownhill Reservoir	Heavily modified	Moderate	Fail
Butterly Res- ervoir	Heavily modified	Moderate	Fail
Colne from River Holme to River Cal- der	Heavily modified	Moderate	Fail
Colne from Source to Wessenden Brook	Heavily modified	Moderate	Fail
Deer Hill Reservoir	Heavily modified	Moderate	Fail

Water Body	Hydromorphological designation	Ecological Status (2019)	Chemical Status (2019)
Digley Reservoir	Heavily modified	Moderate	Fail
Fenay beck from Source to River Colne	Heavily modified	Moderate	Fail
Holme from New Mill Dike to R Colne	Heavily modified	Moderate	Fail
Holme from Source to New Mill Dike	Heavily modified	Moderate	Fail
Mag Brook from Source to River Holme	Heavily modified	Moderate	Fail
New Mill Dike from Source to River Holme	Heavily modified	Moderate	Fail
Ramsden Reservoir	Heavily modified	Moderate	Fail
Riding Wood Reservoir	Heavily modified	Moderate	Fail
Wessenden Bk from But-terly Resr to River Coln	Heavily modified	Moderate	Fail
Wessenden Head Reservoir	Heavily modified	Moderate	Fail
Wessenden Reservoir	Heavily modified	Moderate	Fail
Yateholme Reservoir	Heavily modified	Moderate	Fail

SUMMARY OF KEY ISSUES

The key issues relating to the water environment within the study area are summarised below:

- Poor water quality across the Colne and Holme operational catchment.
- Increasing pressures on water resources across the district from population growth and climate change.

To maintain and improve flood management across the district, the LFRMS should consider the issues outlined above.

GEOLOGY AND SOILS

The geology of a catchment can be an influential factor on the way water runs off the ground surface. This is primarily due to variations in the permeability of the surface material and bedrock stratigraphy.

There are five nationally designated sites for geological importance within Kirklees Metropolitan Borough. Table 5-4 shows the designation and qualifying features of each of the sites.

Table 5-4 Nationally designated geological assets.

Site name	Designation	Catchment	Qualifying features
Park Clough	SSSI	10	The rock sequence shown at Park Clough shows exposures of sandstone and shales of the Namurian Series formed during the Carboniferous Period. The sequence of rock layers includes an important junction between the two major subdivisions of the Carboniferous Period.
Dark Peak	SSSI	5, 7, 11, 12, 23, 25, 27, 28, 29	Six locations of special geological interest are identified within the Dark Peak: a landslip, the rocks exposed behind the land-slip, a classic example of stream erosion on peat, an area of delta-formed sedimentary rock, an area of river evolution and an area of classic peat erosion.
Honley Station Cutting	SSSI	8	It is a site of great importance for understanding this part of the lower Westphalian A and is significant to geologists working in most of the coal-fields in northern and central Europe, and in eastern North America.
Rake Dike	SSSI	12	The Rake Dike valley contains exposures of rocks of the Namurian Series of the Carboniferous Period laid down some 320 million years ago. The rocks consist of layers of sandstone and shale, some of the shale layers

Site name	Designation	Catchment	Qualifying features
			containing important fossil remains.
Standedge Road Cutting	SSSI	10	This road cutting provides important exposures of the Kinderscout Grit which formed during the Carboniferous Period of geological time, about 320 million years ago.

There are 18 Local Geological Sites (LGeoS) in Kirklees Metropolitan Borough.

The Agricultural Land Classification (ALC) provisional data outlines the agricultural potential of land, categorising it into five grades (Natural England, 2020). The best and most versatile land is defined as Grades 1 (excellent quality agricultural land), 2 (very good quality), 3a (good), 3b (moderate), 4 (poor) and 5 (very poor). There are no areas of Grade 1 or 2 in the borough as shown in Figure 5-3. Therefore, the highest-grade agricultural land in Kirklees is located within the north and east of the borough. These areas are classified as Grade 3.

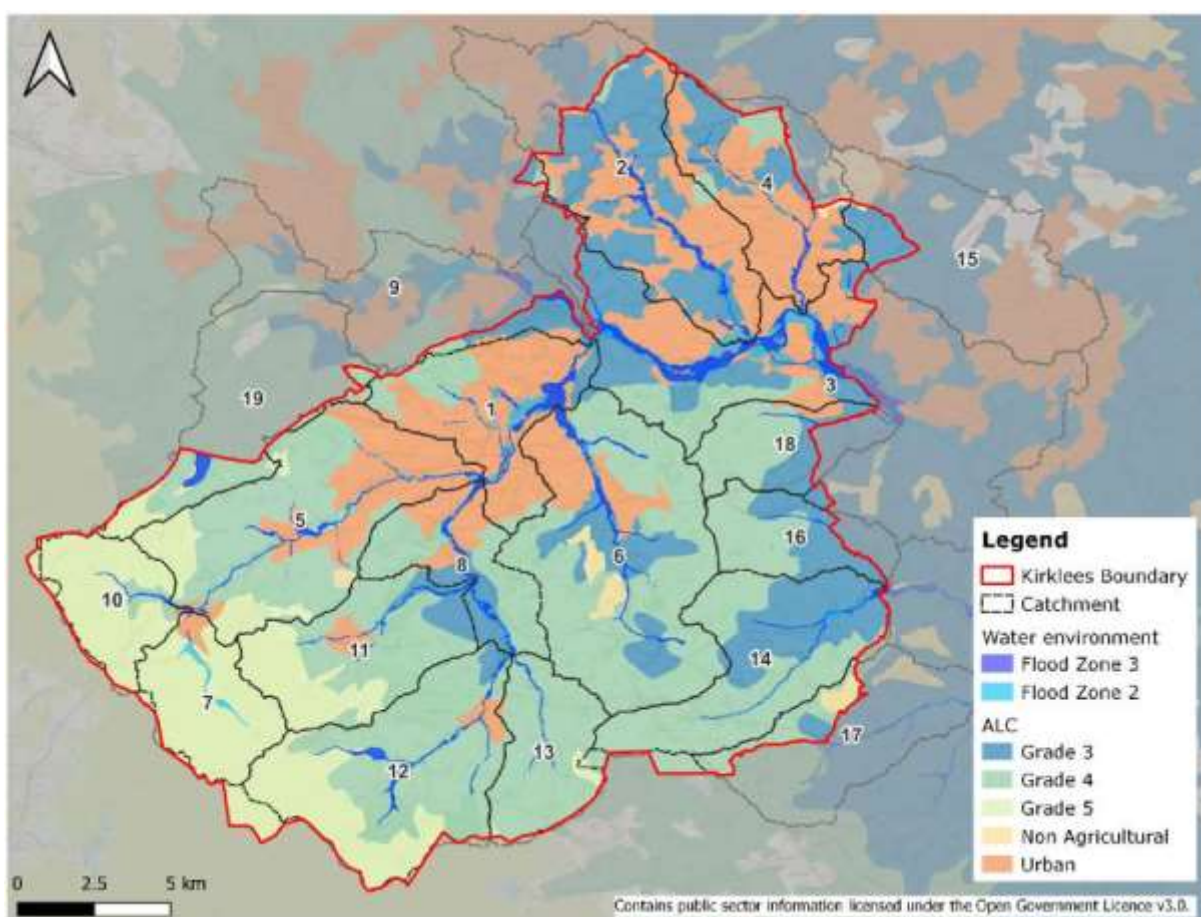


Figure 5-3 ALC in Kirklees Metropolitan Borough

Soil classifications by the Soil Landscapes Online Viewer (Defra, 2022) have classified the study area as containing multiple soil landscapes, but the study area predominantly consists of freely draining slightly acid loamy soils. This soil landscape is freely draining, of loamy texture, mainly covered by arable and grassland.

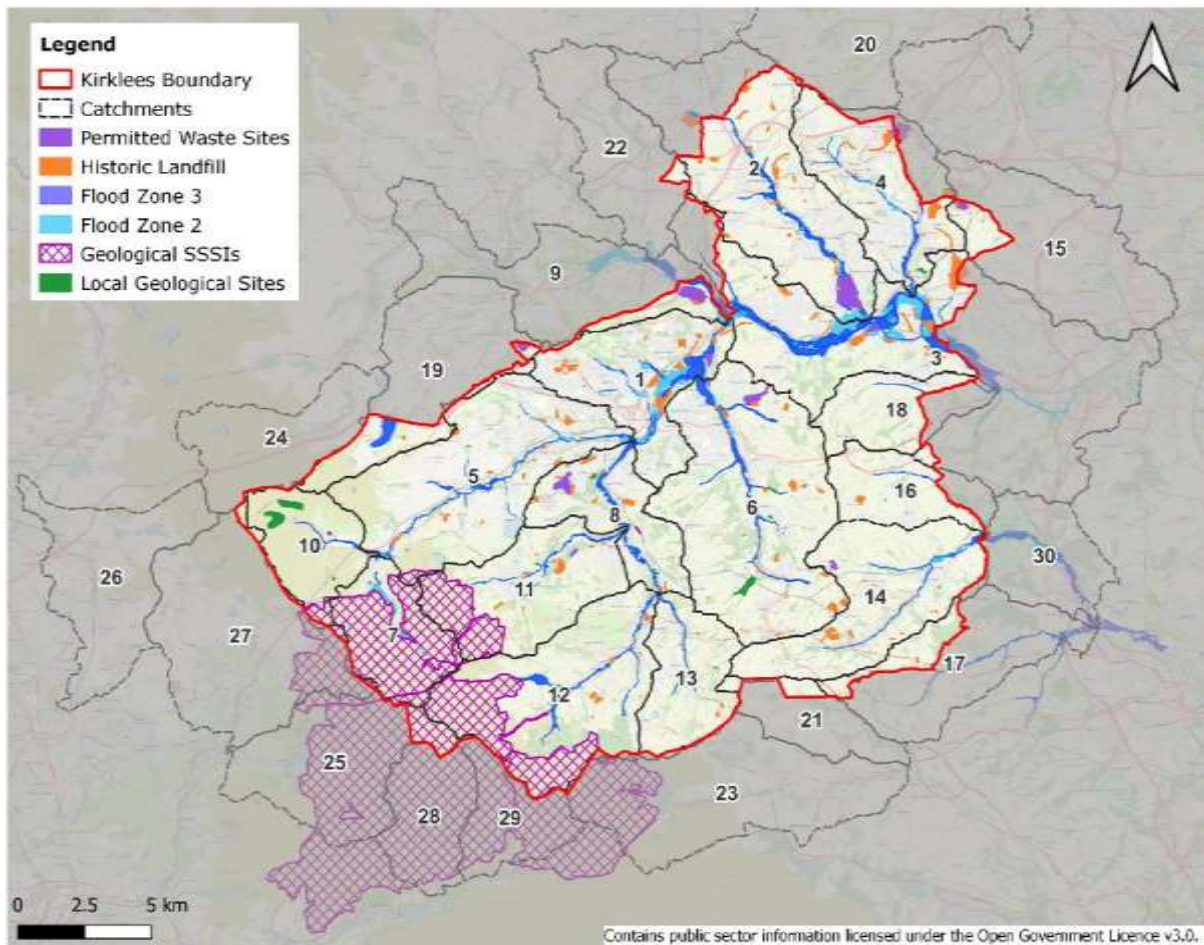


Figure 5-4 Geological SSSIs, Historic and Current Landfill sites in Kirklees.

Contaminated land contains substances in or under the land that are actually or potentially hazardous to health or the environment. Landfill sites are areas of potential contamination. There are 19 permitted waste sites, 222 historic landfill sites, and 19 Local Geological Sites within the study area, as shown on Figure 5-4.

5.5.1 Key Issues

The geological context of the study area, including designations and historic and current landfill is outlined above. The key issues identified are summarised below:

- Flood risk may result in contaminants leaching into surface water, increasing levels of pollution, and threatening human health and the environment; and
- Risk of damage or disturbance to geologically designated SSSIs or LGeoS.

The LFRMS must consider the issues outlined above to prevent erosion of landfill waste into the water course, which would threaten human health and the environment.

HISTORIC ENVIRONMENT

There are a number of heritage assets within the study area, reflecting a rich and diverse built and historic environment. There are approximately 2,974 listed buildings of which 18 are on the Heritage at Risk Register (2021).

The borough also contains 22 Scheduled Monuments. These are awarded protection against potentially damaging activities, including those associated with development, under the Ancient Monuments and Archaeological Areas Act 1979. Three of these Scheduled Monuments are on the Heritage at Risk Register.

The Register of Historic Parks and Gardens by Historic England identifies historic landscapes of note. This can include gardens, grounds and other planned open spaces, the emphasis of the Register is on designed landscapes (Historic England, 2022). There are also six Registered Historic Parks and Gardens in the borough, these are as follows:

- Beaumont Park (8)
- Bretton Hall (14,16)
- Crow Nest Park (2,3)
- Dewsbury Cemetery (2,3)
- Greenhead Park (1,5)
- Kirklees Park (3,9)

The Heritage at Risk Register includes historic buildings and sites of being lost through neglect, decay and deterioration. It includes all types of heritage designations. The overarching purpose of the register is to focus attention on assets in the most need. These heritage assets are outlined in Table 5-5 and on Figure 5-4.

Table 5-5 Historic assets in Kirklees Metropolitan Borough on the Heritage at Risk Register

Name	Designation	Catchment	Condition
Former Huddersfield Infirmary	Listed building Grade II*, CA	1	Poor
New House Hall, Newhouse Road	Listed building Grade II*	1	Very bad
Boiler house, engine house, rope race, water tower and powerhouse at Westwood Mills, Lowestwood Lane, Linthwaite, Huddersfield	Listed building Grade II*, CA	5	Very bad
Mill Dam, at Westwood Mills, Lowestwood Lane, Linthwaite, Huddersfield	Listed building Grade II*, CA	5	Poor
North Range at Westwood Mills, Lowestwood Lane, Linthwaite, Huddersfield	Listed building Grade II*, CA	5	Very bad
Offices and workshop ranges at Westwood Mills, Lowestwood Lane,	Listed building Grade II*	5	Very bad

Name	Designation	Catch-ment	Condition
Linthwaite, Huddersfield			
West Block at Westwood Mills, Lowestwood Lane, Linthwaite. Huddersfield	Listed building Grade II*	5	Very bad
Hopton Congregational Church, Calder Road, Mirfield	Listed building grade II*	3	Fair
Christ Church, Church Lane, Batley and Liversedge	Listed Place of Worship Grade II	2	Poor
Church of St Stephen, Lidget Street, Huddersfield	Listed Place of Worship Grade II	1	Poor
Church St Thomas, Manchester Road, Huddersfield	Listed Place of Worship Grade II*	5	Poor
Church of St John, St John's Road, Huddersfield	Listed Place of Worship Grade II*, CA	1	Poor
Church of St Mark St Marks Road, Huddersfield	Listed Place of Worship Grade II	5	Poor
Church of the Holy Trinity, Trinity Street, Huddersfield	Listed Place of Worship, Grade II*, CA	1	Poor
Christ Church, Woodhouse Hill, Huddersfield	Listed Place of Worship Grade II	1	Poor
Church of Emmanuel, Huddersfield Road, Kirkburton	Listed Place of Worship Grade II	14	Poor
Church of St Thomas, Marsh Hall Lane, Kirkburton	Listed Place of Worship Grade II, CA	6	Poor
Church of St Mary, Church Lane, Mirfield	Listed Place of Worship Grade II*	3	Poor
Emley Day Holes, 200m east of Churchill Farm, Denby Dale	Scheduled Monument	14	Generally unsatisfactory with major localised problems.
Medieval ironstone pits south of Bentley	Scheduled Monument	16	Generally unsatisfactory

Name	Designation	Catchment	Condition
Grange, Denby Dale			with significant localised problems
Crosland Lower Hall moated site, Meltham	Scheduled Monument	11	Generally satisfactory but with significant localised problems.
Birkby, Huddersfield	Conservation Area, 33 listed buildings	1	Poor
Dewsbury	Conservation Area, 41 listed buildings	3,4	Very bad
Holmfirth	Conservation Area, 38 listed buildings	12	Very bad
Huddersfield	Conservation Area, 214 listed buildings	1	Very bad

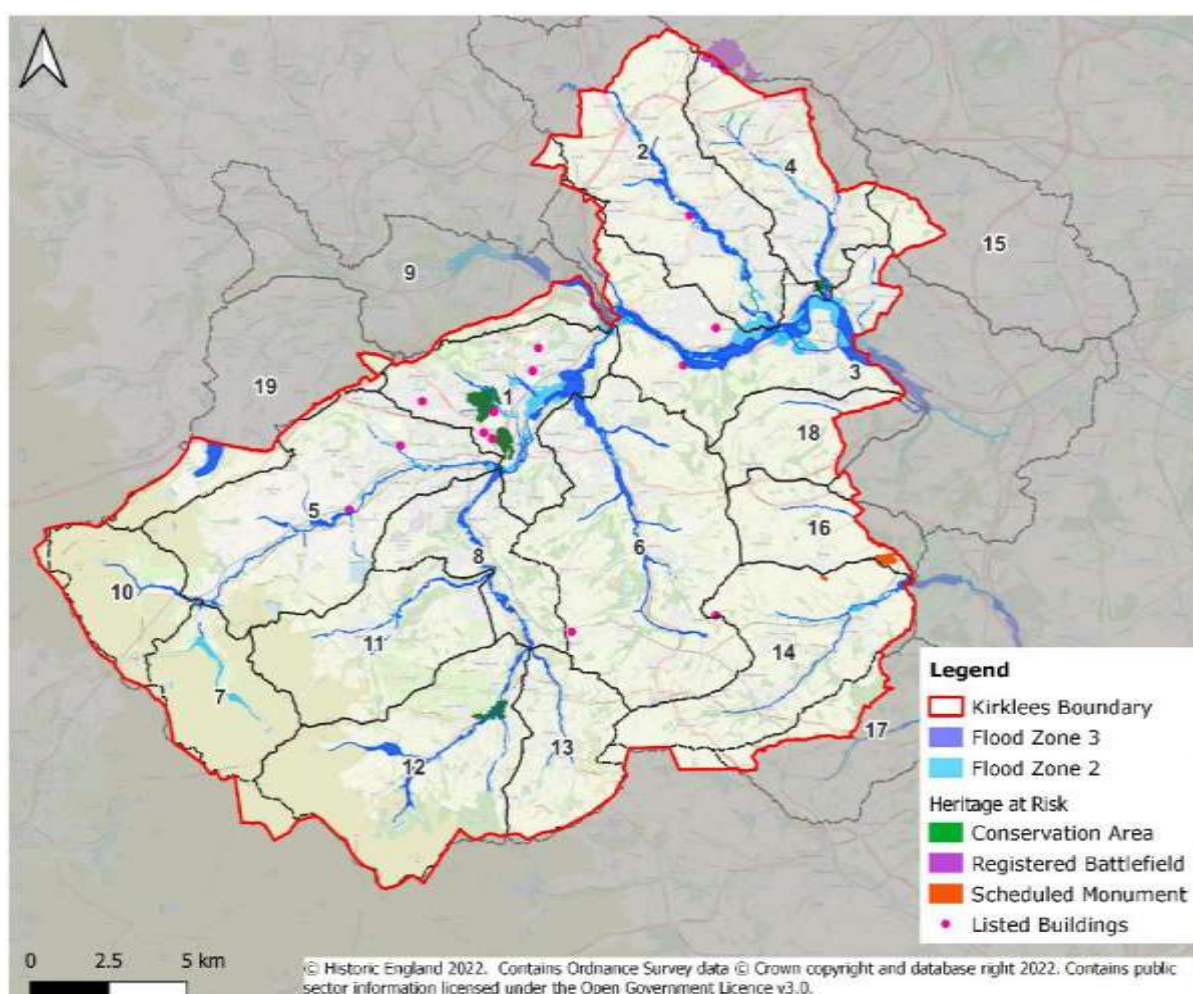


Figure 5-5 Location of Heritage at Risk in Kirklees Metropolitan Borough

The West Yorkshire Joint Services undertook the West Yorkshire Historic Characterisation Project between 2011 and 2017. This developed Historic Land Classification for Kirklees, which evaluates the changes in the historic landscape since 1066. The maps focus upon the key land use areas of commercial, communication, enclosed land, extractive, horticulture, industrial, institutional open land, parkland and recreation, residential, water and woodland (West Yorkshire Joint Services, 2017).

Historic England and Kirklees Metropolitan Council are working in collaboration to deliver a High Street Heritage Action Zone (HSHAZ) in the centre of Huddersfield. The overarching aim of the Action Zone is to rejuvenate the many of listed buildings around Huddersfield town centre which have been in decline.

The West Yorkshire Archaeology Advisory Service have produced a selection of research agenda documents on the:

- Palaeolithic & Mesolithic
- The Later Prehistoric
- Late Iron Age and Roman
- Post Roman to Conquest
- Industrial Archaeology
- Historic Buildings
- Medieval Rural Settlements.

These documents evaluate the historic record of West Yorkshire across the above periods.

KEY ISSUES

There are a variety of heritage assets present within the study area. The key issues are summarised below:

- Potential flood-related damage to many historical, cultural and archaeological features within the study area due to changed water levels or through the force and inundation of flood waters.
- Watercourses and their surrounding fluvial landscapes are important components of the historic environment, containing a wider range of heritage assets.

The provision of flood protection provided by the LFRMS must consider the potential consequences for the historic environment. Where required, early consultation with Local Government Archaeological Officers will help identify the presence of any unknown un-designated archaeological assets and any mitigation to be factored in.

POPULATION

In 2019, the population in Kirklees is 437,000 residents (Kirklees Metropolitan Borough Council, 2019). Only 9% of areas in Kirklees are in the most 10% deprived in England, down from 14% in 2010 and in contrast to rising deprivation in neighbouring areas (Kirklees Metropolitan Borough Council, 2019). Approximately 169,00 households in West Yorkshire are in fuel poverty which is equivalent to 17% (West Yorkshire Combined Authority, 2021).

In Kirklees, 18% of residents have local nature greenspace within 5 to 10 minutes walking distance, which is less than the regional average of 23% (West Yorkshire Combined Authority, 2021).

Kirklees Metropolitan Council are currently running a property Flood Resilience (PFR) Grant 2020-2022 which allows for any measures to be applied to building to make people and the property less vulnerable to the physical impacts of flooding to encourage resilience.

The most densely populated wards in Kirklees are Batley East, Batley West and Greenhead with 36.2 to 47.5 persons per hectare (Kirklees Metropolitan Borough Council, 2020).

The Living Environment domain measures the quality of the local environment. The domain consists of two sub-domains. The ‘indoors’ living environment measures the quality of housing; while the ‘outdoors’ living environment contains measures of air quality and road traffic accidents (Ministry of Housing, Communities & Local Government, 2019).

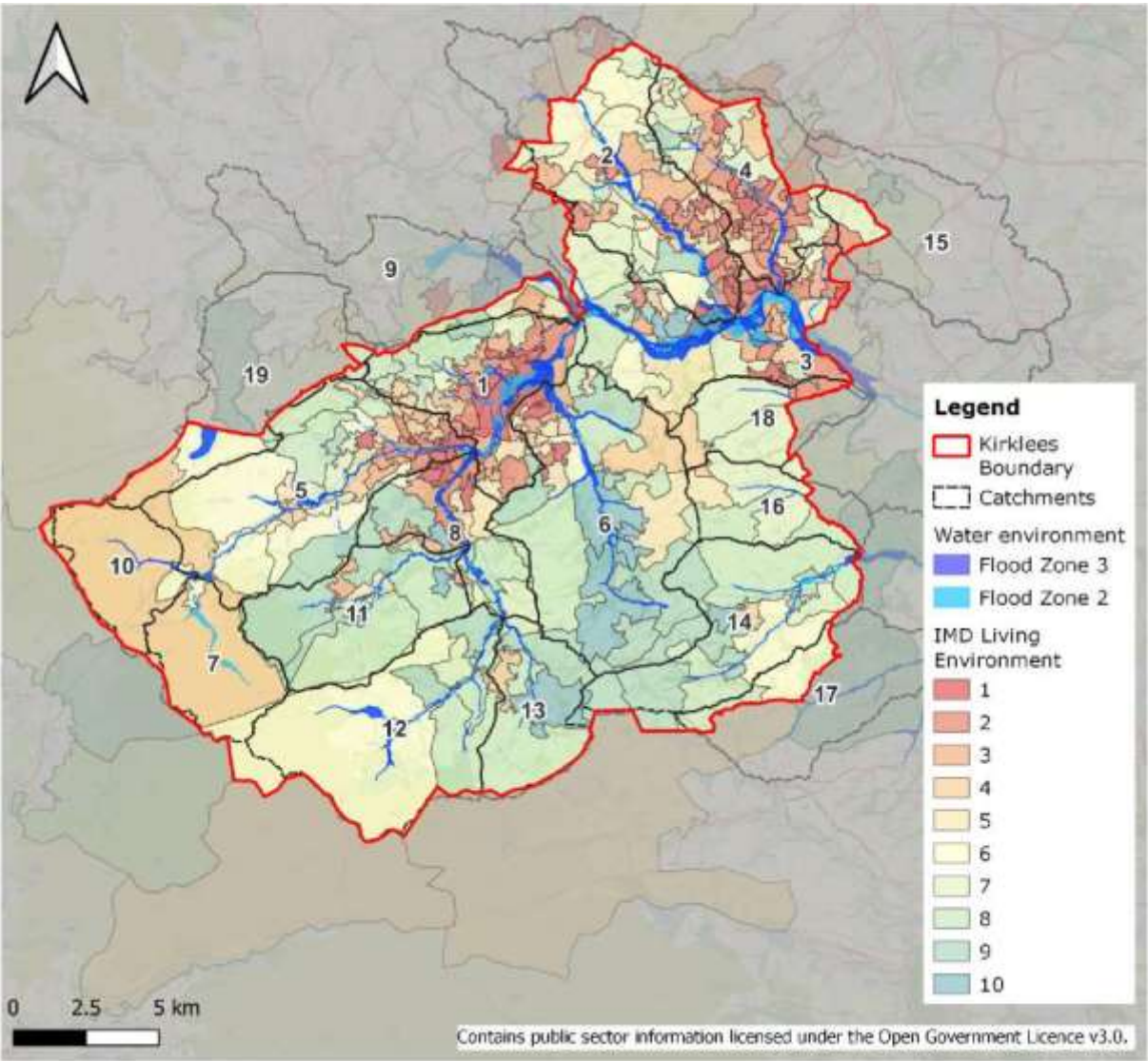


Figure 5-6 IMD Living Environment domain (2019) in Kirklees Metropolitan Borough

Figure 5-5 shows the Index of Multiple Deprivation (IMD) scores for Kirklees. It shows that the greatest deprivation is concentrated around catchments 1 and 4. These relate to the more urban areas of the Huddersfield and Dewsbury. Broadly the more rural areas of the borough experience relatively less deprivation.

SUMMARY OF KEY ISSUES

The key issues relating to the population and health of the study area are outlined above and summarised below:

- Predicted increase in proportion of younger children and older adults within the population, resulting in a relatively small working age population supporting a larger dependent population.
- Consider the sensitivity of areas of deprivation and flood risk exposure across the borough.

The provision of flood management strategies provided by the LFRMS should consider the potential consequences for the local population.

MATERIAL ASSETS

There are 16 train stations in Kirklees, the main rail route is the East/West Trans Pennine Route which links Huddersfield and Dewsbury to Leeds, York, Manchester, and Manchester Airport. There are also local rail connections to Wakefield which provide a further connection to London. The Penistone Line makes a local connection to the Sheffield City Region and Midland Main Line railway (Kirklees Metropolitan Borough Council, 2015).

Between 2009/10 and 2014/25 the number of bus passengers fell from 169.2 million per annum to 156.8 million per annum across West Yorkshire. The current bus service in Kirklees is good, with services mainly focused between corridors of the main towns and urban areas. There are services operating in the rural south of the borough, but these are generally at a lower frequency and require greater public subsidy (Kirklees Metropolitan Borough Council, 2015).

At a regional level, the West Yorkshire transport strategy highlights a number of challenges. The investments in road and rail have not kept pace with economic and population growth, which is manifesting in the congestion and insufficient capacity on public services. At a wider scale, the current transport provision lacks resilience (West Yorkshire Combined Authority, 2017).

Figure 5-6 demonstrates some of the potential critical infrastructure at risk of flooding across the borough.

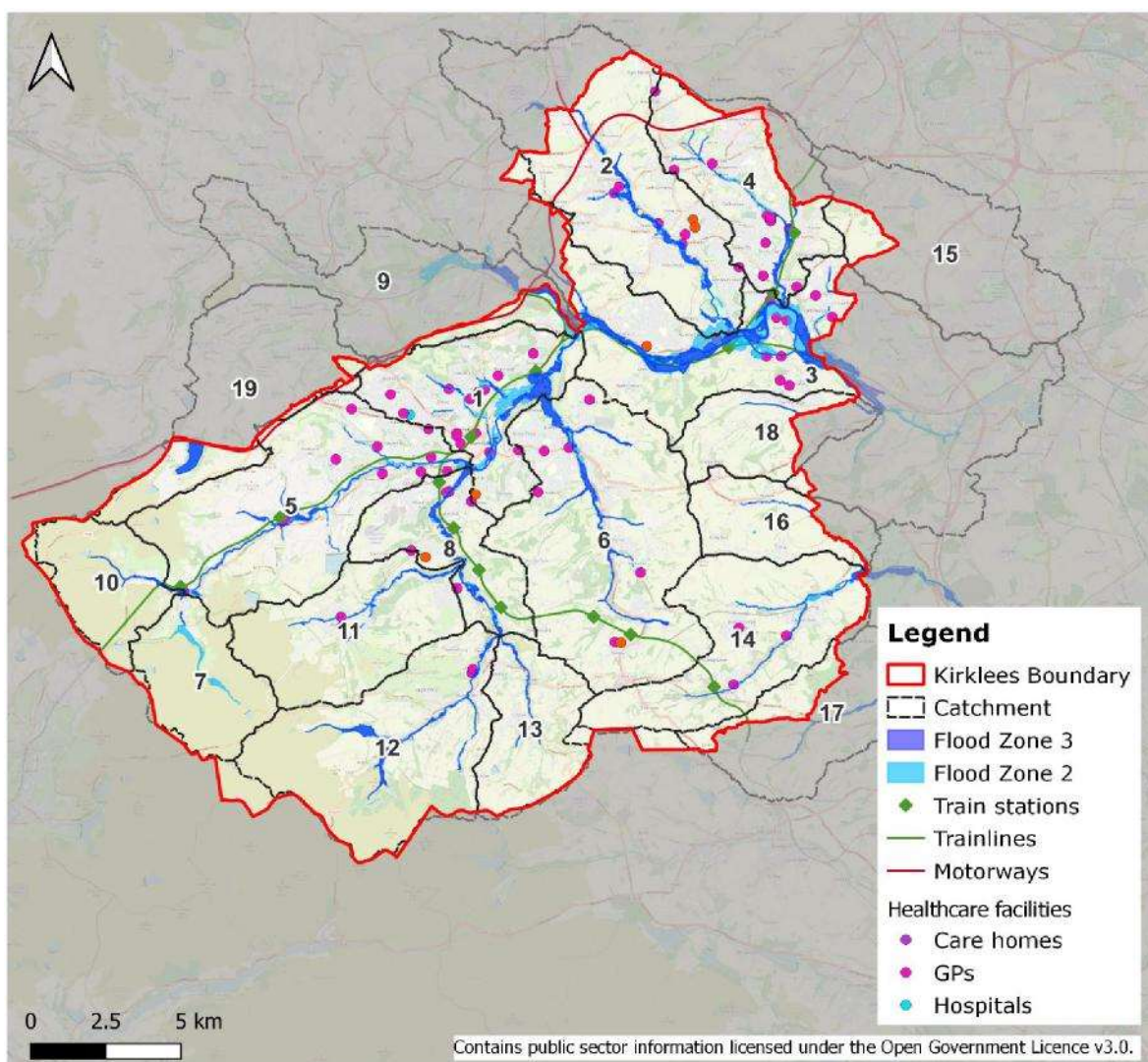


Figure 5-7 Material assets in Kirklees Metropolitan Borough

The overarching conclusion of the Kirklees Infrastructure Delivery Plan (2015) was that there is broadly sufficient infrastructure, either current or planned to support the housing and economic growth aspirations for Kirklees district up to 2031. Specific risks to infrastructure include:

KEY ISSUES

Kirklees Metropolitan Borough is large district with an established network of infrastructure, transport routes, including rural and urbanised areas. The associated key issues are summarised below:

- Critical infrastructure including energy infrastructure, industrial areas, public amenity and transport routes may be vulnerable to flood risk; and
- Sensitivity of infrastructure to damage/disturbance from flooding and associated socio-economic costs.

The provision of flood protection provided by the LFRMS must consider the potential consequences for established and future material assets.

CLIMATE

Recent data indicates that CO₂ end-user emissions in West Yorkshire are approximately 10.8 Mt CO₂ which is equivalent to 4.7 tonnes per capita, below the nation average of 4.9 tonnes. Whilst West Yorkshire's current rates of emissions is lower than the national average, a continuation of the emissions reduction will not achieve its existing target of net zero by 2038 (West Yorkshire Combined Authority, 2021).

Approximately 39% of energy used in the borough is for domestic purposes, domestic electricity uses account for around 8%. Around 2% of energy used is sourced from renewables and waste (Kirklees Metropolitan Borough Council, 2020).

Kirklees falls within one climate region, North-East England, as classified by the Met Office. The annual temperature range in low-lying areas are around 8.5 °C to around 10 °C, mean annual temperatures depend strongly on altitude with a decrease of about 0.5°C for each 100m increase in altitude (Met Office, 2016).

Kirklees Metropolitan Council developed a Local Climate Impacts Profile (LCLIP) to support the West Yorkshire Adaptation Action Plan, where highlighted the impacts of a changing climate on citizens, businesses and partner organisations by detailing the extreme weather events between 2003-2010. Kirklees Council found that extreme weather events had cost the authority £283,030 - £1,255,200 a year, mainly through highway repair and maintenance (West Yorkshire Combined Authority, 2010). The results of LCLIP's across the West Yorkshire region have identified that the main impacts of extreme weather events are:

- Damage to infrastructure e.g., flooding of properties,
- Disruption to travel and accessibility across the region, e.g., traffic congestion and public transport cancellations, and.
- Difficulty or failure in delivering essential services e.g., provision of health and social care.
- Climatic change is likely to result in increased frequency and intensity of severe weather types already experienced across the Yorkshire and Humber region. These effects are likely to have significant implications for businesses and residents (West Yorkshire Combined Authority, 2010).

KEY ISSUES

The key issue relating to climate change is projected increased variability in precipitation events. This is likely to result in the overwhelming of drains and sewers due to increased surface run-off. In turn, this could result in localised flood events, which will have implications for human health, infrastructure, and designated sites.

During the summer months, projected rain increases would have an impact on the capacity of drainage systems. More intense events would exceed the capacity of drainage systems and cause surface water runoff and flooding causing localised surface water runoff and flooding from smaller watercourses, particularly in urban areas.

During the winter months, projected rainfall increases are likely to cause saturation of clayey soils, resulting in wet antecedent conditions, which may result in greater vulnerability to further storms, particularly in rural areas.

To ensure that the region is resilient to impacts of climate change, the LFRMS must consider how to implement measures aimed at coping with them.

SEA FRAMEWORK

INTRODUCTION

The SEA framework, developed at the scoping stage, is used to identify and evaluate the potential environmental issues associated with the implementation of the LFRMS. The framework comprises a set of SEA objectives that have been developed to reflect the key environmental issues identified through the baseline information review. These objectives are supported by a series of indicators, which are used as a means to measure the potential significance of the environmental issues and can also be used to monitor implementation of the LFRMS objectives. These LFRMS objectives are tested against the SEA framework to identify whether each option will support or inhibit achievement of each objective.

Table 6-1 below summarises the purpose and requirements of the SEA objectives, sub-objectives and indicators.

Table 6-1 Definition of SEA Objectives, Criteria and Targets

	Purpose
Objective	Provide a benchmark 'intention' against which environmental effects of the plan can be tested. They need to be fit-for-purpose.
Sub-objective	Aid the assessment of impact significance. Provide a means of ensuring that key environmental issues are considered by the assessment process.
Indicator	Provide a means of measuring the progress towards achieving the environmental objectives over time. They need to be measurable and relevant and ideally rely on existing monitoring networks.

SEA OBJECTIVES AND CRITERIA

SEA objectives and indicators have been compiled for each of the environmental receptors (or groups of environmental receptors) scoped into the SEA. The SEA objectives for the LFRMS are given in Table 6-2 below. These objectives can be refined or revised in light of any additional information obtained during the life of the project.

