

Kirklees Metropolitan Borough Council
Development Management

Our ref: RA/2025/148811/02-L01
Your ref: 2025/92327

Date: 12 March 2026

Sent via email

Dear Planning Team

Erection of 4 dwellings (within a conservation area)

Land Adjacent To, 185, Woodhead Road, Holmbridge, HD9 2NW

Thank you for consulting us on the above.

Environment Agency position

We maintain our objection for the reasons detailed below.

Flood Risk

We have reviewed the updated Flood Risk Assessment (titled "Flood Risk Assessment Woodhead Road, Holmbridge, HD9 2NW" Document Reference: S4655-C-01-C. Revision C dated 06/01/26. Compiled by Building Design Northern Ltd.).

Objection 1: 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:

- consider the impacts of climate change on fluvial flood risk
 - Different climate change allowances have been used to assess future flood risk than those advised in 'Flood risk assessments: climate change allowances', without adequate justification
- demonstrate that the proposed development will not increase flood risk to others
 - We note that the proposed development involves building up the bank to construct the new residential properties. This is within the design flood event flood extent and is therefore likely to displace fluvial floodwaters. The FRA should be updated to demonstrate that this will not increase flood risk to others, i.e. through the provision of like for like level for level compensatory storage.

Overcoming our objection 1

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.

Objection 2: We object to this application as it involves works within 8 metres of a watercourse. As submitted, it is unlikely that we would grant a flood risk activity permit for this application.

Reason:

The proposed development would restrict maintenance and emergency access to the watercourse. The permanent retention of a continuous unobstructed area is an essential requirement for future maintenance and/or improvement works.

It is unclear from the information provided whether the proposed development would affect bank stability.

Overcoming our objection 2

Whilst the FRA has been updated to state "The site will maintain a continuous, unobstructed easement of 6 metres measured from the top of the river bank", the drawings still show that the proposed development will be within this 6m easement.

The applicant should submit a report to demonstrate that the proposed development will not negatively impact bank stability.

Informatives:

River wall - note to LPA/Applicant

We note that a "river wall" has been included on several design drawings. We understand this to be an existing retaining wall which does not have a flood risk function. If this river wall is intended to be a flood defence wall, the flood risk assessment must be updated to include a full assessment of the flood defence wall.

FRA sources of information - advice to applicant

We do not prepare or provide FRAs, however, relevant flood risk data can be ordered via our [Flood Map for Planning page](#) or our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please contact neyorkshire@environment-agency.gov.uk. Your LPA should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your LPA to determine what information is available. Further advice on what to include in an FRA can be found in the planning practice guidance including a checklist: [Flood risk and coastal change - GOV.UK](#).

Flood resistance and resilience - advice to LPA/applicant

We strongly recommend the use of flood resistance and resilience measures. Physical barriers raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the [Flood Risk and Coastal Change pages](#) of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

- Government guidance on flood resilient construction [Flood resilient construction of new buildings - GOV.UK](#)
- CIRIA Code of Practice for property flood resilience [Code of practice for property flood resilience C790](#)

British Standard 85500 – Flood resistant and resilient construction [BS 85500:2015 | 30 Nov 2015 | BSI Knowledge](#)

Note to LPA

Please note that we also have an outstanding Fisheries and Ecology objection, see our previous response RA/2025/148811/01-L01.

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Should you have any queries regarding this response, please contact me.

Yours sincerely

Miss Jennifer Wilson
Planning Specialist

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