

Flood Risk and Drainage Strategy Statement

PROJECT:	457 Bradford Road
Project Address:	457 Bradford Road, Batley
Project Description:	Office accommodation ancillary to the existing Bison Steak House restaurant.
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Purpose of this issue

Support the revised full planning application for an ancillary restaurant office for up to three people.

Final drawing PL01A (PL01 revision A dated 11 October 2026), supplied on 14 October 2026, is the submission drawing. The application area figure is retained at approximately 14.8 m². Roof runoff will drain to a soakaway. No separate office occupation is proposed. Figures and mapping are retained from Revision 02 without a new survey or flood model. No additional flood-level evidence is included; the limitations on safe occupation remain.

CONTENTS

DOCUMENT VERSION.....	2
1 PURPOSE AND SCOPE.....	4
2 SITE SETTING.....	4
3 DEVELOPMENT AND PLANNING HISTORY.....	4
4 EVIDENCE BASE AND LIMITATIONS.....	5
5 POLICY AND ASSESSMENT APPROACH.....	6
6 SOURCES OF FLOOD RISK.....	6
7 DESIGN FLOOD LEVEL AND FINISHED FLOOR LEVEL.....	7
8 FLOOD-RESILIENT DESIGN AND MANAGEMENT.....	9
9 PUBLIC SEWER PROTECTION.....	10
10 SURFACE-WATER DRAINAGE STRATEGY.....	10
11 CONSTRUCTION, OPERATION AND MAINTENANCE.....	11
12 RESIDUAL RISK AND CONCLUSION.....	12
13 IMPLEMENTATION AND CONDITION SCHEDULE.....	12
14 REFERENCES.....	13

1 Purpose and scope

This statement considers flood risk, drainage and public-sewer protection for the use of land to site one 20-foot ISO shipping container as office accommodation ancillary to Bison Steak House, 457 Bradford Road, Batley, WF17 8LB. It coordinates the former storage proposal with the revised application. The office will accommodate up to three people, typically between 8.00am and 6.00pm, and will not be independently occupied.

The office is a regularly occupied workplace. There is no proposed sleeping accommodation, customer seating or food preparation. Offices fall within the less-vulnerable flood-risk category, but that classification does not remove the need to demonstrate safe occupation and access over the development lifetime. Typical hours do not guarantee the absence of occupants at other times and are not a substitute for a flood response plan.

The container measures approximately 6.06 m by 2.44 m by 2.59 m externally. The retained application area and roof catchment are approximately 14.8 m², based on the external footprint, not a measured internal fit-out area. Final PL01A shows a personnel door and two windows. It does not establish surveyed finished-floor or access levels.

2 Site setting

The site is occupied by the existing Bison Steak House on the south-west side of the A652 Bradford Road. Batley Beck, designated as a main river, runs generally south-eastwards close to the south-western site boundary. The land falls generally towards the beck.

Historic information in the 2021 specialist FRA recorded ground in the former development area at approximately 57.6 mAOD, a flood wall beside Batley Beck at approximately 58.92 mAOD, and approximately 57.398 mAOD immediately downstream of the restaurant. These are background values for a different proposal, not verified current levels at the office footprint.

A public sewer crosses or adjoins the part of the site previously considered for development. Its obstruction was decisive in the refusal and dismissed appeal for the former extension. The proposed container, all supports, drainage equipment and lifting operations must therefore remain outside the sewer and its confirmed maintenance corridor.

3 Development and planning history

Kirklees Council refused application 2023/62/92975/E for a three-storey restaurant extension and internet cafe. Appeal APP/Z4718/W/24/3352005 was dismissed on 13 June 2025. In flood-risk terms, the Inspector found that the extension would obstruct access to the main public sewer and could consequently give rise to flooding in an area of medium to high flood risk.

The current proposal is a single ancillary office unit with no additional restaurant covers or upper floors. Up to three people will occupy it during typical daytime working hours. The intended position outside the 6 m sewer exclusion zone remains a key constraint, but regular occupation requires a verified floor level and safe access and escape arrangements.