Table 6-2 SEA Objectives and Criteria

Receptor	Objective		Sub-objective	Indicator
Landscape and Visual Amenity	1	Protect the integrity of local urban and rural landscapes in the area.	Prevent changes to the landscape character of NCAs and local landscape character types.	Changes in the condition and extent of existing characteristic elements of the landscape. The condition and quality of new landscape features introduced to

Receptor	Objective		Sub-objective	Indicator
				the environment (i.e. new flood defences).
Biodiversity, Flora and Fauna	2	Maintain, and enhance and extend biodiversity, wildlife and habitat connectivity.	<p>Protect and enhance protected, important and notable habitats and species and designated nature conservation sites in the area.</p> <p>Increase biodiversity by enhancing, expanding and connecting existing natural areas and wildlife refuges.</p> <p>Increase biodiversity resilience to flood risk and climate change.</p>	<p>Recorded numbers of protected habitats and species.</p> <p>Percentage change in area of priority habitats.</p> <p>'Condition' of designated wildlife, geological sites, and habitats.</p> <p>Deliver measures which also improve the ecological status of WFD waterbodies.</p> <p>Biodiversity net gain and other enhancements achieved in projects delivered through the LFRMS.</p>
Water Environment	3	Protect and enhance the quality of water features and resources.	Do not inhibit achievement of WFD objectives and contribute to their achievement where possible.	WFD chemical or ecological status of water bodies within catchment.
Geology and Soils	4	Maintain soil quality and conserve geological designations.	<p>Reduce risk of contamination from all sources.</p> <p>Maintain soil quality and quantity.</p> <p>Conserve the condition of geological designated sites.</p>	<p>Number of contamination incidents.</p> <p>Risk levels of contamination.</p> <p>Soil quality.</p> <p>'Condition' of geological designated sites.</p>
Historic Environment	5	Preserve and where possible enhance important heritage assets.	<p>No adverse impact on designated and non-designated heritage assets as a result local flooding.</p> <p>No adverse impact on the integrity/setting of designated and non-designated heritage assets as a result of local flood risk management measures.</p>	<p>Number of designated and non-designated heritage sites at risk from local flooding.</p> <p>Number of heritage assets adversely impacted upon by local flood risk management measures.</p>
Population and Human Health	6	Protect and enhance human health and wellbeing.	Conserve and enhance open (including urban amenity areas) and natural green spaces including PRow and recreation opportunities.	<p>Number of open and natural green spaces.</p> <p>Number and value of PRow routes.</p>

Receptor	Objective		Sub-objective	Indicator
			Protect key social infrastructure assets and services from flooding and increase resilience to climate change.	<p>Number of residential properties at risk from flooding.</p> <p>Number of key services at risk from local flooding.</p> <p>Health and wellbeing statistics.</p>
Material assets	7	Minimise the impacts of flooding to the transport network and key critical infrastructure.	<p>No increase in length of road and rail infrastructure at risk from local flooding.</p> <p>No increase in number of infrastructure assets at risk from local flooding.</p> <p>No increase in number of Green Infrastructure assets at risk of local flooding and/or an enhancement of current Green Infrastructure Assets in the area.</p>	<p>Length of road and rail infrastructure at risk from local flooding.</p> <p>Number of key infrastructure assets at risk from local flooding.</p> <p>Number of green infrastructure assets at risk from flooding/created or enhanced through implementation of the LFRMS.</p>
	8	Minimise local and national contribution to climate change.	Minimise short-term carbon and reduce long-term emissions by preferencing low carbon solutions.	Number of flood management measures implemented that will also sequester carbon. Carbon dioxide equivalent emissions (CO ₂ e)

STAGE B: DEVELOPING AND REFINING OPTIONS AND ASSESSING EFFECTS

DEVELOPING ALTERNATIVES

The SEA Regulations require an assessment of the plan and its 'reasonable alternatives'. In order to assess reasonable alternatives, different strategy options for delivering the LFRMS have been considered and assessed at a strategic level against the SEA objectives (see Table 7-1) and environmental baseline. The results of this assessment will be used to inform the decision-making process in choosing a preferred way of delivering the LFRMS.

APPRAISAL OF REASONABLE ALTERNATIVES

The LFRMS has the purpose of managing and reducing local flood risk in the study area. A high-level review of the options against the SEA Objectives was undertaken in the form of a simple matrix for each of the following options:

Do Nothing - where no action is taken, and existing assets and ordinary watercourses are abandoned.

- Do minimum: maintain current Kirklees Council Local Flood Risk Management Strategy (2012)- where existing assets and watercourses are maintained as present in line with the existing local flood risk management plan as an alternative to preparing a new one. Existing infrastructure is not improved over time and the effects of climate change are not taken into account.
- Manage and reduce local flood risk - take action to reduce the social, economic and environmental impact due to flooding through the preparation of a new LFRMS.

Table 7-1 compares all three strategy options against each of the SEA objectives.

Table 7-1 Assessment of the Strategy and Alternative Options Against the SEA Objectives

SEA Objectives		Options and Effects		
		Do Nothing	Do minimum: maintain current local flood risk strategy	Manage and reduce local flood risk
1	Protect the integrity of local urban and rural landscapes in the area.	Potential negative effect resulting from no management that could adversely impact sensitive landscape character. Locally important landscape features, including those identified within the LCAs, would likely be exposed to damage and deterioration through increased exposure to flood risk.	Little change to baseline in the short to medium term. However, in the future, as a result of climate change and increasing flood risk, adverse impacts on local landscapes may arise.	Potential for managing and promoting this objective through sensitively designed flood risk management schemes which enhance local landscape character, such as natural flood management.
2	Maintain and enhance biodiversity, wildlife, and habitat connectivity.	Potential for both adverse and beneficial impacts. For example, abandonment of assets may allow for the development of more natural watercourses and wetland habitat creation/ enhancement through increased inundation. However, there could be an increased risk of spreading of non-native invasive species	Little/no change to baseline levels in the short to medium term. However, as a result of increased flooding in the future due to climate change, new habitats may be created, or existing wetland habitats enhanced. Although, habitats intolerant of increased inundation or changes in water quality may be adversely affected.	Potential for both adverse and beneficial impacts as a result of active management. Opportunities may arise to enhance biodiversity and notable habitats the Council through the implementation of measures to reduce local flood risk, for example: natural flood management measures, improvements

SEA Objectives		Options and Effects		
		Do Nothing	Do minimum: maintain current local flood risk strategy	Manage and reduce local flood risk
		through flooding; deterioration of existing wildlife corridors; and detrimental impacts on habitats intolerant of increased inundation.		to fish passage; encouraging appropriate management of watercourses by riparian landowners; and undertaking watercourse maintenance.
3	Protect and enhance the quality of water features and resources.	Potential for both adverse and beneficial impacts.	Little/no change to baseline levels. However, potential deterioration of water quality during flooding incidents.	Potential for both adverse and beneficial impacts.
4	Maintain soil quality and conserve geological designations.	Potential negative effect resulting from increased erosion of soils as a result of increased flooding and no management of land contamination risks and subsequent effects.	Little/no change to baseline in the short to medium term. However, in the future, as a result of climate change, adverse impacts may arise through erosion and land contamination from increased flooding.	Potential for managing and promoting this objective through reduced flood risk, which will help to protect the Council area's soil resource from erosion and its quality.
5	Preserve and where possible enhance important historic and cultural sites.	Heritage assets will likely be exposed to damage and deterioration through increased exposure to flood risk.	Little/no change to baseline in the short to medium term. However, in the future, important heritage assets may be exposed to increased flooding and damage due to climate change.	Potential for both adverse and beneficial impacts as a result of active management, for example through increased protection of vulnerable heritage assets or reduced inundation resulting in the desiccation of buried archaeology.
6	Protect and enhance human health and wellbeing.	Increased exposure to flood risk from a combination of no management and climate change. This could lead to a greater number of people and their properties at risk of flooding, causing greater damage and disruption, increases in social exclusion, deprivation and health risks.	No improvements to health and well-being as existing flood risk is maintained and the risk may increase in the future as a result of climate change.	Active management to reduce local flood risk should help to protect residential properties and key social infrastructure services from flooding. This has the potential to create a range of social benefits including reducing associated health impacts and social deprivation.
7	Minimise the impacts of flooding to the transport network and key critical infrastructure.	This option is likely to result in increased flood risk to key infrastructure, which would cause significant disturbance	Maintains the current flood risk levels, although this risk may increase in the future due to climate change.	Managing and reducing local flood risk will minimise the impact of flooding on roads, railways and other infrastructure assets. This

SEA Objectives		Options and Effects		
		Do Nothing	Do minimum: maintain current local flood risk strategy	Manage and reduce local flood risk
		ruption to the county, impacting on human and economic activity and the environment.		will reduce disruption during flood events and enable a more effective re-sponse.
8	Minimise local and national contribution to climate change.	Increased exposure to flood risk may result in increased emissions locally. For example, from emissions associated with the recovery effort following flood events.	Little/no change to baseline levels in the short to medium term. However, as a result of future climate change and associated increased flood risk, there may be an increase in emissions following flood events.	Potential for negative impacts if management is carried out using hard engineering approaches which contribute embodied carbon. Potential for management through low carbon measures such as natural flood management.

Impact Significance	Impact Symbol	Description
Significant positive impact	++	Significantly beneficial to the SEA objective -multiple opportunities for environmental improvement or resolves existing environmental issue.
Minor positive impact	+	Partially beneficial (not significant) to the SEA objectives – contributes to resolving an existing environmental issue or offers some opportunities for improvement.
Neutral impact	0	Neutral effect on the SEA objective and environment.
Minor negative impact	-	Partially undermines (not significantly) the SEA objective – would contribute to an environmental issue or reduce opportunities for improvement.
Significant negative impact	--	Significantly undermines the SEA objective – will significantly contribute to an environmental problem or undermine opportunity for improvement.

Uncertain impact	?	Insufficient detail on the option or baseline – cannot effectively assess the significance of the strategy objective on the SEA objective.
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ASSESSMENT APPROACH

The LFRMS objectives and actions have been evaluated in light of their potential cumulative, synergistic, direct and indirect environmental effects on the different SEA receptors selected for further assessment. The assessment of these environmental effects has been informed by the baseline data collected at the scoping stage, professional judgement and experience with other water level management and flood risk related SEAs, as well as an assessment of national, regional, and local trends. In some cases, the assessment has drawn upon mapping data and GIS to identify areas of potential pressure, for example due to presence of environmental designations. Throughout the assessment the following will apply:

- Positive, neutral and negative impacts will be assessed, with uncertain impacts highlighted;
- The duration of the impact will be considered over the short, medium and long term;
- Consideration of whether the impact would be directly on a receptor or indirectly;
- The reversibility and permanence of the impact will be assessed. For example: temporary construction impacts, such as during decommissioning pumping stations; impacts which can be mitigated against/ restored over time such as altered drainage pressures; or completely irreversible changes to the environment; and
- In-combination effects will also be considered.

The significance of effects upon each of the SEA objectives will then be evaluated and used to inform option selection.

LIMITATIONS AND ASSUMPTIONS

The LRFMS actions are high-level and generic and do not include specific details such as location, scale and/ or implementation methods. As such, any assessment is based upon a high-level understanding of the individual actions.

It is assumed that actions will be undertaken in accordance with local and national policies, and to best practice guidance.

ASSESSMENT

The assessment of the LFRMS objectives and actions against the SEA objectives is shown below in Table 8-3. Cumulative effects of the actions against the SEA objectives are shown in Table 8-4. These are qualitative assessments that identify the range of potential effects that the LFRMS may have on delivering the SEA objectives.

Strategic Theme	LFRMS Action	SEA Objectives								Comments
		1	2	3	4	5	6	7	8	
Place	Engage early with spatial planners and growth strategies to ensure new development and plans make best use of land in making space for surface water, fluvial water, sustainable drainage systems and promote the use of adaptive pathways to adapt to climate hazards. Share our understanding of flooding in the area to avoid inappropriate development.	+	+	+	+	+	+	+	+	Ensuring best use of land and incorporating adaptive pathways and sustainable drainage systems (SuDS) will help contribute to reduced flood risk while being considerate of ecological, heritage and visual receptors, water resources and carbon. This action has the potential to positively benefit all SEA objectives.
Place	Work with the Local Planning Authority, Highway Authority, Environment Agency, and water companies to ensure the planning process and development design account fully for land drainage and surface water managements issues. Ensure our practices secure sound management and maintenance regimes that are proportionate and appropriate to the flood risk in the area.	+	+	+	+	+	+	+	+	Ensuring ongoing involvement with consultees on land drainage and surface water management will have indirect positive benefits to material assets as a result of minimising surface water flooding impacts on infrastructure. As statutory consultee, the LLFA could promote the use of sustainable flood risk management measures, such as SuDS, which would indirectly positively impact several SEA objectives.
Place	As a Lead Local Flood Authority engage with others to advise on climate change allowances for sources of flooding from surface water, groundwater, and ordinary watercourses. To share and inform others of current guidance, research and best practice on sustainability and water management to inform decision making.	+	+	+	+	+	+	+	○	Incorporating climate change allowances will improve the accuracy of flood modelling and will allow for targeted flood alleviation options to be achieved. This action should improve flood management in the area and have multiple benefits to SEA objectives, such as enhancing the resilience of ecosystems, communities and infrastructure.

Strategic Theme	LFRMS Action	SEA Objectives								Comments
		1	2	3	4	5	6	7	8	
Place	Enhance our early engagement with developments and commit to targeted periodic inspections of new development to ensure compliance with drainage planning conditions and Land Drainage Act legislation. Seek 106 contributions where appropriate and promote environmental net gain.	+	+	+	+	○	+	+	+	Early consideration of flood risk in development proposals would result in benefits to human and material receptors by ensuring that developments appropriately consider flood risk management measures. Undertaking inspections will ensure these measures are met. Promoting environmental net gain will have positive impacts on a range of SEA objectives through the enhancement of habitats.
Place	Improve our asset data on drainage assets within the district including highway gullies, culverts, carrier drains, debris screens and others to build our evidence base. Where considered significant make this publicly available.	○	○	○	○	○	+	+	○	Collecting and maintaining asset data will not have any identified direct effect on SEA receptors, however this action should promote better flood management in the area, particularly if there is a focus on assets which have a significant effect upon local flood risk.
Protect	Identify and develop flood risk improvement schemes for Kirklees to reduce the risk of surface water flooding and flooding from ordinary watercourses to better protect properties and the highway network in high-risk areas. Be open to new financing models. Promote a range of resilience actions and climate change scenarios.	9	9	9	9	9	+	+	9	Delivery of flood alleviation schemes will result in reduced risk to the local community for the benefit of population, human health and material assets. However, the project location, physical works to install, manage and maintain flood assets are unknown and may have adverse impacts on designated sites (both ecological and cultural), watercourses and soils in the proximity of the works. There is the potential that works will promote positive impacts for these receptors through managing water within the locality for their benefit.
Protect	Improve the awareness, understanding and delivery of Property Flood Resilience measures to manage local flood risk within our communities. Encourage homeowners and business owners to undertake Property Flood Surveys and seek grant funding to support resilience measure installations to support a build back better approach.	○	○	○	○	○	++	+	○	Improved resilience will reduce the impact of flood events on population and human health and material assets and will allow for faster recovery from floods.

Strategic Theme	LFRMS Action	SEA Objectives								Comments
		1	2	3	4	5	6	7	8	
Protect	Work with our partners, universities, and communities to develop integrated solutions and maintenance programmes to deliver multiple benefits to reduce flood risk and look to improve economic, social and environmental benefits. Be innovative in our approach.	+	+	+	+	+	+	+	+	Developing and implementing integrated approaches to flood management, incorporating input from multiple stakeholders will lead to benefits for all SEA objectives.
Protect	Engage with catchment partnerships and landowners to embrace land management techniques and natural flood management to help to manage surface water runoff. Seek out opportunities to use Working with Natural Processes in managing flood risk to promote multiple benefits such as environmental net gain.	+	++	+	+	+	+	+	+	Maximising opportunities for natural flood management will have direct, long-term benefits to ecological receptors and will also likely lead to improvements in water quality, along with sequestering carbon. Implementation of natural flood management may also have indirect positive effects on landscape, cultural assets, amenity, population, human health, and material assets.
Protect	Support the severe weather incident management function the Council undertakes through technological advancements to ensure it is an intelligence led approach.	○	○	○	○	○	+	+	○	Improvements to the severe weather management function will have long-term positive benefits to population and human health and material assets through improved flood resilience.
Protect	Maintain assets based on a risk-based approach to ensure high flood risk assets are prioritised and allowances made for climate change projections are considered. Try new technological approaches. Assess which Council assets require capacity improvements as a last resort.	○	○	○	○	○	+	+	○	This action will ensure that funding will be provided to protect the most at-risk receptors. This should help reduce the magnitude and likelihood of flooding and will have positive benefits to population and human health and material assets.
Response	Provide intelligence to ensure policy frameworks and emergency plans are robust. Work with other services to establish the basis of the Council's response to severe rainfall events in supporting communities.	○	○	○	○	○	+	+	○	Improving flood event response through development of emergency plans and frameworks will help communities better recover from flood events respond more effectively to future flood events, leaving them less vulnerable to further events in the future.

Strategic Theme	LFRMS Action	SEA Objectives								Comments
		1	2	3	4	5	6	7	8	
Response	Work with the local communities to increase their awareness and preparedness for flooding in Kirklees to improve flood resilience in homes, businesses and communities through education campaigns with our partners. Enhance our online content to deliver a one-stop shop.	○	○	○	○	○	+	+	○	Enhancing community preparedness and resilience to flooding will reduce the impact of flooding on communities and allow them to respond more effectively to flood events. This will lead to increased community health and wellbeing, and enable measures to be taken to protect infrastructure.
Response	Encourage flood community action groups to be set up in key areas of flood risk and through this work, in conjunction with partners, provide a higher standard of community led resilience by developing a network of community resilience leads.	○	○	○	○	○	+	+	○	Community flood action groups will promote awareness of flood risk and understanding of response plans. This will not have any identified direct effect on the majority of SEA receptors. However, this action should promote better understanding of flood risk and management plans in the area, and should promote direct engagement of the community in flooding issues.
Response	Ensure flood risk management actions reach out and remain inclusive in our approach within our diverse communities and areas of deprivation.	○	○	○	○	○	+	○	○	Ensuring inclusivity will ensure all communities are involved in discussions around flood risk and will improve understanding and trust in flood risk management actions for all members of the population.
Response	Establish and maintain a Communication Plan in line with national and other Council services to provide coordinated and timely information to communities at flood risk.	○	○	○	○	○	+	+	○	Establishing a communication plan will indirectly benefit local communities and infrastructure through provision of alerts of likely flood risk, which will allow time for preparation for flood events, reducing flooding impacts.
Recovery	Provide follow up recovery support and advice to residents, business owners and communities that have been affected by flooding on funding, wellbeing support and signpost to affordable flood insurance to help them recover quicker.	○	○	○	○	○	+	+	○	Providing flood recovery support will help communities recover after flooding and respond more effectively to future flood events, leaving them less vulnerable to further events in the future.

Strategic Theme	LFRMS Action	SEA Objectives								Comments
		1	2	3	4	5	6	7	8	
Recovery	Investigate flood incidents of all sources and establish flood outlines with our partners to validate existing flood models to help inform future grant fundings and flood risk management projects.	+	+	+	+	+	+	+	+	Validating existing modelling will not have any identified direct effects on the SEA objectives; however, the action should increase understanding of flood risk in the area (including flood risk to sensitive receptors). The results will inform better flood management which may lead to indirect benefits to multiple SEA objectives.
Recovery	Work with Partners and health bodies to ensure mental health impacts from flooding are factored into long term recovery planning.	O	O	O	O	O	+	O	O	Ensuring mental health impacts are factored into planning will have major long-term positive impacts to communities.
Recovery	Support Review Briefings and feedback learning from communities to inform our plans and policies to ensure a more efficient and effective response in the future.	O	O	O	O	O	+	+	O	Understanding learnings from flood events to improve future response will have positive impacts to population and human health and material assets through reduced future flooding impacts.

Receptor	SEA Objective	Assessment Score	Justification
Landscape and Visual Amenity	Protect the integrity of local urban and rural landscapes in the area.	0	<p>The majority of LFRMS action will not have any direct impacts upon this objective, although objectives will have broad positive impacts upon landscape and visual receptors through reduced flood risk and associated reduction in the scale of visual impacts from flood events.</p> <p>There is potential through the LFRMS to provide opportunities for landscape and visual enhancements through the implementation of natural flood management and SuDS, which may enable the protection and enhancement of green spaces, river corridors and woodland to enhance visitor experience and provide recreational amenity.</p> <p>However, there are uncertainties around the actions relating to the delivery of flood alleviation schemes. Without specific details of these projects adverse impacts to visual receptors cannot be ruled out. There is the potential for impacts to arise through the construction of new defence schemes. Schemes should be designed to avoid the potential for significant landscape impacts; including minimising hard engineering and encouraging nature-based solutions. Where impacts are identified, they should be mitigated appropriately.</p>

Receptor	SEA Objective	Assessment Score	Justification
Biodiversity, Flora and Fauna	Maintain and enhance biodiversity, wildlife and habitat connectivity.	0	<p>In general, many of the LFRMS actions will not have any identified direct effects on this SEA objective, however, by promoting better flood management and reducing flood risk to key ecological receptors, including designated sites, the LFRMS may help enhance biodiversity whilst safeguarding habitat connectivity corridors.</p> <p>The LFRMS provides direct opportunities for ecological enhancements through the implementation of natural flood management schemes, which would help deliver policy objectives for the natural environment including habitat enhancements, improved ecological connectivity and increased biodiversity resilience to flood risk and climate change.</p> <p>However, there are uncertainties around the actions relating to the delivery of flood alleviation schemes. Without specific details of these projects adverse impacts to ecological receptors cannot be ruled out. Impacts may arise due to disruption of species and habitats from construction activities. New schemes should be designed to avoid the potential for significant ecological impacts, and where impacts are identified, they should be mitigated appropriately.</p>

Receptor	SEA Objective	Assessment Score	Justification
Water Environment	Protect and enhance the quality of water features and resources.	0	<p>The majority of actions will have a neutral impact upon this objective due to their nature, however, by promoting better flood management and reducing flood risk, the LFRMS may help to improve water quality and WFD status across the Council area. A reduction in the frequency and magnitude of flood events will help prevent sewage spillage incidents and entry of litter into watercourses.</p> <p>The LFRMS provides opportunities for enhancement to the water environment through the implementation of natural flood management, SuDS and drainage management schemes. Such schemes would help reduce flood risk whilst providing water quality benefits by improvements such as: restoring natural sediment processes; reducing surface runoff and increasing infiltration rates; and reconnection of floodplains.</p> <p>However, there are uncertainties around the actions relating to the delivery of flood alleviation schemes. Without specific details of these projects, adverse impacts to the water environment cannot be ruled out. Impacts may arise from spillages and dust pollution during construction activities. New schemes should be constructed in line with industry best practice guidance in order to avoid the potential for significant impacts, and where impacts are identified, they should be mitigated appropriately.</p>

Receptor	SEA Objective	Assessment Score	Justification
Geology and Soils	Maintain soil quality and conserve geological designations.	0	<p>The LFRMS will contribute to objectives relating to geology and soils by reducing flood risk and promoting better flood management. Reduction in the frequency and magnitude of flooding events will help prevent soil contamination incidents, soil erosion, and help conserve the condition of geological designated sites.</p> <p>There are opportunities for enhancement of soil quality through natural flood management and SuDS schemes which may improve the quality of infiltrating water and hence provide improvements to the soil.</p> <p>However, there are uncertainties around the actions relating to the delivery of flood alleviation schemes. Without specific details of these projects, adverse impacts to geology and soils cannot be ruled out. Impacts may arise from contamination and disturbance of soils during construction activities.</p>

Receptor	SEA Objective	Assessment Score	Justification
Historic Environment	Preserve and where possible enhance important historic and cultural sites.	0	<p>The majority of actions will have a neutral impact upon this objective due to their nature, however, there is the potential for the LFRMS to benefit historic environment assets due to better flood management and reduced flood risk. Reduction in flood frequency and magnitude will help prevent damage to cultural heritage receptors, including listed buildings and Scheduled Monuments, which are prone to loss of stability, collapse, biodegradation and moisture-induced damage following flooding. LFRMS actions will also help to improve the setting of heritage assets.</p> <p>There is the potential for adverse impacts to the water environment through the construction of flood defence schemes. Impacts may arise from damage to heritage assets and their setting during construction activities. New schemes should be constructed in line with industry best practice guidance in order to avoid the potential for significant impacts.</p>
Population and Human Health	Protect and enhance human health and wellbeing.	++	<p>The LFRMS actions will directly benefit population and human health receptors through reduced flood risk. A reduction in the frequency and magnitude of flood events will reduce flooding impacts to residential and commercial properties, and key infrastructure such as educational and healthcare facilities.</p> <p>Flood risk reduction and community involvement in planning and recovery will also help to decrease the cost and stress of living in high flood risk areas and dealing with flooding consequences.</p> <p>The construction of new flood defence schemes will improve infrastructure resilience to climate change.</p>

Receptor	SEA Objective	Assessment Score	Justification
Material assets	Minimise the impacts of flooding to the transport network and key critical infrastructure.	+	Overall, the LFRMS objectives are likely to have a significant positive impact in relation to this SEA objective as the LFRMS includes several actions that seek to improve the resilience of material assets in the borough. Reduction in flood risk will reduce impacts to key such as road, rail and power grid.
	Minimise local and national contribution to climate change.	0	The majority of LFRMS actions do not directly contribute to climate change objectives as they do not reduce local carbon emissions. However, reduction in flood risk may indirectly reduce emissions by reducing the requirement for rebuilding/redevelopment after large flood events. In addition, SuDS natural flood management and associated green space enhancement may improve local carbon sequestration.

MITIGATION

There were no negative effects identified in the assessment and therefore on this basis no specific mitigation measures are required. However, potential areas of improvement and consideration for refining the LFRMS objectives and actions are included below.

This is in accordance with the Schedule 2 of the SEA Regulations (7) which states that the Environmental Report should include 'the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme'.

It should be ensured that any flood risk improvement schemes be designed to avoid impacts to SEA receptors and take steps to actively enhance them. This may be completed through an Environmental Impact Assessment (EIA) methodology. Natural flood management and SuDS approaches should be implemented where possible to best work with the natural and built environment and reduce impacts of flood alleviation schemes on the environment.

Where possible, options to reduce flood risk whilst contributing to local carbon reduction targets should be considered, such as through natural flood management.

CONCLUSIONS AND RECOMMENDATIONS

The key aim of the LFRMS is to manage local flood risk by technically, economically, socially and environmentally appropriate options. The intention of the strategy is to set out the roles and responsibilities and to improve local flood risk management so as to minimise the impact of flooding on infrastructure, businesses and properties.

The SEA has been undertaken to identify the likely significant environmental effects of the implementation of the LFRMS. A proportionate approach was adopted towards establishing the scope of the SEA, reflecting the high-level nature of the LFRMS.

A range of different strategy options for delivering the LFRMS have been assessed at a strategic level against the SEA objectives. These alternatives include the 'do nothing' scenario, where no action is taken and existing assets and ordinary watercourses are abandoned, and the 'maintain current Local Flood Risk Management Strategy (2012)' scenario, where existing assets and watercourses are maintained as present in line with current levels of flood risk.

The 'Do Nothing' approach would promote an overall negative effect on the SEA objectives as a result of abandoning current management practices, increasing the risk of local flooding. This impact would be likely to increase over time as responsible bodies will be unable to incorporate precautionary measures in existing or new developments in a response to climate change pressures. The mid-way option of 'Maintain Current Flood Risk Strategy' is unlikely to worsen the current impacts on SEA receptors or have significant change on baseline levels. However, by not fully considering the adaptation to climate change pressures, the current level of flood risk management may be insufficient to prevent detrimental impacts on the environment, socially and ecologically, in the future. The only realistic approach to be employed by Kirklees Council is the 'Manage and Reduce Flood Risk' option, which offers more beneficial environmental outcomes and a pro-active approach to flooding pressures.

The LFRMS will have broad positive impacts to many SEA objectives by encouraging better water management and reducing flood risk. By reducing the magnitude and likelihood of flooding, impacts to key ecological, visual, heritage, water and geological receptors in the council will be reduced, and the quality of these receptors may be preserved. The majority of LFRMS actions relate to enhanced understanding, awareness and response to flood events and will not have impacts on many of the SEA objectives, but will positively impact SEA objectives 6 and 7. By actively managing the flood risk, there will be obvious benefits to the population, human health and material assets. Through promoting a greater understanding of flood risk, encouraging community involvement and promoting self-resilience as well as a coordinated borough-wide flood risk management approach, communities and responsible parties will be better placed to effectively minimise the risk of flooding in the Kirklees area.

The LRFMS provides opportunities for environmental enhancements through the implementation of natural flood management and SuDS schemes. Such schemes reduce flood risk whilst also allowing for sensitive consideration of ecological, visual, water, heritage and geological assets.

At present the LFRMS actions relating to local flood risk improvements schemes has an unknown effect on the SEA objectives as the exact location, nature and scale is currently uncertain. Without a specific methodology for the implementation of these actions, potential beneficial/adverse effects cannot be determined for certain.

The LFRMS actions do not directly contribute to climate change objectives. It is important that climate change be factored into decision making around flood alleviation.

RECOMMENDATIONS

The assessment of the objectives and actions has identified a couple of areas where the LFRMS could be strengthened to promote a more sustainable approach:

- Fully consider climatic factors in the development of both existing and new infrastructure, to ensure appropriate and adaptable flood risk management in the future.
- Ensure that low-carbon approaches to flood alleviation are prioritised to limit local contribution to climate change.
- Take steps to ensure that all relevant stakeholders, including both statutory and non-statutory entities, are involved in sustainability discussions during new development. This collaborative approach will help to promote effective communication and engagement among stakeholders.

To prevent adverse effects from the LFRMS, it is essential to integrate all strategy actions and ensure that the delivery of individual actions aligns with the wider strategy objectives. This includes flood risk improvement schemes in specific areas. Effective management of the development and implementation of these actions is crucial, including the assessment of proposals for their potential positive and negative environmental effects before implementation. If necessary, appropriate mitigation measures should be incorporated into their delivery.

The LFRMS should aim to maximize the potential environmental benefits of its objectives and measures. This can be best achieved through the integration of LFRMS objectives and close partnership working, ensuring that appropriate resources and funding are effectively allocated.

MONITORING

As per the SEA Regulations, Kirklees Council is required to monitor the significant environmental effects of implementing the LFRMS. Monitoring should include key indicators and targets based on those used in the SEA framework.

The indicators and targets will facilitate the monitoring of the LFRMS, enabling early identification and remediation of any problems or shortfalls. If any failings are identified, it will be necessary to revise the LFRMS to ensure that the SEA objectives are not compromised. It is important to note that the effects, whether negative or positive, are unlikely to be immediately visible, and the relative timescale for monitoring will vary for each indicator/target.

Possible Monitoring partners are indicated against the SEA objectives in Table 9-1. These will be refined subject to the outcomes of the consultation process.

Table 9-1 Possible Monitoring Partners for SEA objectives

Receptor	SEA Objective		Monitoring Indicator	Target as a result of local flood risk management measures	Possible Monitoring Partners
Landscape and Visual Amenity	1	Protect the integrity of local urban and rural landscapes in the area.	<p>Changes in the condition and extent of existing characteristic elements of the landscape.</p> <p>The condition and quality of new landscape features introduced to the environment (i.e., new flood defences).</p>	No adverse impacts on landscape character of the NCAs, LCAs or other locally important landscapes/features as a result of implementation of the LFRMS.	<p>Environment Agency</p> <p>Natural England</p>
Biodiversity, Flora and Fauna	2	Maintain and enhance biodiversity, wildlife, and habitat connectivity.	<p>Recorded numbers of protected habitats and species.</p> <p>Percentage change in area of priority habitats.</p> <p>‘Condition’ of designated wildlife, geological sites, and habitats.</p>	<p>No adverse impact on designated nature conservation sites as a result of changes to the current local flooding regime.</p> <p>No deterioration in the conservation status of designated</p>	<p>Environment Agency</p> <p>Natural England</p>

Receptor	SEA Objective		Monitoring Indicator	Target as a result of local flood risk management measures	Possible Monitoring Partners
			<p>Deliver measures which also improve the ecological status of WFD waterbodies.</p> <p>Biodiversity net gain and other enhancements achieved in projects delivered through the LFRMS.</p>	<p>sites as a result of implementation of the LFRMS.</p> <p>No adverse impact on designated nature conservation sites as a result of local flood risk management measures.</p> <p>Increase in the area of good wildlife habitat as a result of implementation of the LFRMS.</p> <p>No new impediments to fish and eel passage.</p>	

Receptor	SEA Objective		Monitoring Indicator	Target as a result of local flood risk management measures	Possible Monitoring Partners
Water Environment	3	Protect and enhance the quality of water features and resources.	WFD chemical or ecological status of water bodies within catchment.	No deterioration to the WFD status of water bodies within the catchment as a result of implementation of the LFRMS.	Environment Agency Natural England Severn Trent Water
Geology and Soils	4	Maintain soil quality and conserve geological designations.	Number of contamination incidents. Risk levels of contamination. Soil quality. 'Condition' of geological designated sites.	No reduction in the condition of geological designated sites as a result of implementation of the LFRMS. No reduction in condition of soils in designated sites within the Council area as a result of implementation of the LFRMS.	Environment Agency Natural England Internal Drainage Boards

Receptor	SEA Objective		Monitoring Indicator	Target as a result of local flood risk management measures	Possible Monitoring Partners
Historic Environment	5	Preserve and where possible enhance important historic and cultural sites.	<p>Number of designated heritage sites at risk from local flooding.</p> <p>Number of heritage assets adversely impacted upon by local flood risk management measures.</p>	<p>No adverse impact on designated heritage sites as a result of flooding.</p> <p>No adverse impact on the integrity/setting of designated heritage sites as a result of flood risk management measures.</p>	<p>Environment Agency</p> <p>Natural England</p> <p>Historic England</p>

Receptor	SEA Objective		Monitoring Indicator	Target as a result of local flood risk management measures	Possible Monitoring Partners
Population and Human Health	6	Protect and enhance human health and wellbeing.	<p>Number of open and natural green spaces.</p> <p>Number and value of PRow routes.</p> <p>Number of residential properties at risk from flooding.</p> <p>Number of key services at risk from local flooding.</p> <p>Health and wellbeing statistics.</p>	No increase in number of residential properties at risk from flooding.	<p>Environment Agency</p> <p>National Health Service</p>

Receptor	SEA Objective		Monitoring Indicator	Target as a result of local flood risk management measures	Possible Monitoring Partners
Material assets and Climate Change	7	Minimise the impacts of flooding to the transport network and key critical infrastructure.	<p>Length of road and rail infrastructure at risk from local flooding.</p> <p>Number of key infrastructure assets at risk from local flooding.</p> <p>Number of green infrastructure assets at risk from flooding/created or enhanced through implementation of the LFRMS.</p>	<p>No increase in length of road and rail infrastructure at risk from flooding.</p> <p>No increase in number of infrastructure assets at risk from flooding.</p> <p>An enhancement of current Green Infrastructure Assets in the Council area.</p>	<p>Environment Agency</p> <p>Network Rail</p> <p>National Highways</p>

Receptor	SEA Objective		Monitoring Indicator	Target as a result of local flood risk management measures	Possible Monitoring Partners
	8	Minimise local and national contribution to climate change.	Number of flood management measures implemented that will also sequester carbon.	Carbon dioxide equivalent emissions (CO2e) Number of flood management measures implemented that will also sequester carbon.	Environment Agency Natural England

NEXT STEPS

CONSULTATION

The next stage of the SEA process (Stage D) will involve consultation on the draft SEA Environmental Report and the draft LFRMS with statutory consultees, stakeholders, and the public. This consultation aims to identify any necessary amendments and updates to the documents.

All consultation responses received will be reviewed and considered for the next stage of the SEA process, which involves preparing a Post-Adoption Statement. The statement will outline how the Environmental Report's findings and the views expressed during the consultation have been taken into account while finalizing and formally approving the LFRMS. The Post-Adoption Statement will also identify any additional monitoring requirements necessary to track the significant environmental effects of the strategy.

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APPENDICES

A PLANNING POLICY CONTEXT

A.1 International Objectives

International Objectives		
Policy/Plan/ Programme/ Strategy	Key Objectives or Requirements relevant to SEA	Implications for LFRMS and SEA
EU Groundwater Directive – Directive 2006/118/EC on the protection of groundwater against pollution and deterioration, 2006	Protection of groundwater sources from pollution and deterioration.	The plan will need to ensure that and locally occurring groundwater storages will not be impacted by pollution or deterioration from proposed works.
EU Water Framework Directive - Directive 2000/60/EC, 2000	An EU directive which commits European Union member states to achieve good qualitative and quantitative status of all water bodies (including marine waters up to one nautical mile from shore).	The plan will need to ensure that the qualitative and quantitative status of local water bodies are not negatively impacted by any proposed works.
European Commission, Nitrates Directive 91/676/EEC, 1991	An EU directive which commits European Union members states to protect water bodies from agricultural nitrates.	The plan will need to ensure that the local water bodies are not negatively impacted by any proposed works involving agricultural nitrates

International Objectives		
European Landscape Convention: guidelines for managing landscape (2010)	The Convention highlights the need to develop policies dedicated to the protection, management and planning of landscape. Raising awareness of the landscape is an important thread running through all these areas. It also encourages the integration of landscape into all relevant areas of policies, including cultural, economic and social policies.	The plan should consider specific measures promoted by the Convention including improved consideration of and integration of landscape in future spatial policy and regulation.
Convention for the Protection of the Architectural Heritage of Europe (1985)	The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe's heritage.	The plan should consider the articles set out in the convention.
European Convention on the Protection of Archaeological Heritage (1995)	The aim of this Convention is to protect archaeological heritage all remains and objects and any other traces of mankind from the past epochs.	The plan should consider the articles set out in the convention.

A.2 NATIONAL POLICY

National Policy		
Policy/Plan/Programme/Strategy	Key Objectives or Requirements relevant to SEA	Implications for LFRMS and SEA
A Green Future: Our 25 Year Plan to Improve the Environment	A government plan to improve air and water quality in both rural areas and cities. The adoption of this plan commits to the following: Clean air Clean and plentiful water Thriving plants and wildlife	The plan will need to ensure that managed land is used sustainably, the beauty of landscapes is

National Policy		
	<p>A reduced risk of harm from environmental hazards such as flooding and drought. Using resources from nature more sustainably and efficiently Enhanced beauty, heritage, and engagement with the natural environment.</p>	<p>enhanced, people are more connected to the environment, resources are used efficiently, and pollution and waste is reduced, the seas and oceans remain clean and biologically diverse, the global environment is protected. The plan also commits to the restoration of 75% of terrestrial and freshwater protected sites to favourable condition, creating or restoring 500,000 hectares of wildlife rich habitat, and recover threatened species.</p>
<p>Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations, 2019</p>	<p>A government policy which protects ambient air quality from the volatile organic compounds in paints, varnishes, and vehicle re-finishings.</p>	<p>The plan will need to ensure that ambient air quality will be protected from volatile organic compounds.</p>
<p>Ancient Monuments and Archaeological Areas Act, 1979 (as amended)</p>	<p>A government policy which protects monuments and archaeological areas from disturbances.</p>	<p>The plan will need to ensure that the local monuments are archaeological</p>

National Policy		
		al areas are protected from any disturbances that proposed works could cause.
Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems, 2011	A government policy which protects England's wildlife and ecosystems.	The plan will need to ensure that the local wildlife and ecosystems are not negatively impacted by any proposed works.
Cabinet Office, National Strategy Action Plan for Neighbourhood Renewal, 2001	A government policy which aimed to remove disadvantages people experienced because of where they lived	The plan will need to consider the impact it may have on areas already experiencing disadvantages.
Clean Air Strategy, 2019	A government policy aimed at reducing all sources of air pollution making our air healthier to breathe, protecting nature, and boosting the economy.	The plan will need to consider the impact it may have on air pollution.
Climate Change Act, 2008	A government policy aimed at reducing all sources of carbon and waste to minimise the impacts on climate change.	The plan will need to consider how it will minimise its carbon emissions and levels of waste.
Climate Change Adaption Strategy, 2020	A government policy aimed at reducing all sources of carbon emissions and eventually becoming net zero by 2050.	The plan will need to consider how it will minimise its carbon emissions and options

National Policy		
		for operating at net zero.
Conservation of Habitats and Species Regulations (amendment - EU Exit), 2019	A government policy aimed at both preserving and restoring species and habitats to a favourable conservation status in a specified area of distribution.	The plan will need to consider how it will prevent any negative impacts on flora and fauna
Contaminated Land (England) Regulations, 2006 (as amended)	A government policy aimed at preserving natural landscapes and waterbodies by protecting them from pollution.	The plan will need to consider how it will prevent any land or water from being polluted.
Water Act, 2014	A government policy aimed at improving water resilience and the supply of water resources.	The plan will need to consider how it will avoid negatively impacting the supply of water resources.
England Biodiversity Framework, 2008	A government policy aimed at protecting the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems.	The plan will need to consider how it will protect biodiversity during any proposed works.
Environment Act, 1995 (as amended)	A government act which gives power and rights to the government body The Environment Agency.	The plan must consider how it will abide by the Environment Agencies policies.
Fisheries Act 2020	A government act which regulates the management of fisheries to ensure the practice is sustainable.	The plan must consider how it will ensure the management of fisheries is not

National Policy		
		negatively impacted by any proposed works.
Floods and Water (Amendment - EU Exit) Regulations, 2019	A EU policy aimed at protecting inland surface waters (rivers and lakes), transitional waters, coastal waters and groundwater, in order to prevent and reduce pollution, promote sustainable water use, protect the aquatic environment, improve the status of aquatic ecosystems and mitigate the effects of floods and droughts.	The plan must consider how it will ensure inland surface, transitional, coastal and groundwater s will be protected from pollution unsustainable water usage as well as ensuring the protection of aquatic ecosystems and mitigate the effects of floods and droughts.
Flood Risk Regulations, 2009	Governmental regulations that provide a framework for managing flood risk over a 6- year cycle, and require: Production of a Preliminary Flood Risk Assessment (PFRA); Identification of potential significant risk, referred to as flood risk areas (FRAs); Mapping of flood hazard and risk; and Flood Risk Management Plans, setting out measures and actions to reduce the risk.	The plant should include a PFRA, FRA, flood risk mapping and flood risk management .
Future Water: The Government's water strategy for England, 2008	A governmental strategy aimed at achieving sustainable delivery of secure water supplies and an improved and protected water environment.	The plan should consider how it will aid in achieving sustainable delivery of water supplies and protecting the water environment .

