

Our Ref: 25C09
Date: 15.09.2025

PLANNING SUPPORTING STATEMENT & FLOOD RISK STATEMENT

For a

FULL PLANNING APPLICATION

For

*THE ADDITION OF A PROPOSED PEDESTRIAN DOORSET AND INTERNAL
WORKS INCLUDING NEW LIFT LOBBY*

At

*CLEGG WOOLS LTD, ASHBROW MILLS, ASHBROW ROAD,
HUDDERSFIELD, HD2 1DU*



1.0 Planning Statement

- 1.1 This Statement has been prepared in support of a Full Planning Application for Clegg Wools. The application is for the addition of a proposed pedestrian doorset and internal works, including new lift lobby.
- 1.2 The proposal includes the installation of a new, level-access external door, in place of an existing boarded window. This means that no new structural openings will be formed as such, as the door will be beneath an existing building, retaining the proportionality of the existing elevation so that the new door integrates seamlessly and is sympathetic to existing building. The door will lead to a new lift lobby.
- 1.3 The approach mentioned in 1.2 ensures 'high quality design' as per Point 11.1 of the *Kirklees Local Plan* whilst improving the building by making it 'more... safe and accessible'. Policy LP24 promotes 'high quality, green, accessible, inclusive and safe design' whilst suggesting in d.i. 'The reuse and adaptation of existing buildings, where practicable' (Kirklees Council, 2019). The proposed development seeks to adapt an existing historic (though not listed) building and better its functionality and safety to suit the needs of the present and future. The lift lobby helps to provide better access for pedestrians and stock across the floors, including, for example, the Lower Ground Floor of the building which has previously only been accessible by a staircase – please refer to Site Photographs in the Appendix. The staircase is fairly steep and may be challenging for ambulant disabled staff, so a lift would improve access for both ambulant staff and future staff using a wheelchair.
- 1.4 The proposal seeks to holistically enhance the safety of the existing building through providing a Lift Lobby to separate the lift from the rest of the building and providing the opportunity for a better evacuation procedure for any future members of staff using wheelchairs, as for example in the future a Disabled Refuge could be provided within this space.
- 1.5 The *Kirklees Local Plan* in Policy LP1 suggests, in line with the NPPF, that 'the council will take a positive approach that reflects the presumption in favour of sustainable development... to secure development that improves the economic, social and environmental conditions in the area.' (Kirklees Council, 2019). The benefits resulting from the proposal largely outweigh any negative impacts, as it provides the potential to boost the local economy and jobs, with the current upper storeys of the mill being unoccupied for much of the year. The proposal aims to improve the attractiveness of the mill for businesses, potentially preventing calls to demolish the existing building and the potential impacts that could be caused as a result on both the visual amenity of the area and carbon footprint involved in demolition and new builds.
- 1.6 Overall, therefore, it is felt that the proposal is both sympathetic to the existing building whilst improving its accessibility, safety, and functionality, in turn providing better opportunities for economic growth in the local area.

2.0 Flood Risk Statement

- 2.1 The site is in Flood Zone 3, as shown in adjacent image meaning that it is an area with a 'high probability of flooding from rivers and the sea' (Environment Agency, 2025). This means it has a 1 in 100 or greater annual probability of flooding. The development does not involve a change of use or an increase in the flood vulnerability classification.
- 2.2 Vulnerability – According to the NPPF Annex 3 (Ministry of Housing, Communities and Local Government, March 2012) the development would be classed as 'less vulnerable' as the building's Lower Ground Floor is used for General Industry / Storage and Distribution.
- 2.3 A site-specific Flood Risk Assessment (FRA) is typically required for developments in this Flood Zone. However, the proposal is, at most, a minor development, not raising flood risk concerns elsewhere and not involving new dwellings, volume or footprint increase or raising of ground. It is therefore felt that a proportionate Flood Risk Statement (included here) is most appropriate.
- 2.4 Adjacent to the proposal are existing level access doors, including a loading door which currently slopes internally. As far as the author is aware, these have not historically resulted in flooding.
- 2.5 Sequential Test – The NPPF suggests that 'applications for some minor development and change of use should also not be subject to the sequential test, nor the exception test' (Ministry of Housing, Communities and Local Government, 2012 (2)).
- 2.6 Flood Resistance Measures – The external hardstanding adjacent to the doorset could be graded away from the threshold of the new doorset, if required, to direct any potential floodwater away from the opening. A linear channel or slot drain could also be installed directly in front of the doorset, connected to the existing surface water drainage system.
- 2.7 Flood Resilience Measures – The doorset should incorporate steel suitable for outdoor use and driving rain. A threshold seal should be provided to prevent minor leakage into the building. The Lower Ground Floor is typically occupied by stock, with few members of staff permanently based in this area. However, an emergency plan could be implemented to make staff aware of the risks and provide an escape plan in the event of flooding.
- 2.8 Surface Water Run-off – According to Gov.uk (2025), the risk of yearly surface water flooding is medium, meaning 'between 1% and 3.3%'. The development will not be increasing the existing footprint, meaning that the proposal does not increase the impermeable area.
- 2.9 In summary, the proposal is appropriate within the Flood Zone given its existing industrial use, the minor nature of the development, and the potential proposed mitigation measures.

