

Planning Policy Comments

Application No: 65844

Location: Former Mondi/Holcombe Mill, Bridge Street, Ramsbottom, Bury, BL0 0BS

Proposal: Erection of 72 no. dwellings including the retention of chimney & 2 no. existing buildings to residential use and demolition of derelict building together with engineering operation to create a development platform and associated parking, landscaping, drainage, the layout of industrial estate roads and footways and other associated works.

Flood Risk

The application site is a former mill site which has partially been cleared and is largely situated within flood zone 3.

There is historical evidence that the site has flooded, namely in the recent Storm Eva and Storm Ciara flood events experienced in 2015 and 2020.

The applicant has submitted a Flood Risk Sequential and Exception Test Assessment (August 2020) as requested in previous comments. In addition the applicant has recently submitted a Flood Risk Sequential Assessment Addendum (February 2021)

These Assessment's conclude that there are no sequentially preferable sites which could accommodate the application proposals having drawn on evidence from the Council's 2018 Strategic Housing Land Availability Assessment (SHLAA). At the time the applicant was undertaking the Assessment, the 2018 SHLAA was the most up-to-date information available. The 2018 SHLAA identified the site as having 'unconstrained potential' for residential development.

The 2018 SHLAA has since been updated and the most recent 2020 SHLAA categorises the application site as a Category 5 (constrained potential) site to reflect uncertainty over whether the flood risk issues could be overcome.

Nevertheless, the Council does accept the criteria by which the alternative sites have been considered within the Flood Risk Sequential and Exception Test and agrees that there are no sequentially preferable sites that are appropriate or reasonably available within the search area and therefore the Sequential Test has been met.

The NPPF states that if, following the application of the sequential test, it is not possible for the development to be located in zones with a lower probability of flooding, the Exception Test should be applied.

The NPPF provides two criteria which should be met for the Exception Test to be passed. These are:

- the development would provide wider sustainability benefits to the community that outweigh the flood risk; and,
- the development will be safe for its lifetime taking account of the vulnerability of

its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall

The Flood Risk Sequential and Exception Test and Flood Risk Assessment submitted with the application seeks to respond to the requirements of the Exception Test and conclude the proposal *"clearly amounts to sustainable development and there are no significant demonstrable adverse impacts arising from the proposals that would outweigh the considerable benefits of the scheme"*.

The proposal seeks to increase the provision of new housing into the Borough meeting an identified need and seeks to regenerate a derelict brownfield site, both of which contribute to meeting the first criteria of the Exception Test.

However the Council does not agree that the above outweighs the flood risk to the site (criteria 1) and furthermore does not accept that the proposal meets criteria 2 of the Exception Test.

A Level 2 Strategic Flood Risk Assessment (SFRA) has been carried out to support work on the Greater Manchester Spatial Framework. Part of this work considered all sites included in Bury's housing land supply (constrained and unconstrained) and located in Flood Zone 3 to determine whether they could pass the Exception Test. The Former Mondi Paper Mill site was included in the assessment.

Considering flood risk from all sources, the SFRA concluded that it is highly unlikely this site could pass the Exception Test and suggested that expensive design solutions would likely to be required i.e. development on stilts to enable development to be considered and this may not be economically viable.

When undertaking the SFRA assessments there were no specific proposals identified for the application site and therefore the conclusions should be considered as guiding principles for the site.

For a site specific flood risk assessment on the application site, the SFRA recommended the following should be included:

- Risk to the site must be confirmed with the EA.
- Risk from the unnamed watercourse and culverts must be quantified.
- Were development to proceed, alternative safe access and egress routes would need to be found.
- Depending on the development options to be assessed, detailed modelling should be carried out to fully ascertain the effects of any such development option as discussed in the Level 2 SFRA. All fluvial modelling should be subject to consultation with the LLFA and the EA.
- All culverts and the Peel Bridge road bridge, discussed in this Level 2 SFRA, should be assessed for capacity and condition. Culvert blockage modelling should be carried out to ascertain residual risk to the site.
- The FRA should include a drainage strategy for the proposed new development layout, assuming development planning is to proceed.
- The FRA should include emergency planning procedures with particular consideration to safety around the onsite watercourses in a residential area and safe access and egress routes in times of flood.

The Council requires the applicant to demonstrate that all of the above has been included within the FRA and agreed with the Environment Agency and the LLFA.

In addition, the Council requires the applicant to discuss with the LLFA whether modelling is required to investigate the interaction between river flooding and surface water in order to determine the likelihood of increased flooding within Ramsbottom.

The Council agrees with the Environment Agency that there are concerns regarding the safety of the development in relation to access/egress and requires the additional hazard modelling outlined in EAs letter (29/12/2020) to be undertaken. The proposed development must be safe to comply with the second part of the Exception Test.

Finally, a Flood Plan (November 2020) has been submitted with the application, it is advised that this Plan is discussed with the Council's Emergency Planners and Emergency Services.

Recreation

SPD1 states that on-site recreation provision will only be considered in exceptional circumstances, assessing each scheme on a site by site basis. In the case of this application, if the flood risk to the site, discussed above, can be mitigated through the creation of on-site recreation provision which fulfils a dual purpose for recreation provision and flood risk mitigation, the Council would be prepared to accept on-site recreation provision in these exceptional circumstances.

Appropriate long term management of the on-site open space will be required and this should include rectifying damage which has occurred due to flooding.

In light of the above, the Council is unable to provide a recommendation at this stage due to insufficient information.

Officer: CW/FS
Date: 02/03/2021