National Policy		
Heritage Protection for the 21st Century, White Paper, 2007	A government policy aimed at developing a unified approach to the historic environment; Maximising opportunities for inclusion and involvement; and supporting sustainable communities by putting the historic environment at the heart of an effective planning system.	The plan should consider how it will aid in supporting the policy aims, especially through the careful management of any proposed works to prevent disturbance of heritage assets.
Land Drainage Act 1991 (as amended)	An Act to consolidate the enactments relating to internal drainage boards, and to the functions of such boards and of local authorities in relation to land drainage, with amendments to give effect to recommendations of the Law Commission.	The plan should consider how it will prevent obstruction to water courses, as well as maintaining the water course to allow the natural flow of water.
Making Space for Nature: A Review of England's Wildlife Sites and Ecological Network, 2010	An independent report on wildlife sites in England and recommendations on how to achieve a healthy natural environment. It makes the following key points: Designated wildlife sites should be protected. New ecological restoration zones should be established. Non-designated wildlife sites should be protected.	The plan should consider how it will protect both designated and non-designated wildlife sites. It should also be aware of the potential for new ecological restoration zones.
Making Space for Water – taking	A governmental Act that places a statutory duty on the Environment Agency to develop a National Flood and Coastal Erosion Risk Management Strategy for England.	The plan should consider how it will

National Policy		
forward a new Government strategy for flood and coastal erosion risk management in England, 2005		develop national flood and coastal erosion risk management . Any proposed works should be assessed for their potential to increase flood and coastal erosion risk.
National Planning Policy Framework, 2021	A government framework which sets out the government's planning policies for England and how these are expected to be applied. Taking into consideration relevant international obligations and statutory requirements.	The plan should consider that any proposed works require prior planning permission
Natural Environment and Rural Communities (NERC) Act, 2006	A government act which created Natural England and the Commission for Rural Communities and, amongst other measures, it extended the biodiversity duty set out in the Countryside and Rights of Way (CROW) Act to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity.	The plan should consider what measure it will put in place in order to protect the conservation of biodiversity.
Planning (Listed Buildings and Conservation Areas) Act 1990	a UK Act of Parliament introduced in 1990 that changed laws relating to the granting of planning permission for building works , with a particular focus on listed buildings and conservation areas . It created special controls for the demolition, alteration or extension of buildings , objects or structures of particular architectural or historic interest , as well as conservation areas .	The plan should consider how it will avoid disturbing listed buildings and conservation areas where appropriate.
Safeguarding our Soils – A strategy for England, 2009	A government policy which aims to protect the integrity of soils for both agricultural and natural requirements	The policy should consider appropriate mitigation strategies for

National Policy		
		soil protection where appropriate.
Salmon and Freshwater Fisher Fisheries Act 1975	A law passed by the government, in an attempt to protect salmon and trout from commercial poaching, to protect migration routes, to prevent wilful vandalism and neglect of fisheries, ensure correct licensing and water authority approval.	The policy should consider its potential impact on salmon trout fisheries and include mitigation measures where necessary.
Securing the Future – the UK Government Sustainable Development Strategy, 2005	A government strategy for sustainable development, which aims to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations.	The plan should consider how it will use resources sustainably, especially the limitation of excessive use of limited resources and consumption of energy where not necessary.
The Carbon Plan, 2011	First published in December 2011, the Carbon Plan sets out the government's plans for achieving the emissions reductions it committed to in the first 4 carbon budgets. Emissions in the UK must, by law, be cut by at least 80% of 1990 levels by 2050.	The plan should consider how it will limit the production of carbon emissions where appropriate and applicable.
The Eels (England and Wales) Regulations 2009	On 15th January 2010, the Eels (England and Wales) Regulations 2009 came into force. These regulations afford new powers to the Environment Agency to implement measures for the recovery of European eel stocks and have important implications for operators of abstractions and discharges.	The plan should consider how it will mitigate any impacts it may have on European eel stocks.

National Policy		
The Environment Act, 2021	The Environment Act allows the UK to enshrine some environmental protection into law. It offers new powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.	The plan must consider mitigation strategies for reducing impacts on the environment , in particular, reducing negative impacts on air quality, water quality, biodiversity and waste reduction. The plan must also consider how to enhance the environment to ensure no net loss and overall biodiversity net gain in associated projects.
The National Flood and Coastal Erosion Risk Management Strategy for England, 2020	This strategy's long-term vision is for: a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100. It has 3 long-term ambitions, underpinned by evidence about future risk and investment needs.	The plan must consider mitigation strategies for reducing impacts of flooding and coastal erosion.
The National Flood Emergency Framework for England, 2011 (as amended)	Its purpose is to provide a forward-looking policy framework for flood emergency planning and response. It brings together information, guidance and key policies and is a resource for all involved in flood emergency planning at national, regional and local levels.	The plan must consider any emergency flooding strategies and responses where appropriate.
Water for	An Environment Agency report highlighting	The plan

National Policy		
Life, Water White Paper, 2011	the need for the sustainable provision of clean drinking water.	must consider potential mitigation strategies to minimise any possible negative impacts on clean drinking water that works may have, taking into consideration pollution and contamination of groundwater and freshwater sources.
Water for People and the Environment , Water Resources Strategy for England and Wales, 2009	A government strategy aimed at ensuring there is 'enough water for people and the environment'. The management and use of water and land must be shown to be sustainable - environmentally, socially and economically. We require the right amount of good quality water for people, agriculture, commerce and industry, and the environment.	The plan must consider potential mitigation strategies to minimise any possible negative impacts on local water resources.
Wildlife and Countryside Act 1981 (as amended)	Under the Wildlife and Countryside Act 1981 (as amended), the country nature conservation bodies have a duty to notify any area of land which in their opinion is 'of special interest by reason of any of its flora, fauna, or geological or physiographical features' – these areas are known as Sites of Special Scientific Interest (SSSI).	The plan must consider the extent of SSSIs, avoiding disturbing the area or if appropriate any relevant mitigation strategies required to minimise negative impacts on the area.

A.3 REGIONAL AND LOCAL PLANS AND PROGRAMMES

REGIONAL AND LOCAL PLANS AND PROGRAMMES			
POLICY/PLAN/ PROGRAMME/ STRATEGY	KEY OBJECTIVES OR REQUIREMENTS RELEVANT TO SEA	IMPLICATIONS FOR LFRMS AND SEA	
REGIONAL			
WEST YORKSHIRE CLIMATE ENVIRONMENT PLAN 2021- 2024	A PLAN PUT IN PLACE BY WEST YORKSHIRE COMBINED AUTHORITY WHEREBY THE MAYOR OF WEST YORKSHIRE AND WEST YORKSHIRE LEADERS HAVE DECLARED A CLIMATE EMERGENCY AND SET AN AMBITIOUS SCIENCE-BASED TARGET FOR THE REGION TO BE NET ZERO CARBON BY 2038, WITH SIGNIFICANT PROGRESS BY 2030. REDUCING HARMFUL CARBON AND AIR QUALITY EMISSIONS, HELPING NATURE TO RECOVER AND IMPROVE LONG-TERM CLIMATE RESILIENCE IS CRITICAL AND ACTION ACROSS ALL PARTS OF THE ECONOMY AND SOCIETY IS REQUIRED.	THE PLAN MUST CONSIDER MITIGATION STRATEGIES FOR REDUCING IMPACTS ON THE ENVIRONMENT, IN PARTICULAR; REDUCING NEGATIVE IMPACTS ON AIR QUALITY, WATER QUALITY, BIODIVERSITY AND WASTE REDUCTION.	
WEST YORKSHIRE COMBINED AUTHORITY (2017)	THE WEST YORKSHIRE COMBINED AUTHORITY IS A DEMOCRATICALLY-LED AUTHORITY AND IS GOVERNED BY A CROSS-PARTY, POLITICALLY BALANCED GROUP OF ELECTED COUNCILLORS NOMINATED BY EACH PARTNER COUNCILS: BRADFORD, CALDERDALE, KIRKLEES, LEEDS, WAKEFIELD, AND YORK.	THE PLAN WILL NEED TO CONSIDER POLICIES PUT IN PLACE BY THE WEST YORKSHIRE COMBINED AUTHORITY, AND ANY MITIGATIONS STRATEGIES THAT MAY BE REQUIRED.	

REGIONAL AND LOCAL PLANS AND PROGRAMMES		
WHITE ROSE FOREST ACTION PLAN 2021-2025	AN ENVIRONMENTAL BODIES' PLAN TO REGENERATE THE NATURAL ENVIRONMENT, IT IS SUPPORTED BY A PARTNERSHIP OF LOCAL AUTHORITIES, NATIONAL PARKS, NATIONAL AND LOCAL CHARITIES, DEFRA ORGANISATIONS AND COMMUNITY ENTERPRISES	THE PLAN MUST CONSIDER MITIGATION STRATEGIES FOR REDUCING IMPACTS ON FORESTED AREAS AND POTENTIAL FOR INCREASING THE FORESTED COVERAGE.
LOCAL		
CALDER CATCHMENT FLOOD MANAGEMENT PLAN (2010)	MANAGEMENT PLAN TO HELP UNDERSTAND THE SCALE AND EXTENT OF FLOODING NOW IN THE FUTURE. INCLUDES SET POLICIES FOR MANAGEMENT FLOOD RISK WITHIN THE CATCHMENT.	THE PLAN WILL NEED TO CONSIDER THE MEASURES AND POLICIES INCLUDED IN THE PLAN.
PEAK DISTRICT BIODIVERSITY ACTION PLAN (2011-2020)	ACTION PLAN TO CONSIDER THE ENHANCEMENT OF HABITATS, LANDSCAPES AND CONCENTRATE EFFORTS ON THE BUFFERING AREAS OF HIGH-QUALITY SITES.	THE PLAN SHOULD CONSIDER THE LOCATION OF HIGH-QUALITY ENVIRONMENTAL SITES, AND CONSIDER POTENTIAL ENHANCEMENT OPPORTUNITIES.
KIRKLEES METROPOLITAN BOROUGH COUNCIL RESOURCES AND WASTE STRATEGY 2021-2030	ACHIEVE A RECYCLING RATE OF AT LEAST 70% AT OUR HOUSEHOLD WASTE AND RECYCLING CENTRES BY 2025. RECYCLE AT LEAST 55% OF MUNICIPAL WASTE BY 2025. REUSE OR RECYCLE AS MUCH OF THE RESOURCES COLLECTED VIA OUR BULKY WASTE COLLECTIONS AS POSSIBLE	THE PLAN WILL NEED TO CONSIDER METHODS FOR THE APPROPRIATE RECYCLING AND DISPOSAL OF WASTE.
KIRKLEES METROPOLITAN BOROUGH COUNCIL BIODIVERSITY STRATEGY	A LOCAL GOVERNMENT STRATEGY TO HALT THE DECLINE OF BIODIVERSITY.	THE PLAN WILL NEED TO CONSIDER HOW IT WILL PREVENT THE LOSS BIODIVERSITY AS A RESULT OF DIRECT OR INDIRECT IMPACTS FROM ANY PROPOSED WORKS.

REGIONAL AND LOCAL PLANS AND PROGRAMMES

KIRKLEES METROPOLITAN BOROUGH COUNCIL LOCAL PLAN 2019	A LOCAL GOVERNMENT PLAN AIMED AT SETTING POLICIES FOR THE DEVELOPMENT OF THE METROPOLITAN BOROUGH FOR THE MEDIUM TERM. A PART OF THE PLAN INVOLVES SETTING DESIGNATIONS WHICH WILL RESTRICT DEVELOPMENTS.	THE PLAN WILL NEED TO CONSIDER THE EXTENT OF THESE DESIGNATIONS AND PREVENT ANY DEVELOPMENT IN THESE AREAS.
KIRKLEES METROPOLITAN BOROUGH COUNCIL NET-ZERO ASSESSMENT FOR KIRKLEES (2021)	A LOCAL GOVERNMENT PLAN WHICH SETS NET ZERO TARGETS FOR THE BOROUGH.	THE PLAN SHOULD CONSIDER CARBON MANAGEMENT SOLUTIONS AND AIM TO REDUCE EMISSIONS AS MUCH AS POSSIBLE BEFORE THE NET ZERO DEADLINE IN 2038.
KIRKLEES DRAFT HERITAGE STRATEGY	THE STRATEGY SETS OUT THE OBJECTIVES AND KEY PRINCIPLES TO HELP DELIVER THE COUNCIL'S VISION FOR HERITAGE IN KIRKLEES FROM 2022-2032.	THE STRATEGY SHOULD CONSIDER THE COUNCIL'S DRAFT ACTION PLAN AND PRINCIPLES.

B LOCAL NATURE RESERVES IN KIRKLEES METROPOLITAN BOROUGH – ADDITIONAL DETAIL

LOCAL WILDLIFE SITE	ADDRESS
LWS1	ARKENLEY LANE, ALMONDBURY
LWS2	CASTLE HILL, HUDDERSFIELD
LWS3	GAWTHORPE LOWER WOOD, LEPTON
LWS4	LEPTON GREAT WOOD, LEPTON
LWS5	GRIM ESCAR WOOD, BIRKBY
LWS6	HUDDERSFIELD BROAD CANAL (SIR JOHN RAMSDEN CANAL), HUDDERSFIELD
LWS7	BRADLEY WOOD, BRADLEY
LWS8	PARK HILL, BRADLEY
LWS9	DEAN WOOD, NETHERTON
LWS10	DELVES WOOD & BUTTER NAB SPRING, HUDDERSFIELD
LWS11	DALTON BANK LOCAL NATURE RESERVE, DALTON
LWS12	LANESIDE QUARRY, KIRKHEATON
LWS13	ROUND WOOD, WATERLOO
LWS14	GLEDHOLT WOODS LOCAL NATURE RESERVE, HUDDERSFIELD
LWS15	LONG HILL PLANTATION, LOWERHOUSES
LWS16	PARK WOOD, BERRY BROW
LWS17	UPPER PARK WOOD LOCAL NATURE RESERVE, HONLEY
LWS18	HOWROYD BECK FIELDS, WHITLEY LOWER
LWS19	SPARROW WOOD, DEWSBURY
LWS20	LOWER SPEN LOCAL NATURE RESERVE, RAVENSTHORPE
LWS21	BRIERY BANK WOOD, LOWER HOPTON
LWS22	COVEY CLOUGH WOOD, MIRFIELD
LWS23	GREGORY SPRING WOOD, MIRFIELD
LWS24	JORDAN WOOD & OLIVER WOOD, MIRFIELD
LWS25	LILEY WOOD, LOWER HOPTON
LWS26	SUNNY BANK PONDS LOCAL NATURE RESERVE, MIRFIELD
LWS27	WHITLEY WOOD, LOWER HOPTON (INCLUDES HAGG WOOD)
LWS28	DOGLOITCH WOOD, SHAW CROSS
LWS29	DUNN WOOD, DEWSBURY
LWS30	SCARGILL WOOD, DEWSBURY
LWS31	SOOTHILL WOOD, BATLEY
LWS32	OAKWELL HALL COUNTRY PARK, BIRSTALL
LWS33	TONG MOOR LOCAL NATURE RESERVE, EAST BIERLEY
LWS34	COCKLESHAW WOOD, EAST BIERLEY
LWS35	HANGING WOOD, CLECKHEATON
LWS36	HUNSWORTH LITTLE WOOD, HUNSWORTH
LWS37	DROP CLOUGH, MARSDEN
LWS38	HUDDERSFIELD NARROW CANAL

LWS39	LOW WESTWOOD POND, LINTHWAITE
LWS40	SHAW WOOD, OUTLANE
LWS41	GREEN HILL CLOUGH, MARSDEN
LWS42	BLACKER WOOD, SCISSETT
LWS43	DEFFER WOODS, DENBY DALE
LWS44	DENBY DELPH, UPPER DENBY
LWS45	HIGH BRIDGE WOOD, SCISSETT
LWS46	KIRKBY WOOD, FLOCKTON
LWS47	LOWER JANE WELL, UPPER CUMBERWORTH
LWS48	PARK GATE DYKE, SKELMANTHORPE
LWS49	RIDING WOOD, CLAYTON WEST
LWS50	TURPIN HILL, UPPER CUMBERWORTH
LWS51	HOB ROYD & MIRY GREAVES SHROGG
LWS52	BANK WOOD, MELTHAM
LWS53	CLIFF WOOD, BROCKHOLES
LWS54	HALL HAYES WOOD, MELTHAM
LWS55	HEY WOOD & WEST WOOD, FARNLEY TYAS
LWS56	HONLEY WOOD, HONLEY
LWS57	ROUND WOOD, BROCKHOLES
LWS58	SPRING WOOD, HONLEY
LWS59	HAGG WOOD, HONLEY
LWS60	CARR GREEN MEADOWS, HOLMBRIDGE
LWS61	DIGLEY RESERVOIR & MARSDEN CLOUGH, HOLMBRIDGE
LWS62	HOLME HOUSE GRASSLANDS, NEW MILL
LWS63	HOLME HOUSE WOOD, NEW MILL
LWS64	HOLMROYD WOOD, NETHERTHONG
LWS65	MALKIN HOUSE WOOD, HOLMFIRTH
LWS66	MORTON WOOD, HEPWORTH
LWS67	NEW LAITH FIELDS, HOLMBRIDGE
LWS68	RAKES WOOD, HEPWORTH
LWS69	WILD BOAR CLOUGH, HADE EDGE
LWS70	YATEHOLME RESERVOIRS & PLANTATIONS, HOLME
LWS71	ALLEN WOOD, SHELLEY
LWS72	ALMONDBURY COMMON WOODS, HUDDERSFIELD
LWS73	ARTHUR WOOD, HUDDERSFIELD
LWS74	BIRKS WOOD, STOCKSMOOR
LWS75	BROWN'S KNOLL MEADOWS, STOCKSMOOR
LWS76	CARR WOOD, HUDDERSFIELD
LWS77	CLOUGH WOOD, STOCKSMOOR
LWS78	GELDER WOOD, KIRKBURTON
LWS79	HUTCHIN WOOD, HOUSES HILL, HUDDERSFIELD
LWS80	LUMB HOUSE, STOCKSMOOR
LWS81	MOLLY CARR WOOD, KIRKBURTON
LWS82	ROAF WOODS, KIRKBURTON
LWS83	SHELLEY WOOD, SHELLEY
LWS84	SHEPLEY MILL WOOD, SHELLEY
LWS85	THUNDERBRIDGE MEADOWS, THUNDERBRIDGE
LWS86	UPPER & LOWER STONE WOODS, SHEPLEY
LWS87	WOODVIEW MEADOWS (RANGE DIKE), FARNLEY TYAS
LWS88	YEW TREE WOOD, SHEPLEY

Kirklees Council Local Flood Risk Management Strategy

Habitats Regulations As- sessment

Screening Assessment

Final Report

2024



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NON-TECHNICAL SUMMARY

This report contributes to Kirklees Metropolitan District Council's legal obligation to The Conservation of Habitats and Species Regulations 2017 (as amended by the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019) to carry out a Habitat Regulations Assessment (HRA) of its plans for effects on European Sites.

Kirklees Metropolitan District Council (KMDC) has developed a Local Flood Risk Management Strategy (LFRMS) for the District. As Lead Local Flood Authority (LLFA) under the Floods and Water Management Act 2010 they are responsible for the management of local flood risk, including from surface runoff, groundwater and flooding from ordinary watercourses (smaller rivers and streams). Several European Sites are located within or adjacent to the KMDC boundary and it is a requirement that LFRMS is assessed under these regulations.

Before a plan can be adopted, the 'competent authority' (KMDC) needs to demonstrate that the plan would have no significant effects on European Sites' integrity to the satisfaction of Natural England.

The first section of this report consists of the first step of the HRA process, which is to screen the LFRMS to determine whether the objectives and associated action identified in the Strategy could lead to a significant effect on European sites, either directly or indirectly, alone, or in combination with other relevant plans and projects.

European Sites consist of Special Areas of Conservation (SAC) designated for habitats and animal species, and Special Protection Areas (SPA) designated for bird species. Ramsar sites designated under the Ramsar Convention on Wetlands 1971 are also included following Government policy.

The LFRMS contains six high level objectives linked to measures to manage flood risk in the District, followed by area specific measures. The screening process identified measures with potential to threaten European Sites. Within the action plan, Natural Flood Management measures and maintenance/construction related actions within close proximity to European Sites (particularly upland sites), had the greatest potential to have likely significant effects on these designated sites at Scheme Level.

The Screening Assessment concluded that the LFRMS is not likely **at this stage** to have significant effects, either alone or in-combination with other plans and projects on any of the European Sites located within Kirklees Metropolitan District or with 15km of the District boundary. This conclusion is based on the very high level and undefined nature of the LFRMS and the potential environmental benefits of the measures included.

It is therefore recommended that the LFRMS can be adopted with no adverse impact on the integrity of European Sites with the advisory that re-screening takes place under the HRA once detailed design is known, with appropriate mitigation detailed as necessary. Partnership (a key objective of the LFRMS), is actively encouraged going forward.

1. INTRODUCTION

This report details the Screening and Appropriate Assessment Stages of the Habitats Regulations Assessment of the Local Flood Risk Management Strategy (LFRMS) that has been developed by Kirklees Metropolitan District Council (KMDC), as part of their responsibility as a Lead Local Flood Authority (LLFA). It is intended to identify, describe and assess the likely significant effects of implementing the strategy on European designated sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) and also Ramsar sites within and around Kirklees Metropolitan District.

1.1 THE LOCAL FLOOD RISK MANAGEMENT STRATEGY

The Flood and Water Management Act 2010 determined the need for flood risk to be managed within the framework of National Strategies for England and Wales and within Local Strategies for each Local Flood Authority Area. The national strategy for England sets out the principles for flood risk management and which organisations are responsible for implementation.

In accordance with the national strategy for England, LLFAs have been allocated responsibility for developing independent LFRMSs to address sources of local flooding. Each LFRMS identifies which local organisation is accountable for managing flood risk and establishes partnership agreements, as well as undertaking an assessment of flood risk and developing plans / actions, for tackling these risks.

KMDC, as a LLFA, has a responsibility to produce a LFRMS to manage water within the District to address local flooding issues. The KMDC LFRMS sets out the overall objectives to manage flooding within KMDC. KMDC present the purpose of the strategy as follows: "The Local Strategy will take into consideration current thinking and understanding to tackling flood risk in our district. Our Local Strategy will encourage more effective risk management by enabling local communities and business owners to work together to:

- Balance the needs of the community, environment, and economy,
- Enhance and extend our partnership working between us and other key stakeholders (e.g., charities, community groups, Parish Councils, and health bodies),
- Improve community awareness of flood risk, respond to their expectations and their priorities,
- Ensure a clear understanding of local flood risks and prioritise high risk catchments and communities,
- Encourage innovative flood risk management techniques,
- Support the development of emergency plans and responses to flood incidents are effective and that communities are better prepared,
- Support communities to recover more quickly and effectively after major flood incidents. Research carried out by the University of York and the Centre for Mental Health reported that the risk of long-term mental health problems was up to nine times more likely for flood victims compared to those who had never experienced flooding,
- Enable continued learning to ensure we remain progressive." (KMDC, 2022)

Kirklees LFRMS identifies six objectives that outline the KMDC strategy to manage local flood risk and puts forward associated measures that will promote the successful delivery of the strategy.

1.2. HABITATS REGULATIONS ASSESSMENT

1.2.1 Legislative Context

The Conservation of Habitats and Species Regulations 2017 (as amended by the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019), also known as the 'Habitats Regulations', provide legal protection to habitats and species of national importance. The regulations also secure an ecological network of protected sites, consisting of SACs and SPAs. Government guidance also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are given the same level of protection as SACs and SPAs.

Prior to the UK's withdrawal from the EU, SACs were designated and protected under domestic legislation transposed from European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (Habitats Directive), and SPAs under European Directive 2009/147/EC on the Conservation of Wild Birds (Birds Directive). Together these sites formed a European-wide Natura 2000 network of protected sites. Since 31 December 2020, SACs and SPAs within the UK no longer fall within the Natura 2000 network, and instead form a National Site Network. SPAs and SACs continue to be referred to collectively as 'European sites' within the context of the Habitats Regulations, reflecting their international importance for the conservation of biodiversity.

SACs and SPAs within the National Site Network are also still designated for habitats listed on Annex I and for species listed on Annex II of the Habitats Directive, and criteria listed under the Birds Directive, and it is these Annex I habitats, Annex II species and Birds Directive Criteria against which assessments under the Habitats Regulations are still made.

It is a requirement of Regulation 105 of the Habitats Regulations that where a plan is likely to have a significant effect on a European site, either alone or in-combination with other plans or projects, and where it is not directly connected with or necessary to the management of the site "the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives".

Therefore, for all plans that are not wholly directly connected with, or necessary to, the conservation management of the site's qualifying features, a formal Screening for any Likely Significant Effects (either alone or in-combination with other plans or projects) on a European site is required. This Screening Assessment is based on available ecological information on the designated site(s), other plans, projects, and policies relevant to the area and details of the proposed development/policy.

If the Screening Assessment concludes that the plan is likely to have a significant effect on the conservation objectives of the site(s), or that such an effect cannot be ruled out (adopting a precautionary approach) an Appropriate Assessment must be carried out. An Appropriate Assessment involves an assessment of the potential effects of the plan on the conservation objectives of the site(s). If significant effects are identified, avoidance measures or mitigation to reduce impacts can be applied.

If it cannot be concluded that the plan will not adversely impact upon the integrity of the site(s), the development will not be able to proceed without further conditions and/or assessment. The plan will need to prove that all alternatives have been considered and that there are imperative reasons of overriding public interest (IROPI) that outweigh the potentially damaging impacts that the plan may have before it can proceed. In this case compensatory measures will be required.

Planning documents, such as the KMDC LFRMS, are required to undergo HRA if there is the potential for significant impacts and they are not directly connected with or necessary to the management of a European site. As the Plan is not connected with or necessary to the management of SACs, SPAs or Ramsar sites, it is necessary to undertake a HRA of the Plan.

2. HRA METHODOLOGY

2.1 Introduction

It is accepted best-practice for the HRA of strategic planning documents to be run as an iterative process alongside the plan development, with the emerging policies, sites or options continually assessed for their possible effects on European sites and modified or abandoned (as necessary) to ensure that the subsequently adopted plan is not likely to result in significant effects on any European sites, either alone or 'in-combination' with other plans. This is undertaken in consultation with Natural England and other appropriate consultees.

2.2 HRA Process

The HRA will follow a four-stage process, based on that detailed in the Department for Communities and Local Government (DCLG) guidance Planning for the Protection of European sites: Appropriate Assessment (2006) and subsequent Government Guidance on the Use of Habitats Regulations Assessment (2019). These stages are described in Table 1.

Table 1: The HRA Process

Stage/Task	Description
HRA Stage 1: Screening	<p>This process identifies the likely impacts upon a European site of a project or plan, either alone or in-combination with other projects or plans, and determines whether these impacts are likely to be significant.</p> <p>If no likely significant effect is determined, the project or plan can proceed. If a likely significant effect is identified, Stage 2 is commenced.</p> <p>Following the People over Wind & Sweetman v Coillte Teoranta Case C-323/17, the assessment does not consider protective, avoidance or mitigation measures for Stage 1 Screening. These measures are carried forward and considered as part of Stage 2.</p> <p>However, any changes to early drafts of a plan, for example the removal of a policy with likely significant effects, are considered as pre-screening decisions. The HRA formal Screening is undertaken prior to the adoption of the Plan. Therefore, any changes on earlier iterations of the draft plan are in effect changes to the essential features or characteristics of the plan itself and are therefore (usually) not considered to be avoidance measures requiring consideration at Stage 2.</p>
HRA Stage 2: Appropriate Assessment	<p>This assessment determines whether a project or plan would have an adverse impact on the integrity of a European site, either alone or in-combination with other projects or plans. This assessment is confined to the effects on the important habitats and species for which the site is designated (i.e. the qualifying interests of the site).</p> <p>Appropriate Assessments, in line with CJEU: Case C-461/17 Holohan v An Bord Pleanála, must also consider impacts upon habitats and species within or outside of a site boundary if they support a qualifying feature and could impact upon the conservation objectives of the site.</p> <p>If no adverse impact is determined, the project or plan can proceed.</p> <p>If an adverse impact is identified, Stage 3 is commenced.</p>
HRA Stage 3: Assessment where no alternatives and adverse impacts remain (Mitigation and Alternatives)	<p>Where a plan or project has been found to have adverse impacts on the integrity of a European site, potential avoidance/mitigation measures or alternative options should be identified.</p> <p>If suitable avoidance/mitigation or alternative options are identified, that result in there being no adverse effects from the project or plan on European sites, the project or plan can proceed.</p> <p>If no suitable avoidance/mitigation or alternative options are identified, as a rule the project or plan should not proceed. However, in exceptional circumstances, if there is an 'imperative reason of overriding public interest' for the implementation of the project or plan, consideration can be given to proceeding in the absence of alternative solutions. In this case, compensatory measures must have to be put in place to offset negative impacts (Stage 4).</p>
HRA Stage 4: Compensatory measures	<p>Stage 4 comprises an assessment of the compensatory measures where, in light of an assessment of imperative reasons of overriding public interest, it is deemed that the project should proceed.</p>

Other guidance documents have been used to help inform the methodology of this assessment, including:

- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission 2002)
- The Habitats Regulations Assessment Handbook (DTA Publications, 2023).
- Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (European Communities, 2018)
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC (European Communities, 2007)

- The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG)
- The Planning Inspectorate PINS Note 05/ 2018: Consideration of avoidance and reduction measures in Habitats Regulations Assessment: *People over Wind*, Peter Sweetman, v Coillte Teoranta (The Planning Inspectorate, 2018)
- UK Government Guidance on the use of Habitats Regulations Assessment (July 2019) [<https://www.gov.uk/guidance/appropriate-assessment>]

2.1. HRA Stage 1: Screening Methodology

The principles of 'screening' are applied to a plan or its components (i.e., policies and site allocations) to allow the assessment stage to focus on those aspects that are most likely to have potentially significant or adverse effects on European sites, as well as shape the emerging strategy. Screening aims to determine whether the plan will have any 'likely significant effects' on any European site as a result of its implementation. It is intended to be a coarse filter for identifying effects (positive and negative) that may occur, to allow the assessment stage to focus on the most important aspects. A plan should be considered 'likely' to have an effect if it is not possible (on the basis of objective information) to exclude the likelihood that the plan could have significant effects on any European site, either alone or in-combination with other plans or projects; an effect will be 'significant' if it could undermine the site's conservation objectives.

Screening can be used to 'screen-out' European sites and plan components from further assessment, if it is possible to determine that significant effects are unlikely (e.g., if sites or interest features are clearly not vulnerable (exposed and/or sensitive) to the outcomes of a plan due to the absence of any reasonable impact pathways).

In order to undertake screening of the LFRMS, it is necessary to:

- Identify the European sites within and outside the plan area likely to be affected, reasons for their designation and their conservation objectives.
- Describe the plan/strategy and their aims and objectives and also those of other plans or projects that in-combination have the potential to impact upon the European sites.
- Identify the potential effects on the European sites.
- Assess the significance of these potential effects on the European sites.

2.3.1. The Precautionary Principle

If there is uncertainty, and it is not possible, based on the information available, to confidently determine no significant effects on a site then the precautionary principle will be applied, and the plan will be subject to an appropriate assessment (HRA Stage 2).

2.3.2. Consultation

It is a requirement of the Habitat Regulations to consult the appropriate nature conservation statutory body (i.e. Natural England). No formal consultation with NE has been undertaken at this stage.

2.3.3. Mitigation, Avoidance and Protective Measures

Following the *People over Wind & Sweetman v Coillte Teoranta* Case C-323/17, the assessment does not consider protective, avoidance or mitigation measures for stage 1 Screening. These measures are carried forward and considered as part of the stage 2 Appropriate Assessment.

3. HRA STAGE 2: APPROPRIATE ASSESSMENT METHODOLOGY

3.1 Appropriate Assessment and Mitigation – HRA Stages 2 and 3

For those European sites screened into the HRA, it is necessary to undertake an Appropriate Assessment to explore the potential adverse effects on their integrity and develop measures to avoid these effects entirely, or if not possible, to mitigate the impacts sufficiently that effects on the European sites are rendered effectively insignificant.

The stages involved in the Appropriate Assessment are to:

- Explore the reasons for the European designation of the "screened in" European sites.
- Explore the environmental conditions required to maintain the integrity of the "scoped in" European sites and become familiar with the current trends in these environmental processes.
- Gain a full understanding of the LFRMS and consider each within the context of the environmental processes – would the policies lead to an impact on any identified process?
- Decide whether the identified impact will lead to an adverse effect on the integrity of the European site.
- In reference to ECJ case C-462/17 (Nov 18) *Holohan v An Bord Pleanala*, the Appropriate Assessment needs to include all typical habitats and species present within and outside of the boundaries of the European site if they are necessary for the conservation of the habitats and species listed for the protected area.
- Identify other plans that might affect these European sites in combination with the LFRMS and decide whether there are any adverse effects that might not result from the strategy in isolation but will do so in-combination.
- Develop measures to avoid the effect entirely, or if not possible, to mitigate the impact sufficiently such that its effect on the European site is rendered effectively insignificant.

In evaluating significance, JBA Consulting has relied on its professional judgement, which will be further reinforced through consultation with Natural England, through the development of the LFRMS and its associated appraisal processes.

4. EUROPEAN SITES

4.1 INTRODUCTION

As discussed in section 1.2, European sites collectively form the National Site Network. The objectives of the National Site Network are to:

- a) maintain at, or where appropriate restore habitats and species listed in Annexes I and II of the Habitats Directive to a favourable conservation status in their natural range (so far as it lies in the United Kingdom's territory, and so far, as is proportionate).
- b) contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds listed in Annex I to the new Wild Birds Directive which naturally occur in the United Kingdom's territory and regularly occurring migratory species of birds not listed in that Annex which naturally occur in the United Kingdom's territory, and so securing compliance with the overarching aims of the Wild Birds Directive.

The National Site Network consists of:

- SACs - these are designated to protect those habitat types and species that are most in need of conservation (excluding birds).

- SPAs) - these are designated to protect rare and vulnerable birds, and also regularly occurring migratory species.

Although not included in the legislation, as a matter of policy, Ramsar sites in England and Wales are protected in the same way as European sites, and therefore considered in the HRA process. The vast majority are also classified as SPAs and Sites of Special Scientific Interest (SSSIs). All SPAs and terrestrial SACs in England and Wales are also designated as SSSIs under the Wildlife and Countryside Act (1981) as amended.

For simplicity in this report, SACs, SPAs and Ramsar sites are collectively referred to as European sites.

4.2 EUROPEAN SITES IN AND AROUND KIRKLEES DISTRICT

Best practice guidance suggests that sites occurring within a wider area of approximately 10km to 15km from the boundary of the area directly affected by a plan should be identified and assessed, in addition to those sites located within the plan area (Therivel, 2009). However, it is important to consider the possibility of impacts for any European site that might be affected, whatever its location, given the activities included in the plan and their range of influence. This may extend some distance from the area within the immediate influence of a plan.

There is one SAC and two SPA sites located within Kirklees. A further two SAC sites located adjacent to Kirklees which have been deemed to be within the influence of KMDC LFRMS. These sites are listed in Table 2 and shown in Appendix A.

Table 2: European Sites Within and Adjacent to Kirklees District

Designation	Within Kirklees District	Adjacent to Kirklees District and deemed to be within the influence of the LFRMS
SAC	- South Pennine Moors	- Denby Grange Colliery Ponds - Rochdale Canal
SPA	- Peak District Moors (South Pennine Moors Phase 1) - South Pennine Moors Phase 2	

Data on the European site interest features, their distribution, and their sensitivity to potential effects associated with the LFRMS were obtained from various sources and reports, including the Joint Nature Conservation Committee (JNCC) and Natural England websites (citations, boundaries, management plans, site improvement plans etc).

Detailed information on these sites, including their qualifying features and conservation objectives are provided in Appendix B within Table 8.

4.3 POTENTIAL HAZARDS TO EUROPEAN SITES

4.3.1 Introduction

Any strategy to manage flooding and the associated infrastructure upon which this strategy relies, can potentially have adverse impacts on the habitats and species for which European sites are designated. These impacts can be direct, such as habitat loss, fragmentation, or degradation, or indirect such as disturbance or pollution from construction, transportation etc.

