

From: Matt Grant
Sent: 17 March 2021 16:37
To: Leach, Helen <H.Leach@bury.gov.uk>; Southgate, Andrew <A.M.Southgate@bury.gov.uk>; Marno, David <D.Marno@bury.gov.uk>; development.control@bury.gov.uk
Cc: Simon Pemberton <simon.pemberton@lichfields.uk>; John Matthews <John.Matthews@ecclestonhomes.co.uk>; Alan Dingley <Alan.Dingley@ecclestonhomes.co.uk>
Subject: Planning Application ref. 65844 - Former Mondi Mill, Ramsbottom [NLP-DMS.FID688556]
Importance: High

Helen,

Please see **below** our Flood Risk Consultant's response to the LLFA/Policy comments issued to us on 3rd March. You will note that the points raised have already been addressed in the original application submission. For the avoidance of doubt, the below clarifies this and sets out which documents should be referred to.

As discussed at our last meeting, due to contractual obligations between my client and the landowner it is essential that the application goes to committee on the 20th April. I recall that you committed to working to this and confirmed that it should be achievable. Since that meeting, other than the LLFA/Policy comments we have responded to below, we have not received any further requests for additional information or had sight of any new objections we have not already responded to. In respect of the viability assessment, we have not received any quotations from yourself for an external review so I assume that this is being progressed internally and is underway or completed? On this basis, I assume that no further issues have been raised? As such, please can you confirm that you are in the process of writing up the application and that it will be on the committee agenda for the 20th April?

If my above assumption is incorrect and you do consider there to be any outstanding matters, I'd be grateful if you could come back to us on these as a matter of urgency and before close of play tomorrow at the latest. The statutory target date for the application was 17th December 2020 so this is now significantly over due and as set out above it is essential we are on the agenda for the 20th April.

I am aware that you have issues receiving emails so I have copied in Development Control and I'd be grateful if you could respond to the read receipt.

Kind regards,

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From: James Aldridge <James.Aldridge@weetwood.net>
Sent: 16 March 2021 21:07
To: John Matthews <John.Matthews@ecclestonhomes.co.uk>
Subject: RE: Former Mondi/Holcombe Mill, Ramsbottom

Hi John,

Please find my response to the various points raised by the LPA below (in red):

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.

The planning application at the site is supported by a site-specific Flood Risk Assessment (ref: 4714/FRA/Final/v1.2/2020-08-07). The Flood Risk Assessment (FRA) presents a package of flood mitigation measures to facilitate development of the site and was uploaded to the Bury Council planning portal on 19 August 2020. The proposed flood mitigation measures principally involve regrading site levels and are considered to be financially viable.

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.

The FRA presents an assessment of the risk of fluvial flooding at the existing site based upon the Environment Agency's Mid Irwell hydraulic model. The hydraulic model was also used to assess the risk of flooding at the developed site and the impact of development on flood risk elsewhere. The associated hydraulic model files were submitted to the EA for review on 19 October 2020.

The EA provided a consultation response letter to Bury Council on 20 November 2020 confirming that the modelling is acceptable and fit for purpose.

- Risk from the unnamed watercourse and culverts must be quantified.

The EA approved hydraulic model includes the unnamed watercourse and culverts located at the site. As such, the FRA considers the flood risk from these sources.

- Were development to proceed, alternative safe access and egress routes would need to be found.

Alternative access to the site is not considered to be required. Safe refuge is provided at the site and the flood hazard rating on Bridge Street is generally shown to be low, with flood depths of less than 0.25 m. As such, the primary issue relates to access for emergency vehicles and the Defra/EA Flood Risks to People Phase 2 report (ref: FD2321/TR1) states that emergency vehicles such as fire engines remain controllable in flood depths of 0.50 m at up to 5 m/s flows.

- 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.

As stated previously, the EA has confirmed that the modelling is acceptable and fit for purpose.

- 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.

Bridge blockage modelling for the developed scenario has not been undertaken. However, the FRA states that raising the development plots above the peak 1 in 100 (+70%) AEP flood levels would be expected to mitigate the residual risk of flooding associated with a blockage of the Bridge Street bridge because floodwaters overtopping Bridge Street are heavily influenced by the weir located directly upstream.

- The FRA should include a drainage strategy for the proposed new development layout, assuming development planning is to proceed.

The planning application at the site is supported by a Drainage Assessment (ref: 4714/DA/Final/v1.0/2020-08-07). The Drainage Assessment presents the proposed surface water drainage strategy and was uploaded to the Bury Council planning portal on 19 August 2020.

- 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 planning application at the site is supported by a Flood Plan (ref: 4714/FP/Final/v1.0/2020-11-18). The Flood Plan presents the procedures that should be followed in the event that flooding is expected or has occurred but does not appear to have been uploaded to the Bury Council planning portal.

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.

The EA's consultation response letter to Bury Council dated 29 December 2020 indicates that the last outstanding point relates to preparation of an appropriate Flood Plan. It is not clear if Bury Council has reconsulted the EA following receipt of the Flood Plan.

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 LLFA is yet to provide any form of consultation response to the planning application.

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.

The flood hazard rating on Bridge Street for the upper (+70%) climate scenario is significant. However, it should be noted that there is only a 10% chance that climate change will result in an increase in river flow of 70%.

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.

Agreed.

Kind Regards,

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Technical Director

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