

**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 with details of access points only

Date Responded: 12th April 2025

Responding Officer: Paul Farndale

Responding Ref: 3

Further to our comments of September 13th 2023 and 14th July 2024, Kirklees LLFA would have to object to this application on policy grounds.

As an update to our previous comments Kirklees Council is currently preparing a new SFRA to inform the local plan. In addition, the flood risk maps for planning (river) has been updated on 25th March 2025. There are no significant changes to the latter in terms of flood zones 2 and 3.

However, Kirklees Council are no longer supported by the Environment Agency is the use of zone 3ai for land allocations. This was a zone where water should go and would have been designated functional flood plane if it was not previously developed. Development potentially could be allowed without increasing the footprint with less vulnerable uses.

All sites where water should go will now by designated functional flood plane whether developed or not. A decision on policy within functional flood plane could still be the same as the 3ai for developed areas. No decision has been made to date.

Watercourse channels will also become functional floodplain and a stand off distance does also. This has an effect on Nun Brook, as it enters site where a car park is proposed.

The current provisional SFRA mapping is to undergo further changes before being finalised.

All our comments still stand.

We recommend however dialogue with the Environment Agency who has been awarded grant money for flood alleviation proposals for Mirfield. This could involve the use of land for sacrificial flooding to ease risk downstream. Potential development in this area could contribute to these developing plans.