This section identifies the potential hazards to European sites within and adjacent to Kirklees District and then goes on to identify the types of hazards to which the qualifying features that are present within the sites are particularly sensitive.

4.3.2 Hazards to Sites

The European sites within and adjacent to KMDC comprise of moorland, canal and pond sites, and the moorland sites in particular have considerable bird interest. Potential hazards to the interest features are identified in Table 3 below.

Table 3: Potential Hazards to the European Sites within and adjacent to the District

Potential Hazard		Description
1	Change in water levels	Flooding, or altered water levels, may have adverse impacts on water dependant habitats and species. Additionally, changes to ground-water may adversely impact on these habitats.
2	Changes in hydrological regime	These are changes to existing hydrological processes (e.g. changes to flow rates) that may alter the present characteristics of the European site.
3	Changes in water quality	Activities which may impact upon water quality, such as accidental pollution spills as a result of defence construction or pumping station operation, may adversely affect wetland habitats and species.
4	Changes to surface water flooding	Activities which may result in a reduction or increase in the frequency and extent of surface water flooding which may affect riverine, floodplain and other habitats.
5	Competition from invasive non-native species	Flooding may cause introduction or spread of invasive non-native species, particularly plants, which could result in changes to community composition and even to the complete loss of native communities.
6	Disturbance	Human activity (construction or other) can adversely impact on the qualifying features of the site directly (physical disturbance) or indirectly (visual or noise).
7	Habitat fragmentation	This is where flood events, or flood risk management measures such as defence construc-

Potential Hazard		Description
		tion, result in the separation of available habitats or split extensive areas of suitable habitat. Most likely to affect species.
8	Habitat loss	This is a loss of habitat within the designated boundaries of a European site, for example as a result of defence construction.
9	Habitat/community simplification	Changes to environmental conditions that result in a reduction and fragmentation of habitats that will reduce biodiversity.
10	Turbidity and siltation	Increases in turbidity within water environments can impact upon aquatic plants, fish and wildfowl due to sedimentation and reduction in penetrable light. This may rise from construction activities or changed flood-ing/hydrological regimes.

4.3.3 Qualifying Features and Sensitivity to Hazards

Table 4 below, shows the qualifying features of the European sites within and adjacent to KMDC and identifies the hazards to which they are sensitive (see Table 3). It must be noted that during the assessment of the potential impacts of the LFRMS on a European site, all of the potential hazards will be considered.

Table 4: Sensitivity of European Sites to Potential Hazards

Feature	Potential Hazards										Sites at Risk of Hazard
	1 Change in water levels	2 Changes in hydrological regime	3 Changes in water quality	4 Changes to surface water flooding	5 Competition from invasive non-native species	6 Disturbance	7 Habitat fragmentation	8 Habitat loss	9 Habitat/community simplification	10 Turbidity and siltation	
Dry heathland habitats	X	X		X	X	X	X	X	X		South Pennine Moors SAC
Bogs and wet habitats	X	X	X	X	X	X	X	X	X	X	South Pennine Moors SAC
Dry woodland	X	X		X	X	X	X	X	X		South Pennine Moors SAC
Wet heathland habitats	X	X	X	X	X	X	X	X	X	X	South Pennine Moors SAC
Breeding Bird Assemblage						X	X	X	X		Peak District Moors (South Pennine Moors Phase 1) SPA South Pennine Moors Phase 2 SPA
Breeding Amphibians	X	X	X	X	X	X	X	X	X	X	Denby Grange Colliery Ponds SAC
Aquatic Macrophytes	X	X	X	X	X	X	X	X	X	X	Rochdale Canal SAC

5. SCREENING ASSESSMENT

5.1 INTRODUCTION

This section gives a summary of the KMDC LFRMS strategic themes and objectives (which are defined in Appendix F of the LFRMS entitled ‘The Flood Risk Action Plan’). The LFRMS contains four strategic themes and six high level objectives to manage flood risk in the District. Table 5 summarises the four strategic themes, six objectives and the specific measures that apply to both, as identified in the KMDC LFRMS and whether they have the potential to impact on European Sites.

The Habitat Regulations also require the cumulative effects with other plans or projects to be considered at the screening stage. This section, therefore, also identifies the other plans and projects that it is considered could potentially act “in combination” with the LFRMS to have “significant effects” on European sites. These are identified in the following section (Section 6).

Table 5: LFRMS Strategic Measures

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
PLACE	Engage early with spatial planners and growth strategies to ensure new development and plans make best use of land in making space for surface water, fluvial	Engagement	Surface water run-off, and fluvial.	Partnership	District wide	All proposed development will be subject to a separate Habitats Regulations Assessment (HRA) and will not be permitted should a significant effect be predicted on a given European Site within the	No in-combination effect; zero effect alone. No effect

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	water, sustainable drainage systems and promote the use of adaptive pathways to adapt to climate hazards. Share our understanding of flooding in the area to avoid inappropriate development.					District. This assessment will include any recommendation given by Kirklees Metropolitan Borough Council as to preventative flood actions. In addition, this is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023). No effect at all	
	Work with the Local Planning Authority, Highway Authority, Environment Agency and water companies to ensure the planning process and	Collaboration/ Policy and Implementation	Surface water run-off	Partnership	District wide	All proposed development, management and maintenance regimes will be subject to a separate HRA and will not be permitted should a significant effect be predicted on a given European	No in-combination effect; zero effect alone. No effect

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	development design account fully for land drainage and surface water managements issues. Ensure our practices secure sound management and maintenance regimes that are proportionate and appropriate to the flood risk in the area.					Site. This assessment will include any recommendation given by Kirklees Metropolitan Borough Council as to preventative flood actions. In addition, this is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)). No effect at all	
	As a Lead Local Flood Authority engage with others to advise on climate change allowances for sources of flooding from surface water, groundwater	Engagement/Training	Surface water run-off, groundwater and fluvial.	Partnership/Adapt/Sustainable	District wide	This training and sharing of best practice will allow others to make decisions in line with the latest research and developments in flood risk management. At this stage this knowledge sharing is purely	No in-combination effect; zero effect alone. No effect

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	and ordinary water-courses. To share and inform others of current guidance, research and best practice on sustainability and water management to inform decision making.					theoretical and geographically undefined. Empowering decision makers in this way will not lead to any direct effects on European Sites. No effect at all	

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	Enhance our early engagement with developments and commit to targeted periodic inspections of new development to ensure compliance with drainage planning conditions and Land Drainage Act legislation. Seek 106 contributions where appropriate and promote environmental net gain.	Engagement	Surface water run-off	Partnership/Sustainable	District wide	This measure relates to development already secured and ensures compliance of drainage planning conditions. As part of the planning process, such development would be subject to an HRA and as such would not be permitted were there adverse impacts predicted on neighbouring European Sites. No effect at all.	No in-combination effect; zero effect alone. No effect
	Improve our asset data on drainage assets within the district including highway gullies, culverts, carrier	Investigation	All forms of flooding	Evidence	District wide	By enhancing and expanding the current understanding of drainage assets, resilience to flood risk can be improved. This will ensure that management is based on the	No in-combination effect; zero effect alone. No effect

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	drains, debris screens and others to build our evidence base. Where considered significant make this publicly available.					latest information. Adopting this guidance should ensure that asset condition and other particulars are readily available but will not directly lead to development to impact on European Sites. No effect at all.	
PROTECT	Identify and develop flood risk improvement schemes for Kirklees to reduce the risk of surface water flooding and flooding from ordinary watercourses to better protect properties and the highway network in high risk areas. Be open to	Scheme	Surface water run-off, fluvial.	Innovation/Adapt	High risk catchments	High risk areas are most likely to focus on settlements and major roads. Should the focus of such Schemes be restricted to these areas, European Sites are likely to be protected, as the majority of European Sites within proximity to the catchment are in the uplands, away from hubs of development.	Potential for effects alone or in-combination effects; in-combination assessment completed in Section 6.

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	new financing models. Promote a range of resilience actions and climate change scenarios.					In addition, this is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023). No likely significant effect	
	Improve the awareness, understanding and delivery of Property Flood Resilience measures to manage local flood risk within our communities. Encourage homeowners and business owners to undertake Property Flood Surveys and	Engagement/Training and Scheme	All forms of flooding	Communities	District wide	This measure is most likely to focus on settlements. Should the focus of such Schemes be restricted to these areas, European Sites are likely to be protected, as the majority of European Sites within proximity to the catchment are in the uplands, away from hubs of development. In addition, this is a general statement of	Potential for effects alone or in-combination effects; in-combination assessment completed in Section 6.

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	seek grant funding to support resilience measure installations to support a build back better approach.					policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)). No likely significant effect	
	Work with our partners, universities and communities to develop integrated solutions and maintenance programmes to deliver multiple benefits to reduce flood risk and look to improve economic, social and environmental benefits. Be innovative in our approach.	Collaboration/Innovation/Scheme	All forms of flooding	Partnership/Sustainable/Innovation	District wide	This measure focuses on partnership working and there is no direct driver for development. In addition, the measure looks to improve environmental benefits, so the policy should steer away from impacts to European sites. No effect at all.	No in-combination effect; zero effect alone. No effect
	Engage with catchment	Engagement and NFM	Surface water run-off	Partnership/Sustainable	District wide	Natural flood management	Potential for effects alone or

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	partnerships and land-owners to embrace land management techniques and natural flood management to help to manage surface water runoff. Seek out opportunities to use Working with Natural Processes in managing flood risk to promote multiple benefits such as environmental net gain.		and all forms of flooding			techniques are likely to target upland areas to protect downstream development. The moorland European Sites referenced in Figure 1 may be at risk from NFM measures. This is however a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023). In addition, the measure seeks to promote environmental net gain and hence should steer change in such a way as to protect European Sites from adverse impacts.	in-combination effects; in-combination assessment completed in Section 6.

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
						No likely significant effect	
	Support the severe weather incident management function the Council undertakes through technological advancements to ensure it is an intelligence led approach.	Innovation/ Collaboration	All forms of flooding	Innovation	District wide	This measure will ensure severe weather incidents are managed intelligently but supplying intelligence is in a sense theoretical and will have no direct effects on European Sites. No effect at all	No in-combination effect; zero effect alone. No effect
	Maintain assets based on a risk based approach to ensure high flood risk assets are prioritised and allowances made for climate change projections are considered. Try new technological approaches.	Scheme/Innovation	All forms of flooding	Adapt	District wide	This will ensure that management within these communities is current and considers variables (such as changing climate). This measure focuses on the approach to maintenance as opposed to maintenance itself and hence is unlikely to have any direct	No in-combination effect; zero effect alone. No effect

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	Assess which Council assets require capacity improvements as a last resort.					effects on European Sites. In addition, this is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)). No effect at all.	
RESPONSE	Provide intelligence to ensure policy frameworks and emergency plans are robust. Work with other services to establish the basis of the Council's response to severe rainfall events in supporting communities.	Policy and Implementation/ Collaboration	All forms of flooding	Evidence	District wide	This is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)). No effect at all.	No in-combination effect; zero effect alone. No effect
	Work with the local	Engagement/ Training	All forms of flooding	Communities/Partnership	District wide	Empowering communities in	No in-combination

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	communities to increase their awareness and preparedness for flooding in Kirklees to improve flood resilience in homes, businesses and communities through education campaigns with our partners. Enhance our online content to deliver a one-stop shop.					this way will not lead to any direct effects on European Sites. No effect at all	effect; zero effect alone. No effect

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	Encourage flood community action groups to be set up in key areas of flood risk and through this work, in conjunction with partners, provide a higher standard of community led resilience by developing a network of community resilience leads.	Collaboration and engagement	All forms of flooding	Communities	Known flooded places	Empowering communities in this way will not lead to any direct effects on European Sites. No effect at all	No in-combination effect; zero effect alone. No effect
	Ensure flood risk management actions reach out and remain inclusive in our approach within our diverse communities and areas of deprivation.	Engagement	All forms of flooding	Communities	District Wide	Empowering and including diverse communities in this way will not lead to any direct effects on European Sites. No effect at all	No in-combination effect; zero effect alone. No effect

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	Establish and maintain a Communication Plan in line with national and other Council services to provide coordinated and timely information to communities at flood risk.	Engagement/Education	All forms of flooding	Communities/Partnership	District wide	Good communication and education within communities at risk is likely to lead to small scale, benefits to flood risk management at the individual level. It is will not lead to any direct effects on European Sites. No effect at all.	No in-combination effect; zero effect alone. No effect
RECOVERY	Provide follow up recovery support and advice to residents, business owners and communities that have been affected by flooding on funding, wellbeing support and signpost to affordable flood insurance to help	Support and Advice	All forms of flooding	Communities	District wide	Support and advice within communities affected by flooding is likely to lead to small scale, benefits to flood risk management at the individual level. It is will not lead to any direct effects on European Sites. No effect at all.	No in-combination effect; zero effect alone. No effect

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
	them recover quicker.						
	Investigate flood incidents of all sources and establish flood outlines with our partners to validate existing flood models to help inform future grant fundings and flood risk management projects.	Investigation	All forms of flooding	Evidence/Partnership/Innovation	District wide	Collecting data to validate flood models and inform future projects is very much theoretical and will have no direct effects on European Sites.	No in-combination effect; zero effect alone. No effect
	Work with Partners and health bodies to ensure mental health impacts from flooding are factored into long term recovery planning.	Collaboration and support	All forms of flooding	Communities	N/A	Better supporting the wellbeing of communities affected by flooding is likely to lead to mental health benefits and personal resilience at the individual level. It is will not lead to any direct effects on European Sites.	No in-combination effect; zero effect alone. No effect

Strategic Theme	LFRMS Strategic Measure	Category of Work	Source of Flooding	LFRMS Objective	Geographical Area	Potential Effect on European Sites	Potential for In-Combination Effect?
						No effect at all.	
	Support Review Briefings and feedback learning from communities to inform our plans and policies to ensure a more efficient and effective response in the future.	Investigation/Policy	All forms of flooding	Communities/Innovation/Evidence	N/A	Gathering data to streamline plans and policy will not lead to any direct effects on European Sites. No effect at all	No in-combination effect; zero effect alone. No effect

6. Other Relevant Plans and Projects that might act In-combination.

A series of individually modest effects may in-combination produce effects that are likely to adversely affect the integrity of one or more European sites. Article 6(3) of the Habitats Directive tries to address this by taking into account the combination of effects from other plans or projects. The Directive does not explicitly define which other plans and projects are within the scope of the combination provision. Guidance in section 4.4.3 of *'Managing Natura 2000 Sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC'*, published by the European Commission, states:

'When determining likely significant effects, the combination of other plans or projects should also be considered to take account of cumulative impacts. It would seem appropriate to restrict the combination provision to other plans or projects which have been actually proposed.'

Table 6 lists the relevant plans and projects that have been identified as having the potential to result in adverse effects on European sites in-combination with the LFRMS. A search was made of the local planning authority and National Infrastructure Planning websites, in addition to a search of Natural England's website for Nature Improvement Areas.

Table 6: Other Plans and Projects

Plan/Project	Potential In-combination Effects
The Kirklees Development Plan (Kirklees Council, 2022)	<p>The Kirklees Development Plan consists of the Kirklees Local Plan and, in applicable areas, the Holme Valley Neighbourhood Development Plan. This Plan sets out how the District will develop and change over the next nine years. The Plan comprises separate parts, including the Core Strategy which other documents under the Plan fall under, which address different aspects of development within the District and surrounding area. No adverse in-combination effects with the LFRMS are expected as proposed development, schemes and plans which are stated within the Development Plan Documents (DPD) under the Framework will require assessment under the Habitat Regulations if they pose any risk to European Sites within or adjacent to the boundary. Therefore, any development facilitated by or that becomes feasible because of measures within the LFRMS will also be subject to the HRA process to ensure no adverse impacts arise.</p> <p>No likely significant effect in combination with relevant LFRMS Strategic Measures identified</p>
A57 Link Roads (previously known as Trans Pennine Upgrade Programme) (National Infrastructure Planning, 2022)	<p>The A57 Link Roads project will include the creation of two new link roads: (1) Mottram Moor Link Road - a new dual carriageway from the M67 junction 4 roundabout to a new junction on the A57(T) at Mottram Moor; and (2) A57 Link Road - a new single carriageway link from the A57(T) at Mottram Moor to a new junction on the A57 in Woolley Bridge. This project is situated within 10km of the southern boundary of Kirklees District. No adverse in-combination effects with the LFRMS are expected as the proposed development will require assessment under the Habitat Regulations if they pose any risk to European Sites within or adjacent to the boundary. Therefore, any development facilitated by or that becomes feasible because of measures within the LFRMS will also be subject to the HRA process to ensure no adverse impacts arise.</p>

Plan/Project	Potential In-combination Effects
	No likely significant effect in combination with relevant LFRMS Strategic Measures identified
Dark Peak Nature Improvement Area (NIA) Programme (2015) (The National Archives, 2014)	<p>This programme may result in positive in-combination effects in relation to the Peak District National Park as key projects in the programme relate to the enhancement of these sites, through habitat and water quality management. Working with the Dark Peak Partnership and NIA programme may identify opportunities to achieve some of the objectives of the LFRMS (e.g. Objective 5), whilst helping to protect these European Sites. Subsequent land management initiatives continuing after completion of the project suggests positive effects likely to be ongoing.</p> <p>No likely significant effect in combination with relevant LFRMS Strategic Measures identified</p>

7. Screening Assessment Results

7.1 Introduction

This section considers the actions and measures identified in the LFRMS that are considered to have a potential impact on European Sites (as shown in Table 5) and identifies whether or not they are likely to have significant effects on site integrity, either alone or in-combination with other plans and/or projects, as detailed in Table 6. Many of the actions and measures identified in the KMDC LFRMS have been screened out in Table 5 as they are high level actions and are not determined to directly threaten the integrity of European Sites.

7.2 Screening Assessment

Considering the location of the European sites and the interest features carried forward from Table 4 in relation to KMDC and the identified potential hazards associated with the actions and measures of the LFRMS, an assessment was made as to whether the LFRMS, alone and in-combination with other plans and/or projects, would have likely significant effects on any European sites.

Table 7: Summary of screened in LFRMS actions and measures and their likely impacts on European Sites.

LFRMS Measures	Potential Hazard	Interest Feature Affected	Designated Sites which include Interest Feature Affected	Likelihood of Significant Effect on Sites
Identify and develop flood risk improvement schemes for Kirklees to reduce the risk of surface water flooding and flooding from ordinary watercourses to better protect properties and the highway network in high risk areas. Be open to new financing models. Promote a range of resilience actions and climate change scenarios.	The scope for potential hazards under this action is very broad and due to the high level, undefined nature of this action, impacts are uncertain.	<ul style="list-style-type: none"> -Dry heathland habitats -Bogs and wet habitats -Dry woodland -Wet heathland habitats -Breeding Bird Assemblage -Aquatic Macrophytes -Breeding Amphibians 	South Pennine Moors SAC	<p>This is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)).</p> <p><i>No likely significant effect alone or in combination.</i></p>
			Peak District Moors (South Pennine Moors Phase 1) SPA	<p>This is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)).</p> <p><i>No likely significant effect alone or in combination.</i></p>
			South Pennine Moors Phase 2 SPA	<p>This is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)).</p> <p><i>No likely significant effect alone or in combination.</i></p>

LFRMS Measures	Potential Hazard	Interest Feature Affected	Designated Sites which include Interest Feature Affected	Likelihood of Significant Effect on Sites
			Denby Grange Colliery Ponds SAC	This is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)). <i>No likely significant effect alone or in combination.</i>
			Rochdale Canal SAC	No in-combination effect; zero effect alone due to the distance (approximately 7km) of the European Site to the District and lack of hydrological connectivity. <i>No effect at all</i>
Improve the awareness, understanding and delivery of Property Flood Resilience measures to manage local flood risk	The scope for potential hazards under this action is very broad and due to the high level, undefined nature of this action, impacts are uncertain. However, impacts are	<ul style="list-style-type: none"> -Dry heathland habitats -Bogs and wet habitats -Dry woodland -Wet heathland habitats 	South Pennine Moors SAC	This is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)). <i>No likely significant effect alone or in combination.</i>

LFRMS Measures	Potential Hazard	Interest Feature Affected	Designated Sites which include Interest Feature Affected	Likelihood of Significant Effect on Sites
<p>within our communities. Encourage homeowners and business owners to undertake Property Flood Surveys and seek grant funding to support resilience measure installations to support a build back better approach.</p>	<p>likely to be small scale and focused on the individual property level e.g., installing flood gates etc. The combined effect of this measure may be to force more flood water elsewhere on the floodplain. This could change patterns of sedimentation and hydrology.</p> <p>The focus of this measure is on settlements. Should the focus of such Schemes be restricted to these areas, European Sites are likely to be protected, as the majority of European Sites within proximity to the catchment are in the uplands, away from hubs of development. This</p>	<p>-Breeding Bird Assemblage</p> <p>-Aquatic Macrophytes</p> <p>-Breeding Amphibians</p>	<p>Peak District Moors (South Pennine Moors Phase 1) SPA</p>	<p>Peak District Moor SPA is largely located upstream of the District and unlikely to be significantly affected by changes in hydrology and sedimentation patterns.</p> <p>In addition, the majority of property within the District is located downstream of the SPA and the interest features of the SPA (Breeding Bird Assemblage) includes moorland species:</p> <p>-A098 <i>Falco columbarius</i>; Merlin (Breeding)</p> <p>-A140 <i>Pluvialis apricaria</i>; European golden plover (Breeding)</p> <p>-A222 <i>Asio flammeus</i>; Short-eared owl (Breeding)</p> <p>These species are less likely to be affected by changes to the river corridor.</p> <p>Furthermore, this is a general statement of policy, so in itself cannot</p>

LFRMS Measures	Potential Hazard	Interest Feature Af-fected	Designated Sites which in-clude Interest Feature Af-fected	Likelihood of Significant Effect on Sites
	is not to say that property within such sites would not qualify for support.			<p>lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023).</p> <p><i>No likely significant effect alone or in combination.</i></p>
			South Pennine Moors Phase 2 SPA	<p>South Pennine Moors SPA is largely located up-stream of the District and unlikely to be significantly affected by changes in hydrology and sedimentation patterns.</p> <p>In addition, the majority of property within the District is located downstream of the SPA and the interest features of the SPA (Breeding Bird Assemblage) includes moorland species:</p> <p>A098 <i>Falco columbarius</i>; Merlin (Breeding)</p> <p>A140 <i>Pluvialis apricaria</i>; European golden plover (Breeding)</p> <p>These species are less likely to be affected by</p>

LFRMS Measures	Potential Hazard	Interest Feature Affected	Designated Sites which include Interest Feature Affected	Likelihood of Significant Effect on Sites
				<p>changes to the river corridor.</p> <p>Furthermore, this is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)).</p> <p><i>No likely significant effect alone or in combination.</i></p>
			Denby Grange Colliery Ponds SAC	<p>This is a general statement of policy, so in itself cannot lead to any impacts on any European Sites (see Section F.6.3.1 in the DTA Handbook (DTA, 2023)).</p> <p><i>No likely significant effect alone or in combination.</i></p>
			Rochdale Canal SAC	<p>No in-combination effect; zero effect alone due to the distance (approximately 7km) of the European Site to the District and lack of hydrological connectivity.</p> <p><i>No effect at all</i></p>

LFRMS Measures	Potential Hazard	Interest Feature Affected	Designated Sites which include Interest Feature Affected	Likelihood of Significant Effect on Sites
<p>Engage with catchment partnerships and landowners to embrace land management techniques and natural flood management to help to manage surface water runoff. Seek out opportunities to use Working with Natural Processes in managing flood risk to promote multiple benefits such as environmental net gain.</p>	<p>Delivery of this objective will result in reduced flood risk to local and downstream communities for the benefit of population, human health, and material assets. Whilst environmental gains are likely (via improved water quality and habitat creation), there is the potential for impacts on European Site Interest Features from specific measures under this action and until detailed designs are known, impacts remain uncertain.</p>	<ul style="list-style-type: none"> -Dry heathland habitats -Bogs and wet habitats -Dry woodland -Wet heathland habitats -Breeding Bird Assemblage -Aquatic Macrophytes -Breeding Amphibians 	South Pennine Moors SAC	<p>Section F.6.3.5 of the DTA handbook (DTA, 2023), refers to the ability to screen out policies and proposals which will have the indirect or unintentional effect of steering change away from European Sites. Any measure which promotes environmental benefits is likely to do so.</p> <p><i>No likely significant effect alone or in combination.</i></p>
			Peak District Moors (South Pennine Moors Phase 1) SPA	<p>Section F.6.3.5 of the DTA handbook (DTA, 2023), refers to the ability to screen out policies and proposals which will have the indirect or unintentional effect of steering change away from European Sites. Any measure which promotes environmental benefits is likely to do so.</p> <p><i>No likely significant effect alone or in combination.</i></p>

LFRMS Measures	Potential Hazard	Interest Feature Affected	Designated Sites which include Interest Feature Affected	Likelihood of Significant Effect on Sites
			South Pennine Moors Phase 2 SPA	<p>Section F.6.3.5 of the DTA handbook (DTA, 2023), refers to the ability to screen out policies and proposals which will have the indirect or unintentional effect of steering change away from European Sites. Any measure which promotes environmental benefits is likely to do so.</p> <p><i>No likely significant effect alone or in combination.</i></p>
			Denby Grange Colliery Ponds SAC	<p>Section F.6.3.5 of the DTA handbook (DTA, 2023), refers to the ability to screen out policies and proposals which will have the indirect or unintentional effect of steering change away from European Sites. Any measure which promotes environmental benefits is likely to do so.</p> <p><i>No likely significant effect alone or in combination.</i></p>

LFRMS Measures	Potential Hazard	Interest Feature Affected	Designated Sites which include Interest Feature Affected	Likelihood of Significant Effect on Sites
			Rochdale Canal SAC	<p>No in-combination effect; zero effect alone due to the distance (approximately 7km) of the European Site to the District and lack of hydrological connectivity.</p> <p><i>No effect at all</i></p>

8. Screening Statement and Conclusions

8.1 Summary

The LFRMS sets out the overall objectives to manage flooding within KMDC. The purpose of the Strategy is to " In combination with the National Strategy, our Local Strategy will encourage more effective risk management by enabling people, communities, businesses and the public to work together " (KMDC, 2022). The six objectives of the Strategy set out a vision as to how local flood risk will be delivered and managed by DMDC as LLFA, and all other Risk Management Authorities as well.

The Screening Assessment identified the potential for hydrological changes, water quality effects and impacts to habitats and species that may occur as a direct or indirect result of the implementation of the LFRMS. These effects could arise from measures directed at waterway maintenance and management of flood risk in specific locations, potentially using flood defences and separately via NFM initiatives.

The Screening Assessment process did not identify any likely significant effects arising from the KMDC LFRMS's proposed objectives that might significantly affect the European Sites located within Kirklees Metropolitan District or with 15km of the District boundary. This was largely due to the high-level nature and general aspirations of the LFRMS as well as the dual purpose of achieving environmental gain. It is therefore not necessary for an Appropriate Assessment (HRA Task 2 and 3) to be carried out.

9.Appendix A

9.1 Location of European Sites within and adjacent to KMDC

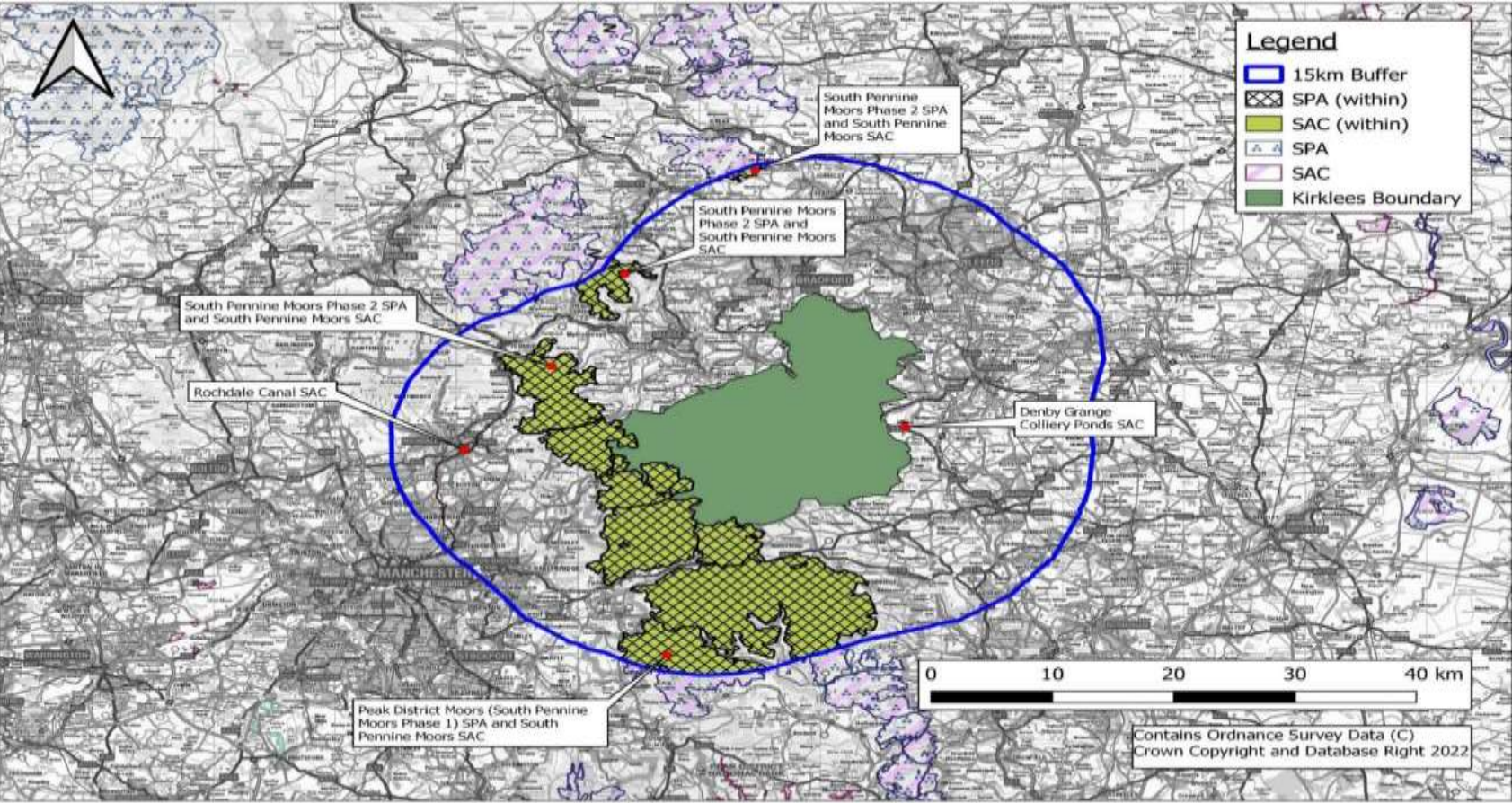


Figure 1: European Site Map

10. Appendix B

10.1 Details of European sites within and adjacent to Kirklees District

Table 8: Details of European Sites within and adjacent to KMDC. Information from JNCC and Natural England

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Conservation Objectives	Site Vulnerability
South Pennine Moors SAC <i>Site area</i> <i>65024.32 ha</i>	-Dry heathland habitats -Bogs and wet habitats -Dry woodland -Wet heathland habitats	Annex I habitats: <i>4030 European dry heaths</i> <i>7130 Blanket bogs (* if active bog)</i> <i>* Priority feature</i> <i>91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles</i> <i>4010 Northern Atlantic wet heaths with Erica tetralix</i> <i>7140 Transition mires and quaking bogs</i>	Subject to natural change, to maintain or restore: -The extent and distribution of the qualifying natural habitats -The structure and function (including typical species) of the qualifying natural habitats, and, -The supporting processes on which the qualifying natural habitats rely	The site is vulnerable to: -Air pollution, air-borne pollutants (B)* -Agriculture activities not referred to above (B) -Human induced changes in hydraulic conditions (B) -Fire and fire suppression (I)* -Outdoor sports and leisure activities, recreational activities (I)

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Conservation Objectives	Site Vulnerability
Peak District Moors (South Pennine Moors Phase 1) SPA <i>Site area 45,270.52 ha</i>	-Breeding Bird Assemblage	Annex I species: <i>-A098 Falco columbarius; Merlin (Breeding)</i> <i>-A140 Pluvialis apricaria; European golden plover (Breeding)</i> <i>-A222 Asio flammeus; Short-eared owl (Breeding)</i>	Subject to natural change, to maintain or restore: -The extent and distribution of the habitats of the qualifying features -The structure and function of the habitats of the qualifying features -The supporting processes on which the habitats of the qualifying features rely -The population of each of the qualifying features, and, -The distribution of the qualifying features within the site.	The site is vulnerable to: - Outdoor sports and leisure activities, recreational activities (I) - Human induced changes in hydraulic conditions (B) - Fire and fire suppression (I) - Hunting and collection of wild animals (terrestrial), including damage caused by game (excessive density), and taking/removal of terrestrial animals (including collection of insects, reptiles, amphibians, birds of prey, etc., trapping, poisoning, poaching, predator control, accidental capture (e.g., due to fishing gear), etc.) (I) - Reduced fecundity/ genetic depression (I)
South Pennine Moors Phase 2 SPA <i>Site area 20944.46 ha</i>	-Breeding Bird Assemblage	Annex I species: <i>A098 Falco columbarius; Merlin (Breeding)</i> <i>A140 Pluvialis apricaria; European</i>	Subject to natural change, to maintain or restore: -The extent and distribution of the habitats of the qualifying features	The site is vulnerable to: - Hunting and collection of wild animals (terrestrial), including damage caused by game (excessive density), and taking/removal of terrestrial animals (including collection of insects, reptiles, amphibians, birds of prey, etc., trapping, poisoning, poaching,

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Conservation Objectives	Site Vulnerability
		golden plover (Breeding)	<p>-The structure and function of the habitats of the qualifying features</p> <p>-The supporting processes on which the habitats of the qualifying features rely</p> <p>-The population of each of the qualifying features, and,</p> <p>-The distribution of the qualifying features within the site.</p>	<p>predator control, accidental capture (e.g., due to fishing gear), etc.) (I)</p> <p>- Reduced fecundity/ genetic depression (I)</p> <p>- Fire and fire suppression (I)</p> <p>- Human induced changes in hydraulic conditions (B)</p> <p>- Outdoor sports and leisure activities, recreational activities (I)</p>

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Conservation Objectives	Site Vulnerability
Denby Grange Colliery Ponds SAC <i>Site area 18.34 ha</i>	- Breeding Amphibians	Annex II species: 1166 Great crested newt <i>Triturus cristatus</i>	Subject to natural change, to maintain or restore: -The extent and distribution of the habitats of qualifying species -The structure and function of the habitats of qualifying species -The supporting processes on which the habitats of qualifying species rely -The populations of qualifying species, and, -The distribution of qualifying species within the site.	The site is vulnerable to: - Pollution to groundwater (point sources and diffuse sources) (B) - Other ecosystem modifications (B) - Forest and Plantation management & use (I) - Human induced changes in hydraulic conditions (B) - Invasive non-native species (B)

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Conservation Objectives	Site Vulnerability
Rochdale Canal SAC <i>Site area 24.86 ha</i>	- Aquatic Macrophytes	Annex II species: 1831 Floating water-plantain <i>Luronium natans</i>	Subject to natural change, to maintain or restore: -The extent and distribution of the habitats of qualifying species -The structure and function of the habitats of qualifying species -The supporting processes on which the habitats of qualifying species rely -The populations of the qualifying species, and, -The distribution of the qualifying species within the site.	The site is vulnerable to: - Air pollution, air-borne pollutants (B) - Human induced changes in hydraulic conditions (B)

*I = Inside, O = Outside, B = Both

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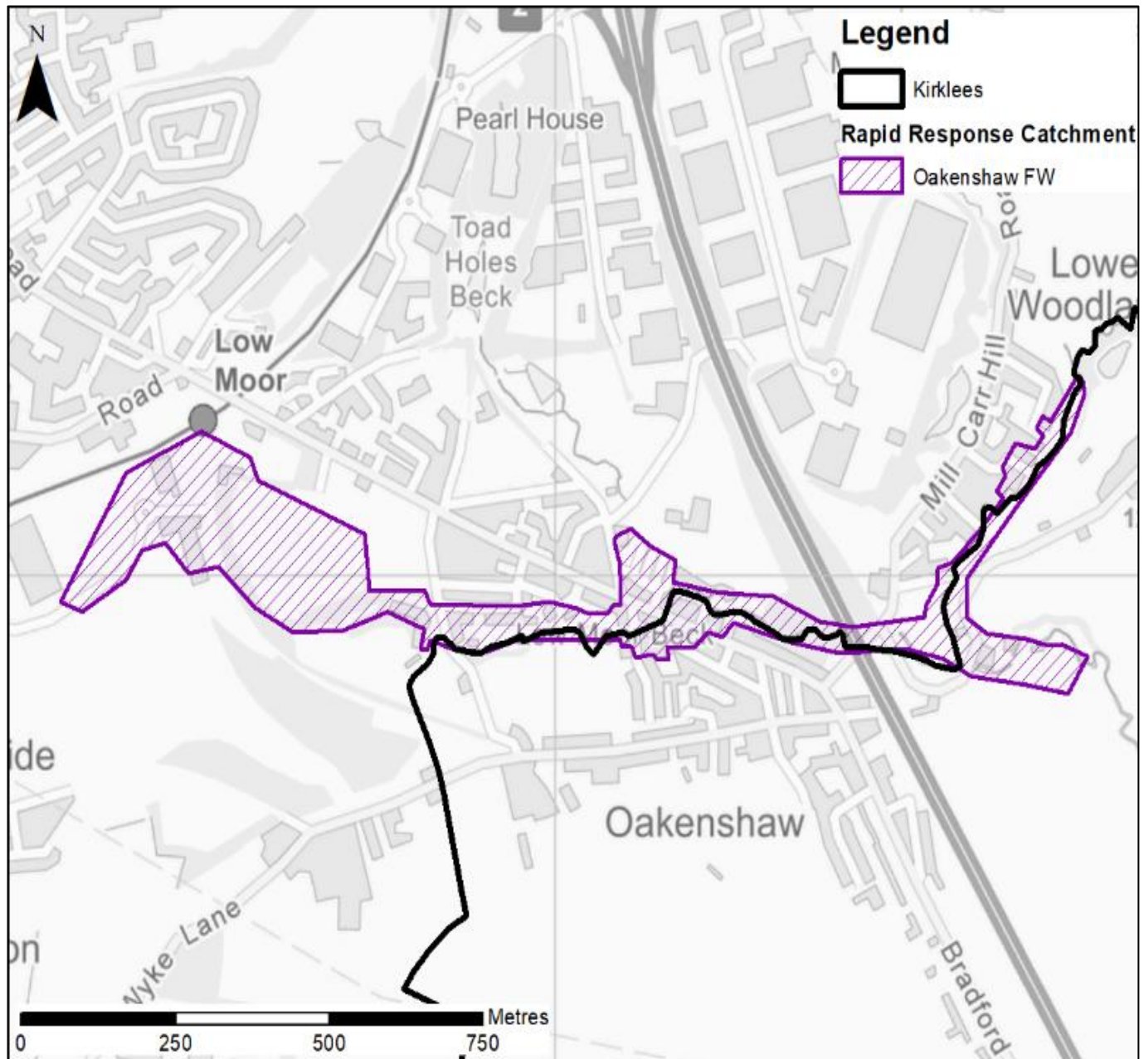
Appendix C – Environment Agency Rapid Response Catchments

