

Bury Metropolitan Borough Council
Town Hall
Knowsley Street
Bury
Lancashire
BL9 0SW

Our ref: SO/2025/124668/01-L01
Your ref: 71426
Date: 20 January 2025

Dear Sir/Madam

**DEMOLITION OF BUILDINGS AND ERECTION OF 87 NO. AFFORDABLE
DWELLINGS AND ASSOCIATED ACCESS OFF DUMERS' LANE,
LANDSCAPING AND PARKING.**

**LAND ADJACENT TO BEALEY INDUSTRIAL ESTATE, DUMERS LANE,
RADCLIFFE, MANCHESTER, M26 2BD**

Thank you for referring the above application to the Environment Agency. We object to the proposed development and would like to make the following comments.

Environment Agency position

In the absence of an acceptable 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. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- Consider how people will be kept safe from the identified flood hazards
- take the impacts of climate change into account
- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for the 1 in 100-year flood event + 35% climate change. Consequently, the development proposes inadequate:
- Flood storage compensation. There is a small section of flood zone 3 in the proposed red line boundary. Any development here will require like-for-like compensatory flood storage including the appropriate allowance for climate change.

Environment Agency
Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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- Raised finished floor levels. FFLs should be at a minimum of 600mm above the 1% flood level + 35% climate change. According to the submitted FRA, the FFLs of the dwellings located in flood zone 2 are proposed to be 600mm above the 0.5% flood event. It is for the applicant to demonstrate that the proposed finished floor level is equal to the 1% event + 35% climate change + 600mm level.

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 consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

Please forward a copy of this letter to the applicant.

Yours faithfully

Mrs. SYLVIA WHITTINGHAM
Planning Advisor

SPPlanning.RFH@environment-agency.gov.uk