

Consultation Response from KC,  
Lead Local Flood Authority

2023/92448 Former Cooper Bridge Water Treatment Works, Leeds Road, Mirfield, WF14 0BT

Outline application for erection of B8 industrial unit

Date Responded: 14<sup>th</sup> July 2024

Responding Officer: Paul Farndale

Responding Ref:

**Further to our comments of September 13<sup>th</sup> 2023, Kirklees Flood Management & Drainage OBJECTS to this application on grounds of inadequate flood risk assessment and inadequate flood risk reduction methodology.**

Further to talks with the planning officer it is accepted that a zoning of 3ai as stated in the Strategic Flood Risk Assessment (CALDER) 2016, covers part of the site. It is also accepted that the shape of the area demarking flood zones 3ai (1in 20/ 1in 25) and 3a (1 in 100) are virtually the same, bordering on flood zone 2 (1 in1000). This being across the construction of filter beds, it therefore appears to be erroneous. That said flood risk maps for planning which merge the zone 3a, 3ai and 3b, still needs to be formally challenged and accepted by the EA to recommend a revision of the maps. This is in line with Kirklees Council custom and practice.

Should flood zone 3 be subsequently altered, the EA will still have to be satisfied that adequate compensatory storage has been provided by the development. This has not yet been addressed.

A recent assessment of flood levels given in pre-application advice by the EA does not consider climate change. It suggests but does not produce an interpolation of flood levels from different reaches of main river, all close to the site. The finished floor level suggested may therefore flood in a 1in 100-year return event. Adding climate change uplifts will further compromise the safety of the proposed development.

We would wish to see finished floor levels safely above the 1 in 100-year flood event with an appropriate allowance for climate change and an appropriate freeboard to compensate for modelling error. This is considered standard practice.

Regarding the flood evacuation plane, we cannot accept any proposal that starts with a blank page, ending with a submerged flood route for the 1 in 100-year event (climate change not added). This must be rethought incorporating climate change, examining the use of elevated walkways, and safe havens (e.g. mezzanine floor), to adequately tackle residual risk. Reliance on emergency responders is not considered as a suitable argument to mitigate flood risk. Emergency responders should not be put at risk due to a proposed development and there is every chance here that they will be needed.

We will not comment on surface water flood risk or drainage until the above issues are adequately assessed and mitigated.