

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

2025/92327 Land adjacent to, 185, Woodhead Road, Holmbridge, HD9 2NW

Erection of 4 dwellings (within a Conservation Area)

Date Responded: 19th October 2025

Responding Officer: Paul Farndale

Responding Ref: 1

Kirklees Flood Management & Drainage OBJECT to this application on the grounds of flood risk.

The red line boundary and property curtilage is in flood zones 1, 2 and 3. We note habitable floor levels are raised by flood risk maps for planning that must assume defences fail, would indicate that flooding would be hugging the building and inside rear access, and inundating garden areas.

A sequential test is the risk avoidance tool for the Council. An application should not be seen to be promoted on the grounds of attempt to mitigate risk.

The Council should look at avoid risk in the first instance in accordance with the NPPF and concentrate on sites in flood zone 1. Only where it can be shown that there aren't enough available sites in flood zone 1 can flood zone 2 be considered and so on. The Local Plan is the first steer for this as to whether this application would be allowed to come forward but would then require market research for other available sites at lower risk.

We believe this site will fail the test given our allocations in the local plan. We believe this site does not constitute a sequential approach in line with recent changes in guidance.

Any further discussion on sequential testing should be chaired by the planning officer, in discussion with the LLFA and Planning Policy.

Flood Management & Drainage offer no further comment at this stage.