

Kirklees Metropolitan Borough Council -
Development Management
HUDDERSFIELD, HD1 2JR

Reference: PA-0000875/01
Customer reference: 2025/93464
15 April 2026

Sent via email

Dear Planning Team,

Demolition of existing building and erection of industrial building

Spinksmire Mill Huddersfield Road Meltham Holmfirth HD9 4AN

Thank you for consulting us on the above.

Environment Agency position

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

Flood Risk

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. In particular, the FRA fails to:

- Accurately describe the nature of the proposed development.
 - Drawing number 1564-LRC-ZZ-XX-DR-A_1002, revision P01, dated 04/02/2026 shows “potential area of open culvert to be covered to enable vehicle route to service turning if required”, however this is not addressed in the FRA. Please note, the Environment Agency is opposed to culverting of watercourses because of the adverse ecological, flood risk, geomorphological, human safety and aesthetic impacts.
- Provide details of appropriate mitigation
 - Finished floor levels should be raised 300mm above the 1% AEP plus climate change flood event, and should be provided in metres Above Ordnance Datum (mAOD).
- Demonstrate that the proposed development will not increase flood risk to others
 - We note that the proposed development represents an increase in footprint from the existing development. Paragraph 6.1.8 of the FRA indicates that a water entry design strategy shall be implemented, however, no details of how this will be achieved have been provided.

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.

Note to LPA

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.

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.

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

Yours faithfully,

Jennifer Wilson

Planning Specialist

E-mail sp-yorkshire@environment-agency.gov.uk