

Mr Christopher Carroll
Kirklees Metropolitan Borough Council
Development Management
PO Box B93
Huddersfield
West Yorkshire
HD1 2JR

Our ref: RA/2019/140142/01-L01
Your ref: 2019/91333
Date: 31 May 2019

Dear Mr Carroll

PROPOSAL: ERECTION OF SINGLE STOREY TEMPORARY OFFICE
ACCOMMODATION INCLUDING ASSOCIATED WELFARE
FACILITIES AND INFRASTRUCTURE

LOCATION: CUMMINS TURBO TECHNOLOGY, ST ANDREW'S ROAD,
HUDDERSFIELD, HD1 6RA

Thank you for consulting the Environment Agency regarding the proposed single storey temporary office accommodation including associated welfare facilities at Cummins Turbo Technology in St Andrews Road, Huddersfield

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA) we object to this application and recommend that planning permission is refused.

Reason(s)

The Flood Risk Assessment (FRA) by Farrar Bamforth Associates Ltd dated April 219 does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance.

The FRA does not therefore adequately assess the development's flood risks. In particular, the FRA fails to:

1. Provide an FRA to assess the flood risk to the site from all sources and considering climate change.
2. Provide appropriate site specific flood risk mitigation, given the risks identified.
3. Assess whether compensatory storage is required
4. Indicate the distance of the Development from the river
5. Consider the requirement for flood emergency planning including flood warning and evacuation

Overcoming our objection

Finished Floor Levels

The FRA indicates that the site is protected by a 1 meter flood defence wall, however our information shows that there is just high ground alongside the side of the river in this location and no flood defences. The FRA indicates demountable flood barriers above the height of the wall.

It is not clear what height the finished floor level of the modular buildings will be set to, the FRA needs to confirm this in meters above ordnance datum (mAOD) along with a topographic survey showing the ground levels in mAOD.

The finished floor levels should be above the 1% probability or 1 in 100 year modelled flood level plus in addition the allowance for climate change and a further 300mm.

We prefer to see raising of finished floor levels to provide the flood protection to the required height rather than the use of demountable defences as they require human intervention to install before or during a flood event.

The FRA needs to assess the flood risk from all sources and how this will be mitigated. Further guidance on completing an FRA is available in the online [Planning Practice Guidance](#) and on our [website](#). Any FRA will need to use the latest [climate change allowances](#).

We recommend you request the most up to date flood risk information we hold for this are by contacting our Customers and Engagement teams who can provide any relevant flooding information that we have available. Please email neyorkshire@environment-agency.gov.uk. Your local planning authority should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your local planning authority to determine what information is available. Further advice on what to include in an FRA can be found at

<https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

You also need to consider [extra flood resistance and resilience measures](#) and make sure your flood resistance and resilience plans follow the guidance on [improving the flood performance of new buildings](#).

Transfer of flood risk to others and Compensatory Storage

It is not clear whether the site levels are being re profiled to raise finished floor levels, if any changes are made to existing and proposed flood routes through the site you must ensure this does not increase the flood risk within the site, alter existing flow routes or transfer flood risk to others or be allowed to spill into nearby watercourses.

Compensatory storage is required for any development within flood zone 3. The site is within flood zone 3 therefore you will need to assess this requirement. If the modular buildings allow the free flow of water beneath them without any obstruction to flow or opportunity for debris to collect to the 1 in 100 or 1% probability modelled flood level plus climate change plus 300mm then compensatory storage may not be required.

We do however advise that modular buildings are anchored to prevent mobilization

during a flood.

Flood Risk Activity Environmental Permit

It is not clear how far the modular buildings are from the River Colne, the FRA needs to indicate the distance from the modular buildings to the top of the high ground adjacent to the Main River Colne.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place on, over, under or within 8 metres of a main river channel or culvert quarrying or excavation within 16 metres of any main river, flood defence or culvert.

This was formerly called a Flood Defence Consent. Some activities are also now [excluded](#) or [exempt](#). A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

This is to ensure we can maintain access to the watercourse for future maintenance or improvements and provide for overland flood flows. Access needs to be maintained to existing EA, LPA and other 3rd party flood defence assets, such as for example for maintenance purposes and operational response

Safe Access /Egress

The modular buildings are single storey without an upper flood place of safety and within flood zone 3. The FRA needs to demonstrate that the occupants can remain safe for the development lifetime incorporating allowances for climate change for all sources of flood risk with sufficient flood risk mitigation up to the design flood level and specified arrangements for safe access and egress.

The FRA needs to include access/egress proposals and demonstrate 'dry' or 'wet' safe access/egress. You need to consider the likely duration, depth, velocities and UK flood hazard rating (FD2320) of floodwater and the LPA should consult the emergency planners/emergency services about whether 'safe' access/ egress can be achieved through the FWEP

We consider this is an Emergency Planning issue the Flood Risk and Emergency Planning Teams at Kirklees Council need to be satisfied that the development and particularly the ground floor uses are appropriate given the flood risk and that there is an appropriate place of safety for the ground floor accessible for all users of the buildings and with safe access/egress to/from the site during a flood and that you can accept the risk if, for whatever reason, they are not able to do this. We advise that an Evacuation Plan is produced for the site in consultation with the Flood Risk and Emergency Planners at Kirklees Council (please see further details in the informatives)

If you have any queries please contact me

Yours sincerely

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