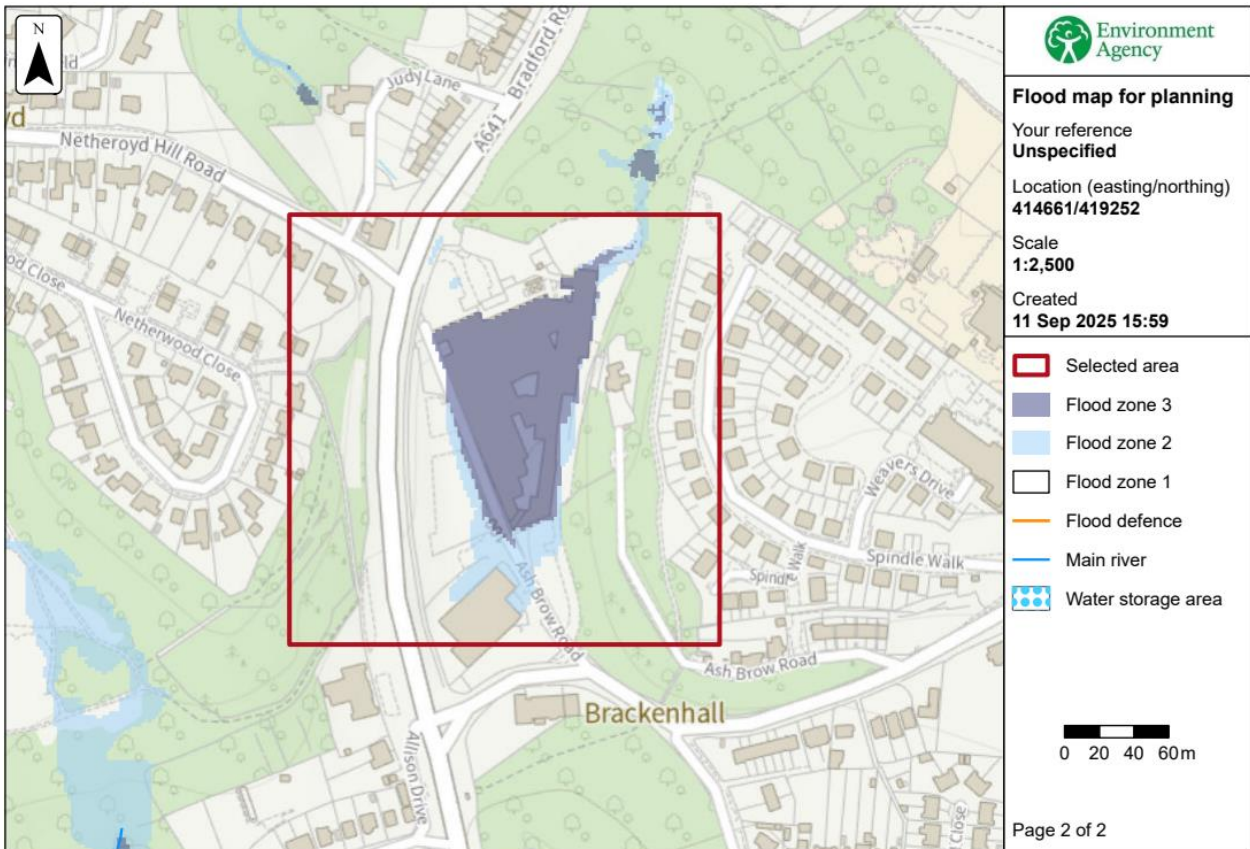


Figure 1 – Flood Map for Planning indicating that the Site is in Flood Zone 3, meaning it is at a high probability of flooding from rivers and the sea (Environment Agency, 2025)

3.0 References List

Kirklees Council (2019). *Kirklees Local Plan Strategy and Policies, p8, 9, 111 [pdf]*. Retrieved from <https://www.kirklees.gov.uk/beta/planning-policy/local-plan.aspx>

Environment Agency (2025). Get flood risk information for planning in England. Retrieved from <https://flood-map-for-planning.service.gov.uk/>

Ministry of Housing, Communities and Local Government (2012). Annex 3: Flood risk vulnerability classification. Retrieved from <https://www.gov.uk/guidance/national-planning-policy-framework/annex-3-flood-risk-vulnerability-classification>

Ministry of Housing, Communities and Local Government (2012) (2). 14. Meeting the challenge of climate change, flooding and coastal change, Paragraph 176. Retrieved from https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change?utm_source=chatgpt.com

4.0 Appendix – Site Photographs



Figure 3 - Photograph of Existing North-East Facing Elevation, where new Doorset is to be built in place of existing window aperture



Figure 2 - Photograph taken inside of the Mill looking towards the blanked out window, which is covered by a large timber door



Figure 4 – Photograph taken inside the Lower Ground Floor showing the existing staircase, the only access to the Lower Ground Floor at present from the upper floors