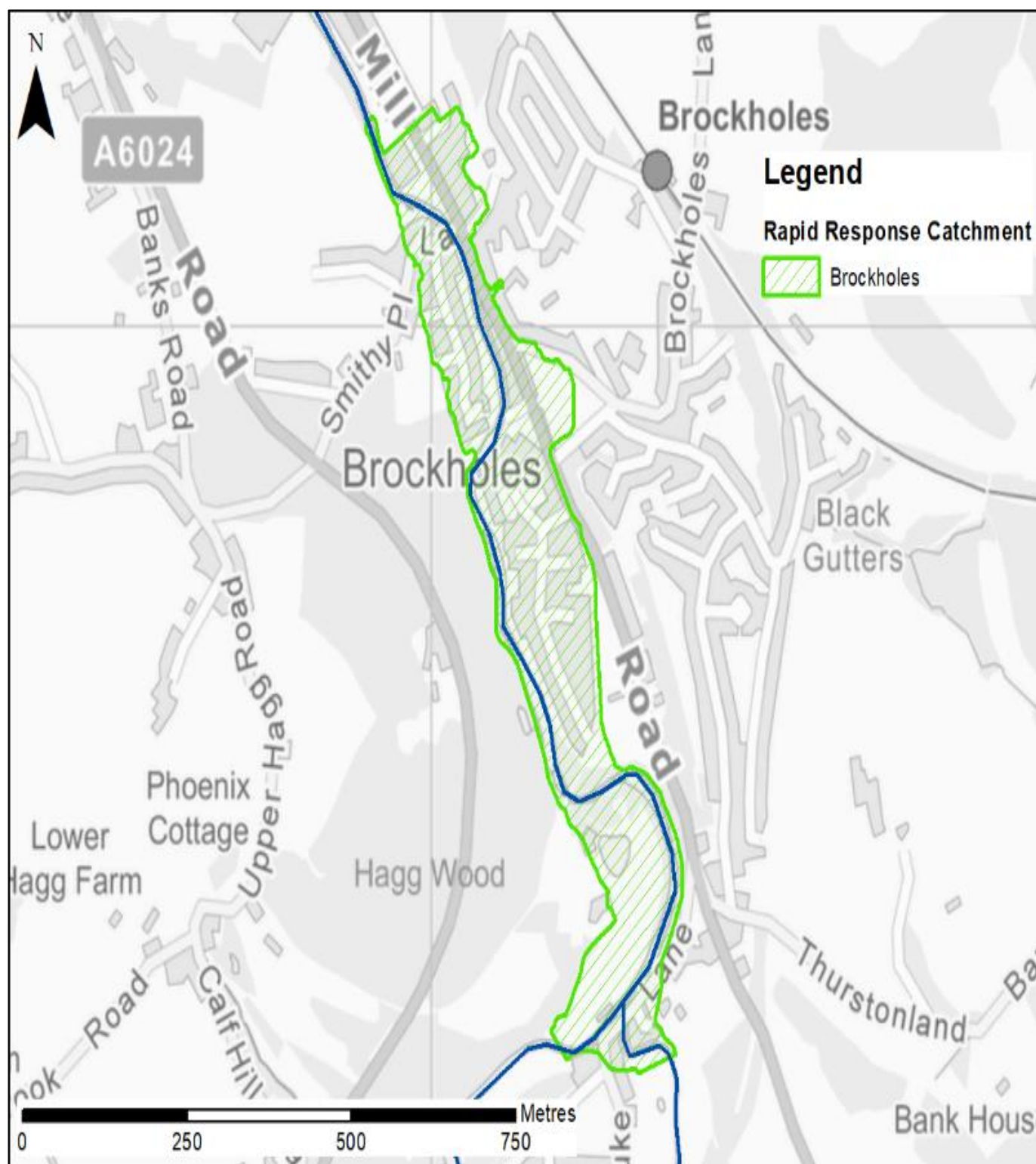
ENVIRONMENT AGENCY RAPID RESPONSE CATCHMENTS

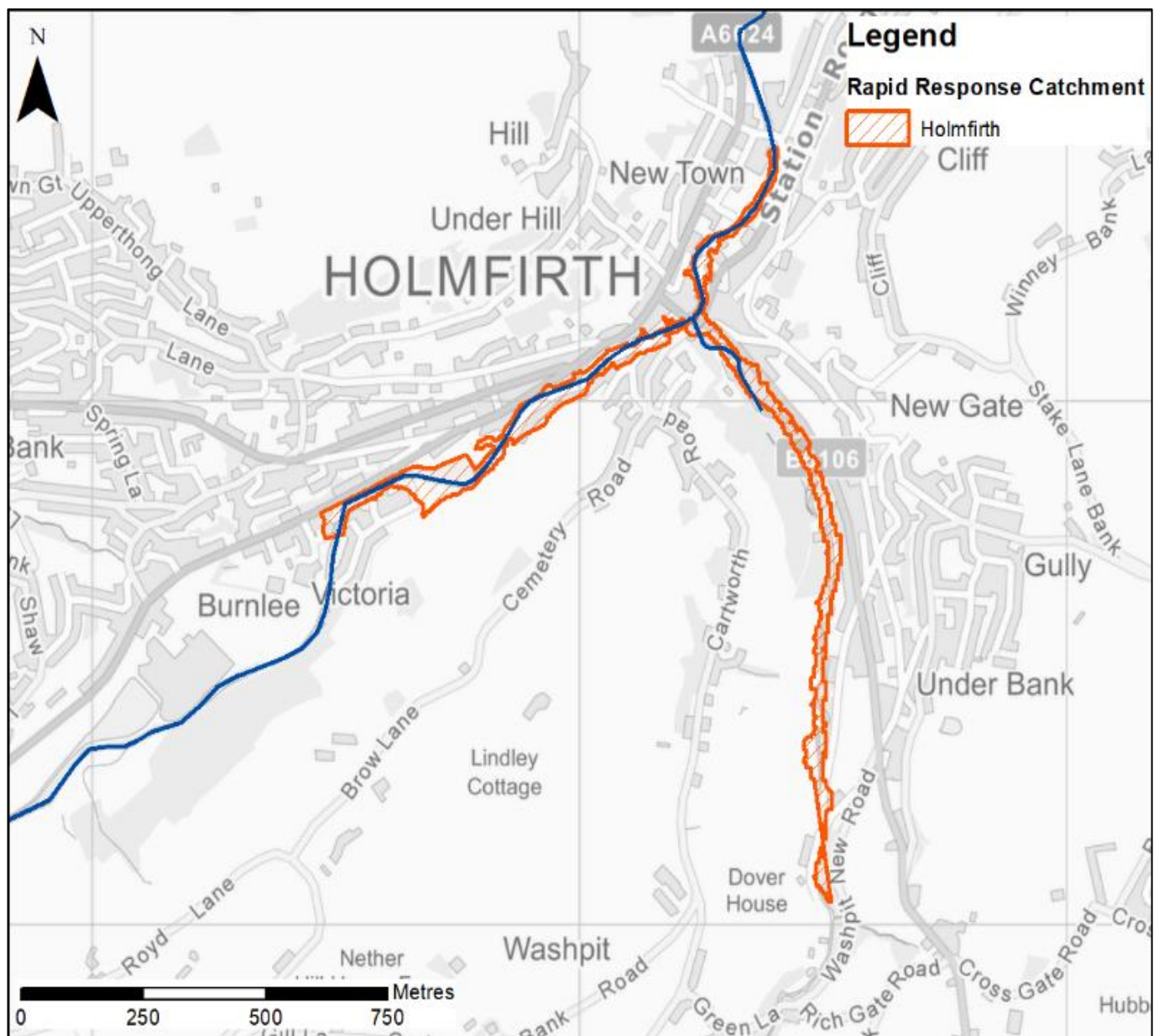
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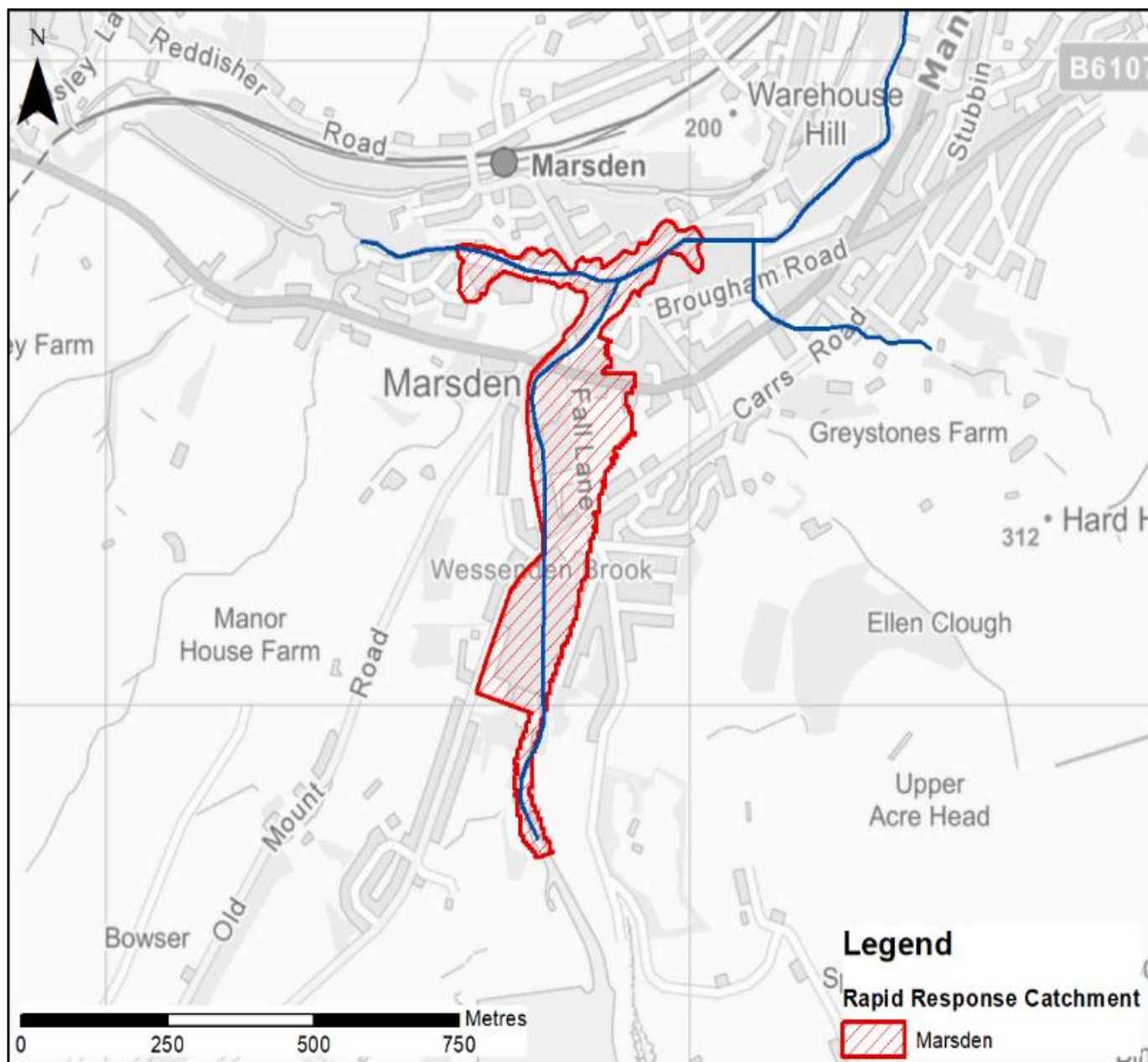
ENVIRONMENT AGENCY RAPID RESPONSE CATCHMENTS

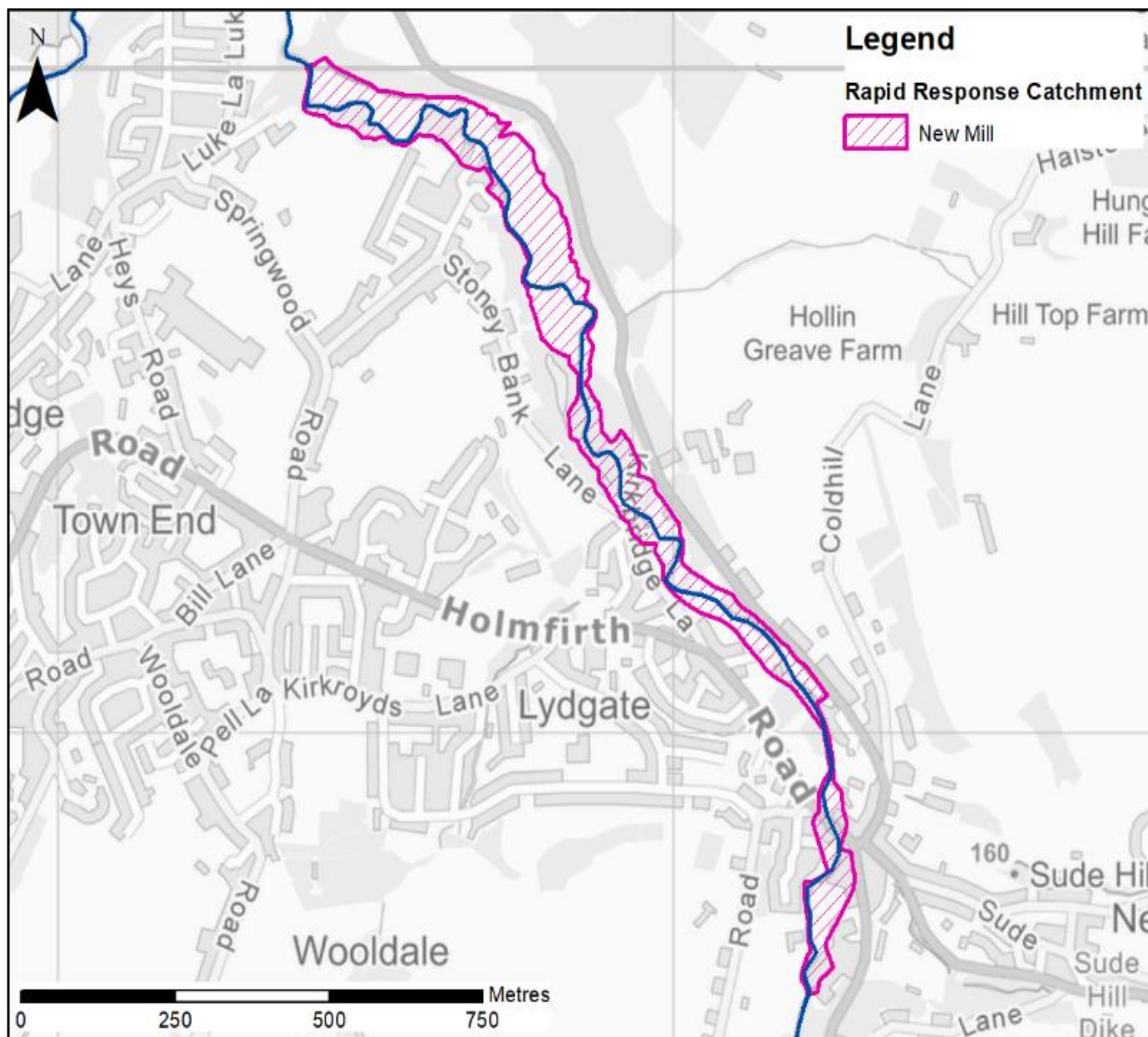
The Environment Agency has a Rapid Response Catchment (RRC) register which was prepared using a combination of flood event factors, such as time to maximum flood depths and velocities, and the amount of debris carried in the floodwater. Potential property numbers affected, and vulnerable sites such as care homes and campsites, were also considered.

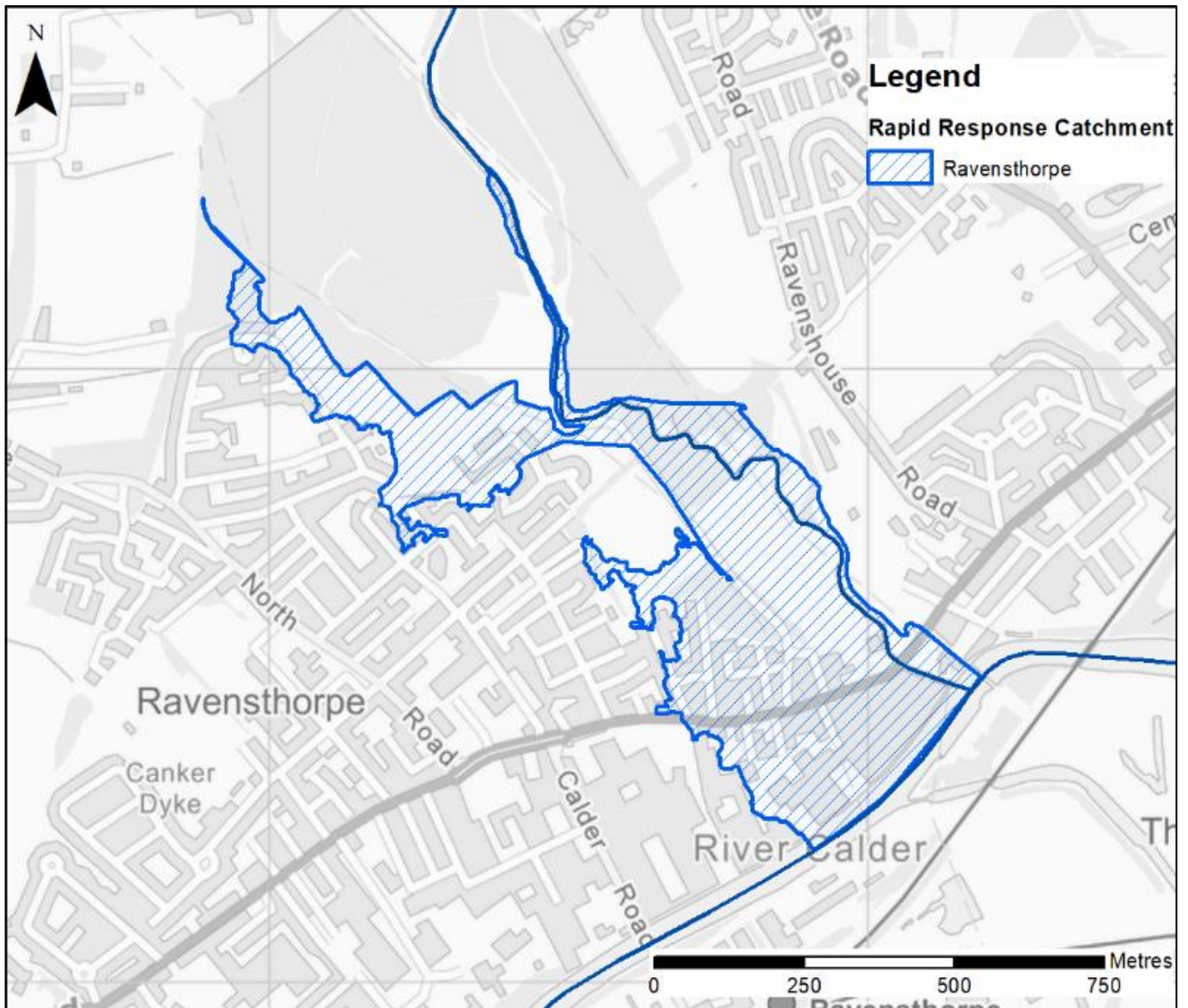












Appendix D Flood risk management roles and responsibilities

APPENDIX D FLOOD RISK MANAGEMENT ROLES AND RESPONSIBILITIES

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FLOOD RISK MANAGEMENT ROLES AND RESPONSIBILITIES

In relation to Kirklees, the Risk Management Authorities include:

- The Lead Local Flood Authority – Kirklees Council,
- Environment Agency,
- Water and sewerage companies – Yorkshire Water,
- Highways Authority – Kirklees Council and National Highways

Under the provisions of the Flood and Water Management Act the following duties and powers are common to all risk management authorities:

- Duty to cooperate with other risk management authorities,
- Duty to act consistently with the national and local strategies,
- Powers to take on flood risk functions from another RMA,
- Duty to contribute towards the achievement of sustainable development,
- Duty to be subject to scrutiny from the LLFA's democratic process.

SCHEDULE 3 SUSTAINABLE DRAINAGE (FWMA 2020)

The enactment of Schedule 31 of the FWMA means there is a requirement for the inclusion of SuDS in all new development which must be approved by the Council as the 'approving body'. The Council would also be expected to adopt and maintain SuDS for new developments once the development is complete. It is expected that legal, statutory guidance will be produced which will provide a more consistent approach to SuDS design and approval. It is expected that this would replace the non-statutory guidance and the Council's local guidance.

¹ [Schedule 3 Flood and Water Management Act 2010](#)

Some of the main roles and responsibilities in relation to flood risk management activities



Some of the main roles and responsibilities in relation to flood risk management activities for each RMA are as follows:

KIRKLEES COUNCIL LLFA

- Provides strategic leadership of local flood risk management authorities,
- Develops, maintains, applies and monitors a strategy for local flood risk (this Local Strategy) (FWMA 2010),
- Prepares Preliminary Flood Risk Assessments and Flood Risk Management Plans concerning flood risk attributable to surface water runoff, ordinary watercourses and groundwater (Flood Risk Regulations 2009),
- Has powers to carry out works to manage flood risk from surface water runoff, ordinary watercourses and groundwater (Land Drainage Act 1991),
- Is a statutory consultee to determine the acceptability of proposed SuDS (as per the enacted Schedule 3 of the FWMA 2010). Approvals must be given before the developer can commence construction, and sometime before the occupation of dwellings. Working with the local planning authority, planning conditions or obligations should be in place to ensure arrangements are in place for ongoing maintenance of any SuDS over the lifetime of development,



- Acts as a statutory consultee for planning authorities and responds to drainage designs for major planning applications (Town and Country Planning (Development Management Procedure) (England) Order 2015),
- Has powers to request information from any person in connection with the authority's flood risk management functions,
- Has a duty to investigate and publish reports on significant flood incidents in Kirklees (where appropriate and necessary) to identify which authorities have relevant flood risk management functions, and what they have done or intend to do (FWMA 2010)

The Council will endeavour to investigate flood incidents which meet the following criteria:

- Where one or more residential or business property suffers internal flooding
- Where there is a risk to life as a result of the depth and / or velocity of floodwater
- Where critical infrastructure (e.g. emergency services buildings, utility company infrastructure, schools, day centres, hospitals and main transport routes) suffer flooding or obstruction, or were in imminent danger of flooding
- Where five or more properties were in imminent danger of flooding, or
- Where local democratic pressures from elected members, committees, or other elected bodies, might be considered as a factor in determining whether a formal investigation should be carried out

- Has a duty to maintain a register of structures or assets that have a significant effect on flood risk (FWMA 2010). The LLFA has discretion to set a local indication of "significance" to determine which assets it records on the register, which is available for inspection

The Council's register of drainage assets aims to include the following structures or features:

Pipes and culverts:

- Where the diameter is greater than 600mm or cross-sectional area is greater than 0.3m² or
- Where the pipe/culvert has a recorded history of flooding or
- Where the pipe/culvert is within 20m of a cluster of 5 or more recorded flood incidents (non-cellar) – excluding pipes of 225mm diameter or less

Debris screen:

- Where a debris screen is blocked

Others:

- Reservoirs
- Mill ponds
- EA assets

SuDS:

- All new SuDS adopted by the LLFA

- Powers to designate structures and features with flood risk significance other than on main rivers (Land Drainage Act 1991). The Council will use these powers in a proportionate manner, determining an appropriate measure of significance for the flood risk. Any proposal to designate a structure or feature will be fully evidenced and justified,
- Has a duty to ensure local flood risk management functions are consistent with the national strategy,
- Has a duty to contribute towards the achievement of sustainable development in the exercise of flood risk management functions and to have regard to any ministerial guidance on this topic.

ENVIRONMENT AGENCY

- Carries out works to manage flood risk from main rivers (Water Resources Act 1991),
- Regulates the operation of large, raised reservoirs (Reservoirs Act 1975),
- Sets the direction for managing flood risk through the National Flood and Coastal Erosion Risk Management Strategy for England (FWMA, 2010),
- Prepares Preliminary Flood Risk Assessments and Flood Risk Management Plans for flooding from main rivers, reservoirs and the sea (Flood Risk Regulations 2009),
- Operates flood warning systems for the public (Ministerial Direction to the National Rivers Authority, 1996),
- Regulates the activities that may affect the risk of flooding from main rivers (Environmental Permitting Regulations (England and Wales) Regulations 2016),
- Carries out surveys and mapping (Flood Risk Regulations 2009, Water Resources Act 1991),
- Reports to the minister on flood and coastal erosion risk and how the national and local strategies are being applied by all the authorities involved (FWMA, 2010),
- Acts as a statutory consultee for planning authorities providing advice on planning applications, local plans and environmental assessments regarding flood risk from main rivers and the sea (Town and Country Planning (Development Management Procedure) (England) Order 2015).

YORKSHIRE WATER

- Is responsible for public water supply and sewerage systems,
- Must manage the risk of flooding from its water supply networks and sewerage networks,
- Must produce Drainage and Wastewater Management Plans (DWMPs) to assess current and future capacity, pressures, and risks to the networks such as climate change and population growth. DWMPs must cover a minimum of 25 years,
- Must prepare and review water resource management plans and provide drought plans,
- Where appropriate, assists the LLFA in meeting its duties in line with the national strategy,
- Where appropriate, shares information and data with other RMAs, relevant to their flood risk management functions,



- Has a duty to effectually drain its area (includes sewage and surface water), in accordance with section 94 of the Water Industry Act 1991,
- Advises on the appropriate management of surface water and encouraging the use of SuDS,
- Creating a detailed understanding of flood risk from the public sewer system,
- A duty to ensure local flood risk management and drainage works are consistent with environmental regulations (including the Water Framework Directive).

. Highways Authority (Kirklees Council and National Highways)

- Are responsible for providing and managing highway drainage and some roadside ditches / gullies,
- Must ensure that new road projects do not increase flood risks,
- Are permitted to carry out drainage works on highways or adjoining land (Highways Act 1980),
- Has a duty to act in a manner which is consistent with the local and national strategies,
- Has a duty to share information with other RMAs relevant to their flood risk management functions.



APPENDIX E - High risk catchments

HIGH RISK CATCHMENTS

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PPROACH TO DEFINING HIGH RISK CATCHMENTS

As part of the development of Kirklees Local Flood Risk Management Strategy (LFRMS), a flood risk appraisal was undertaken in order to identify and prioritise the areas of Kirklees most at risk of surface water flooding and flooding from main rivers to help inform where actions should be focused. A catchment-based approach has been taken using the Water Framework Directive (WFD) watercourse catchments.

DATA

Data used within the analysis has been divided into two groups, primary and secondary, depending on the perceived level of significance within the catchment prioritisation process.

PRIMARY DATASETS

This data was used in the initial cluster analysis and formed the basis of the catchment prioritisation.

- Water Framework Directive (WFD) watercourse catchments (19 catchments in study area)
- National Receptor Dataset 2021 (NRD)
- Ordnance Survey (OS) MasterMap buildings
- Risk of Flooding from Surface Water (RoFSW) dataset
- RoFSW 1% AEP event + climate change

CLUSTER ANALYSIS

The Risk of Flooding from Surface Water (RoFSW) was used as the primary dataset to assess flood risk. It shows the flooding that takes place from the 'surface runoff' generated by rainwater (including snow and other precipitation) for the 1 in 30-year (3.3% AEP), 1 in 100-year (1% AEP) and 1 in 1000-year (0.1% AEP) rainfall events. This dataset has been chosen because, unlike the Environment Agency Flood Zones, it includes watercourses with catchments smaller than (3km²), and as surface water flooding is the responsibility of the Lead Local Flood Authority, as opposed to Main River fluvial flooding, the responsibility for which predominantly lies with the Environment Agency. Additionally, climate change uplifts have been applied to the 1% AEP event, based on the allowances set out in the main report.

These datasets were used to identify clusters of properties at risk of surface water flooding. The approach used to identify these clusters is set out below:

1. National Receptor Dataset 2021 (NRD) was used to identify all properties. The Multi-Coloured Manual (MCM) codes within the NRD were used to identify residential and non-residential properties. Non-residential properties were further classified into types of property (emergency services, education, utility services, transport, offices, commercial and retail). A sensibility check of the NRD data was done compared to OS mapping.
2. Building footprints were extracted from OS MasterMap data for each NRD point identified within step 1.
3. Building footprints were screened against the RoFSW datasets and all NRD points where the flood risk intersects the building footprint were extracted. This was undertaken for each of the three RoFSW return periods (3.3%, 1% and 0.1%) plus two climate change uplifts (1% AEP + 30% and 1% AEP + 45%) individually, creating five sets of data.
4. The NRD point for each property at risk of flooding within each dataset were buffered by 50m (to create a 100m diameter circle around each point).

5. The NRD buffers within each dataset were merged together where they intersected to generate clusters of properties at risk. Clusters with fewer than three properties were then discounted to avoid skewing the prioritisation towards individual properties in rural catchments, where there will be less opportunity schemes to be undertaken due to lower cost-benefit ratios.
6. To generate an individual 'risk score' for each WFD catchment and return period, the total number of properties within all the clusters (containing three or more properties) in a catchment was divided by the total number of clusters in each catchment (the average number of properties per cluster within a catchment).
7. To give greater weighting to locations susceptible to more frequent flooding, the individual 'risk scores' for each Annual Exceedance Probability (AEP) was combined to produce an overall prioritisation. This was achieved by multiplying the individual "risk scores" for each AEP by their AEP and then adding them together. i.e. the 3.3% AEP averages were multiplied by 3.3, the 1% AEP averages (an average of the 1% AEP, 1% AEP + 30% CC and 1% AEP + 45% CC) multiplied by 1 and the 0.1% AEP averages multiplied by 0.1.
8. Finally, the primary prioritisation scores were normalised by dividing the score for each WFD catchment by the maximum score – giving a score between one and zero for each WFD catchment.

WEIGHTING

Once the initial prioritisation of catchments was generated, the secondary datasets were used to adjust the weightings of the catchments to consider the impact other sources of flooding and historic flood records may have on the prioritisation of catchments. This allows catchment priorities to be influenced by existing (verified) flood risk information and potential for partnership working as a result of flood risk from multiple sources.

A weighting was applied to normalised flood risk score for each of these datasets within each WFD catchment based on the following information:

- Historic Flooding: derived from information provided by Kirklees Council as part of this study and the number of properties in the Environment Agency Historic Flood outlines **[0.5]**
- Number of properties in Flood Zone 2 (normalised) **[0.2]**
- Number of properties in Flood Zone 3 (normalised) **[0.2]**
- Number of properties in the highest risk (Zone 3 and 4) of the JBA groundwater map (normalised) **[0.1]**

For each secondary dataset, the score was normalised by dividing each WFD score by the maximum score – giving a score between one and zero for each WFD catchment. A weighting (shown in bold square brackets) was applied to each secondary dataset and then was added to the primary prioritisation score.

Strategic Theme	Ref	LFRMS Strategic Measure	Geographical Area	Key External Partner(s)
PLACE	1	Engage early with spatial planners and growth strategies to ensure new development and plans make best use of land in making space for surface water, fluvial water, sustainable drainage systems and promote the use of adaptive pathways to adapt to climate hazards. Share our understanding of flooding in the area to avoid inappropriate development.	District wide	Developers, Consultants
PLACE	2	Work with the Local Planning Authority, Highway Authority, Environment Agency and water companies to ensure the planning process and development design account fully for land drainage and surface water managements issues. Ensure our practices secure sound management and maintenance regimes that are proportionate and appropriate to the flood risk in the area.	District wide	EA, YW
PLACE	3	As a Lead Local Flood Authority engage with others to advise on climate change allowances for sources of flooding from surface water, groundwater and ordinary watercourses. To share and inform others of current guidance, research and best practice on sustainability and water management to inform decision making.	District wide	Developers, Consultants
PLACE	4	Enhance our early engagement with developments and commit to targeted periodic inspections of new development to ensure compliance/enforcement with drainage planning conditions and Land Drainage Act legislation. Seek 106 contributions where appropriate and promote environmental net gain.	District wide	Developers, Consultants, Riparian Owners
PLACE	5	Improve our asset data on drainage assets within the district including highway gullies, culverts, carrier drains, debris screens and others to build our evidence base. Where considered significant make this publicly available.	District wide	Asset Owners
PROTECT	6	Identify and develop flood risk improvement schemes for Kirklees to reduce the risk of surface water flooding and flooding from ordinary watercourses to better protect properties and the highway network in high-risk areas. Be open to new financing models. Promote a range of resilience actions and climate change scenarios.	High risk catchments	YW, EA, Landowners
PROTECT	7	Improve the awareness, understanding and delivery of Property Flood Resilience measures to manage local flood risk within our communities. Encourage homeowners and business owners to undertake Property Flood Surveys and seek grant funding to support resilience measure installations to support a build back better approach.	District wide	EA, Suppliers
PROTECT	8	Work with our partners, learned institutions, communities to develop integrated solutions and maintenance programmes to deliver multiple benefits to reduce flood risk and look to improve economic, social and environmental benefits. Be innovative in our approach.	District wide	EA, YW, Universities
PROTECT	9	Engage with catchment partnerships and landowners to embrace land management techniques and natural flood management to help to manage surface water runoff. Seek out opportunities to use Working with Natural Processes in managing flood risk to promote multiple benefits such as environmental net gain.	District wide	Local Partnerships, River Trusts, Landowners
PROTECT	10	Support the severe weather incident management function the Council undertakes through technological advancements to ensure it is an intelligence led approach.	District wide	Suppliers
PROTECT	11	Maintain assets based on a risk-based approach to ensure high flood risk assets are prioritised and allowances made for climate change projections are considered. Try new technological approaches. Assess which Council assets require capacity improvements as a last resort.	District wide	Suppliers
RESPONSE	12	Provide intelligence to ensure policy frameworks and emergency plans are robust. Work with other services to establish the basis of the Council's response to severe rainfall events in supporting communities.	District wide	Local Resilience Forums, Met Office, EA
RESPONSE	13	Work with the local communities and landowners to increase their awareness and preparedness for flooding in Kirklees to improve flood resilience in homes, businesses and communities through education campaigns with our partners. Enhance our online content to deliver a one-stop shop.	District wide	Local flood groups
RESPONSE	14	Encourage flood community action groups to be set up in key areas of flood risk and through this work, in conjunction with partners, provide a higher standard of community led resilience by developing a network of community resilience leads.	Known flooded places	Parish Councils, Local Flood Groups
RESPONSE	15	Ensure flood risk management actions reach out and remain inclusive in our approach within our diverse communities and areas of deprivation.	District Wide	Communities
RESPONSE	16	Establish and maintain a Communication Plan in line with national and other Council services to provide coordinated and timely information to communities at flood risk.	District wide	Various
RECOVERY	17	Provide follow up recovery support and advice to residents, business owners and communities that have been affected by flooding on funding, wellbeing support and signpost to affordable flood insurance to help them recover quicker.	District wide	EA, Flood Re

RECOVERY	18	Investigate flood incidents of all sources and establish flood outlines with our partners to validate existing flood models to help inform future grant fundings and flood risk management projects.	District wide	EA, YW
RECOVERY	19	Work with Partners and health bodies to ensure mental health impacts from flooding are factored into long term recovery planning.	N/A	Local health services, charities
RECOVERY	20	Support Review Briefings and feedback learning from communities to inform our plans and policies to ensure a more efficient and effective response in the future.	N/A	Local Resilience Forums, Local Flood Groups

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Appendix 2 to Overview and Scrutiny Management Committee Report (5-12-23)

Kirklees Council Local Flood Risk Management Strategy

Summary Report
2024



KIRKLEES LOCAL FLOOD RISK MANAGEMENT STRATEGY

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INTRODUCTION

There are over 35,000 properties currently at risk from surface water flooding in Kirklees, and 9,000 at risk from main rivers in a 1 in 1000-year rainfall event. These numbers will rise in the future due to climate change. This Local Flood Risk Management Strategy (Local Strategy) for Kirklees sets out how Kirklees Council addresses and will address these risks in the future with a targeted Flood Risk Action Plan, the management of local flood risk and how it undertakes its flood risk management responsibilities that are a statutory requirement of the Flood and Water Management Act (FWMA) 2010.

This Local Strategy will replace the current strategy which has been in place since 2012.

Our Local Strategy is aligned with the National Flood and Coastal Erosion Management Strategy¹ and the latest guidance and legislation. Our Local Strategy will encourage more effective risk management by enabling local communities and business owners to work together to:

- Balance the needs of the community, environment, and economy.
- Enhance and extend our partnership working between Kirklees Council and other key stakeholders (e.g., charities, community groups, Parish Councils, and health bodies).
- Improve community awareness of flood risk, respond to their expectations and their priorities.
- Ensure a clear understanding of local flood risks and prioritise high risk catchments and communities.
- Encourage innovative flood risk management techniques.
- Support the development of emergency plans and make sure responses to flood incidents are effective and that communities are better prepared.
- Support communities to recover more quickly and effectively after major flood incidents. Research carried out by the University of York and the Centre for Mental Health reported that the risk of longterm mental health problems was up to nine times more likely for flood victims compared to those who had never experienced flooding².
- Enable continued learning to ensure we remain progressive.

A Flood Risk Action Plan has been developed that sets out measures for the council and key partners to help achieve the themes in the Local Strategy. The Kirklees Local Strategy will continually develop as new evidence, expertise and resources influence flood risk management in the district.

It is important to note the strategy intends to mitigate the impact of flooding with a focus on properties, but it recognises that it cannot prevent flooding. The challenge is here is a global one, in addressing climate change, and is outside the scope of this strategy.

