

Mrs Emma Thompson
Kirklees Metropolitan Borough Council
Development Management
PO Box B93
Huddersfield
West Yorkshire
HD1 2JR

Our ref: RA/2016/135680/01-L01
Your ref: 2016/93147
Date: 16 November 2016

Dear Mrs Thompson

**OUTLINE APPLICATION FOR ERECTION OF RESIDENTIAL DEVELOPMENT.
444 BRADFORD ROAD, BATLEY, WF17 5LW**

Thank you for consulting us on this application which we received on 1 November 2016.

Environment Agency position

In the absence of an acceptable flood risk assessment (FRA) we object to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reason

The FRA submitted with this application does not comply with the requirements set out in paragraph 030 of the National Planning Practice Guidance. The submitted FRA does not therefore; provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails to reference the latest relevant modelling data available for Batley Beck which has been made available since the FRA was first produced in 2010. As such, the minimum finished floor levels have not been properly assessed and may not provide suitable mitigation for the development.

For a residential development, a finished floor level of 600mm plus 1% annual probability flood level, plus climate change should be established. The latest climate change guidance needs to be considered. More information on the latest climate change guidance can be found here: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Overcoming our objection

The applicant can overcome our objection by submitting an FRA and proposed layout plan which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Environment Agency
Coverdale House Aviator Court, York, North Yorkshire, YO30 4GZ.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

Yours sincerely

Mrs Beverley Lambert
Sustainable Places - Planning Advisor

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