

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

2025/90517 land off, Forge Lane, Thornhill Lees, Dewsbury, WF12

**Outline application, including the consideration of access and layout, for two commercial units
(use class B2 and/or B8) and associated works**

Date Responded: 29th July 2025

Responding Officer: Paul Farndale

Responding Ref: 1

Kirklees Flood Management & Drainage OBJECTS to this application on the grounds that an updated FRA and Drainage Strategy is required and that the site is reliant on a pumped surface water solution.

Since November 2024, new flood risk maps for planning and surface water flood risk maps have been produced by the Environment Agency (March 25th 2025).

Kirklees Council is in the process of updating its Strategic Flood Risk Assessment to support updates to the local plan. This site is now shown to be vulnerable to flooding in the 0.1% annual probability of river flooding with an appropriate allowance for climate change, i.e. flood zone 3 with a climate change allowance. This was not the case in November 2024 when the submitted FRA and drainage plan was produced.

As such the planning officer may wish to re-run a sequential test to see if more appropriate sites are available for development first.

Kirklees LLFA objects in principle to the use of surface water pumped solutions which is the least sustainable method of disposing of surface water and relies on the electrical and mechanical engineering (which can break down and incurs the use of energy).

Please note that main river flooding is from the river Calder and not the watercourses that actually flow through the site that are unmodelled.

Surface water flood mapping (pre March 2025) does give an indication of flood risk to the site from surface water and potential surcharging of local watercourses. The surface water flood risk to site is particular high in comparison to most areas of Kirklees.

The use of compensatory storage for surface water flood risk could be viable. We strongly suggest however that developed land is raised significantly and enough to ensure gravity connections to local drainage systems. We appreciate that this solution may not be acceptable considering the requirements form other disciplines.

Opportunities for opening watercourses on site and the use of natural SUDS features including wetland areas for storage instead of attenuation tanks should be considered. This is in line with local planning policy.

All known systems should be overlaid on the development plan to ensure adequate stand off distances are achieved in the layout.

Given the unique nature of flood risk to this site and its history of planning applications, we invite the planning officer to a meeting to discuss the risks involved and potential solutions that may require more information at this stage.