

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

2024/92651 land at, Blackmoorfoot Road, Crosland Hill, Huddersfield, HD4 5NU

Hybrid planning application comprising full application for erection of industrial units (use classes E(g)(ii-iii), B2, and B8) in Units 1 and 2, including ancillary offices, mezzanines, landscaping, parking and formation of new access, and outline application with all matters reserved for erection of industrial units (use classes E(g)(ii-iii), B2, and B8).

Date Responded: 24th August 2026

Responding Officer: Paul Farndale

Responding Ref: 2

Further to our previous comments where a discharge rate of 95l/s was rejected as previous application had agreed a smaller discharge based on the same information. Evidence has been supplied that a new rate of discharge to public sewer has been agreed with Yorkshire Water. The LLFA will SUPPORT this position.

As this is a hybrid application and some parts are 'all matters' reserved, Kirklees LLFA suggests a full suite of conditions to allow for design change.

Designs should be developed in accordance with the document Flood Risk Assessment and Drainage Strategy 23078-DCE-XX-XX-T-C-001-P03 by Dudleys dated 2/1/26.

Key points to note : Drawings of attenuations tanks will be required when design is finalised. The design should be linked to a bespoke maintenance plan that references drawings so as not to be generic. This includes access to and where appropriate into the tanks. The longevity of crate storage tanks is an issue as manufacturers do not offer a guarantee on the product and it cannot be readily inspected once installed (unlike a camera through a pipe looking for defects). A maintenance plan should therefore look at a 25-year replacement as an arbitrary figure alongside any management of the tank that may be able to observe some defects. However, if there is an independent test on the product such as BBA certificate that gives confidence of a 50–60-year lifespan, then the LLFA will review its position.

As the site is made up of multiple units a management company will be required to ensure all shared drainage infrastructure is managed. This should be obtained via a section 106 agreement.

Kirklees LLFA agrees with the take on surface water flood risk maps where redevelopment of the isolated predicted pools of water can be designed out with cut and fill. The risk is therefore considered negligible.

Minor flooding is noted but for the 15-minute event at 1 in 100 + 45% climate change. The 45% climate change is usually applied to domestic properties with 100 year+ lifespan. This is in several places but consists of less than 1 cubic metre (3 at most). This is acceptable for a 15-minute storm which may struggle to get into the gullies. A 6-hour storm does not need to be referenced on this occasion.

Suggested Conditions

DR01 Drainage Details

Development shall not commence until a scheme detailing foul, surface water and land drainage, (including off site works, outfalls, balancing works, plans and longitudinal sections, hydraulic calculations, phasing of drainage provision, existing drainage to be maintained/diverted/abandoned, where appropriate) has been submitted to and approved in writing by the Local Planning Authority. None of the buildings shall be occupied until such approved drainage scheme has been provided on the site to serve the development or each agreed phasing of the development to which the buildings relate and retained thereafter.

DR04/5 Attenuation and Surface Water Infrastructure Maintenance

The scheme shall include a detailed maintenance and management regime for the storage facility including the flow restriction and connected pipework. The bespoke plan shall reference plans and cross sections of tanks and key infrastructure such as the flow control manhole, and described in the

form of a method statement, include how tasks are carried out with an itinerary and schedule. There shall be no piped discharge of surface water from the development, and no part of the development shall be brought into use until the flow restriction and attenuation works comprising the approved scheme have been completed. The approved maintenance and management scheme shall be implemented thereafter.

DR07 Flood Routing

The development shall not commence until an assessment of the effects of 1 in 100-year storm events, with an additional allowance for climate change, blockage scenarios and exceedance events on drainage infrastructure and surface water run-off pre and post development between the development and the surrounding area, in both directions, has been submitted to and approved in writing by the Local Planning Authority. No part of the development shall be brought into use (buildings shall not be occupied) until the works comprising the approved scheme have been completed, and such approved scheme shall be retained thereafter.

DR10 Construction Phase Flood Risk and Pollution Prevention (Temporary Drainage)

Development shall not commence until a scheme, detailing temporary surface water drainage for the construction phase (after soil and vegetation strip) has been submitted to and approved in writing by the Local Planning Authority. The scheme shall detail:

- phasing of the development and phasing of temporary drainage provision.
- include methods of preventing silt, debris and contaminants entering existing drainage systems and watercourses and how flooding of adjacent land is prevented.

The temporary works shall be implemented in accordance with the approved scheme and phasing. No phase of the development shall be commenced until the temporary works approved for that phase have been completed. The approved temporary drainage scheme shall be retained until the approved permanent surface water drainage system is in place and functioning in accordance with written notification to the Local Planning Authority.

DR12 interceptor

Development shall not commence until a scheme, detailing the treatment of all surface water flows from parking areas and hardstanding through an oil interceptor, (**or a full petrol oil interceptor**) reedbed or alternative treatment system, has been submitted to and approved in writing by the Local Planning Authority. Use of the parking areas/hardstanding shall not commence until the works comprising the approved treatment scheme have been completed. Treatment shall take place prior to discharge from the treatment scheme. The treatment scheme shall be retained, maintained to ensure efficient working and used throughout the lifetime of the development. Roof water shall not pass through the interceptor.