

**Consultation Response from KC,  
Lead Local Flood Authority**

**2022/93766 Syngenta Ltd, Leeds Road, Huddersfield, HD2 1FF**

**Erection of three industrial sheds on existing industrial site**

**Date Responded: 18<sup>th</sup> November 2022**

**Responding Officer: Paul Farndale**

**Responding Ref:**

**Kirklees Flood Risk Management & Drainage acting as Lead Local Flood Authority OBJECTS to this application on the grounds of inadequate flood risk assessment.**

The site does require an official **SEQUENTIAL TEST**. However as being an extension of an existing business, the comparison area may be limited to the red line boundary which will produce a pass. The planning officer must confirm this. We do suggest that any new buildings are located within the areas of least risk within the site. This is known as a **SEQUENTIAL APPROACH**. The planning officer needs to advise whether this is reasonably practicable before we can move on to the submitted flood risk assessment. At the moment all new buildings are located in the zone of highest risk.

The FRA is deemed inadequate. First the EA must comment on main river flood risk in full including compensatory storage requirements and the setting of appropriate FFL's. It appears the developer is looking for levels below the usual standards due to the configuration of existing buildings.

In the FRA there is an assumption on surface water requirements using a brownfield run off analysis. Existing buildings have been demolished for some time and have lost their place in the system. Greenfield run off analysis is considered more appropriate. The LLFA is concerned over multiple small applications producing a cumulative increase in flood risk because minimum run off standard will apply to small individual buildings which will be above greenfield run off. We therefore suggest an application showing existing drainage and an analysis how existing pipework can be combined with new drainage and attenuated to ensure that a 30% reduction in peak flows for such an area is produced. The facilitation of future development should also be assessed so the same problem does not arise an additional time.

**The FRA therefore required updating.**