

# 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, educations 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

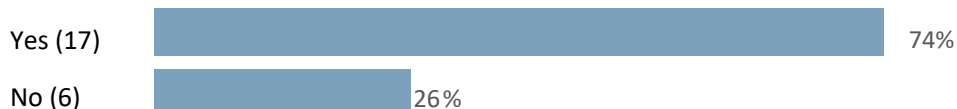
Wessenden Head Road has started to open up again, so we are all for a progressive local flood risk strategy.

- 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

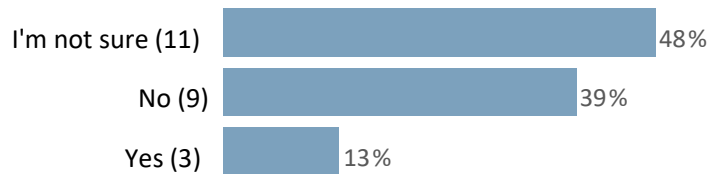
soil/mud and grass growing out of them. Clearing them and maintaining them will help with surface water flooding.

- 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?**

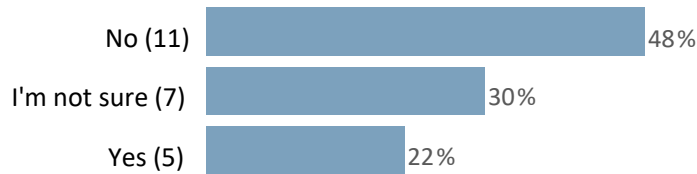


- Kirklees Climate commission is a tick box exercise by the council with no commitment to climate change or proper independent assessments of major planning applications.
- It can get worse, or it can improve. We all need fresh drinking water to sustain life. Treat it with respect. The systems are in 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?**

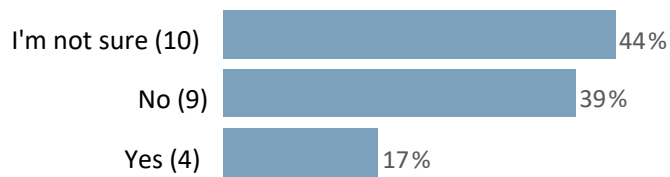
- Through a locally based & organised group

**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!