2026/90604 Proposed change of use of public house ground floor and basement to dental clinic & taxi office
at 159 -161, Manchester Road, Longroyd Bridge, Huddersfield, HD1 3LE

Response to Lead Local Flood Authority objection

Introduction

This document has been prepared by ***ADP Architecture and Design Ltd*** in response to the Kirklees Lead Local Flood Authority objection in respect of flood risk and sets out why the objection should be withdrawn or, where necessary, addressed by an appropriately worded planning condition.

Background

In April 2025 a Pre-application Enquiry was submitted to Kirklees Council in order to obtain formal feedback and advice in respect of the proposal for change of use of the public house to dental clinic & taxi office. The planning officer dealing with this was Elenya Jackson.
On 12th June 2025 we received the Council's Pre-application response, which was largely positive in respect of the proposals.

Please see below extract taken from the pre-application response, in respect of flood risk and drainage;

Climate Change –

Kirklees Council declared a Climate Emergency in January 2019 and the Kirklees Local Plan includes policies aimed at supporting development which contributes positively to climate change. The LPA requires applications to be supported by a statement from the applicant which details how climate change, its contributors and impacts, have been considered as part of a development proposal.

Flood Risk and Drainage –

The site does not lie within a flood zone and no known watercourses cross the site. As such, there are no concerns raised in terms of Flood Risk, given the scale / nature of the

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Planning
Investment and Regeneration Service
PO Box B93, Civic Centre 3,
Off Market Street, Huddersfield, HD1 2JR

proposal it is not considered necessary for a scheme of foul / surface water drainage to be submitted as part of any application.

Conclusion

To conclude, based on the information provided, the principal of developing the site may be acceptable for the development.

ADP Architecture and Design Ltd is a limited company registered in England & Wales: No. 10148770.
Registered Office: The Old Police Station, 16 Bridge Lane, Holmfirth, HD9 7AN, United Kingdom. VAT Registration No. 241 8534 12.

Based upon the outcome of the pre-application response, the applicant took the decision to purchase the property.

On 20th April 2026 we submitted a planning application for change of use of public house ground floor and basement to dental clinic & taxi office.

A Flood Risk Assessment prepared by UNDA Consulting Ltd was submitted as part of the application. The FRA concluded;

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8.17. The site is located within the maximum inundation extent on the EA Reservoir Inundation Map when river levels are normal. The EA also advise on their website that reservoir flooding is extremely unlikely.

8.18. The EA hold no records of historic flooding having affected the site or surrounding area.

In Summary:

- The proposed application is for the change of use of ground floor public house to dental clinic and taxi office.
- There will be no increase to built footprint, impermeable areas or increase to vulnerability. Internal access will be permanently maintained from the basement to the ground floor. There will be no residential elements as part of this proposal.
- Post development, the site will remain "less vulnerable" (commercial).
- The ground floor finished floor levels are 76.50mAOD, 2.07m above the undefended 1:100 year plus 20% climate change flood event (74.43mAOD).
- The applicant has agreed to raise the basement finished floor levels as much as feasibly possible (150-200mm above existing).
- The applicant has also confirmed that the new basement floor will be of solid resilient construction. The applicant has detailed that the basement walls are of solid imperforate construction with no openings.
- Extra flood resistance and resilience measures will be implemented.
- The proposed development fits within Standing Advice for vulnerable developments.
- Safe escape can be achieved with the inclusion of climate change.
- In case of an extreme flood event without warning, site users should seek refuge on the ground floor of building, as the ground floor finished floor levels are 76.50mAOD, 2.07m above the undefended 1:100 year plus 20% climate change flood event (74.43mAOD).
- The applicant has agreed that a permanent means of internal access will be provided from the basement to the ground floor, thus providing safe refuge.
- There will be no loss of fluvial floodplain storage.
- Due to the small scale of development, a full Surface Water Drainage Strategy is not required at this stage of planning.
- The applicant will register with the free Environment Agency Floodline Alert Direct service.

Assuming accordance with these flood risk management measures, Unda Consulting Limited consider the proposed application to be suitable in flood risk terms.

Unda Consulting Limited
April 2026

Environment Agency
We note that the Environment Agency has raised no objection to the proposal, subject to condition.
Any such condition can be fully complied with and implemented in accordance with clause 6.19 of the FRA.

cont.

Summary

The LLFA objection primarily concerns the proposed use of the basement and refers to “a build up behind the building itself that appears to be a recess to the lower ground floor”.
This description does not reflect the construction on site: at some point in time a brick extension has been formed at ground floor level on steel beams and columns, leaving a complete void below rather than a recess.



The solid imperforate canal wall along this stretch of the canal and beyond, is 1.0m higher than the tow path on the opposite canal bank (see below).



In addition, the river level and canal continue to fall considerably in the direction of Huddersfield Town Centre.
Water levels in the River Colne and subsequently canal levels, would have to rise considerably, to breach the canal wall in this location.

The LLFA report also refers to cellar flooding at properties approximately 40m away; however, the relevance of those incidents to the application property is unclear without details of the construction, levels, flood pathway, and circumstances of those properties.
There is no known history of flooding to the basement storey at 159–161 Manchester Road.

The report states;
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.

The proposed use does not, in itself, increase the probability of flooding; rather, the relevant planning consideration is whether the proposed occupation and use of the basement can be made safe and appropriately resilient.

The proposed basement use may alter the consequence of a flood event for the building owner because the space would be occupied and contain equipment, but that matter can be addressed through design, resilience, and management measures.

The applicant has taken this risk into account and is prepared to implement appropriate mitigation measures to improve the watertightness and resilience of the building.
These measures include an internal tanking scheme for the basement, a new waterproof floor structure, full-height treatment of the existing walls, and careful positioning of plant and services.

In respect of the safety of people, the basement escape route and travel distances to ground-floor level have been designed in accordance with Approved Document B Volume 2, and the detailed Building Regulations process will further address safe means of escape and life-safety requirements.

ADP Architecture and Design Ltd