

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

2026/90604 The Bridge, 159-161, Manchester Road, Longroyd Bridge, Huddersfield, HD1 3LE

Change of use of public house ground floor and basement to dental clinic and taxi office

Date Responded: 24th June 2026

Responding Officer: Paul Farndale

Responding Ref: 1

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

As this is change of use application, a sequential test and exceptions test do not apply. The previous use was classed as 'more vulnerable' (drinking establishment). However please note that the lower ground floor was used as storage only and the users that made the classification more vulnerable would have been confined to the ground floor. It is noted that for river flood risk, the ground floor has finished floor levels above the flood levels supplied in the FRA with an allowance for climate change.

The new use for the building overall has a vulnerability of classification of 'more vulnerable' (non-residential occupation for health services), and the use of the lower ground floor is changed to active, and the Flood Risk Assessment should have taken into account this change and consider **'the safety of people within buildings'**.

On this basis, the flood risk (consequences) has increased and therefore should be objected to. The building could be used for other purposes, and the lower ground floor could be inactive (storage only).

The FRA is reliant on mitigation of flood risk and cannot achieve finished floor levels 300mm above the flood level with climate change added.

In addition, Kirklees Council has a record of flood incidents in the area, including cellar flooding to properties less than 40 metres away, also adjacent to water features on the opposite side of road to the side aspect of the public house.

For surface water flood risk, 3rd and 4th generation flood risk modelling shows flood risk adjacent to the property. We appreciate the practitioners have some concerns over recently introduce 4th generation mapping which is why we are combining the two maps.

Naturally being close to canal and river in the low spot of an area, you would expect surface water run off from the uplands and surcharging drainage systems to work their way down to low spots. 4th generation should build up behind buildings on Manchester Road at a higher level, 3rd generations show flow routes from the same direction, from the railway track, down Well St, opposite the building. It also shows a build up behind the building itself that appears to be a recess to the lower ground floor from an aerial view. Lower ground floor space and that of single-story buildings should consider the 1 in 1000 year event in the FRA.

We conclude therefore that the use of the basement, both active use compared to previous and what it is used for (more vulnerable) increases flood risk and therefore we OBJECT. Mitigation methods are therefore inappropriate as they would be considered actions against 'residual risk', where as the planning authority has the opportunity to avoid this risk.