

Ms Farzana Tabasum
Kirklees Metropolitan Borough Council
Development Management
PO Box B93
Huddersfield
West Yorkshire
HD1 2JR

Our ref: RA/2025/148983/01-L01
Your ref: 2025/92882
Date: 02 December 2025

Dear Ms Tabasum

**ERECTION OF 75 DWELLINGS WITH ASSOCIATED PARKING,
INFRASTRUCTURE, HARD AND SOFT LANDSCAPING AND ACCESS FROM
MANCHESTER ROAD
CELLARS CLOUGH MILL, MANCHESTER ROAD, MARSDEN, HUDDERSFIELD,
HD7 6LY**

Thank you for consulting us on this application.

Environment Agency Position

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

Reason(s)

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:

- Demonstrate that the proposed development will not increase flood risk to others.

Overcoming our objection

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

We understand from the FRA that the whole site will be raised above the design flood level. It is unclear how the compensatory storage requirements have been calculated. The FRA should be updated to demonstrate how hydraulically linked like for like level for level flood compensatory storage outside of the design flood event flood extent shall be achieved.

The FRA currently only provides an indication where the compensatory storage might be located but does not provide any further details. Please note, the current location for the proposed compensatory storage is within the design flood event flood extent and is therefore not considered suitable.

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

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 our objection be removed, it is likely we will recommend the inclusion of conditions on any subsequent approval.

Yours sincerely

Mark Williams
Planning Advisor for Yorkshire Sustainable Places Team
Environment Agency

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