¹ [National Flood and Coastal Erosion Risk Management Strategy for England. Environment Agency. 2020](#)

² [University of York | January 2021](#)

The Local Strategy is supported by six key objectives for managing flood risk and increasing resilience:

1. Evidence - We will enhance our strategic understanding of flood risk from local sources, both in the present day and in the future considering new data, studies, research and science in climate change impacts for Kirklees.
2. Communities - We will work with communities and businesses to raise greater awareness of present and future flood risk through engagement, support and education to help them to become more resilient to future flood risk.
3. Adapt - We will work to implement adaptive approaches so we can continue to keep our natural and built environment resilient in response to a changing climate.
4. Sustainable - We will contribute positively to sustainable growth and support environmental net gain by influencing development and regeneration plans to deliver flood risk benefits, which will benefit society and the local economy whilst enhancing biodiversity in promoting measures that work with the natural processes of our catchments.
5. Partnership - We will work with all risk management authorities and stakeholders to achieve a consistent, coordinated and catchment-based approach to flood risk management.
6. Innovation - We will seek opportunities (including funding, technological, research) to be innovative and try new approaches in making communities resilient to flooding now and in the future.

FLOOD RESILIENCE AND ADAPTATION

Our Local Strategy considers resilience and adaptation to be a principal aim in supporting existing and new communities in dealing with future flood risk. Adaptation is about strengthening Kirklees' approach to adapting to climate change. It will reduce the potential impact that our changing climate, through flooding, storms, and higher temperatures, will have on Kirklees.

There are four key areas when managing flood resilience as shown below, based on the National Strategy³.

³ [National Flood and Coastal Erosion Risk Management Strategy for England. Environment Agency. 2020](#)

PLACE MAKING

IMPROVE PLACE MAKING:
MAKING THE BEST LAND USE MD
DEVELOPMENT CHOICES TO MANAGE
FLOODING MD COASTAL CHANGE

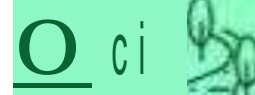
Communities, planners and land managers making the best land use and design choices for development and infrastructure to manage the damages from flooding and coastal change. This includes making space for water to manage risk and support wider environmental benefits



PROTECT

**BETTER PROTECT: BUILDING
AND MAINTAINING DEFENCES AND
MANAGING THE FLOW OF WATER**

Sustained and long term investment in building and maintaining flood and sea defences ensuring they *provide* an appropriate standard of protection, operate reliably and perform as expected when exceeded. Better protection includes nature based solutions that manage the flow of water to reduce the risk of flooding and coastal change.



PLAN TO
ADAPT



RECOVER

**RECOVER QUICKLY: GETTING
BACK TO NORMAL AND BUILDING
BACK BETTER**

Helping people and local economies recover more quickly by clearing up the damages, returning water and power supplies or draining floodwaters from farmland. Recovery should also include building back better so that properties and infrastructure are more resilient to future events.

RESPOND

**READY TO RESPOND: PREPARING
FOR AND RESPONDING
EFFECTIVELY TO INCIDENTS**

Organisations and communities working together to prepare for and respond to flood and coastal incidents through timely and effective forecasting, warning and evacuation.

THEMES OF OUR LOCAL STRATEGY

Our Local Strategy establishes four key areas to focus our efforts in better protecting and supporting our communities against the risk of flooding.



Place making – to make our local places more climate resilient to flooding by considering land use in combination with flood risk. We will make space for floodwater, ensure buildings and infrastructure consider current and future flood risks including supporting the use of climate resilient local planning policies and avoiding inappropriate development in flood risk areas through spatial planning. We will ensure early engagement with developers in the pre-planning process.

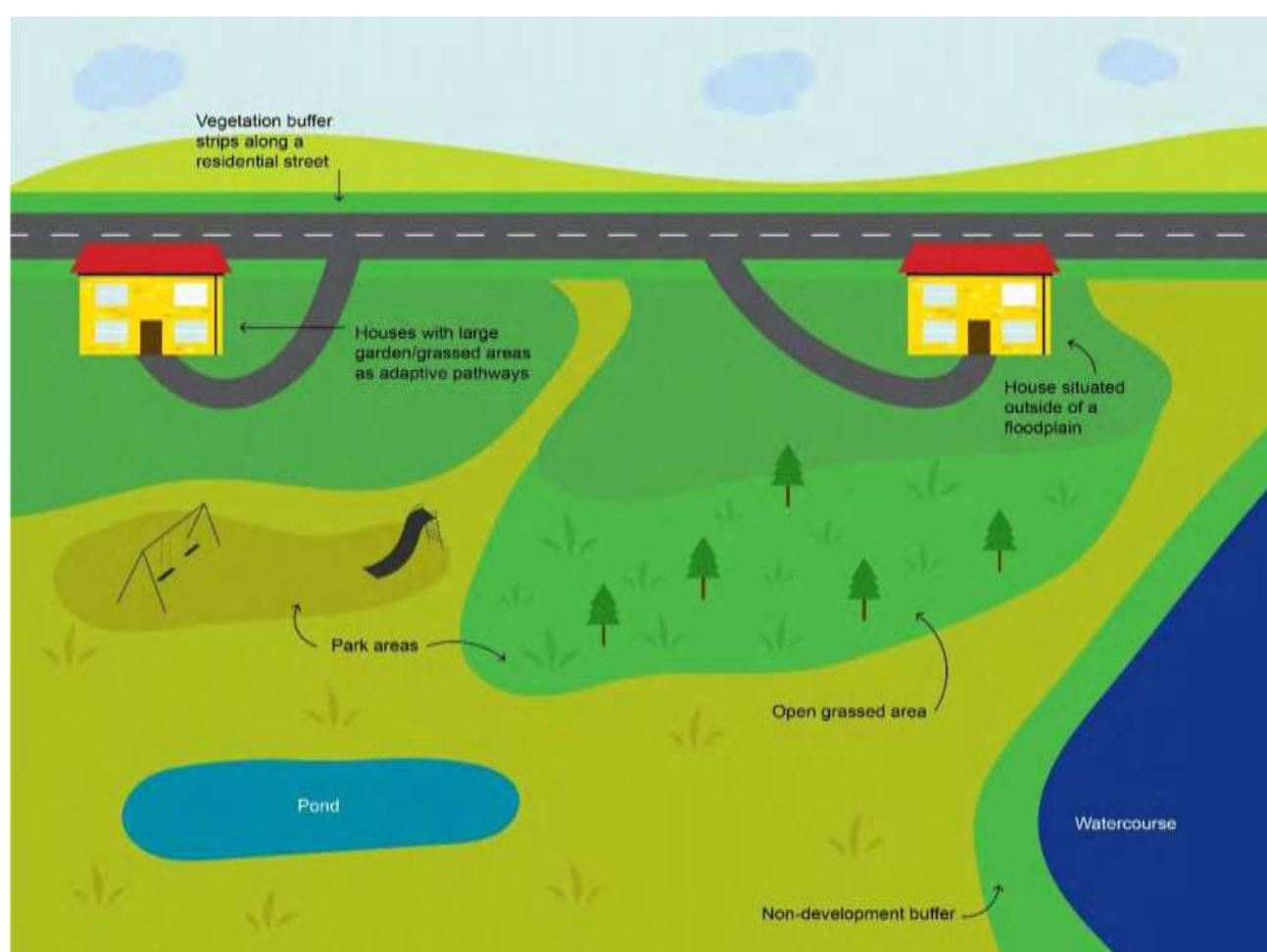


Figure 1-1 examples of place making



Protect – ensure our communities are better protected from flooding both now and in the future. We will support existing communities through implementing nature-based solutions in catchments such as utilising upland water storage, better planned land management practices, deculverting, blockage clearance of assets, construction of new defences, retrofitting to existing homes, businesses, infrastructure, and key services.

Natural Flood Management - maximising water retention, slowing the flow, slowing the rate at which water enters a watercourse, rainfall interception, floodplain restoration, gully blocking.

Environmental Land Management – government support schemes for landowners to alter their land management practices enhancing the local environment and provide flood risk benefits.

Adaptive pathways – allow communities to be agile to climate change where land use can easily adapt to future changes to the local environment.



Figure 1-2 examples of natural flood management

Property Flood Resilience – using various techniques to lower flood risk through the reduction of the impact of flooding on a property (e.g. installing flood doors).



Figure 1-3 examples of Property Flood Resilience techniques

Sustainable Drainage Systems (SuDS) – used in new development or retrofitted to existing development. SuDS manage surface water and runoff as close to the source as possible and should mimic natural drainage through infiltration and attenuation following the SuDS hierarchy.

Rural environment where 95% of water infiltrates into the ground and 5% runs off as overland flow.

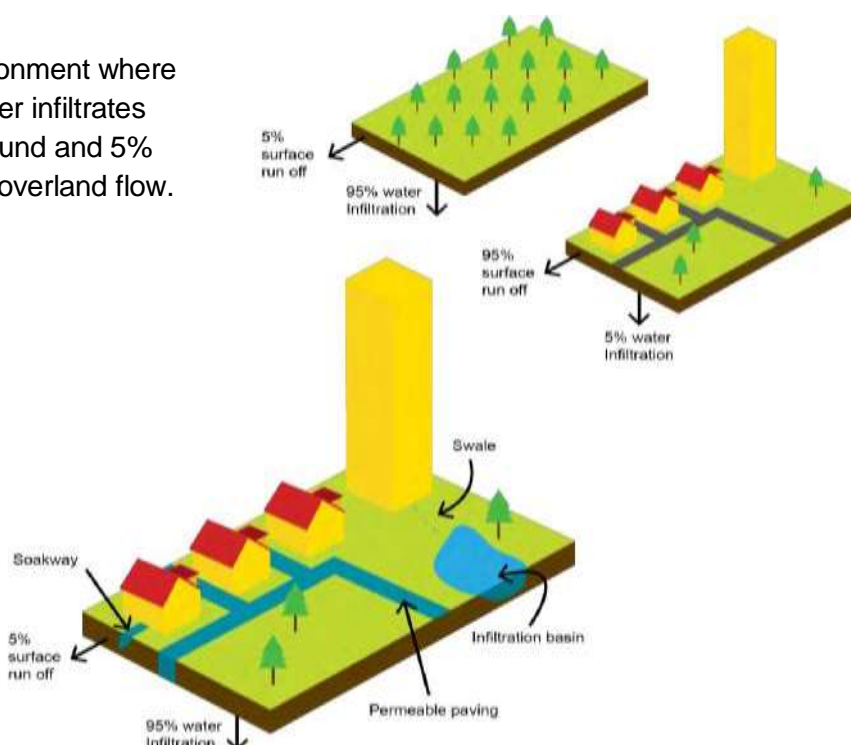


Figure 1-4 examples of SuDS techniques



Response – being adequately prepared to ensure we can better respond to a flood event. We will assist organisations and communities in ensuring they are adequately prepared for a flood event occurring, for example, through early flood warnings, emergency flood and evacuation plans, and education and training and to enable local community flood groups to become resilient.





Recovery – recovering quickly and effectively from a flood event. We will aim to provide post-flood event recovery support, signpost affordable flood damage insurance, support community wellbeing and implement a build back better approach. We will also aim to review and record flood impacts to increase intelligence and review flood risk assets.



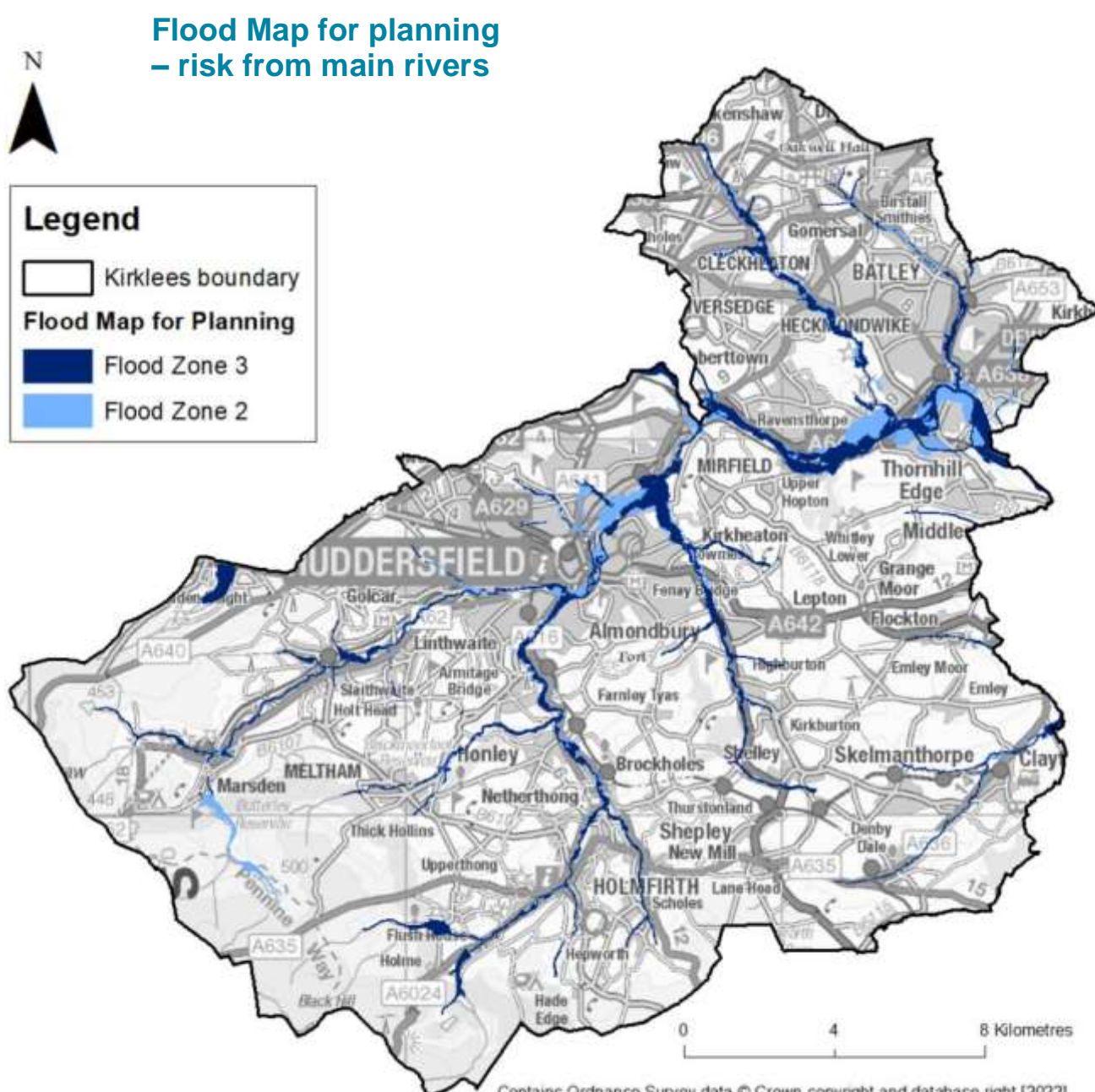
Figure 1-5 examples of responses to flooding

FLOOD RISK IN KIRKLEES

The principal flood sources in Kirklees include fluvial and surface water; the most common pathways are rivers, drains, sewers, overland flows; and the receptors include people, their property and the environment. Within the strategy we have considered the impact of all sources of flooding and historic flooding across Kirklees.

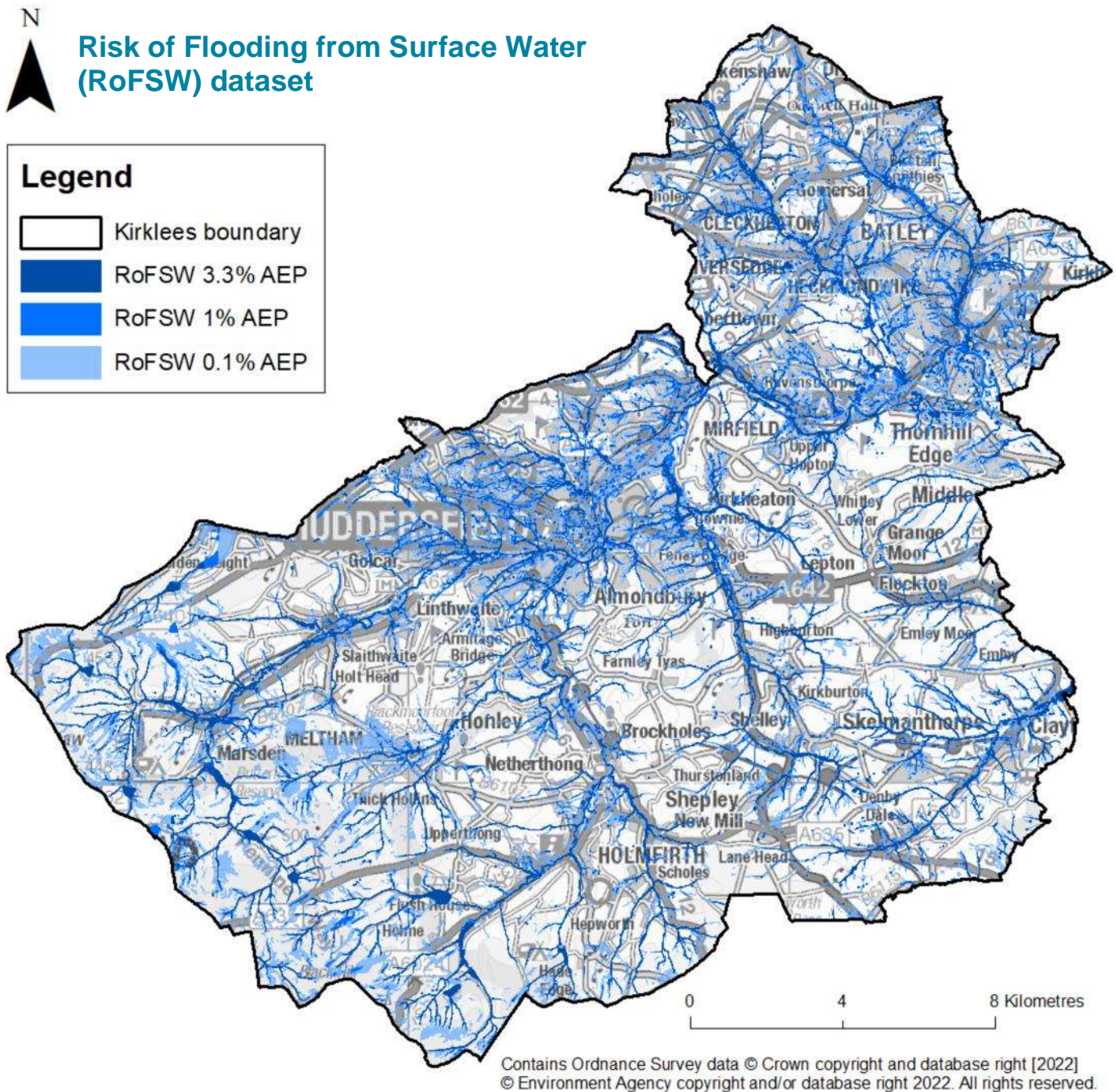
Existing Risk - Rivers

The map below shows the existing risk from main rivers in Kirklees.



Existing Risk – Surface Water

The map below shows the existing risk from surface water in Kirklees.



HISTORIC FLOODING

Kirklees has a history of flooding in many different locations from fluvial, surface water and sewer sources. Information on significant incidents of flooding is recorded by the EA and the LLFA.





Notable recorded historic flood incidents include:

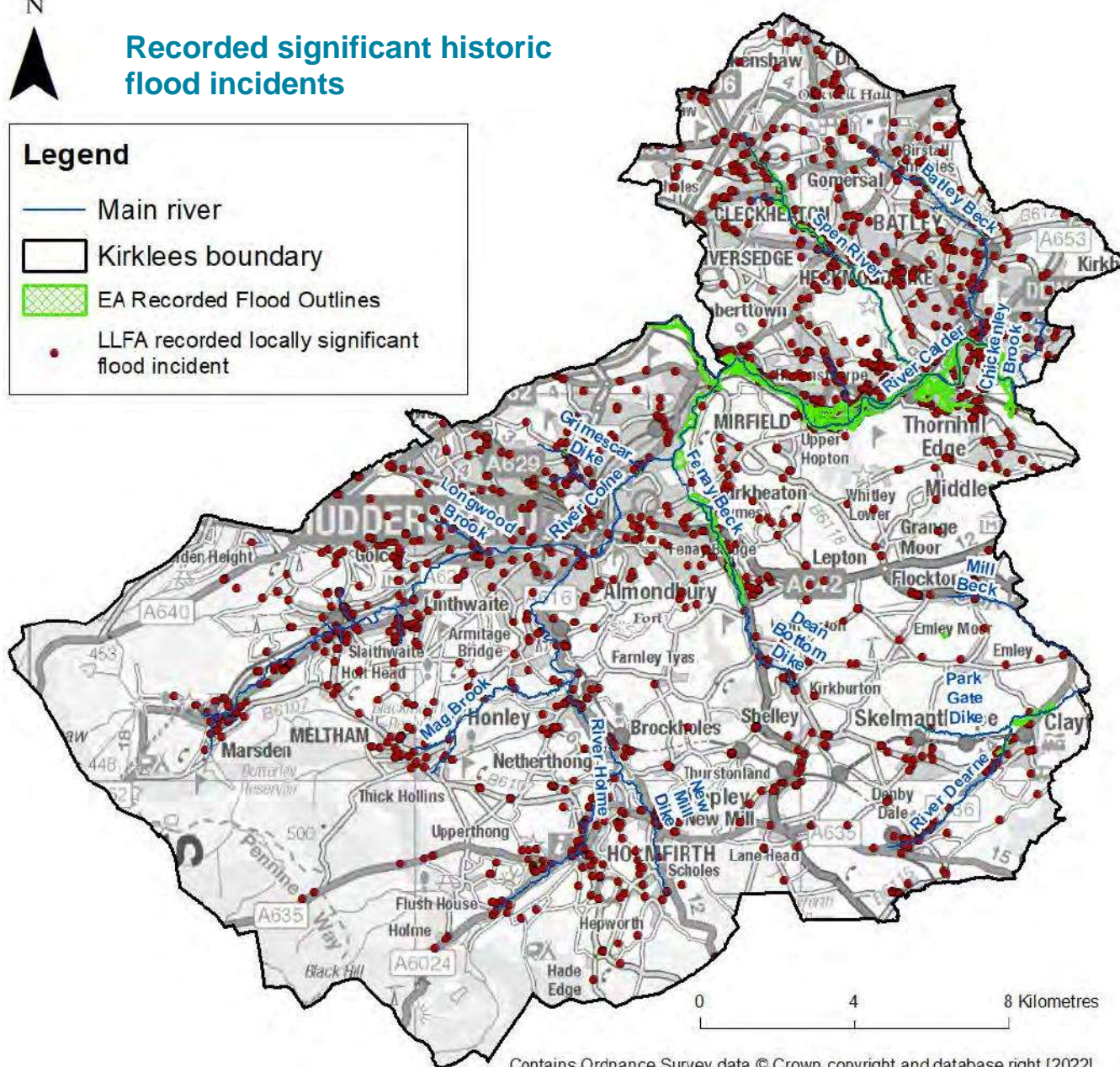
- February 2022 – Storm Dudley, Eunice and Franklin: triple storm week brought strong winds and rain to the district. A considerable number of internal property flooding was reported to both residential properties and businesses.
- February 2020 – Storm Ciara and Storm Dennis: channel capacity exceeded on main rivers, including the River Calder, and ordinary watercourses.
- December 2015 – Channel capacity exceeded on the River Calder upstream of Sands.
- June 2007 - Estimated 500 properties flooded due primarily to surface water where rainwater was unable to enter drainage systems due to design capacity being exceeded. The flooding was widespread across the district, but hotspots occurred around Ravensthorpe, Liversedge, Cleckheaton, Chickenley, Mirfield, Milnsbridge, Brockholes, New Mill, Denby Dale, Scissett and Clayton West.

The map below shows flood incidents, from any source, recorded as locally significant by Kirklees since 2007. These incidents include internal and external flooding of properties and businesses, and roads, footpaths and gardens. The major flooding events within Kirklees have mainly occurred around the main rivers: the River Colne, River Calder and Spen River.

Recorded significant historic flood incidents

Legend

-  Main river
-  Kirklees boundary
-  EA Recorded Flood Outlines
-  LLFA recorded locally significant flood incident



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CLIMATE CHANGE

Following on from the UK Climate Projections 2009 (UKCP09), the UK Climate Projections 2018 (UKCP18) delivered a major upgrade to the range of UK climate projection tools designed to help decision-makers assess their risk exposure to our changing climate.

The existing EA river models available in Kirklees are not up to date with the latest climate change allowances. However, it is clear from the allowances stated that climate change will likely have a significant impact on the district. The impacts of climate change are well documented and will have a significant impact on flood risk within Kirklees. Increases in duration and intensity of extreme rainfall events because of climate change will increase flood risk from multiple sources.

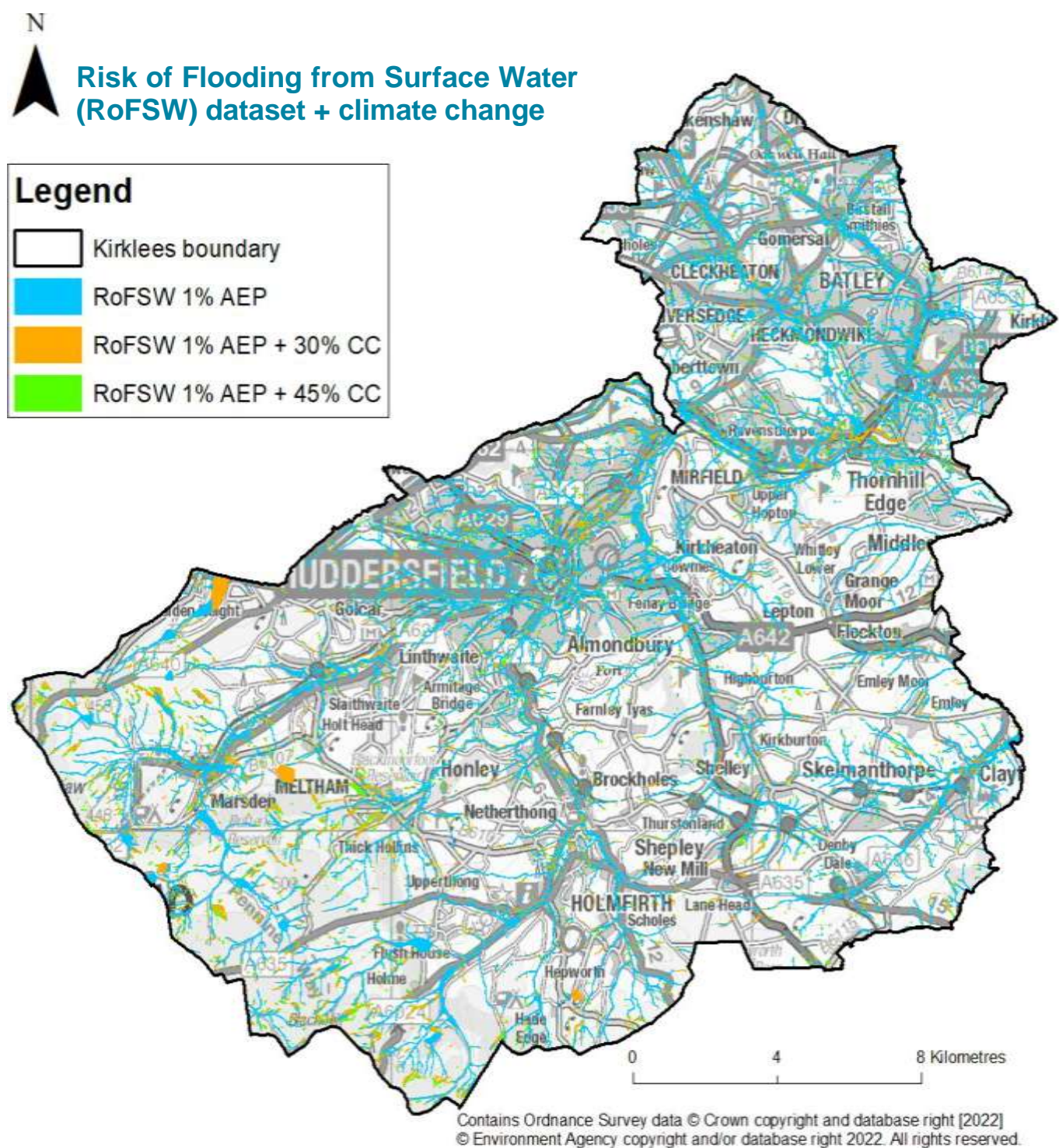
SURFACE WATER AND CLIMATE CHANGE

The impacts of climate change on surface water and for small scale drainage design, the Environment Agency updated their allowances for peak rainfall intensities in 2021 based on management catchments, provided in table below. The allowances are based on the high emission scenario of UKCP18, with the central allowance representing a 4°C increase by 2100.

Management catchment	Allowance category	Total potential change anticipated for peak rainfall intensities (based on a 1961 to 1990 baseline)			
		3.3% annual exceedance rainfall event		1% annual exceedance rainfall event	
		2050s (up to 2060)	2070s (2061-2125)	2050s(up to 2060)	2070s (2061-2125)
Aire and Calder	Upper end	35%	40%	40%	45%
	Central	20%	25%	25%	30%
Don and Rother	Upper end	35%	35%	40%	40%
	Central	20%	25%	20%	25%
Upper Mersey	Upper end	35%	40%	40%	45%
	Central	20%	30%	25%	30%

Peak rainfall intensity allowances for management catchments in Kirklees

The map below illustrates how the risk from surface water will increase with climate change in Kirklees.



FLOOD RISK MANAGEMENT ROLES AND RESPONSIBILITIES

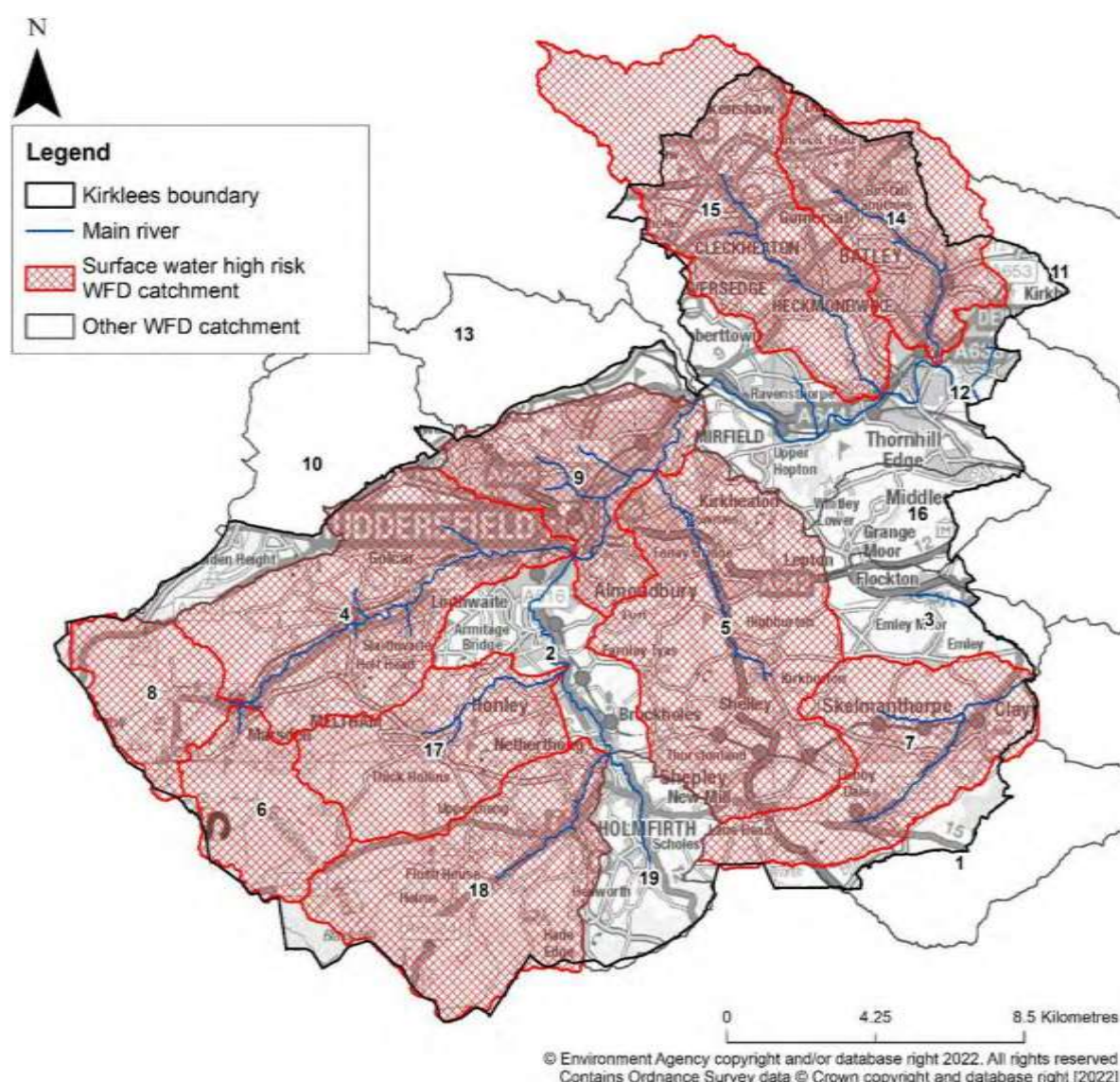
As a Lead Local Flood Authority, Kirklees Council's responsibilities relate to managing flood risk from surface water, groundwater and ordinary watercourses. In relation to Kirklees, other risk management authorities include:

- Environment Agency
- Water and sewerage companies – Yorkshire Water
- Highways Authority – Kirklees Council and National Highways



HIGH RISK CATCHMENTS

Kirklees Council has carried out a high-level strategic study into which are the highest risk hydrological catchments in the district based on surface water flood risk to existing properties and infrastructure. At a strategic level, this will help us to identify the communities within these high-risk catchments that may be in greatest need of action on flood risk management. These high-risk catchments are shown on the map below.



1 - Cawthorne Dyke from Source to River Deame
2 - Holme from New Mill Dike to R Colne
3 - Bentley Brook from Source to River Deame
4 - Colne from Wessenden Brook to R Holme
5 - Fenay beck from Source to River Colne
6 - Wessenden Bk from Butterfly Resr to River Coln
7 - Deame from Source to Bentley Brook

8 - Colne from Source to Wessenden Brook
9 - Colne from River Holme to River Calder
10 - Black Brook from Source to River Calder
11 - Chald from Source to River Calder
12 - Calder from River Colne to River Chald
13 - Calder from Ryburn Confluence to River Colne
14 - Batley Beck from Source to River Calder

15 - Spen Beck from Source to River Calder
16 - Smithy Brook from Source to River Calder
17 - Mag Brook from Source to River Holme
18 - Holme from Source to New Mill Dike
19 - New Mill Dike from Source to River Holme

FLOOD RISK ACTION PLAN

Together with the longer-term local strategic themes, we have also formulated a set of shorter term, measurable actions which formulate our Flood Risk Action Plan.

The action plan (see the full report) is to remain a live document and be continually updated as and when new measures and actions are defined, when new funding sources or delivery partners are found, and when the action has been delivered or a programme for delivery has been formulated. The strategy is to be in place for the ten years, during which the measures and actions in the action plan will be delivered.

The actions making up the Flood Risk Action Plan have been developed from the following sources:

- Rollover actions from the current implementation plan where still appropriate.
- Feedback and suggestions from stakeholders following the stakeholder engagement workshops carried out as part of this Local Strategy.
- The Humber Flood Risk Management Plan 2 (2021 – 2027) consultation responses on draft actions and measures included in the latest FRMP update.
- Identified high risk catchments and communities.

The measures listed within the Flood Risk Action Plan shows how it aligns with the following:

- Resilience themes:
 - Place making
 - Protect
 - Respond
 - Recover
- Local Strategy action falling within a resilience theme.
- Geographic areas where actions are required.
- Key delivery partners for delivering the action.

IMPLEMENTATION AND MONITORING

Our Local Strategy sets out the roles and responsibilities of the RMAs. In partnership with other RMAs and key stakeholders, we will use this strategy to guide our approach to local flooding issues across Kirklees.

The overarching objective of the strategy is to reduce local flood risk to residents, businesses and key infrastructure by increasing resilience in our communities. This will be achieved through the implementation of our Flood Risk Action Plan with a focus on nature-based solutions and helping

communities to be more resilient. The measures and actions will be delivered over the next ten years. The successful implementation of the strategy will be influenced by external factors such as funding and resource availability. Funding of capital works may prove to be a challenge, particularly where schemes must receive partnership contributions. Where appropriate, we will seek to fund schemes through multiple routes.

REVIEW

The Local Strategy will be reviewed and updated as and when required. The Flood Risk Action Plan will be reviewed annually to check that the measures continue to be appropriate and achievable. It should be noted that this strategy represents the current situation (at the time of publishing) based on current evidence base.

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Appendix 3 to Overview and Scrutiny Management Committee Report (5-12-23)

Kirklees Local Flood Risk Management Strategy

Engagement & Consultation Responses

Internal Council Workshop (03/08/2022) and (18/08/2022)

The comments below have been grouped to match the subheading theme.

Comments from stakeholders to support the development of the strategy:

Planning Policy

- The current SFRA was a joint document shared between Kirklees, Calderdale and Wakefield Councils. This was found to be a weakness and too broad.
- A suggestion was made that definitions used in the LFRMS are stronger and clearer. For example, the definition of a 'functional floodplain' should be clear and what this means for spatial planning and future development should be outlined as part of the definition. These definitions are important because they are strict in terms of spatial planning and link to Strategic Flood Risk Assessments (SFRAs).
- It was proposed that the sequential test process needs to be clearer within the strategy. Future SFRAs should be a strengthening tool to be clear on which site allocations can be approved. The next SFRA should put a greater focus on using the functional floodplain as a tool to restrict development in areas of flood risk. Any development that comes forward within Flood Zone 3 should not be permitted.
- The NPPF has been updated to include all sources of flood risk within the sequential test which means there is now stronger wording to be used within planning to avoid development in areas at risk of flooding.
- There should be a greater focus on avoiding risk rather than mitigating risk. For example, making it clearer what the functional floodplain is and what this means for development (e.g., preventing any development on functional floodplains will help to avoid rather than mitigate risk). To achieve this, the LFRMS should look at strategic land use and how to safeguard land from development in flood risk areas.

