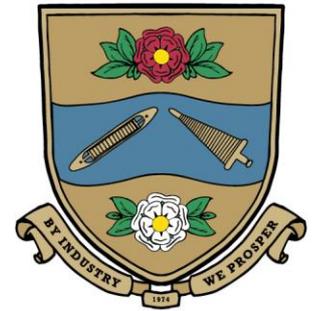


TODMORDEN TOWN COUNCIL

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Robin Tuddenham
Chief Executive
Calderdale Council
Town Hall
PO Box 51
Halifax
HX1 1TP

DATE: 15th June 2020

Dear Robin,

Various Flooding related and Planning Issues at Lidl Supermarket, Mill Bank Close Residential Development and Sandholme Mill Industrial Unit Development in Todmorden

In opening may we first of all recognise the severe pressures that Calderdale MBC has faced, and continues to face, and again pass on our thanks to all in terms of the way in which you have all responded.

Our concern is as always to represent the interests of our Ratepayers and in this vein, are writing to you for your help in ensuring progress is made in investigating and resolving a number of outstanding flooding related/planning issues. Many of our residents in the centre of town were hit by both recent flooding incidents and are frankly feeling abandoned by CMBC in not resolving these and living in fear of the next flooding incident to happen.

There is anxiety amongst some residents that CMBC is prioritising economic regeneration and increase in housing stock above implementing flood reduction measures in new developments. The result is then having to be deal with these matters retrospectively, which inevitably involves a subsequent compromise that in practice increases the risk of flooding into nearby resident's properties.

Lidl Store

The issue surrounding the engineering fix to higher build levels of the attenuation tanks, has as far as we are aware, not yet been resolved. Whilst we understand some progress may have been made in gaining agreement to release "as built" drawings, it is imperative that this be pursued with vigour so that further investigations can be made to ensure all connections underground are as they should be.

We understand that you have received feedback from Yorkshire Water following their investigation of the flooding on Halifax Road and that they have undertaken CCTV surveys of the sewer network in the area, carried out lid lifting and found some signs of surcharge in the inspection chambers, however, their investigations did not find any defects which would have caused the flooding.

We further understand that they have also carried out modelling work to help understand how the public surface water sewer network operates and report that this work has not identified

the surface water sewer on Halifax Road to have a capacity issue in non-exceptional rainfall events.

We appreciate that you are seeking further clarification from them on the combined sewer that also runs along Halifax Road as this wasn't mentioned in their feedback and that this is required in order for the s19 report to be produced for the event of 16th March 2019, which we believe is therefore overdue (and of course now the Feb 2020 incident in the same area).

We would ask that this part of the process is completed, and the report issued with some urgency in order to establish that the infrastructure is operating as it should. If this is indeed the case, then the investigations into Lidl take on even greater importance, especially given the visible levels of water run off from the car park.

Mill Bank Close and Sandholme Development

Both developments have land level related issues that can only add to the surface run off of water that will feed into the same areas and increase the potential of further flooding incidence following heavy rainfall.

Both sites we understand have seen a build level of one metre higher than as submitted in their original planning permission, and in the case of Sandholme Mill, spoil from the development spread across the site towers two metres above the original land level. This is bound to raise the flood risk in an area where the development site is currently used as a flood plain (Flood Risk 3) and the residential streets around regularly suffer from flooding.

Whilst we are assured that the spoil this will be removed, we do expect CMBC to be monitoring this to ensure it is removed and not another post build issue of non-compliance to be dealt with.

The surface water from these sites runs off on to Commercial St and other local streets which are already subject to significant flooding, the impact of which is that in practice, sump pumps in the area trying to cope with the influx of water at the higher end of the area ends up being pumped from dwellings onto the street and then causes the flooding of other dwellings lower down the line.

Future developments in Todmorden

Members are keen that any future development in Todmorden considers in full the ramifications of flooding and recognises that there will be an increasing cumulative effect of individual development, that in theory may meet specific local flood risk assessment requirements, but overall as more development comes forward, is likely to add further impact.

Members appreciate that this is a difficult balance between new development need (residential or business) and flooding mitigation, but would ask that a heightened sense of awareness of the overall flooding issue is taken on board when considering bringing forward development opportunity.

In the meantime, Members have expressed an interest in understanding more fully the planning issues where a certain ground level has been approved and this is seemingly different to that of the completed projects and how this can be avoided in the future.

It may also be of benefit to start some dialogue with Planning Officers about the very serious concerns already facing Todmorden in respect of flooding issues, and perhaps whether there can be any localised additional conditions attached to permissions and or a Policy

Framework developed that is specific to Todmorden, to help by not adding to already very difficult circumstances.

For those directly affected, we are aware that the stress and continual worry is impacting on their mental and physical wellbeing and therefore do look to you as the Planning Authority to engage with us in trying to find a way forward to help our residents in what we do acknowledge is a difficult balance to achieve.

Members are ready to engage on this at the earliest opportunity and would appreciate any help and assistance you are able to provide on the issues raised.

Yours sincerely

Colin R Hill

Colin Hill

Town Clerk, Todmorden Town Council