

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

Our ref: SO/2020/120679/01-L01
Your ref: 66114
Date: 02 December 2020

Dear Sir/Madam

ERECTION OF BALE STORE BUILDING UNIT 3 IRWELL WORKS, LOWER WOODHILL ROAD BURY BL8 1AA

Thank you for consulting the Environment Agency on the above application. We would wish 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.

Reason(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the development's flood risks. In particular, the FRA fails to:

- Clearly show that flood risk will not be increased elsewhere.

We have reviewed the Flood Risk Assessment (FRA), referenced 4959/FRA/Final/v1.0, produced by Weetwood dated 17/9/2020, submitted with the application. The FRA has determined that there are significant depths of flooding that could affect the site. As part of the flood risk mitigation measures in section 5, the FRA states that "*finished floor levels should be set at a minimum of 0.15 m above adjacent ground levels following reprofiling of the site*". It is not clear what re-profiling is proposed but ground levels and floor levels must not be raised above existing levels without adequate compensation to avoid displacement of flood water elsewhere.

The proposed open bale storage building must be free to flood and should preferably have a gap at the base of the sides and rear to allow flood water to move freely.

Reason(s)

The proposed building is positioned immediately adjoining the bank top of the River Irwell. It is not clear exactly how close the building would be to the bank top but sufficient easement must be available to be able to inspect the river bank. We ask that this be clarified.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA and/or plans which clearly show that ground levels will not be raised. A revised plan must also show the building proximity to the bank top and that at least pedestrian access for inspection is available. The landowner is responsible for the condition of the riverbank and it is in the applicant's own interest to ensure they can inspect the bank. If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised FRA 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

Direct dial 0203 0251059

Direct e-mail sylvia.whittingham@environment-agency.gov.uk