These comments have been noted when the SFRA will be revised. The local strategy has now a dedicated theme on Place which focuses on best land use taking flood risk into consideration.

Natural Based Solutions/SuDS:

- Areas with the potential for natural flood management should be looked at to be allocated for safeguarding.
- In terms of environmental protection, Nature-based solutions such as tree planting should be incorporated into the strategy. A further suggestion for managing drainage was to use hard features such as resurfacing for temporary storage solutions in areas such as parks and playgrounds. There have been successful examples of this throughout the county already.

- The strategy should encourage developers and the council internally to incorporate SUDs into local developments. Nature based solutions should be encouraged at development stage rather than retrofitting, as the problem with implementing them within the council is having the resources to maintain them. An idea proposed implementing SUDs on roundabouts, however the drawbacks with regards to funding and approval was highlighted as people need to be invested into larger scale projects.
- A suggestion was made to research Sheffield's Greater Green project. This could be useful in advising Kirklees LFRMS.

Nature based solution and Natural Flood Management has strong presence in the new Local Strategy. SuDS and a water hierarchy for the disposal of surface water are already embedded within the Council's current Local Plan LP28 and LP34.

Community resilience

- Empowering communities – important as council departments are becoming less resourced, communities need to take ownership, be more prepared and aware.
- Improve clarity and communication between the council and communities to ensure roles and responsibilities during flooding are clear. This could incorporate sharing ideas of what the community/resident could do for themselves.
- Community groups and flood wardens are important to prepare and respond. Look at what existing flood groups there are in Kirklees and encourage more to be set up.
- Encourage the set-up of flood stores storing flood kits and temporary defence equipment for residents to use and deploy themselves during a flood event without being reliant on the council to come and do this for them.
- Flood groups create local flood plans to prepare and plan the response. Flood groups could organise annual flood exercises where they can rehearse their response to flooding.
- Flood groups can identify shelter and evacuation sites as part of the community plan.
- Encourage individual flood plans – this links to empowering the community and individuals within the community.
- Involve flood wardens as part of consultation for the LFRMS.
- Flood warnings can be short notice and this results in it being challenging for the council to find volunteers in time to go and help communities with deployment of temporary defences. Therefore, having flood groups who have a community plan which has been tested will enhance resilience and preparedness even when warnings come with a short lead time.
- Flood Groups can identify vulnerable residents within a community to ensure there are volunteers to help with deploying sandbags/PFR and evacuating vulnerable people from their homes.

Community Resilience is now a key strategic objective with new Local Strategy and measures have been identified in the Action Plan to look at the initiatives that have been proposed. The new Local Strategy now include themes around Response and Recovery.

Engagement

- Use of social marketing techniques to target areas of a community. Need to target different members with different marketing techniques.
- Public consultation
- Previously, school visits were undertaken by the emergency planning department. This would entail a resilience lesson and demonstrations of flood kits to children how to prepare for flooding. The aim was to improve resilience through education and encourage the children to share what they had learnt with their parents. Leaflets were also provided to the children to take home.
- A suggestion was made to raise engagement from a water safety perspective and link this with engagement in schools. This is because a high number of 999 calls in Kirklees are due to accidents in open water and this could link with flood water which can be deep and fast-flowing.
- The council could attend community events such as country shows and village fetes. At the event they would have an information desk and give out leaflets to increase awareness of flooding and how to prepare and respond.
- Education is key to improving resilience.
- Leaflets and handouts could be developed to improve community preparedness.

As part of the development of the new Local Strategy a public consultation was undertaken. The measures identified within the Action Plan will consider the suggestions made around leaflets, education campaigns at school with our partners.

Mental Health

- The council have Humanitarian Assistance Centres and are commonly used for flood response, these are both virtual and physical sites. The sites are activated when needed. Once activated a link is published online and this signposts people to where people can go. During smaller incidents it's just online and in larger incidents a physical site is set up.
- SWIFT (mental health group in the community). SWIFT provide mental health support and set up support hubs following incidents – an example was the Manchester Arena bombing.
- Many residents live in fear – this fear could be reduced by providing education, awareness and protection.
- Awareness and educating people how to be resilient and live with water could reduce worry for residents.
- People may have pre-existing mental health problems and experiencing flooding can make their existing condition worse. The flood may not be the primary cause of the mental health problem. However, a flood event can bring on PTSD.
- Flood groups are a good place to offer support to local residents. Groups offer a place to share experiences and help one another.

Mental Health has been included in the new Local Strategy and a dedicated measure is now included in the Action Plan to focus the Council's efforts around this important subject.

Technological advancements

- Surface water and flash floods – lack of flood warnings. Need technology for these flood sources.
- Option suggested for sensors to be placed in gullies to identify silt. Gullies are highlighted to be maintained and silt is removed so in the event of a flash flood water is able to drain away.

The new local Strategy has now a new strategic objective to be innovative to look at new research and technology advances. The measures listed in the Action Plan highlight the specific need to look at new technology.

External Stakeholder Engagement Workshop (03/10/2022)

Communities

- Will there be extra effort in terms of the most at-risk communities in Kirklees? Big differences in resilience and vulnerabilities within different communities.
- Finding communities affected that don't always speak up. Look to local leaders to engage so it's less of a top-down approach.

The Strategy has a strong focus on community resilience and the importance to engage. Will set up a dedicated community Workshop to discuss the new strategy approach those communities directly.

The local parish Councils will be approached and so will the business community areas that do flood will be directly written to. This will hopefully encourage the community to respond and share their thoughts on the new strategy.

Modelling

- Appreciate the issue with climate change scenarios in terms of how good the river modelling is and how this has been thought about in terms of flood risk issues. How good are other sources of modelling?
- No mention or reference to the Canal & River Trust (CRT) or the canal and navigations within Kirklees. Can have a big impact on water transfer within Kirklees. If it's not accounted for then flooding could impact places you wouldn't have expected.

All available EA models were made available for the Strategy. However, we have no information on any targeted updates to these models. We will request a list on those models and if there are any to be updated with the new climate change scenarios in the future is considered within the Action Plan.

The surface water flood map was produced by our consultant so have easily been able to run climate change modelling. The EA is currently updating the surface water flood map which will be far more

representative and more robust. We will consider making an update once the new surface water flood map is released.

CRT agreed to send data through.

General

- Strategy seems to be covering the main themes – thinking about the capital programme, how is this going to be incorporated into the strategy?

The Action Plan identified strategic measures around the Protect Theme and does include a specific measure in developing a capital programme(s). The Action Plan will be annually monitored for progress.

Planning

- Interested to see the planning objectives to define the action plan. How is this going to shape the strategy? We often notice hotspots in terms of volume of planning applications and permits. The strategy needs to point to the permitting and planning guidance to reach those communities.
- One of the key policies used for planning is the SFRA. How does the strategy work with the SFRA? Is there any plan to update the SFRA?

There have been some discussions on updating the SFRA. The SFRA and LFRMS will be aligned if and when the SFRA is updated. Climate change modelling will be carried out as part of the SFRA if the modelling is up to date.

There is a section within the Strategy highlighting EA responsibilities. We have included more signposting to EA policies and guidance to direct people to exactly what they need to be doing in terms of planning applications.

Nature Based Solutions

- Good to hear the commitment and the awareness that you've got your own nature-based solutions because quite often flood risk strategies focus very much on the short-term solutions, often hard engineering, massive budgets, etc. and don't always deliver. What we're learning now is that perhaps previously regarded ideological solutions around nature-based solutions and natural flood management actually offer a lot of longer term pretty robust solutions. Interested to hear about the agenda in the in terms of building the partnerships, the mechanisms to deliver this going forward. Obviously, this is an immediate issue, this is something we need to work together on together. Fairly fortunate in the area that you have got quite a lot of expertise with some of your stakeholders who are NGOs including ourselves and the CRT. YWT supportive of anything that does develop.
- Recently had a farmer's event in Kirklees – branching out relationships with landowners. Calderdale Council have had a NFM grant recently and had quite a big uptake with farmers after doing confidential surveys on their land and building up relationships with them. Could this help further down the line? Farming team could support on this.

NFM is a big theme within the Strategy. We are securing funding for NFM mapping within Kirklees. the Strategy focuses on implementing nature-based solutions.

One of the main aims of the Strategy is developing partnerships and collaboration. Taking a catchment-based approach to managing flood risk. NFM is becoming more important and building its momentum is something we will do. However, people want immediate solutions which is difficult to achieve with NFM. We have looked to bridge that gap within the Strategy. A 'now solution' is Property Flood Resilience which is a key part of the Strategy. The Strategy is a combination of immediate responses and longer-term strategies. Longer-term strategies, such as NFM, will make for the big wins in terms of reducing the impacts of climate change on flooding and carbon sequestration.

General Stakeholder Observational remarks:

- 'Our future landscape strategy' looking at NBS as a whole within the Upper Colne and Holme.
- West Yorkshire wide partnership which came about as a result of a bid to the innovative resilience funding from Defra last year.
- Fire and Rescue Service - There are local Kirklees flood plans in place, however these are quite scant as risk is perceived as being quite low.
- Fire and Rescue Service - Deliver different sorts of education packages around water safety. Fire and rescue would be happy to support any initiatives.
- National trust has local volunteers that might be able to support in recovery and incident management.
- Yorkshire Water - has a whole education team that go into schools. Yorkshire Water have a lot of virtual assemblies with schools. YW happy to be involved and happy to stay involved in engagement.
- Department for Education funding – trying to apply for funding for SuDS for some schools to incorporate that into lessons and assemblies.

Public Consultation Workshop (07/09/2023)

8 public attendees

Land/Development

People who own the land should also be communicated with, e.g., major developers and landowners. Focus on landowners that are contributing to the flooding not just the communities that flood.

We have included for this in the Strategy and agree this is a positive idea that will be taken forward with the Strategy through a specific action in the Action Plan.

How can the Council influence the Planning Enforcement function?

Planning Enforcement is undertaken when considered reasonable to do so. We will include further emphasis on this in the new local Strategy .

Resident's home has flooded. Using natural flood barriers and attenuation tanks is not good enough. Need to stop building on green land. What can be done to support this view?

A multi-faceted approach is required to look at how we can work using many different methods to prevent flooding. The new Local Strategy recognises the importance of land use around flood risk, supports the appropriate use of land and encourages to work with developers and landowners.

Resident is supportive that the strategy is looking at health and wellbeing of flood victims around mental health and tree planning (i.e. NFM) associated work in and around the area to help mitigate flood risk.

Resident shared experience around a recent PFR grant initiative (e.g. pumps) as to not be very effective. In the case of the example there is nowhere to pump the water to.

Resident keen to encourage work to be done around planning of new developments not to increase flood risk to homeowners.

Resident: Were Developer's invited to this meeting?

The comments have been noted and feedback is helpful. Developers were not invited as this meeting is for residents. We have edited our new Strategy to include for engagement with landowners and developers whose roles can be important in managing and reducing flood risk in high-risk areas.

Comments made on the Concept Board

Noted on concept board 01: Keeping the lines of communication open and listening to those who have experienced flooding. The Council needs to know how the water enters residents' homes. i.e. we have already learnt a flood gate on the door does not work as the water goes into the foundations and up through the floor.

Noted on concept board 02: Solutions like a flood gate / pump would not work in our environment as water comes through the floor and we are at the lowest point and nowhere for the flood water to

be pumped to. We need to understand there is not a one size fits all approach and understand the differences between areas that flood and discuss viable options.

Noted on concept board 03: holding estate management agencies to account if not keeping up with maintenance.

The comments and feedback have been noted. It is accepted that know all flood risk mitigations works are appropriate for every property. We have included in the new Local Strategy to work with existing landowners around their maintenance requirements.

Online Questionnaire Responses

This report was generated on 26/09/23. Overall, 24 respondents completed this questionnaire. The report has been filtered to show the responses for 'All Respondents'. A total of 24 cases

Answers to Council questionnaire available from 24/08/2023 – 18/09/2023

Has your home ever been flooded? (24 responses)



Has your business ever been flooded? (21 responses)



Why is a local flood risk management strategy important to you? (17 responses)

- My village in Slaithwaite gets flooded at the bottom of Crimble.
- I am a local resident, from Mirfield where the River Calder has flooded exceptionally over the last 10 years, whereas the Calder may have flooded 3 or 4 times at the most in the 80s/90s. I currently reside in Huddersfield now local to the river Holme. What I have consistently noticed in the 5 years of walking on Woodhead Road is that virtually every drain is /was blocked. So when you have a downpour what happens, all the runoff from Castle Hill travels along and down roads, not down drainage, creating dangerous driving conditions on untreated surfaces contaminated with leaves/mulch in some areas, not only bad for driving, or erosion of walls, but can give way to subsidence of the road itself if not managed or maintained correctly. Pedestrian walkways can be flooded over, including pedestrians getting soaked because of transport driving through flooded areas or standing puddling water. Perhaps if certain members of the Council were to walk instead of using vehicles, they possibly might take note and raise these points through meetings with appointed members. Also, behind Huddersfield University, from Jones's Pie towards the bottom of Newsome Road and the road where TopTaste Takeaway is located, so that is both sides of the River Colne, the drains are blocked, so quite regularly an odour of feces or fecal matter is prevalent whilst in that area. What does this suggest? As a normal pedestrian who regularly walks everywhere notices this on a regular basis, and nothing seems to be done on how to eradicate these problems, yet probably nobody has brought it to the attention of Kirklees Council. Personally, I don't know who is responsible; Kirklees Highways or Kirklees Council or whom to approach. I think very recently Woodhead Road has had some drains unblocked due to local flooding into some of the properties adjacent on Woodhead Road, otherwise once again it is overlooked, not reported, or it is not cost effective or not in the budget for whoever is responsible. Whoever manages drains, planes, flooding etc needs to carefully risk manage the whole system. 3 key rivers Holme, Colne, Calder flow towards Mirfield,

Ravensthorpe and Dewsbury. Perhaps by doing something proactive now, you can prevent serious disruption or failures in the future for all concerned.

- My post round is in an area prone to flooding and I see the devastation it causes.
- I live on Holmebank Mews in Brockholes and less than 100m from the River Holme.
- We live in a High Flood Risk area and are stranded by being cut off from all amenities when river flooding occurs.
- Fenay Bridge - Rowley Lane floods annually. Beldon Brook Green also floods and the council is ploughing on with a development on green belt land which will increase flooding on Rowley Lane and Penistone Road and surrounding roads and properties.
- Flooding disrupts people's lives long after the flood has passed.
- It floods every time it rains heavy. Right up to the door! When it drizzles the road floods, even in light drizzle. But heavy rain = flooding to the door!
- Because I live here and flooding is an issue.
- To enable continuity of daily activities to a good standard. To promote life.
- The council needs to stop building houses as our drainage system cannot cope. The council are to blame not climate change. Every planning permission should be carried with a report on can the drains cope. Not just where the buildings are but further down.
- I live in Kirklees and the level of flooding, together with construction on/poor use of floodplains is increasing. There is virtually no evidence of drainage clearing or flood prevention in Kirklees.
- To avoid extensive damage to premises, machinery, stock etc. To avoid another insurance hike and to avoid business downtime.
- To incorporate drainage away from our cellar. At times it has been 4feet deep. We have had sump pumps installed however these only seem to last a few months. We also have a backup power supply as when there is an electric cut out the pump stops working and we switch to the backup power which lasts about 2 hours. Prior to 6 years ago Hill Top Road and Mount Pleasant Street were unadopted and water soaked away. It was only approx. 6 years ago when Kirklees tarmacked the roads that the floods started. After that the rainwater had nowhere to drain to as Kirklees did not incorporate any drainage, gullies or any other means of drainage away from the houses. We have lived in this house for nearly 40 years and had no floods until Kirklees tarmacked the road with no drainage. I have spoken to Highways numerous times. However, they have not remedied the situation. We even have a camera in the cellar so we can monitor the situation if we are away from home. The situation is always worse in winter with higher rainfall and snow. We have reached a point where we have had numerous sump pumps and electric backups. We cannot carry on like this as it is obviously causing damage to the property. Also, the electric switch box is in the cellar causing a definite risk to life. I shall be ringing the Highways Department again and writing to our local Councillors. We are now at a stage where we have done all we can. However, Highways have been of no assistance whatsoever. The last time I rang, a young man finished our conversation with the words "what do you want us to do, dig the road up again?" I.e. as it was before a muddy road. I will be in touch further in the next few days as we get older, we cannot put up with FLOODS caused by Kirklees work causing floods.
- On behalf of Meltham Town Council, the biggest flood risk in Meltham comes from the damage to and moving of traditional underground watercourses - often, but not exclusively due to inappropriate development. This, plus the fact that the rainwater drains, but many gullies are blocked leaving nowhere for the water to dissipate. Finally, the sink hole on

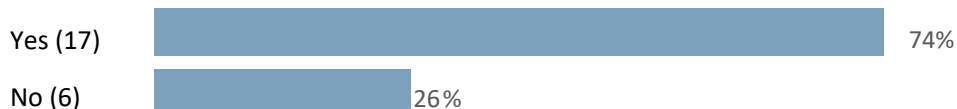
Wessenden Head Road has started to open up again, so we are all for a progressive local flood risk strategy.

- A few years ago, the Calder flooded our car park and nearly entered our building - which would have caused severe disruption and damage to my business. The only cost however was a day of my life getting rid of all that smelly mud which would have become a health hazard.
- We live on Fenay Lea Drive which is in a floodplain. We have come close to flooding numerous times but building thousands of houses down the valley will increase our chance of being flooded. Stop building on floodplains and take measures to reduce the chances of flooding on Fenay Beck.

Officers will aim to get some of the issues raised with the appropriate services to look into.

The Strategy includes for a multi-faceted approaches to managing flood risk for the short term and long term. The Strategy includes for introducing simpler communication channels to report incidents of flooding to the Council so we can look to take action. We have included within our Action Plan to engage early with spatial planners and growth strategies to ensure new development and plans make the best use of land in making space for surface water, fluvial water, sustainable drainage systems and promote the use of adaptive pathways to adapt to climate hazards. We will share our understanding of flooding with landowners and developers in areas at risk to avoid inappropriate development, as far as is possible.

Have you read the proposed local flood risk management strategy? (23 responses)



Do you agree with the approach in the strategy to make our communities more resilient to flooding both now and in the future and to enhance the environment for future generations? (23 responses)



The strategy has focused on four themes: Planning, Protect, Respond and Recover. Are there any particular areas of focus you felt that the strategy has not given sufficient attention? (18 Responses)

- For the protect and planning I think that road sweepers should be more available and the machines that suck the leaves and debris out of drains. All the drains are blocked up with rubbish and the surface water runs down the hills as it can't go into the drains.
- No confidence in the council flood authority standing by strategy when faced with major planning application being supported by council leaders.
- Clearing roadside drains to allow water to runoff.
- With recent heavy rainfall I have noticed that the drains in Brockholes are full of debris and mud/soil and do not absorb the rainfall. The drains need clearing out as rainfall runs down from the higher ground also. Kirklees drains in general are in a poor state being full of

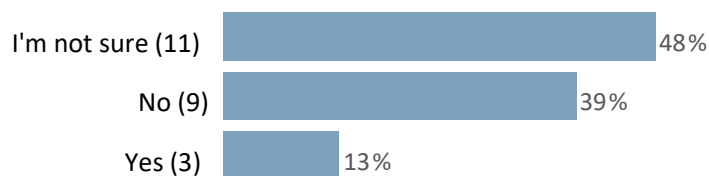
soil/mud and grass growing out of them. Clearing them and maintaining them will help with surface water flooding.

- New developments on high flood risk land, insurance, management of site evacuation.
- Building on green belt land will not support the short term strategy. Wake up!
- Although an excellent example of an academic approach, far more emphasis on practical and exact solutions being pursued should have been the approach.
- Preventative maintenance of road surface drains currently does not take place. This basic maintenance would at least ensure the current drainage system works. In Holmfirth it is common to see drains full of silt, usually at the bottom of hills. The excuse given is that cars are parked over the drains and the cleaners cannot gain access - not completely true - this problem needs to be addressed. Also, multiple agencies try to 'pass the buck' - it has taken over 2 years for the council / Yorkshire water to agree there is a problem on Goose Green and for YW to accept responsibility, unfortunately site visits took place when it was dry, so the underlying issue was not fully resolved, resulting in my having to get my local councillor involved. Why can't the statutory agencies just do their jobs and work together to address problems rather than deny and delay?
- Helping people that flood in unadopted roads. As someone who floods in drizzle, and right up to the door in heavy rain or prolonged rain, action needs to be taken where people are getting flooded in unadopted areas. Having flooded for 20 years and the council not caring one bit because it is unadopted, I am trapped on my road as a disabled person and the amount of damp due to this flooding is crazy!
- Clearing road gullies and general highways drainage.
- It's impossible for the general public to comment. Your summary is 20 pages long. As a professional individual, I'm not sure how you expect the general public to digest and understand this.
- Cleaning road drains and check they work. Removal of all loose debris on riverbanks and keeping them clear. Reinstate open drains / ditches by the roadside.
- It should not be allowed for excess water to be run into rivers without it been filtered. The council should be taking flooding into account before any planning is granted. Can Yorkshire Water cope? I can tell you no, they cannot. Kirklees council are to blame for flooding. They need to stop mass house building. It is NOT climate change.
- Dredging is only done as a reaction in 2007 after flooding. It should be done on a regular basis like it used to be but with all the cutbacks I don't think it will ever be done again and will just be blamed on climate change.
- Need more routine roadside gully clearing all year round instead of just before storm events.
- I need to know specifically what is being done to avoid another flood here, without having to read through 237 documents.
- Recover.
- On behalf of Meltham Town Council, the biggest flood risk in Meltham comes from the damage to and moving of traditional underground watercourses - often, but not exclusively due to inappropriate development. This plus the fact that the rainwater drains, but many gullies are blocked leaving nowhere for the water to dissipate. Finally, the sink hole on Wessenden Head Road has started to open up again, so we are all for a progressive local flood risk strategy.

We understand the issues of gully blockages and the need for increased maintenance. We have included for this in our Action Plan to improve our asset data on drainage assets within

the district including highway gullies, culverts, carrier drains, debris screens and others to build our evidence base. In terms of inappropriate development, Kirklees Council does everything it can to stop this we but can be overruled.

Do you feel the strategy adequately addresses the impact of climate change?

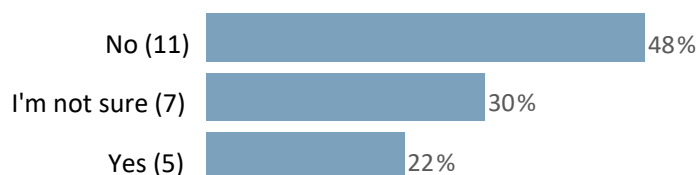


- Kirklees Climate commission is a tick box exercise by the council with no commitment to climate change or proper independent assessments of major planning applications.
- It can get worse, or it can improve. We all need fresh drinking water to sustain life. Treat it with respect. The systems are in place, ignorance leads to failures.
- If you know an area is at risk, then when heavy rainfall is forecast or occurs a local watch would help to protect the community especially when the River Holme is ready to burst. Keeping the river free of debris and fallen trees would also help. There is a fallen tree near Brockholes campsite that has been there since March and not removed.
- Too late in my opinion.
- Short term planning and building on green belt land will not help local communities.
- Weather forecasting!!
- You need better customer engagement - there is no way the general public will have any clue what this means.
- I think it should also link to a water shortage strategy as this is a real risk. Water collected during periods of heavy/excessive rainfall e.g. storm drains should be used for brown water needs (i.e. toilets) or for residents to water their gardens. I think this should be designed into all new properties through planning, amongst many other practical options.
- Stop building! STOP BLAMING CLIMATE CHANGE!
- There is a lack of future thinking evident; it appears to be simple crisis management.
- No comments as I don't have time to read through 237 pages of documents (equivalent to reading a book).
- Climate Change has been a massive in the last 12 months and will probably carry on.
- Removal over many centuries of most of the trees over the entire country is the cause of our present problems - we need more rewilding of our environment - less tarmac, concrete and buildings - and more vegetation.

Our Strategy is built around the central theme of resilience, including building community resilience to climate change. Climate change is a major threat to communities which is why we are looking to implement a long term approach to flood risk management. Our Action Plan identifies the need to develop flood risk improvement schemes for Kirklees to reduce the risk of surface water flooding and flooding from ordinary watercourses to better protect properties and the highway network in high risk areas. we aim to be open to new financing

the development of new and updated flood models whilst promoting a range of resilience actions and investigating the full range of climate change scenarios.

Community Resilience is a focus of the strategy, this is the capacity of people to plan for, better protect, respond to, and to recover from flooding. Do you think you would volunteer to support community type work in your area?



How would you want to do this?

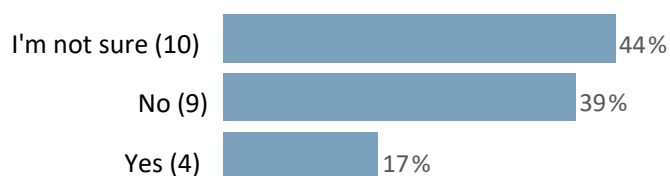
- Through a locally based & organised group

What would potentially stop you getting involved?

- I am a single mother who works full time and cares for my elderly father.
- Dodgy planning decisions.
- Bureaucracy.
- Helping people that flood in unadopted roads. As someone who floods in drizzle, and right up to the door in heavy rain or prolonged rain, action needs to be taken where people are getting flooded in unadopted areas. Having flooded for 20 years and the council not caring one bit because it is unadopted, I am trapped on my road as a disabled person and the amount of damp due to this flooding is crazy! Noone would help on this unadopted road.
- Not understanding what you require.
- If the council failed to keep all road drains / ditches clear.
- It should not be up to volunteers. I pay extortionate council tax. They allow house building; they should deal with the consequences.
- Personal health issues.
- Whenever we have heavy rain or snow, we are too busy drying out our own flooded cellar.
- I am still involved in running my company full time.

There are a number of flood groups already in place in Kirklees. We are also appealing through the Strategy for greater community involvement to help each other to respond and increase resilience to flooding. Our Action Plan states we will provide follow up recovery support and advice to residents, business owners and communities that have been affected by flooding on funding, wellbeing support and provide signposting to affordable flood insurance to enable quicker recovery. We will look to work with Partners and health bodies to ensure mental health impacts from flooding are factored into long term recovery planning. We will support Review Briefings and feedback learning from communities to inform our plans and policies to ensure a more efficient and effective response in the future.

Do you agree with the overall measures that have been set to achieve the delivery of the strategy?



- Measures are fine but worthless if compromised by planning department.
- There are no specific time frames for clearing drains out or working with Yorkshire Water or the rivers authority to minimise flooding. Work as a team and co-ordinate your workforce. Clear out drains as a priority.
- Many ancient trees have been lost due to development.
- Appendix F is farcical. Where is the application of a SMART methodology?
- Helping people that flood in unadopted roads. As someone who floods in drizzle, and right up to the door in heavy rain or prolonged rain, action needs to be taken where people are getting flooded in unadopted areas. Having flooded for 20 years and the council not caring one bit because it is unadopted, I am trapped on my road as a disabled person and the amount of damp due to this flooding is crazy!
- It's not possible to understand what your strategy is.
- It isn't clearly stated that all existing highway drains and culverts will be cleared of the debris that has blocked them for years. This seems a necessary and primary action. I also think planning have a key role to play in requiring new access roads, drives, car parks, verges, laybys to be built out of the concrete with holes in that allows for plants to grow. This allows water absorption and benefits biodiversity.
- Stop house building.
- The measures are incredibly simplistic: altering the planning approach to avoid floodplain construction, widening and clearing drainage is only the start. Unfortunately, the plan does not even consider these.
- Needs more emphasis on quick wins such as clearing road gullies.
- I don't have time to read 237 pages of documents to find the strategy.
- Consultation with people who have been flooded.
- More work on routinely unblocking drains.

Do you have any comments on the strategic environmental assessment section in the strategy?

- It's too late once the trees are gone.
- I can't see where this is so I've no idea what it says. My feedback would be to stop building on the greenbelt.
- We need to protect our rivers and local ecology. Harsher penalties for people who pollute our rivers.
- The SEA in Appendix 1 is overwhelmingly vague and over-positive. It does not appear to factor in climate change and future planning impact. Unfortunately, it is therefore destined to fail.
- I don't have time to read 237 pages of documents to find the strategy.

Our SEA fully covers the standard requirements for a SEA.

Do you have any comments on the habitat regulation assessment section in the strategy?

- Habitat corridors already disrupted.
- Fenay Bridge and Lepton Great Wood will lose various animals from their natural habitat due to dodgy planning decisions devised by the council. Don't expect the existing community to help out when the council is compounding difficulties.
- I've no idea what a habitat regulation assessment is. Again, you're baffling the general public with words.
- Stop using our rivers as a dumping ground.
- I don't have time to read 237 pages of documents to find the strategy.

Fenay Bridge and Lepton Great Wood are not European Sites for Nature Conservation.

Protecting the green belt and flood plain: These are important principles to reduce flooding of local properties, as well as protecting biodiversity and ecological connectivity. Surely this principle is addressed/promoted more fully within the main body of the LFRMS? Developing on the floodplain was briefly covered in Table 7 of the HRA, where it was stated that: the focus of such development would most likely be centred around settlements and European Sites are likely to be protected, as the majority of European Sites within proximity to the catchment are in the uplands, away from hubs of development. Developing on a flood plain may force more flood water elsewhere on the floodplain. This could change patterns of sedimentation and hydrology. Floodplain connectivity is an important principle for flood risk management and enhancing biodiversity and ecological processes. Promoting it doesn't directly fall under the remit of an HRA, however.

Rewilding/nature-based solutions: Natural Flood Management measures are included within the LFRMS Action Plan. The HRA flagged that Natural Flood Management measures (particularly maintenance/construction related actions), within proximity to European Sites (particularly upland sites), have the greatest potential to have likely significant effects on the scoped in designated sites at Scheme Level-see non-technical summary. Again, promoting nature-based solutions doesn't directly fall under the remit of an HRA.

Sustainable drainage/removal of hard surfaces: The LFRMS includes the following measure: Engage early with spatial planners and growth strategies to ensure new development and plans make best use of land in making space for surface water, fluvial water, sustainable drainage systems and promote the use of adaptive pathways to adapt to climate hazards. Share our understanding of flooding in the area to avoid inappropriate development-see Table 5. This measure is assessed within the HRA, however promoting the principle of sustainable drainage systems doesn't directly fall under the remit of the HRA.

Protecting against water pollution: The introduction of the HRA raises the potential for water pollution stemming from the actions of the LFRMS: 'Any strategy to manage flooding and the associated infrastructure upon which this strategy relies, can potentially have adverse impacts on the habitats and species for which European sites are designated. These impacts can be direct, such as habitat loss, fragmentation, or degradation, or indirect such as disturbance or pollution from construction, transportation etc.' Table 3 lists changes in water quality as a hazard: 'Activities which may impact upon water quality, such as accidental

pollution spills as a result of defence construction or pumping station operation, may adversely affect wetland habitats and species'. Denby Grange Colliery Ponds SAC is listed as being especially vulnerable to pollution to groundwater (point sources and diffuse sources). However, the HRA concluded that the LFRMS could be adopted with no adverse impact on the integrity of European Sites with the advisory that re-screening takes place under the HRA once detailed design is known, with appropriate mitigation detailed as necessary (this would include pollution control measures and follow the guidelines issued by CIRIA). Tackling water pollution in general however does not fall under the remit of the LFRMS nor the HRA; mitigation to prevent water pollution where it stems from a particular action/measure does fall under the remit of an appropriate assessment, where appropriate (hopefully the above covers this).

In summary, the purpose of an HRA is to assess the potential for significant effects on European Sites because of a plan or project. So, providing measures to facilitate the above ambitions are outside of the scope of an HRA.

What flood linked support would you like to receive?

- Drain and gully clearing.
- ASSURANCE.
- River dredging?
- I would like for flooding due to collapsed drains and culverts on unadopted land to be taken seriously. In 20 years the council won't help due to it being unadopted, even when Yorkshire Water offered to work with you to fix it once and for all. That never happened as the council wouldn't help. Even though I am disabled, chronically ill, can't work and am TRAPPED on the flooded road.
- Stop building on greenbelt and floodplains. For example, water runs off the massive industrial development that was approved on Leeds Road, and the new development on granny Lane will flood as it's a water meadow. Calder view needs sorting. We need less concrete and more greenery to absorb the water.
- Better infrastructure. The drainage system has not been upgraded for how many years?
- I need to know in simple layman's terms what is being done, and when, to avoid another flood here.
- Drainage away from our property by way of gullies and drains of which there are none by our property.
- On behalf of Meltham Town Council, the biggest flood risk in Meltham comes from the damage to and moving of traditional underground watercourses - often, but not exclusively due to inappropriate development. This plus the fact that the rainwater drains, but many gullies are blocked leaving nowhere for the water to dissipate. Finally, the sink hole on Wessenden Head Road has started to open up again, so we are all for a progressive local flood risk strategy.

Any other comments?

- The strategy will be worthless if the planning department / council leaders allow the strategy to be compromised by developers of major planning applications.

- I would like for flooding due to collapsed drains and culverts on unadopted land to be taken seriously. In 20 years the council won't help due to it being unadopted, even when Yorkshire Water offered to work with you to fix it once and for all. That never happened as the council wouldn't help. Even though I am disabled, chronically ill, can't work and am TRAPPED on the flooded road.
- Clearing blocked road gullies routinely is very important. I've reported many in the past on the Council's website, but they have never been actioned.
- I personally think this survey and the way you're going about this is poor. You'll never get a good response from a diverse range as your documentation and terminology is ruling out a lot of people. I'm a professional, educated, middle aged woman and I couldn't understand what I needed to review or what some of the questions meant.
- Stop blaming climate change. It's a cop out. Stop building when our drainage can't cope. Kirklees should be cleaning gully drains and checking they are not blocked. I see so many where they have been tarmacked over.
- Sending pdf documents totalling 237 pages is not very helpful. We need a short, concise document that tells us what is being done to avoid further floods here.
- An inspection of the road and installation of gullies and drains away from our property.
- I can't understand why Kirklees allowed the construction of a complete new housing estate adjacent to / or on the floodplain of the Calder directly opposite our premises, bearing in mind the uncertainty regarding climate in the future!

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Name of meeting: Overview and Scrutiny Management Committee

Date: 5 December 2023

Title of report: Communications Strategy: update 2024

Purpose of report: The draft Communications Strategy update (Appendix A) sets out the service's proposed priorities and business plan for 2024.

The report is presented to the Committee for noting and to receive comments.

Key Decision	No
The Decision - Is it eligible for call in by Scrutiny?	No
Date signed off by <u>Strategic Director</u> & name	23-11-23 - Rachel Spencer-Henshall
Cabinet member: Corporate Services	Cllr Paul Davies

Electoral wards affected: All.

Ward councillors consulted: No.

Has GDPR been considered? Yes. No implications.

1. Information required to take a decision

The draft strategy is presented to the committee for noting and to receive comments.

2. Implications for the Council

The Communications Strategy supports the work of the council through communicating and marketing the council's priorities and activities.

2.1 Working with People

Understanding Kirklees residents and audiences is at the heart of the Communications Strategy.

2.2 Working with Partners

Partners were consulted in drafting the original strategy and are a key part of delivering many of the activities set out in the business plan.

2.3 Place Based Working

Tailoring messages to different audiences in various geographic communities across Kirklees is a key part of the strategy's mission.

2.4 Climate Change and Air Quality

The business plan includes promotion of the council's work on climate change and net zero.

2.5 Improving outcomes for children

The business plan includes promoting access to services that improve outcomes for children.

3. Consultation

None.

4. Next steps and timelines

Following comments from scrutiny, the strategy will be presented to Cabinet in December 2023 for implementation in 2024.

5. Officer recommendations and reasons

Members are asked to note the report and provide feedback.

6. Contact officer

Marcus Bowell, Head of Strategic Communications (marcus.bowell@kirklees.gov.uk)

7. Background Papers and History of Decisions

None

8. Service Director responsible

Andy Simcox, Service Director for Strategy and Innovation
(andy.simcox@kirklees.gov.uk)

Kirklees Council

Communications Strategy

Update 2024

Contents:

Introduction: strategic communications	2
Part one: service development plan	3
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Introduction: strategic communications

This paper is an update to the Communication Strategy (2022/23) and sets out the service's strategic and operational priorities for 2024.

The service retains its core mission from the 2022/23 strategy:

Our mission is to build a strategic communications function for Kirklees Council

Strategic communications are a means to an end. Across sectors and industries, the principles of strategic communications are employed to enhance reputation with audiences, are at the heart of marketing places, products and services as well as influencing behaviour. They are also the key to increasing reach and engagement which represent the bottom line of communications.

Strategic communications

The previous strategy described the characteristics of strategic communications and how they differ from traditional approaches (see table 1). These characteristics remain central to the approach for 2024.

Table 1: strategic communications summarised

Traditional communications	Strategic communications
Reactive	Planned
Information	Narrative
Elite	Grounded
One dimensional	Audience specific
Tactical	Coordinated
Broadcast	Relationship building
Telling	Showing
Brand anarchy	Brand discipline
Disposable	Enabling
Repetitive	Consistent
Siloed	Corporate
Press focus	Multi-platform
Linear	Evaluating, changing, improving

Communications Strategy

The strategy is in two parts.

1. The service development plan describes how the communications team is implementing a strategic approach to its work. It describes how the three key pillars of strategic communications are being developed. They are: narrative, reach & engagement and evaluation.
2. The second section is the operational business plan for the year, which describes how the service will prioritise its resources over the coming year and its planned schedule of proactive communications activity to support the council's objectives.

Part one: service development plan 2024

The service development plan includes the actions we are taking to strengthen the three key pillars of strategic communications and updates on progress since 2022/23:

1. Narrative

Audiences engage more strongly with communications that are part of an ongoing story. That is why strategic communications prioritise planned, proactive and campaign-led communications. This is in line with the LGA Peer Challenge recommendation for Kirklees Council to: 'Craft and tell your story, externally and internally; and put strategic communications at the heart of the organisation.'

Update on 2022/23 actions:

- **Annual business plan** - *Agree and deliver a business plan that draws together the council's disparate activities, organises them within themes and sets up consistent messaging that will drive our communications.*

Update: First business plan agreed, with 89% of content delivered as planned.

- **Campaigns** - *Within the business plan, we will identify priority campaigns where we will focus our resources and promotion.*

Update: Major campaigns delivered (and ongoing) on corporate priorities, including Voter ID, Blueprints and Cost of Living.

