

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

Reference: PA-0012227/01
Customer reference: 2026/92123
25 September 2026

Dear Jillian,

Demolition of leisure centre; erection of hotel (Use Class C1) and mixed-use flexible event space courtyard (Use Classes C1/E/Sui Generis); alterations and refurbishment to north stand including hospitality space; pitch-side hospitality suites/hotel rooms (Use Class C1/Sui Generis) and other associated works

The Accu Stadium Stadium Way Huddersfield HD1 6PG

Thank you for consulting us on this application which we received on 16 September 2026.

Flood Risk

Our Flood Map for Planning shows the site lies within Flood Zone 3, with a high probability of flooding from rivers and/or the sea. The application is for mixed-use development, which includes a 'more vulnerable' land use in [Annex F \(Table 2\)](#) of the National Planning Policy Framework. It is therefore necessary for the application to pass the Sequential Test and Exception Test and to be supported by a site-specific flood risk assessment (FRA), which can demonstrate that the 'development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall'.

Flood Risk Assessment

An FRA by Clancy Consulting Limited, referenced KSTAD-CCL-XX-XX-RP-C-02500 Rev 03 and dated 16 July 2026, has been submitted in support of the application.

We note that the proposed development involves a change of use from a leisure centre to a hotel lobby on the ground floor. We also note that the hotel lobby includes a bar area, which represents an increase in vulnerability use classification from "less vulnerable" to "more vulnerable". The FRA states that the ground floor use will be less vulnerable only.

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.

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:

- Provide details of appropriate mitigation
 - The FRA does not confirm the finished floor levels for the ground floor space. We note that this space will include more vulnerable development. Finished floor levels should be raised 600mm above the 1% AEP plus climate change flood event.
- Adequately consider access and egress

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.

If you need any clarification or further information, please contact us by email at: sp-yorkshire@environment-agency.gov.uk.

Yours sincerely,

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