4 Evidence base and limitations

This statement has been prepared from the following information:

- Earth Environmental & Geotechnical Ltd, Flood Risk Assessment A4372/V1, dated 8 October 2021, prepared for the former restaurant extension.
- Environment Agency Product 4 information dated 27 March 2017, reproduced within FRA A4372/V1.
- Kirklees Council Decision Notice 2023/62/92975/E, dated 1 July 2024.
- Planning Inspectorate Appeal Decision APP/Z4718/W/24/3352005, dated 13 June 2025.
- Kirklees Planning Validation Requirements, effective from 6 February 2023.
- Environment Agency planning guidance and standing advice recorded as reviewed on 13 October 2026 in the preceding revision.
- Environment Agency Flood Map for Planning - Flood Zones, revised 20 May 2026 and service data updated 6 July 2026.
- Environment Agency Flood Map for Planning - Flood Zones plus Climate Change, service data updated 6 July 2026.
- Environment Agency Surface Water Spatial Planning Depths, present-day and climate-change datasets published 28 May 2026.
- Environment Agency 1m LiDAR Composite Digital Terrain Model, 2022 composite accessed 4 August 2026.
- Site photographs supplied to Stoddart Architecture in August 2026.

The historic FRA was prepared for a different development and restricts reliance or reuse. Its technical data are retained as background only. The mapping, LiDAR values and figures below are carried forward from Revision 02, which records an August 2026 review; no fresh site survey or flood modelling has been undertaken for this office-use amendment. Their applicability to the exact office position and access route requires confirmation.

Revision 02 records EA 1 m DTM levels of 57.622 mAOD at E424338 N424463 and approximately 57.41–57.80 mAOD within the surrounding 10 m square, with a median near 57.60 mAOD. These are retained source values, not newly verified survey measurements. They provide screening context but do not establish the finished floor level or safety of the office access route.

5 Policy and assessment approach

National policy requires development to be directed away from areas at highest flood risk and, where development is necessary, to remain safe throughout its lifetime without increasing flood risk elsewhere. Kirklees Local Plan Policy LP27 requires a site-specific assessment of all sources of flooding, climate change and mitigation. Policies LP28 and LP34 require satisfactory drainage, protection of water infrastructure and use of the surface-water drainage hierarchy.

Kirklees' validation list requires a proportionate drainage strategy for all non-householder applications in Flood Zones 2 or 3. It expects the strategy to identify the drainage hierarchy, layout, levels, SuDS, runoff and storage, exceedance routing and long-term maintenance. The small scale of the proposal supports a concise assessment, but does not remove the need for site-specific levels and a drainage plan.

The office remains operationally dependent on the restaurant. The Council has treated the proposal as use of land for siting a container for fee purposes; this does not by itself establish a flood-risk Sequential Test exemption. The Council should confirm the applicable test requirements for the revised development under current policy. The precise footprint must be checked against the functional floodplain: less-vulnerable office development is not appropriate in Flood Zone 3b. Compatibility elsewhere does not remove the requirement for a site-specific safety assessment.

6 Sources of flood risk

Source	Screening	Assessment
Fluvial	Medium/high site sensitivity	The July 2026 dataset places historic reference E424338 N424463 in Flood Zone 2. Flood Zone 3 crosses other parts of the wider site. The current climate-change extent also intersects the reference point.
Surface water	Present and future risk	At the reference point, May 2026 data show less than 150mm depth in the present-day 1% AEP event, 150-300mm in the 1% AEP climate-change event, and 300-600mm in the 0.1% AEP climate-change event.
Sewer	Material infrastructure constraint	No historic sewer-flooding incident was identified, but the public sewer must remain accessible. Obstruction could impede maintenance and increase consequences during failure or surcharge.
Groundwater	Low/moderate screening sensitivity	Historic SFRA information indicated moderate groundwater-emergence susceptibility at broad grid scale. No basement or below-ground occupied space is proposed.
Reservoir/canal	Very low	Historic mapping identified no canal nearby and placed the site outside the mapped maximum reservoir-flood extent.

Source	Screening	Assessment
Coastal	None	The inland site is not subject to tidal or coastal flooding.

7 Design flood level and finished floor level

The historic Product 4 information reproduced in FRA A4372/V1 gives a defended 0.1% annual probability flood level of 57.775 mAOD at an adjacent model node. This is historic evidence and is not adopted as the current design flood level for the office. Obtain appropriate flood-level and climate-change information for the precise footprint and access route and identify the governing design event, development lifetime and residual risk.

