

Nick Hirst  
Kirklees Metropolitan Borough Council  
Development Management

**Our ref:** RA/2023/146640/02-L01  
**Your ref:** 2023/93539

**Date:** 03 April 2024

By email: [dc.admin@kirklees.gov.uk](mailto:dc.admin@kirklees.gov.uk)

Dear Nick

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

Thank you for re-consulting us on this application following submission of additional information, which we received on 8 March 2024.

We have reviewed the formal response to our objection by EWE Associates Ltd dated 4 March 2024. No new technical information has been provided to overcome our objection, so we are not in a position to remove it.

In summary our comments to EWE's responses to our objection points are as follows:

Point 1:

- The FRA needs to be clear and consistent in presenting the design flood level and confirming the source it comes from.
- The attached letter of 2 September 2021 doesn't confirm that the floodplain compensation solution was signed off by us. That letter contained pre-application advice and advised that floodplain compensation would be required.
- While the model that supports the FRA has been signed off as fit for purpose, this only means that from a technical standpoint, the model itself has been built in an appropriate way to represent the things it is built to represent. This does not mean that the solution that has been modelled is considered acceptable.

Point 2:

- The FRA doesn't state a clear and consistent design flood level to set finished floor levels from, nor does it commit to a specific finished floor level.

Point 3:

- As per point 1, the proposed stilts and voids aren't considered to be a suitable way of maintaining floodplain storage volume on site. This was covered in previous correspondence.

Point 4:

- As no finished floor levels have been specified and the proposed stilts and voids solution isn't considered acceptable, we aren't able to conclude that site users will be safe on site during a flood.
- As the site would flood during a design flood event, safe access and egress would rely on suitable emergency procedures. We do not review or approve emergency procedures, but we do need to make sure that suitable information is provided to inform them. This includes information on depth, velocity, and hazard rating. These have not been provided in full, so we aren't able to advise the emergency planners appropriately.

### **Planning Advice Service**

Please advise the applicant that if they would like to get further specific advice on how to overcome our objection, they can take advantage of our planning advice service. We can offer services including meetings, telecons and reviews of revised information prior to formal submission. We encourage the applicant to contact us directly to discuss this further.

We currently charge £100 plus VAT per officer per hour. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms for our charged for service are available [here](#).

If you need any clarification or further information, please contact me.

Yours sincerely

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