

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

Reference: PA-0000461/02
Customer reference: 2025/93535
22 June 2026

Sent via email

Dear Planning Team,

Erection of commercial unit

S S COMPONENTS, HUDDERSFIELD ROAD MIRFIELD KIRKLEES WF14 9DQ

Thank you for consulting us on the above application

Environment Agency position

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

Flood Risk

We have reviewed the updated FRA and maintain our previous objection.

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:

- Take the impacts of climate change into account
 - There is no assessment of the impact of climate change on fluvial (river) flood risk using appropriate climate change allowances as per [‘Flood risk assessments: climate change allowances’](#)
- Provide details of appropriate mitigation
 - There are no details of the proposed finished floor levels in metres Above Ordnance Datum

- Demonstrate that the proposed development will not increase flood risk to others
 - Paragraph 5.4.4 states “the proposed building which will be designed to be flooding”, we understand from this statement that a water entry design strategy is proposed, however there are no details of how this will be achieved.
 - Paragraph 5.4.4 also states “if required, a sub-floor void can be incorporated into the building construction to provide compensatory flood storage volume”. Please note, as per paragraph 049 of the Planning Practice Guidance, stilts and voids are not considered to be a suitable form of compensatory storage. Any compensatory storage should be provided on a like-for-like, level-for-level basis.

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