Floor level and resilience design

Agree an appropriate design flood level and climate-change allowance for the office lifetime. Set the finished floor and resilience levels using the applicable Environment Agency guidance and verified site and access levels. Any departure from the recommended freeboard requires a reasoned site-specific assessment accepted by the Council. Flood-resistant materials and raised electrical equipment do not replace the need for safe access and escape.

Regular occupation changes the assessment basis. A targeted level survey tied to Ordnance Datum should establish ground levels at the office, adjacent road and intended escape route. The proposed finished floor level and any ramp or steps must then be assessed against the appropriate flood information. The present evidence does not demonstrate that these matters can safely be left entirely to an installer's pre-installation check.

Final PL01A specifies discrete supports, an open void and anchoring, but does not give a surveyed finished-floor level in mAOD, a flood-resilience datum or a complete accessible entrance arrangement. Its 170 mm dimension does not demonstrate flood freeboard. This statement does not infer missing levels or certify safe occupation. The Council must assess whether the available evidence is sufficient.

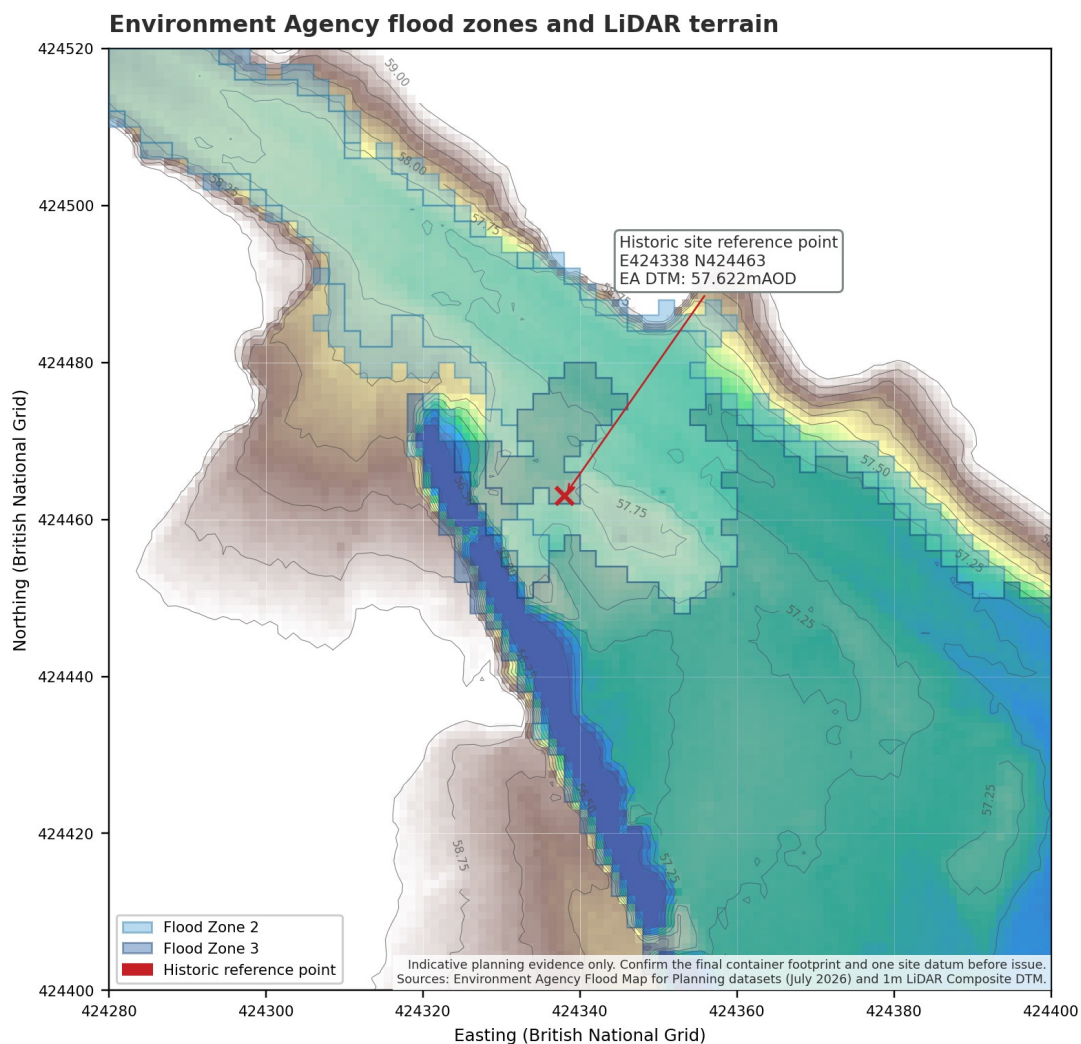


Figure 1 - Flood-zone and EA 1 m DTM illustration retained from Revision 02; assessed reference point and surrounding terrain.

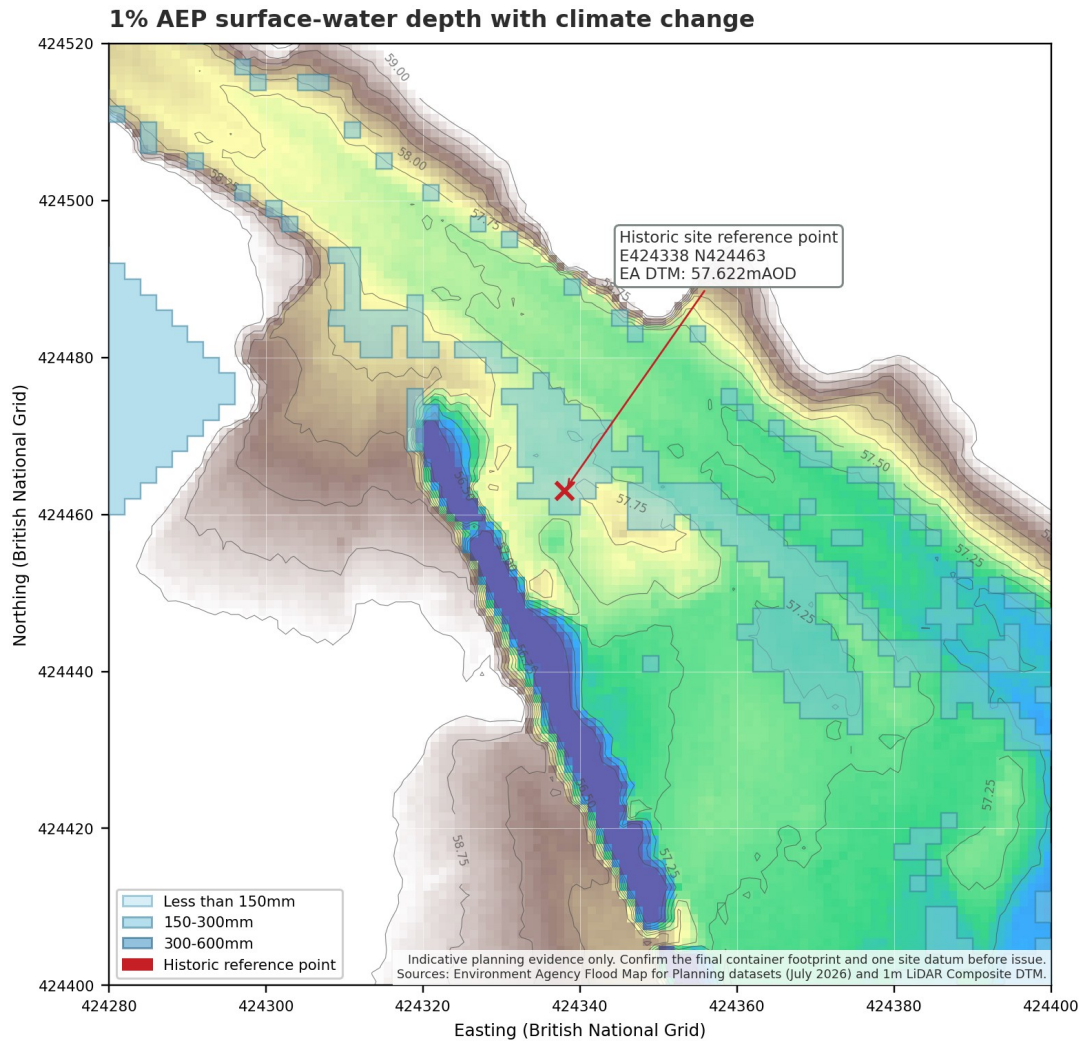


Figure 2 - Surface-water depth with climate change retained from Revision 02; the reference point is shown in the 150–300 mm band for the 1% AEP event.

