

4<sup>th</sup> March 2024

Environment Agency

**For the attention of Sustainable Places Team - Bev Lambert**

EA reference - RA/2023/146640/01-L01

**OUTLINE APPLICATION – LAND ADJ, LEDGARD BRIDGE MILL, BACK STATION ROAD, MIRFIELD, WF14 8NZ**

Thank you for your letter dated 19<sup>th</sup> January 2024 relating to the above planning application. The letter raises 4 points relating to the submitted flood risk assessment dated 22<sup>nd</sup> November 2023. Please find below comments relating to the points raised.

1) *Make an adequate assessment of the flood risks to the site.*

Following a pre application discussion with the EA during 2018 it was confirmed by the EA that the existing River Calder 2026 hydraulic model was not fit for purpose. Subsequently, the EA's term consultants JBA were engaged by the client to update the hydrology and hydraulic model in line with the site. This work was completed during 2018 and approved as fit for purpose by the EA during 2019. The model was also used to assess the impact of the proposed development on flood levels in the local area. See page 6 of the FRA under "consultation with the EA". Subsequently, this model and flood compensation assessment was signed off by the EA. See attached letter dated 2<sup>nd</sup> September 2021.

Consideration has also been given within the FRA to the increased food risk due to onsite runoff. Storage volumes have been estimated for the 100yr+CC storm with no flooding permitted within the site. See page 16 of the FRA under "Increased runoff due to development".

2) *Adequately demonstrate how the development and its users will be kept safe from flooding, up to and including the design event (1%AEP event, taking the impacts of climate change into account).*

Habitable levels have been elevated above modelled/estimated flood levels determined by the JBA modelling. Furthermore, there is an existing telemetry flood warning evacuation plan in place for the existing adjacent site which will be extended to include this site. It is proposed that occupants are evacuated from the area in times of potential extreme floods.

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3) *Demonstrate that the proposed development will not increase offsite flood risk.*

The modelling undertaken by JBA concluded that the proposed development which is to be constructed on silts will not increase flood risk at the site or adjacent. EA confirmed that the JBA modelling showed that this building made an insignificant difference to the flood water on adjacent sites.

4) *Adequately demonstrate that site users (including emergency services) will have a safe means of access and egress to and from the site.*

The JBA model estimates flood depths of upto 600mm adjacent to the building which will be accessible to the emergency services. However, the building will be a safe area from the flood water and the flood warning evacuation system will reduce the number of occupants within the site during an extreme flood event. A flood warning and evacuation plan is currently being prepared and will be initially forwarded to the LLFA for their flood response teams approval.

Yours sincerely,

Lea Favill

Director

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For and on behalf of  
EWE Associates Ltd