

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

2023/93539 Land adj, Ledgard Bridge Mill, Back Station Road, Mirfield, WF14 8NZ

Outline application, including the considerations of access appearance, layout, and scale, for the erection of a six-storey building to host 76 residential apartments (C3 use) and ancillary works comprising demolition of vacant building, formation of new access, parking areas, open space and landscaping; erection of cycle and bin refuse storage structures

Date Responded: 4th January 2024

Responding Officer: Paul Farndale

Responding Ref:

Kirklees Flood Management & Drainage acting as Lead Local Flood Authority STRONGLY OBJECTS to this application on flood risk grounds.

- After discussion with the planning officer, we understand a sequential test has been carried out. As current allocations within Kirklees' local plan avoid placing residential properties in flood zone 3 (or use a sequential approach within sites), applications like this failed in comparison to those in lower risk zones. We foresee a potential difficulty when windfall sites with associated risk are compared to the local plan allocations as and that of additional land for sale on the commercial market, as it is expected those at least risk should be developed first, otherwise efforts in the local plan are undermined. We therefore suggest a meeting between the LLFA, Planning Policy and the Planning Officer.
- The nature of flooding both within the site and its immediate vicinity means there is no safe access and egress available (evacuation plan) in storm events which will put a reliance on, and as a result, place emergency services at risk. This is unacceptable in our opinion. The Environment Agency do not comment on flood and evacuations plans.

We make no further comment on the application at this stage except that we do not envisage any issue with surface water discharge for sites immediately adjacent to a main river.