8 Flood-resilient design and management

- The container shall be supported above ground on discrete, structurally designed pads or piers. No continuous solid plinth, retaining wall or other barrier shall obstruct overland flood routes or materially displace flood storage.
- A structural engineer shall specify anchors and connections adequate to resist flotation, sliding, overturning and debris impact at the confirmed design flood level while allowing future removal without disturbing the public sewer.
- Water-resistant and recoverable construction should be used below the agreed resilience datum, including appropriate insulation and internal finishes. Sockets, wiring, IT equipment, heating controls and other sensitive services should be located above the design protection

level. The electrical installation and isolation arrangements must be designed for the occupied office.

- Doors, windows, ventilation openings and service penetrations must be coordinated with the flood-resilience design. Prefer passive measures; the safety case must not depend on staff fitting a demountable barrier before a flood. Any measure must preserve safe exit and must not create a risk of occupants being trapped.
- Office records and equipment should be protected above the agreed resilience datum, with electronic records backed up away from the site. No fuel, oils, chemicals, gas cylinders, polluting liquids or hazardous storage is proposed. Furniture and finishes should allow cleaning and recovery following inundation.
- Close and evacuate the office on an applicable flood alert or warning, or earlier if local conditions threaten the access route. Do not reopen while flooding, warnings or unsafe access persist. Staff must not enter or re-enter to recover records or equipment during an incident.
- The restaurant operator should register for available flood warnings and appoint a responsible person and deputy to monitor warnings during office use. Before occupation, provide a written flood plan covering early closure, an assessed route to safety, assistance for any user needing it, accounting for all three occupants, safe electrical isolation and inspection before reoccupation. A plan and supporting levels must demonstrate the route to land outside current and future flood risk. Because the container is single storey, suitable refuge arrangements must also be assessed; access to the restaurant's upper floors is not assumed to be safe or available without verification.

9 Public sewer protection

Application drawing PL01A identifies the public sewer centreline and a 6 m exclusion zone. The container shall not be placed over the sewer, any manhole or its maintenance corridor. This restriction applies equally to support pads, anchors, drainage equipment and installation operations.

PL01A shows the office footprint outside the indicated exclusion zone but does not establish the clearance of all supports, anchors, access works and drainage equipment. These require coordination against a verified sewer alignment. Removability is not a substitute for maintaining ordinary inspection, repair and emergency access to the sewer throughout the development lifetime.

This measure directly addresses the flood-risk reason in the previous appeal. Reliance shall not be placed merely on the container being theoretically movable; ordinary inspection, repair and emergency access to the sewer must remain practical throughout the development's lifetime.

10 Surface-water drainage strategy

The container has an approximately 14.8 m² roof catchment. Roof runoff will be collected and discharged to a soakaway within the application site, consistent with the amended form. Any

additional hard surface associated with entrance works must be included in the detailed runoff assessment.

The proposed drainage arrangement is as follows:

1. Collect roof runoff through gutters and downpipes with leaf protection and an accessible silt trap before conveying it to the soakaway. No rainwater tank or separate reuse system is relied upon for storm attenuation.
2. Soakaway infiltration is the selected drainage method. Its location, dimensions, storage capacity, ground permeability and groundwater separation require verification through detailed design and appropriate site testing. Selection of this method does not establish that infiltration feasibility has already been demonstrated.
3. Keep the soakaway and connecting drainage clear of the verified sewer maintenance corridor, foundations and the watercourse bank. No new public-sewer connection, office WC or foul connection is proposed. Suitable welfare facilities in the restaurant must be available before occupation.
4. Direct watercourse discharge: no new direct outfall to Batley Beck is proposed.

Final PL01A contains general roof-water management notes but no detailed drainage layout. This statement identifies the selected soakaway method. Detailed design must establish collection and conveyance, capacity, infiltration performance, levels, exceedance routing and maintenance access; these are not represented as completed or tested.

