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: 23rd October 2025 **Responding Officer: Paul Farndale** **Responding Ref:**

Further to our previous comments, we have observed that the flooding of the existing converted mill building has been estimated at 100mm deep and a finished floor level of 45.239m AOD, giving a flood level of 45.339m in Storm Ciara 2020.

This application will now need specific questions directed at the Environment Agency, the statutory consultee for main river flood risk. It is also important given that a JBA model of expected levels for flooding has been submitted to override that of the EA.

As 100mm of flooding is an estimate for main river flooding, a precautionary approach is politely suggested by the LLFA to question the EA on their thoughts on managing risk from real experience to modelling (a representation of reality).

Does the EA have local estimates in the district's main rivers as to estimated return periods recorded for storm Ciara to be measured against the quoted experience and the modelled 1 in 100 year fluvial event.

From EA data, suggested 1 in 100 level is less than 2020 flood if interpolated between 45.24 (upstream of site) and 44.32 downstream. JBA modelling is slightly less upstream and more downstream. This would indicate that 2020 Storm Ciara is greater than 1 in 100.

Also, an event in 2020 does not take any climate change into account. The inference being that a storm giving a 100mm flood of the existing building has a higher risk of occurring more frequently in 50-100 years' time, and an equal chance of being deeper. EA advice on climate change and the estimated return period for storm Ciara is required.

There are conflicting statements in the site-specific flood risk assessment that suggest suggested finished floor levels for the new building to be 46.78m AOD. Other areas mention 45.68m in more than one place, 300mm above the 1 in 100 + 30% cc fluvial event.

There still doesn't appear to be an analysis of depth of flooding where 'elevated walkway' is located and the areas of the bridge adjacent to the emergency platform. It does appear that this is the best that can be achieved in terms of meeting Ledgard Bridge. We would require clarification on the elevated walkway drawing that is labelled 'existing ground level' 'flood level' but nor 'walkway level'. Clarity over safety of the evacuation route is required.

We offer no further comment until this aspect is resolved but are almost certain to ask for a simulation of surface water design with a surcharged outfall, given attenuation is in the highest risk flood zone.