

Kirklees Metropolitan Borough Council -
Planning Services
HUDDERSFIELD, HD1 2JR

Reference: PA-0004535/01
Customer reference: 2026/62/90823/E
04 June 2026

Dear Nicole Helliwell,

**Demolition of existing workshop and erection of larger workshop at Wakefield Road
Denby Dale Huddersfield HD8 8RP**

Thank you for your consultation regarding the above proposal which was received on 19th May 2026.

Environment Agency Position

We have reviewed the information submitted with the application and we object to the proposal and recommend that planning permission is refused. Our detailed comments are as follows.

Flood Risk

We have reviewed the Flood Risk Assessment (FRA) attached with the application which was submitted on the planning portal dated 25th March 2026.

In the absence of an acceptable FRA, we object to this application and recommend that planning permission is refused.

Reason(s)

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:

- adequately assess risk to site
- consider the impacts of climate change
 - There is no assessment of the impact of climate change using appropriate climate change allowances [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](#).
- provide details of appropriate mitigation.

- demonstrate that the development does not increase flood risk to others.
 - We note the proposed development is replacing the existing building which appears to be on stilts over the watercourses with the proposed new building also being on stilts over the watercourses. The soffit of the new building appears to be significantly lower than the existing building. The FRA will need to be updated to demonstrate that the soffit of the proposed development is suitably above the design flood level, and will not increase flood risk, including in event of a blockage.
 - This should include consideration of the impact of loss of floodplain storage and demonstration that offsite land and property will not experience increased risk. If increased risk is predicted, then appropriate mitigation measures will need to be demonstrated.

Overcoming our objection

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 on any revised FRA submitted and we'll respond within 21 days of receiving it.

Informative(s):

Building over a watercourse – Advice to applicant

We are opposed to the culverting of any watercourse because of the adverse ecological, flood risk, geomorphological, human safety and aesthetic impacts. We note that the proposed development involves replacing an existing building that is sited above 2 ordinary watercourses with a new building over the watercourses. We have not objected to the principle of the proposed development on this basis but wish to note that this is a missed opportunity to de-culvert these watercourses. In demonstrating the proposed development will not increase risk to others, the applicant should be mindful of Paragraph 049 of the Planning Practice Guidance which states "Whilst the use of stilts and voids below buildings may be an appropriate approach to mitigating flood risk to the buildings themselves, such techniques should not normally be relied upon for compensating for any loss of floodplain storage. This is because voids do not allow water to freely flow through them, trash screens get blocked, voids get silted up, they have limited capacity, and it is difficult to stop them being used for storing belongings or other materials.". Any compensatory storage should be provided on a like for like, level for level basis.

Culverting consent - Advice to applicant

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the lead local flood authority which in this instance is Kirklees Council. It is best to discuss proposals for any works with them at an early stage.

If you have any questions regarding our response, please contact sp-yorkshire@environment-agency.gov.uk.

Yours sincerely,

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