

# TODMORDEN TOWN COUNCIL

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Mr P Copeland  
Calderdale Planning Department  
Calderdale Council  
Northgate House,  
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DATE: 25th JANUARY 2021

Dear Mr Copeland

## **Concerns About Planning Application 20/01367/FUL Derdale St, Todmorden**

I am writing on behalf of the members of the Development Committee of Todmorden Town Council (TTC). They have asked me to let you know that they are very concerned about the potential for additional flooding in Todmorden caused by further building proposed for Derdale St - planning application 20/01367/FUL.

In relation to this planning application members are concerned:

- About the rise in the local water table causing ongoing flooding in the cellars of local properties and the inadequacy of the local drains to cope with the impact of additional properties and surface run-off water.
- That at least one property in the area has had to be evacuated because of subsidence caused by water damage to the basement and ground floor structure.

(We have not had an update yet from CMBC on what is planned to address this for this property and others nearby which are likely to be affected also).

- A very small attenuation tank is proposed in the plans which seems to be totally inadequate.
- It is stated (by the developer and Yorkshire Water) that the local drains should have the capacity to cope with the demand from additional houses and surface water. However, in reality, the current situation is inadequate (a letter has also been sent to Yorkshire Water to raise this issue).
- The ground level of the site has been raised by around 7ft, which does not appear to comply with the original planning permission. The existing properties nearby are at a lower level than the proposed building so additional surface water will affect them adversely. In this respect, I note from Ms Bailey's email of 14 January 2021, that enforcement action is to be taken and TTC strongly supports this. **Members expect this to be followed through.**

- The proposed plans risk land instability around the canal, which could damage existing properties and increase the likelihood of flooding.

The cumulative impact of the existing developments in the area (Lidl and Mill Bank Close – 22 houses and 18 flats) plus the proposed building of industrial units on the Sandholme Mill site, and now this application for a further 12 houses on Derdale St, will make an already difficult situation worse.

Currently, the EA has categorised this area as flood zone 3(a) (based on a 1 in a 100-year possibility of flooding) so that limited building with strict conditions can be built. The condition for building in Flood Zone 3 (from the Environment Agency) is that new builds should be set at a certain level to avoid flooding.

However, as flooding events seem to be more 1 in 10 years or higher it may be appropriate for them to consider a recategorization of this area to flood zone 3(b) so that it is a functional flood plain. In the absence of the EA reviewing the categorisation, themselves, in view of the frequent flooding on the sites mentioned, would it be appropriate for Calderdale Planning Department to challenge the classification with the EA?

Of note is that when walking down the canal towards Hebden Bridge, after the Weir Minerals site, the land to the left of the canal is a floodplain.

Existing properties in the area are already subject to flooding and this is likely to be exacerbated by additional development.

We feel that inadequate consideration has been given to residents in nearby existing properties when planning applications are considered. This cannot be right and fair that new development Planning Permissions are granted that given recent experiences, will place greater strain on a drainage network and lead to it being overwhelmed even earlier, even more so when this scenario is likely to be further aggravated by climate change.

Whilst Members understand that there may be extant planning permission in place to build new development, and possibly approved before 2015 that will still be valid today, in view of subsequent flooding incidents, should these not be reconsidered?

When considering future applications, whilst we appreciate there is a risk of appeal if declining, in view of the horrendous impact on Todmorden, Todmorden Town Council strongly believes that the onus should be on Calderdale MBC to robustly mitigate flooding in this area. The area requires a far higher burden of proof to be provided by developers to mitigate the potential impact of flooding than currently seen, given the known impact on flooding.

**Yours sincerely**

*C R Hill*

**Colin Hill**

**Town Clerk, Todmorden Town Council**

Sent by email