

Kirklees Metropolitan Borough Council
Development Management

Our ref: RA/2025/149072/01-L01
Your ref: 2025/90673

Date: 20 January 2026

Sent via email

Dear Planning Team

Erection of detached warehouse

Adj, 7, Halifax Road, Millbridge, Liversedge, WF15 6JQ

Thank you for consulting us on the above.

Environment Agency position

We **OBJECT** for the reasons detailed below.

Flood Risk

We note the proposed development classification is less vulnerable and that the proposed site is in Flood Zone 3a(i) which is land defined by Kirklees Council Strategic Flood Risk Assessment (SFRA) as having a high probability of flooding.

Additionally, we note the proposed building is positioned above a culverted ordinary watercourse.

In the absence of an adequate flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Reasons:

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails to:

- adequately assess risk to site, including residual risk.
- Provide finished floor levels for the redevelopment, (these should be provided in meters Above Ordnance Datum (mAOD))
- due to the above, provide details of appropriate mitigation.
- demonstrate that the development does not increase flood risk to others.
- consider access & egress
- consider how people will be kept safe from the identified flood hazards
- demonstrate the proposed development and use will not reduce the flood plain storage

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Additionally, the applicant will need to demonstrate that their development will not comprise the structure of the culvert or prevent access for maintenance.

We recommend an easement of 8m or 45 degrees from the outer edge of the base of the culvert running under the site. Flood mitigation around culverts should consider what would happen if the culvert collapses.

Where possible, culverted watercourses should be opened up as part of development proposals. Consideration should also be given to the maintenance of the culvert. Because this is an ordinary watercourse, the LPA / Lead Local Flood Authority will need be satisfied regarding the structural integrity and maintenance of the culvert.

The applicant should consider undertaking a survey of the culvert and may need to contact the LPA/ Lead Local Flood Authority, which in this instance is Kirklees District Council, regarding the culverted ordinary watercourse alignment.

FRA sources of information - advice to applicant

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please email neyorkshire@environment-agency.gov.uk. Your local planning authority should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your local planning authority to determine what information is available. Further advice on what to include in an FRA can be found in the planning practice guidance including a checklist: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#para80>

Note to LPA

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Should you have any queries regarding this response, please contact me.

Yours faithfully

Miss Jennifer Wilson
Planning Specialist

Direct e-mail sp-yorkshire@environment-agency.gov.uk