

**Consultation Response from KC,  
Lead Local Flood Authority**

**2023/91491 Prickleden Mills, Woodhead Road, Holmfirth, HD9 2JU**

**Erection of 61 age-restricted apartments with ancillary accommodation including separate residents lounge and manager facilities and associated external works, including the erection of access bridge and riverside walk featuring two pedestrian bridges (within a Conservation Area)**

**Date Responded: 30<sup>th</sup> November 2025**

**Responding Officer: Paul Farndale**

**Responding Ref: 4**

**Further to our previous comments of 20<sup>th</sup> December 2023, 23<sup>rd</sup> July 2024, Kirklees Flood Management & Drainage acting as LLFA OBJECTS to this application.**

**A sequential test must be carried out.** As apartment blocks, access roads are located in flood zone 3a (SFRA 2016). Please note that under provisional plans for a revised SFRA, this area becomes flood zone 3b which is incompatible with housing which is listed as a 'more vulnerable' use.

The opportunity to perform an on-site sequential approach to negate the need for a sequential test has not been taken. For this to occur, all development would be required to be located in the areas of the site shown as flood zone 1.

Recent changes in NPPF would allow cut and fill on the site to produce new areas of flood zone 1 as long as appropriate compensatory storage is provided. Although not in the local planning policy the LLFA would support this process if it provided betterment to the wider catchment, i.e. provided sacrificial storage that reduced flood risk beyond the site.

As the current local plan allocated housing outside flood zone one, coupled with potentially available sites on the market providing less flood risk, **we would expect the sequential test to fail.**

**Additional Comments – Subject to alterations to pass the sequential test or adopt a sequential approach.**

We have agreed a 9l/s discharge from the site for surface water discharge to river, an increase on previous comments. This is to reduce the risk of blockage from small orifices on flow control devices. An indicative plan of attenuation would be required.

The quoted finished floor levels and predicted flood levels incorporating climate change are noted. It is for the EA, once the sequential test/approach has been altered to comment on compensatory storage,

The design of the pond including overflows and how it best protects this site is crucial. Previous submissions for this site have gone into much more detail on design. We would expect the pond to be drained, and a design agreed with emergency drain down, and acceptable risk to the new buildings before any other work on site commences.

The undercroft car parking is a concern **due to the potential rapid inundation and loss of life.** Any defences such as walls should be assumed to fail. We therefore would only accept undercroft parking if entrances to it were above the 0.1% annual probability flood level, i.e. flood zone one. It would be prudent to look at climate change/freeboard to allow for modelling error.