Exceedance routing must avoid office and restaurant entrances and additional risk to neighbouring land or the highway. Supports, access works and drainage equipment must not dam existing flood routes. If testing shows infiltration is unsuitable, a revised strategy will require agreement with the Council; no alternative discharge is assumed approved.

11 Construction, operation and maintenance

- Installation shall use shallow, localised works and avoid stockpiling soil, concrete washout, fuels or loose materials beside Batley Beck or above the sewer corridor.
- Temporary runoff shall be filtered and contained on site. No silty or contaminated water shall be discharged to the beck, highway or drainage system.
- Gutters, leaf guards and downpipes shall be inspected every six months and after severe storms; debris shall be removed immediately.
- Inspect the silt trap and connecting drainage every six months and after severe storms; remove accumulated sediment and repair defective components.
- Inspect the soakaway at least twice yearly and after severe storms for blockage, prolonged ponding and loss of performance. Maintain access for inspection and remedial work.

- Stoddart Architecture's client, as site owner/operator, shall retain responsibility for the system unless this is transferred formally to another competent party.

12 Residual risk and conclusion

Residual risks include flood events beyond the adopted design standard, defence failure or overtopping, drainage blockage, sewer surcharge and rapidly developing flooding while the office is occupied. Raised and resilient construction, anchoring and maintained drainage reduce physical consequences; an assessed escape route and early closure procedure are also required for the safety of occupants.

The final proposal is a regularly occupied ancillary office on discrete supports, with roof runoff directed to a soakaway. The reports and form use that same approach. Flood levels, finished-floor level, safe access and escape, verified sewer clearance and soakaway performance have not been demonstrated by new technical evidence. Coordination does not remove those limitations. The Council will assess the sufficiency of the evidence and the scope of any further information or conditions.

13 Implementation and condition schedule

Item	Required evidence	Status
Current EA information	Verify the retained mapping at the exact office footprint and access route and obtain appropriate design flood data.	Further confirmation
Floor level and safe access	Survey levels in mAOD; assess finished floor, steps or ramp, escape route and refuge arrangements.	Before determination
Container details	Final PL01A shows a personnel door, two windows, discrete pads or piers and an open void. Detailed threshold and anchoring design must preserve that arrangement.	Final planning drawing
Public sewer	Confirm office, supports, access works and drainage remain clear of the sewer and maintenance corridor.	Verify before relevant works
Roof-water management	Soakaway selected. Establish infiltration suitability, capacity, layout, levels and exceedance routing in the detailed design.	Method fixed; design unverified
Flood response plan	Record warnings, responsible persons, early closure, evacuation and post-flood checks.	Before occupation

Item	Required evidence	Status
Other consents	Check separate approvals needed for works near the main river or drainage infrastructure.	Before relevant works

14 References

- National Planning Policy Framework, August 2026, Chapter 18 and Annex F; reviewed 13 October 2026. <https://www.gov.uk/guidance/national-planning-policy-framework>
- Environment Agency, Flood risk assessments: applying for planning permission; reviewed 13 October 2026. <https://www.gov.uk/guidance/flood-risk-assessments-applying-for-planning-permission>
- Environment Agency, Preparing a flood risk assessment: standing advice, updated 28 May 2026; reviewed 13 October 2026. <https://www.gov.uk/guidance/preparing-a-flood-risk-assessment-standing-advice>
- Environment Agency, Flood risk assessment: Flood Zones 1, 2, 3 and 3b, updated 28 May 2026.
- Environment Agency, Flood Map for Planning - Flood Zones and Flood Zones plus Climate Change, data updated 6 July 2026.
- Environment Agency, Surface Water Spatial Planning Depths - Present Day and Climate Change, published 28 May 2026.
- Environment Agency, 1m LiDAR Composite Digital Terrain Model, 2022 composite.
- Kirklees Local Plan Strategy and Policies, adopted February 2019, Policies LP27, LP28 and LP34.
- Kirklees Planning Validation Requirements, effective 6 February 2023.
- Earth Environmental & Geotechnical Ltd, Flood Risk Assessment A4372/V1, 8 October 2021 - historic context only.
- Planning Inspectorate, Appeal Decision APP/Z4718/W/24/3352005, 13 June 2025.



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