- **Methodology** - *We will develop a new campaign planning methodology to ensure consistency of approach and execution.*

Update: Campaign and communications plan methodologies developed, agreed and rolled out across the service.

- **Grid** - *We will increase our planning range to control messaging, announcements and events.*

Update: Communications planning grid delivered each week throughout 2022/23.

Actions for 2024

- Agree new business plan for 2024.
- Deliver content of business plan and planning tools.

2. Reach and engagement

An understanding of demographics, habits and values is essential to create engaging content that reaches target audiences. The communications service continuously analyses its channels and audiences to increase reach and engagement.

Update on 2022/23 actions:

- **Channel review** – *We will review all our current channels, their reach and effectiveness.*

Update: Social media content reviewed by reach and engagement.

- **Audience segmentation** – *We will use our data more effectively to build audience profiles around demographics, geographies and interests which will help us create content that engages.*

Update: Social media channels reviewed by demographics and location of audience.

- **Knowledge bank** – *With a greater understanding of our audiences and our channels, we will build resources to help the team plan campaigns that target and engage.*

Update: Channel planner developed to help team plan campaigns using insight.

Actions for 2024:

- Develop channel plans for each major social media platform to increase reach.
- Create personas for key Kirklees audiences to strengthen targeting.

3. Evaluation

The service aims to adapt and improve. We measure the performance of our campaigns and channels as well as sharing learning across the service.

Update on 2022/23 actions:

- **Evaluation framework** – *Our priority campaigns will be evaluated. Using the Government Communications Service framework as a basis, we will measure inputs, outputs and outcomes to gauge success and learn good practice.*

Update: Priority campaigns evaluated for reach and engagement.

- **Performance Indicators** – *We will routinely gather and publish data on our work and establish trends in performance. We will gather data on reputation and local opinions through the council's existing functions as well as generating our own.*

Update: Key indicators now regularly gathered on channel performance.

- **Learning** - We will set up forums within the team collectively to analyse campaign performance and identify lessons that can be taken into future campaigns. experiences beyond their own role.

Update: Quarterly whole-service performance meetings to share best practice and learning.

Actions for 2024:

- Add press, media, email and website reach to KPIs.

Part two: business plan 2024

Excellent communications rely on effective planning. A plan for priority campaigns and proactive messaging allows the service to deliver the key elements of strategic communications:

- Building narrative behind the council's corporate priorities (as set out in the Council Plan).
- Applying consistent messaging.
- Using channels and audience segmentation in the most effective ways.
- Encouraging brand discipline.

The business plan is presented in two sections below: priority campaigns (section 1) and proactive messaging (section 2).

Section 1: Priority campaigns 2024

We will focus our resources on campaigns that say most about the council's priorities and values. A campaign is the pinnacle of strategic communications, being objectives focused, proactive and using a range of channels to reach and influence the appropriate audience(s).

Table 2: shows the service's priority campaigns for 2024 to promote the four Council Plan themes.

Council priority	Responsible	Priority Campaign(s)
Address our financial position in a fair and balanced way.	BP: Corporate and Internal (and various BPs) BP: Public Health and Communities	<ul style="list-style-type: none"> • Budget 24/25 – consultation, budget setting, roll out of budget measures. • Cost of Living - ongoing support relating to energy bills, food and personal finance.
Transform council services to become more efficient and effective.	BP: Children's Services BP: Adult Services BP: Adult Services	<ul style="list-style-type: none"> • Our Kirklees Futures (attainment and inclusion) including SEND Transformation. • Modernisation of Adult Social Care - work across health and social care system to help people live independently and focusing on prevention. • Public-facing elements of transformation priorities, including: Access to Services, Assets rationalisation, Technology Strategy.
Deliver a greener, healthier Kirklees and address the challenges of climate change.	BP: Environment and Climate Change BP: Public Health and Communities	<ul style="list-style-type: none"> • Climate Change Action Plan • Environment Strategy • Waste Strategy. • Public Health / ICB messaging – focused on prevention.
Invest and regenerate our towns and villages to support our diverse places and communities to flourish.	BP: Growth and Regeneration	<ul style="list-style-type: none"> • Huddersfield Blueprint. • Dewsbury Blueprint.

		<ul style="list-style-type: none"> • Local Blueprints – Holmfirth, Heckmondwike, Cleckheaton and Batley. • Connecting Kirklees – bringing all works updates into one section of website and roll out of visual identity.
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Section 2: proactive messaging 2024

Alongside campaigns, the communications service will deliver day-to-day communications that help the council achieve its goals. Though less resource-intensive than campaigns, the service will use the principles of strategic communications to reach and engage target audiences in the council's work.

Table 3: summarises the business-as-usual proactive communications the service will deliver for services in 2024.

Directorate lead	Proactive communications	Description
Corporate Services	Corporate priority campaigns	Promoting campaigns incl: Pride, South Asian Heritage Month, Yorkshire Day, National Inclusion Week, Remembrance, Black History Month.
	Major religious celebrations / festivals	Marking religious festivals incl: Easter, Eid, Passover, Vaisakhi, Ramadan, Diwali, Christmas, Hanukah.
	Elections	Statutory messaging, advice and guidance on voter ID, election count and results coverage.
	Public meetings	Promoting transparent decision-making: live tweeting Cabinet and Council meetings, publicising and explaining decisions.
	Mayoralty	Promoting the Mayor's work in the community.

Economy & Regeneration	Homes & Neighbourhoods	Develop relationship with tenant audience, including improved channels of communication, promoting service excellence vision and safety initiatives such as damp and mould, fire safety.
	Business Kirklees	Promote support available to Kirklees businesses.
	Planning and regeneration	Sharing major planning policy and applications and promoting regeneration outside Blueprints.
Environment & Climate Change	Cleaner and Greener Kirklees	Promoting and rolling out 'cleaner and greener' brand to tie in all operational services activity: waste, parks, highways etc.
	Culture and events	Marketing support for core council-run events: Christmas lights, Pride, holiday activities. Plus, develop and promote Creative Kirklees platform for marketing community-led events.
	Highways	Promote delivery of capital plan and roads maintenance (ties in with Connecting Kirklees campaign).
	Winter	Planning and delivery of adverse weather communications plan and development of @KirkleesWinter.

Adults	Recruitment	Marketing and promotion of recruitment campaigns for careers in social work.
	Libraries	Promoting services, activities and support available at Kirklees libraries.
	ICB	Support NHS campaigns in Kirklees, focusing on prevention.
Children	Safer Kirklees	Cover work of council services in communities and respond to incidents alongside Police. Promote public safety campaigns, including: domestic violence, knife crime prevention, Ask for Angela, water & road safety, hate crime, digital safety.
	Schools communications	Disseminating key council messages to schools and supporting with ad hoc PR and communications advice.
	Ofsted	Communicating the progress and outcome of inspections.
	Fostering	Supporting the service in recruiting foster carers and promoting work.
	School places / attainment	Guidance and advice on applying for school places and celebrating the

		achievements of schools and young people.
Communities and Public Health	Public Health campaigns	Messaging throughout the year in line with corporate priorities and national campaigns, including: healthy eating, vaccination, diabetes awareness, cancer and mental health.
	Wellbeing	Promoting services that support residents' wellbeing, including: KAL, social prescribing, mental and physical health.
	Place based working	Increasing reach and engagement of Place Standard activity.
	Asylum and migration	Managing messages around asylum dispersal.
	VCSE relations	Promoting joint working and celebrating the strength of the third sector in Kirklees.
Internal communications	Budget and service change	Corporate messaging on impacts of the budget for the organisation, services and staff.
	Staff wellbeing	Promoting support, advice and help for staff.

	Values	Programme of internal activities / events to celebrate the council's values, including: Pride, South Asian History Month. Working with staff networks to disseminate messages.
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Kirklees Council

Scrutiny Lead Member Report

Lead Member: Cllr Jo Lawson

Panel: Environment and Climate Change Scrutiny Panel

Period of Update: From June 2023 to November 2023

Overview of Panel Activity and Meetings

Work Programme Workshop (informal) meeting held 14th June 2023

The Panel's work programming workshop was attended by the Strategic Director for Environment and Climate Change, and Service Leads/Senior officers. The relevant Cabinet Portfolio Holders were also in attendance.

The workshop helped Panel members to gain a better understanding of the direction of travel of multiple strategies within Environment and Climate Change as well as Cabinet Members key priorities. This information was then used to inform the Panel's work programme for the 2023-24 municipal year and their 'golden threads' (i.e.- climate impact and delivery of net zero targets).

Lead member Briefings:

(Purpose overview of forward plan, the work programme, and Cabinet Portfolio Holder priorities)

- 31st July 2023 (Chair and Service Director - Highways and Streetscene)
- 14th November 2023 (Chair, Cabinet Portfolio Holder - Culture and Greener Kirklees and Service Director - Highways & Streetscene).

Meeting of the Panel held 4th July 2023:

- Cumulative Impact Assessment
- White Rose Forest – Summary Review 2022

Meeting of the Panel held 30th August 2023:

- Re-Profile of Kirklees Resource and Waste Strategy 2021-2030
- Snow Warden Volunteer Scheme Update

Meeting of the Panel to be held 25th October 2023:

- Council Owned Tree and Woodland Management Policy
Air Quality Update

Key Highlights and Outcomes

Cumulative Impact Assessment:

Background: The Licensing Act 2003 requires the licensing authority to prepare and publish a statement of its licensing policy at least every five years. The existing policy was adopted in January 2020 and was due for renewal in 2025. As a part of the review, work had been undertaken to consider the introduction of a CIA.

Meeting of the Panel held 4th July 2023:

The Panel considered a report on proposals to introduce a Cumulative Impact Assessment (CIA) Policy under the Licensing Act 2003.

The purpose of the report was to brief members of the Panel on proposals to carry out public consultation in respect of introducing a CIA for Huddersfield and Dewsbury Town Centres prior to reporting to the Licensing and Safety Committee on 19th July 2023 for approval.

The Panel were informed that a review of crime statistics over the last 5 years had been undertaken and this demonstrated that there was sufficient evidence to propose consultation on the introduction of a CIA in Huddersfield and Dewsbury town centres. Concerns had also been raised by Ward Members around the number of Off-licences opening in town centres, and in response current proposals were to consult on the introduction of a CIA limited to the off-licence trade. It was also noted that whilst the initial evidence was reviewed for Huddersfield and Dewsbury town centres, there was potential for ward members to request consideration be given to introducing CIA's in other areas.

The publication of a CIA set a strong statement of intent about the Councils approach to considering applications. If approved a 12-week consultation would be undertaken with the view for submission to a meeting of the Full Council to consider the adoption or rejection of the CIA in January 2024.

In the discussion that followed, the Panel raised a number of key points highlighting the importance of:

- Setting a clear ambition for the number of responses from the public to ensure the validity of the consultation.
- The inclusion of the student population in the consultation as key stakeholders.
- The enforcement of existing licences and scope for these to be included in the CIA.
- Addressing issues in relation to fast food chains, electronic cigarette/vape shops and street-drinking.
- Scope for the introduction of a CIA in other areas outside of Huddersfield and Dewsbury Town Centre.
- Data clarity and ensuring that the boundaries for the CIA's were set to achieve the best outcomes.

Outcomes:

In respect of the consultation, it was recommended that the ambition for the number of responses was made clear and that a statistically valid figure against the overall population be set to ensure broad representation, meaningful engagement and to set a benchmark to measure success. The Panel also recommended that consideration be given to amending the period within which the consultation was to be held to ensure the student population be represented.

The Panel welcomed the approach to consider other ward areas for a CIA, highlighting the importance of continuing to take an inclusive approach and it was agreed that if the consultation be approved, that an email be sent to all Ward Members asking them to put forward the areas that they represent for consideration if they felt it would be useful.

The Panel further recommended that the clarity of data be improved and that a review of the boundaries be undertaken where streets may be excluded and in doing so may increase the risk for issues to persist.

In terms of requests for further information and future monitoring the Panel requested to be provided with; (i) information in relation to those licences that were being reviewed, the scope for refusal and evidence of good practice (ii) The maps be made clearer and shared with the Panel following review with the Public Health Department and (iii) an update on progress prior to further consideration by Licensing and the Full Council if the Consultation was approved.

White Rose Forest – Summary review 2022/23 and looking ahead to 2023/24

The Panel considered a presentation on White Rose Forest (WRF) - Summary review of 2022/23 and looking ahead to 2023/24. The Panel were informed that the WRF was in its 3rd year of a 5-year programme and during this time the WRF had gained a national profile with a growing reputation. After 3 seasons the WRF had:

- Created 805 hectares of new woodland and supported the planting of 1600 trees.
- Invested £6.7m with landowners across North and West Yorkshire.
- Planted 235 hectares of new woodland next to the existing ancient woodland resource protecting its biodiversity value.

Moving forwards, a WRF 25-year plan from 2025-2050 (aimed to launch 1st August 2025) was being developed which set out the Vision, targets and ambitions for woodland creation and woodland management for North and West Yorkshire. The Plan was to prioritise biodiversity, climate resilience, community mental health and job skills.

In the discussion to follow, the Panel explored several issues including;

- Value for money, measuring success and the risks of failed trees: and found that once the scheme had been designed that the contract was put in place which outlined the amount of maintenance and funding required. Kirklees as the accountable body and on behalf of DEFRA bought in a 15-year woodland. Up until that point if the trees weren't successful, legally the ownership was on the landowner to rectify this. It was also noted that where there were droughts or rain at the wrong time, there were sites where there

was inevitably failure.

- The use of tree guards noting concerns that the decision not to use guards increased the risk of failure; and found that the use of tree guards was dependent on several factors arising from the landowner and the purpose of the site. There were numerous ways of doing this, (i.e.- fencing, a weeding regime, species selection, or guards etc...) and most sites did include the use of guards unless there was a risk of increased vandalism, in which case more trees would be planted with the expectation of some losses. There were also some sites that chose to be plastic free.
- The ambition for the 'Green Streets' in Kirklees; and it was found that the Green Streets project aimed to target priority communities, areas of job growth and the key routes that linked them. Kirklees were currently undertaking mapping work around its transport routes to identify opportunities for tree planting and woodland creation and further agreed to provide the Panel with Kirklees specific data.
- Landownership, and support/best practice guidance for landowners in relation to the long-term maintenance of trees; and found that there was a bespoke process (the WRF delivery pathway) which involved working with landowners and assessing their needs. Support and training was then shaped around this, and Landowners were revisited on a 5 yearly basis to reassess any changing needs
- The importance of biodiversity and the targets in relation to increasing biodiversity; and it was found that native species were the default chosen for planting. In the case of Ancient Woodland, it was acknowledged that this was a finite resource which could not be replaced or expanded but action could be taken to plant around it to increase biodiversity. Work was being undertaken with Forest Research to link into key biodiversity corridors in North and West Yorkshire. The targets were long term and were dependent on the individual driver and design working with the landowner.
- Future scope to work with community groups; and it was found that the main challenges to smaller groups arose from the complex regulatory processes, but there were plans to help support Community Groups including the offer of bespoke training in relation to increasing understanding of the delivery pathway, 1:1 meetings to identify training/resource needs, and a planning grant which the Panel welcomed.

Outcomes:

The Panel welcomed the responses to their lines of enquiry and noted the report. It was also agreed that Kirklees specific data in relation to the Green Streets Project be provided to the Panel.

Re-Profile of Kirklees Resource and Waste Strategy 2021-2030

Background: The former Economy and Neighbourhoods Scrutiny Panel first scrutinised the new Waste Strategy in 2021. In 2022/23 there was a focus on pre-decision scrutiny of the Waste Strategy Capital Update and the Cabinet decision 2nd August 2022 was taken to approve funds. In 2023/2024, the Environment and Climate Change Panel received an update around work undertaken to refresh the strategy in light of recent financial challenges and changes to legislation.

Meeting of the Panel held 30th August 2023:

The Panel considered the report, Re-profile of the Kirklees Resource and Waste Strategy 2021- 30 and were informed that the Strategy set out how the Council aimed to achieve its vision of “a clean, green, sustainable future for Kirklees with zero waste to landfill and where waste was valued as a resource through re-use, recycling, and recovery.

It was advised that since the strategy was adopted in 2021 the financial climate had changed considerably. The strategy assumed that reforms and funding streams from central Government would allow the development and investment set out in the strategy. Due to delays and uncertainty from central Government, there were some elements that now needed to be reprofiled to meet the new timeframes provided and to allow time to understand what funding would be available. The strategy required significant investment to implement however, the re-profiling sought to reduce this cost. It was proposed to revise the strategy’s key targets as follows:

- Achieve a recycling rate of at least 70% at Household Waste and Recycling Centres by 2030.
- Recycle at least 65% of municipal waste by 2035.
- Achieve a 95% diversion from landfill rate by 2030.

The forecasted spend under the original action plan was £2.9m capital spend and the revised initiatives estimated to decrease spend to around £800k. Included within the presentation was a timeline for the revised strategy approval, initial delivery milestones and a list of overarching risks and dependencies. This was scheduled to be presented to Cabinet on 17th October 2023, where approval for the revision would be sought.

The Panel noted the presentation and expressed gratitude to the team for their work and ambition within the challenging financial context. In the discussion to follow the Panel asked several questions in relation to:

- The impact of the re-profile of the strategy on net zero targets.
- Increasing capacity for the emptying of community recycling points, noting that it was important that recycling bins were always available for use (not full).
- Understanding the data in relation to contamination; (i) local projections in comparison with the national average, (ii) the impact of contamination and the targets for addressing this
- The Reuse shop the potential for future expansion to more rural areas in Kirklees as well as concerns of the potential impact the introduction of the

Reuse shop may have on local charities (i.e.) reducing donations.

- Business Recycling and the disposal of single use electronic cigarettes.
- Access to disposal of bulky waste for vulnerable residents and residents who become vulnerable and the timeframe for the 'Period Dignity Scheme'.

Outcomes: The Panel noted the Re-profile of the Kirklees Resource and Waste Strategy 2021- 30 and made the following recommendations.

In relation to increasing capacity for the emptying of community recycling points, it was agreed that investigation into the frequency of which they were emptied would be undertaken.

In relation to the impact of contamination and the targets for addressing this, it was found that, a detailed assessment of the content of bins had been undertaken to identify the sources of contamination. Culture change was highlighted as a key element of reducing contamination as well as enforcement if necessary to reduce continued abuse of facilities and the diversion/loss of loads. In response the Panel recommended that (i) the Panel be provided with Data in respect of the projected impact of contamination and that (ii) comparison between Kirklees and other Local Authorities with a similar demographic be undertaken in respect of contamination rates.

In relation to the ReUse Shop, the Panel were reassured that engagement was held regularly with third sector leaders with the ambition of creating a supportive network of charity organisations instead of a competitive environment. In response, the Panel further recommended that data be obtained to understand the potential impacts.

In respect of business recycling, it was found that the offer of access to the recycling service had been expanded to trade customers and the Panel recommended a mechanism to allow businesses to express their interest in the service be investigated further. In relation to the disposal of single use vapes, the Panel recommended that engagement be undertaken with local businesses around collection points, and that ideas to provide advice to customers on sale be explored further.

In response to a question raised by the Chair if Scrutiny around how residents whom were unable to travel be supported to dispose of garden waste it was found that free bulky waste collections were offered to a limited number of people on the assisted collections list and that it may be possible to link this with vulnerable residents who could no longer access the garden waste site. In response the Panel recommended that the possibility of (i) enabling vulnerable residents to dispose of garden waste through assisted bulky waste collections and (ii) the 5-year timeframe for the 'Period Dignity Scheme' be investigated.

Snow Wardens Volunteer Scheme

Background: The former Economy and Neighbourhoods Scrutiny Panel reviewed the approach taken to Winter Maintenance at its meeting held on 7th September 2021. Key issues noted included the maintenance of active travel routes during winter and of the challenges around housing growth, resources, and capacity for maintenance. It was agreed that the current policy for winter maintenance should be assessed. This work was undertaken, and a further update was given at the meeting of the Panel held 30th August 2022.

Meeting of the Panel held 30th August 2023:

As part of the Panel's work reviewing the theme of winter maintenance, the Panel considered a report on the Snow Wardens Volunteer Scheme. The Panel were informed that the scheme enabled the Council to equip residents with grit, equipment and PPE which would allow them to clear snow from residential areas that gritters would not cover. The Scheme was flexible, where residents were able to decide how much time they would like to dedicate to the scheme, allowing them to choose their own hours and locations of work.

In the discussion to follow the Panel raised several key points around communications. In response to a question from the Panel around direct communication with residents and the suggestion of use of email, it was found that the current key methods of communication were; 'Gritter Twitter,' the website and community networks. The ambition to engage more community groups and Parish Councils in the scheme as it expanded was also highlighted.

The Panel highlighted the importance of taking a consistent approach to communications and raising awareness of the scheme across the Council, including the provision of social media guidance. The Panel also suggested the use of handouts (for elected members) to share with residents and help to promote the scheme within communities, as well as encouraging the exploration of ways to promote the scheme in rural areas through community events such as agricultural shows.

Outcomes:

The Panel welcomed the Snow Wardens Volunteer Scheme and recommended that a consistent approach be taken to communications and raising awareness of the scheme across the Council through the provision of (i) social media guidance, (ii) handouts for elected members to share with residents and (iii) the promotion of the scheme through community events.

Panel Visits:

Energy from Waste Facility and Materials Recycling Facility Scrutiny Visit

Arising from the Panel's scrutiny of the Re-Profile of Kirklees Resource and Waste

Strategy 2021-2030, Panel members were invited to visit the Energy from Waste Facility and Materials Recycling Facility in Huddersfield.

The visit took place on 27th September 2023, where Panel members undertook a tour of the waste and recycling facility located on Diamond Street in Huddersfield.

During the tour, Panel members were shown how recyclable material is processed, separated, and baled ready for re-use, and how non-recyclable material is put to good use as an alternative to fossil fuels creating enough electricity to power over 15,000 homes. The Panel noted the risks from disposable vapes and felt that messaging to raise awareness of this was important.

General Comments from the Chair

As the newly appointed Chair, I look forward to working with the members of the panel. The panel has welcomed a number of new panel members this municipal year to assist in its consideration of a diverse portfolio and looks forward to meaningful debate and scrutiny across a wide range of items.

There are a number of items for consideration this year and it is important for the panel to prioritise pre-decision scrutiny alongside maintaining oversight across the panel's remit to be reactive to any arising issues.

It is also important to give consideration to the wider context of key national issues such as climate change as well local changes within Kirklees.

Looking Ahead

At upcoming meetings of the Panel, the following items are to be considered:

- Environmental Sustainability Strategy
- Heat District Energy Network
- Waste Strategy Re-Procurement
- Parks and Greenspace Vision
- Statutory Food Hygiene Plan 2024 – 2025 / Statutory Health & Safety Plan 2024 – 2025
- Parking Strategy Review
- Events (Woven/Pride/Year of Music)

Scrutiny Lead Member Report

Lead Member: Cllr Yusra Hussain (June-August) and Cllr Moses Crook (September-October)

Panel: Growth & Regeneration Scrutiny Panel

Period of Update: **From:** 12 June 2023 **To:** 10 October 2023

Panel Highlights

(Include examples of pre decision work, scrutiny getting out and about, etc)

LM Briefings June-August

David Shepherd, Strategic Director Growth and Regeneration
Joanne Bartholomew, Service Director, Development
Edward Highfield, Service Director, Skills and Regeneration
Naz Parkar, Service Director, Homes and Neighbourhoods
Cllr Graham Turner, Portfolio Holder, Regeneration (Finance & Regeneration)

Panel workshop 12 June 2023

The Panel held its workshop to begin to shape and develop its work Program for the 2023/24 municipal year. In conjunction with the Portfolio holder for Regeneration, senior officers within the service outlined the Directorate priorities for the year ahead, which would help to inform the Panels work Program priorities.

Panel meeting – 3rd July 2023

At the Panel meeting on the 3rd July, senior officers from the Growth & Regeneration Directorate provided the Panel with a presentation which gave an introduction to the services within the Directorate including:

Skills and Regeneration
Development
Homes and Neighbourhood

The Panel also received an update on the Housing Delivery Plan Update and Small Centres Program.

Panel meeting 14 August 2023

At the meeting, the Panel considered Damp, Mould and Condensation and Tenant Safety in Council Housing. The Panel was advised that with regard to damp, mould and condensation, a dedicated IT system had been introduced, where all relevant information can be brought together in one place and all officers in Homes and Neighbourhoods and Kirklees Direct have access to this system and have received guidance on how to use it. The information held in the system would be used to triage and categorise cases.

LM Briefings September – October

Edward Highfield, Service Director, Skills and Regeneration
Johanna Scrutton, Planning Policy Team Leader
Jonathan Nunn, Policy and Partnership Team Manager
Edward Highfield, Service Director, Skills and Regeneration
Cllr Graham Turner, Cabinet Portfolio Holder for Regeneration
Gillian Wallace, Head of Employment and Skills

Martin Dearnley, Head of Risk, Financial, IT and Transactional Service
Joanne Bartholomew, Service Director, Development
Cllr Elizabeth Raynolds

Panel meeting 25 September 2023

At the meeting on the 25 September, the Panel received an update on the Kirklees Local Plan Review Process and update on the Kirklees Wide Town Centres and Small Centres Program. The Panel was informed that it is a statutory requirement to publish a review of whether the local plan is fit for purpose, and that has to be carried out, within five years from the date of adoption. For Kirklees, the assessment has to have been undertaken and taken through the cabinet process and be in the public domain by February 2024. The Panel was informed that the assessment will go to cabinet on the 17 October 2023, and then on to council on the 15 November 2023.

The panel received a detailed update on the Batley Small Centres Plan within the Kirklees Wide Town Centres and Small Centres Program.

Panel meeting 10 October 2023

The Panel meeting on the 10 October was an additional meeting of the panel to consider, Inclusive Economic Strategy and receive an Overview of Post 16 Skills, Training and Apprenticeships.

Outcomes:

From the information presented on damp mould and condensation, the Panel asked that the guidance and training materials provided to frontline staff to help them triage, and effectively deal with calls, be shared with the staff within the MP's offices as they are often the first contact.

From the information presented on the Local Plan, the Panel supported the officer recommendation that additional non-mandatory phases of public consultation be carried out. The panel recommended that officers look at the consultation strategy, which is the same as for LP1, and take any learning points to further enhance consultation response – both numerically and in terms of inclusivity.

On the Kirklees Wide Town Centres and Small Centres Program, the presentation concentrated on a review of the plans for Batley town centre. The panel noted cost pressure due to inflation along with relatively tight delivery timeframes associated with some of the funding streams for this project. Panel recommendation was to note the review and applaud continuing capital programs supporting economic growth and aspiration. Panel also noted that a wider review of the Town Centres and Small Centres Program was scheduled within the work program later in the year.

The presentation on Inclusive Economic Strategy was noted as was the continuing impact of Covid and the cost of living crisis, and corresponding mitigations for this within the strategy. The persistent economic lag for the lowest decile in comparison to overall growth was noted. Awareness of this persistence of deprivation and Officer strategy to combat this was recognised. The panel supported the strategy overall.

The panel noted the presentation on Post 16 Skills, Training and Apprenticeships

and in particular the persistent correlation between childhood poverty and future life prosperity prospects. The positive work to mitigate this was noted.

Monitoring Work

(If monitoring previous recommendations please identify what difference Scrutiny has made)

The recommendations from the ad hoc scrutiny panel into Building Safety & Compliance Combined Action Plan will be monitored by the Panel and an update is scheduled for March 2024.

The Lead Member will monitor the Station to Stadium Program through briefings with the Cabinet member.

Looking Ahead

(What are the next issues the Panel plans to look at?)

The Panel will next meet on the 20 November 2023, and the items on the agenda will be 'Interim Housing Position Statement for Boosting Supply', Cultural Heart Gateways 3-4, and an informal session looking at corporate risk.

Lead Member comments:

Cllr Yusra Hussain – June 2023- August 2023

The Growth and Regeneration Scrutiny Panel was newly established at the start of the municipal year, and at the work programme development workshop, in June 2023, it became apparent that it would be a busy work programme and additional meetings to deal with the scope of the panels work would be required.

The priorities included on the Panel's work programme were developed in conversation with senior officers from the G&R Directorate and the Cabinet Member for Regeneration. During my tenure as Lead Member, the panel considered matters including damp, mould and condensation, housing growth, small centres programme and tenant safety. I had asked that any information being presented to the Panel should include a financial aspect to the update, in recognition of the difficult financial position the council was facing.

Cllr Moses Crook LM – September 2023 – October 2023

I would like to say that the support I had from Governance Officers in this was exemplary. I took this role on part way through the municipal year and with Officer support, I was able to navigate catching up on both process and the broader context of this scrutiny panel quickly. Arrangements for briefings and work planning were arranged efficiently and it was this support that allowed the working of the panel to continue without disruption.

Briefings from Officers and Cllrs were comprehensive allowing for effective scrutiny process to be carried out to reassure stakeholders that good decision making, and policy continues to be maintained by Kirklees Council. Recommendations from the Panel were well received by Officers.

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OVERVIEW AND SCRUTINY MANAGEMENT COMMITTEE – WORK PROGRAMME 2023/24

MEMBERS: Councillors; Elizabeth Smaje (Chair), Bill Armer, Andrew Cooper, Jo Lawson and Shabir Pandor

SUPPORT: Sheila Dykes, Principal Governance and Democratic Engagement Officer

FULL PANEL DISCUSSION		
THEME / ISSUE	APPROACH / AREAS OF FOCUS	OUTCOMES / ACTIONS
1. Leader's Priorities 2023/24	The Leader will set out her portfolio priorities for 2023/24 and later in the municipal year will give an update	<p><u>1 August 2023</u> Deferred until 24 October</p> <p><u>24 October 2023</u> The Leader attended to set out her four core priorities and answered questions from Members. It was agreed that she be invited to return, at an appropriate time, to give an update on progress. It was also noted that the Environment and Climate Change Scrutiny Panel would be looking at climate change and suggested that the points raised on this issue be taken forward by the Lead Member as appropriate.</p>
2. Corporate and Finance & Regeneration Portfolio Holders' Priorities 2023/24	The Portfolio Holders will set out their priorities for 2023/24 and later in the municipal year will give an update	<p><u>1 August 2023</u> Priorities for the Corporate Portfolio were presented, questions answered and comments made.</p>
3. Council Financial Management	<ul style="list-style-type: none"> Quarterly Financial Management Reports. Financial management areas of interest to scrutiny: <ul style="list-style-type: none"> Energy Budgets (August) MTFP Update (September) Cost of Living Programme Update (October) TBC 	<p><u>20 June</u> Regular updates requested in line with financial reporting timescales with additional updates in between the quarterly reporting cycle to allow for scrutiny of any particular areas of financial concern.</p> <p style="text-align: right;">continued...</p>

		<p><u>1 August 2023</u> Presentation in respect of a review of the Council's arrangements and budgets for energy. Questions answered and comments made.</p> <p><u>5 September 2023</u> (1) Further information on the position at Quarter 2, the achievability of savings and detail of the re-profiling of the Capital Plan to be provided to Members of the Committee at the earliest possible opportunity. (2) Noted that the following issues were included within the Committee's Work Programme for 2023/24: (i) Procurement and external funding. (ii) The approach to asset management. (iii) IT Strategy.</p> <p><u>24 October 2023</u> Presentation to provide an update on the Work being undertaken as part of the Council's Cost of Living Programme, with questions and comments being invited from Members. It was recommended that the comments be taken on board in future work on this issue.</p> <p><u>5th December 2023</u></p>
4. Performance Management	Scrutiny of the latest performance management reports.	<p><u>5th September 2023</u> Recommended that the issue of transparency of performance management information be taken into account in the consideration of the future approach.</p>
5. IT/Technology Strategy	<ul style="list-style-type: none"> • Potential for digitisation • Replacement of telephony system • Security 	

6. Communications	Pre-decision scrutiny of Communications Strategy	<u>5th December 2023</u>
7. Inclusion and Diversity	<p>Monitoring work, including:</p> <ul style="list-style-type: none"> • Inclusion and Diversity Strategy • Pre-decision scrutiny of the revised strategy • Inclusion and Diversity Annual Report 	<u>9th January 2024 (informal)</u>
8. Council Plan	<ul style="list-style-type: none"> • Pre-decision scrutiny in respect of the development, and content, of the latest version of the Council Plan 	<u>20th June 2023 – informal</u>
9. Kirklees Communities Partnership Plan (Crime and Disorder) and Domestic Abuse Strategy	<ul style="list-style-type: none"> • Annual scrutiny of the Kirklees Communities Partnership Plan in accordance with statutory requirement under Section 19 of the Police and Justice Act 2006. (Community Safety Partnerships have a duty to develop a strategic plan to address multi-agency issues affecting quality of life for residents including crime and anti-social behaviour.) <i>(2022 – 2027 Plan endorsed by Cabinet 21.9.23 and adopted by Council 12.10.22)</i> • Kirklees Domestic Abuse Strategy – annual review. <i>(Current strategy 2022 to 2027 – adopted by Cabinet 17.1.23)</i> 	
10. Corporate Safeguarding Policy	<ul style="list-style-type: none"> • Implementation of Policy <i>(adopted by Cabinet 8th March 2022, Council 13th July 2022)</i> • Further to the rollout of the refreshed policy; how it has worked in practice, the outputs, and feedback on training (OSMC 15-2-22) 	
11. Local Flood Risk Management	<ul style="list-style-type: none"> • Annual Review of the Council's Flood Risk Management Plan, including progress against the Action Plan. <p>continued...</p>	<u>5th December 2023</u>

	<ul style="list-style-type: none"> Pre-decision scrutiny of revised Local Flood Risk Management Strategy (OSMC 7-3-23) 	
12. Kirklees Active Leisure	<ul style="list-style-type: none"> Briefing on the not-for-profit charity that manages ten leisure facilities throughout Kirklees, including the review taking a strategic approach to the future leisure centre offer 	<p><u>1st August 2023</u></p> <p>(1) Views of the Committee to be sought during the review consultation period and that the results of the analysis of the different models of operation be provided to members of the Committee when available.</p> <p>(2) Recommended that the importance of the links with health and wellbeing be acknowledged.</p> <p><u>5th December 2023</u></p>
13. Procurement	<ul style="list-style-type: none"> Challenges and future plans 	<u>9th January 2024</u>
14. Asset Management	<ul style="list-style-type: none"> Pre-decision scrutiny of Asset Management Strategy, including proposals for engagement 	<p><u>24th October 2023</u></p> <p>The Committee received a report which provided a summary of the approach to property asset management, and the use of good practice in developing and bringing forward the Council's Corporate Property Strategy</p> <p>It was resolved that the strategy be brought back to the Committee for further consideration at an appropriate point.</p>
15. People Strategy/People Management	<ul style="list-style-type: none"> Impact for/on transformation 	<u>9th January 2024</u>
16. Overview of Scrutiny Work Programmes	<p>Maintain an overview of the Work Programmes of the four Panels:</p> <ul style="list-style-type: none"> Children's Environment and Climate Growth and Regeneration Health and Adult Social Care <p>and receive regular updates from Lead Members</p>	<p><u>1st August 2023</u></p> <p>Panel Work Programmes for 2023/24 endorsed.</p> <p>Lead Member Updates:</p> <p>Children and Health & Adult Social Care - 5th September 2023</p> <p>Growth & Regeneration and Environment & Climate Change – December 2023</p>

17. Social Isolation/Loneliness	Scrutiny work in relation to social isolation and loneliness, with specific reference to the impacts of the Covid-19 pandemic: <ul style="list-style-type: none"> • Focus on evidence relating to young people. • Production of final report 	
18. West Yorkshire Joint Services – Activity in Kirklees	Director to attend to give members a briefing on the work being undertaken by WYJS with a focus on work in Kirklees by WYJSC	<u>24th October 2023</u> The Director of West Yorkshire Joint Services (WYJS), attended the meeting and gave a presentation about the work of the organisation, with a particular focus on work within Kirklees. A briefing note had been included with the agenda for the meeting which explained that WYJS delivered a number of shared services, including a number of statutory services, on behalf of the five West Yorkshire Councils. The Director was thanked for the presentations and it was requested that copies of the ‘Little Book of Big Scams’ be shared with the Committee.
19. Mental Health Services for Older People – JOHSC Establishment		<u>5th September 2023</u> Agreed that the nominations for Kirklees representation on the Joint Health Overview and Scrutiny Committee, with Calderdale and Wakefield Councils, should be sought from the main political groups (Labour, Conservative, Liberal Democrat, Green) on the basis of 1:1:1:1.

LEAD MEMBER BRIEFING ISSUES

THEME/ISSUE	APPROACH / AREAS OF FOCUS	LEAD OFFICER/NOTES
1. Risk	Risk reports circulated to Members of OSMC for consideration prior to each meeting.	Briefings held with the Council’s Head of Risk on regular basis in line with risk reporting schedule.
2. Performance Reporting	Performance reports circulated to Members of OSMC for consideration prior to each meeting	

3. Budget Engagement		LM Briefing 15-11-23
4. Innovative Working in Kirklees		LM briefing tba
5. Corporate Landlord Function	Challenges and future plans	LM Bfg 31-8-23
6. Challenges to Delivery		LM briefing tba
7. Grant Funding Distribution to Anchor Organisations	Update on contract, including locality plans to be shared	Briefing note to be provided.
8. Regional Working	<p>Including:</p> <ul style="list-style-type: none"> - The mechanics of how Kirklees is working with the WYMCA and the relationship between the two. - Funding streams and Kirklees approach - How funding bids are considered - The project plan <p>To include:</p> <ul style="list-style-type: none"> • Meetings with Kirklees Members of WYMCA Scrutiny Committees • Funding and Kirklees' approach 	
9. Primary Care Networks and Local Health Improvement	Approach to engagement and communication with Ward Councillors on arrangements that span more than one ward such as PCNs and schools as community hubs.	Information awaited re future PCN landscape (role of wider teams involved with primary care and development of place-based approach to health outcomes, CG&AC)
10. Armed Forces Covenant	Monitor the Council's work in relation to the Armed Forces Covenant.	<p><u>20th June 2023</u></p> <p>Committee noted the update on the work of the Kirklees Armed Forces Board, including the ongoing work with partner and voluntary organisations including the budget position, welcomed the work with housing services to help Armed Forces Personnel navigate the housing processes welcomed and recommended that:</p> <ul style="list-style-type: none"> - A survey be developed to hear the voice and understand the need of Armed Services personnel locally - Discussions be undertaken with health organisations to allow the Council to understand how they are working with the Covenant. - Statistical information relating to the take up of e-learning training be provided in future updates to the Committee.

11. Data and Insight Strategy	Update	
12. Libraries Service	Update	LM Briefing 25-9-23

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