

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

Our ref: SO/2020/120565/03-L01
Your ref: 65844
Date: 29 December 2020

Dear Sir/Madam

ERECTION OF 72 NO. DWELLINGS INCLUDING THE RETENTION AND CONVERSION OF 2 EXISTING BUILDINGS TO RESIDENTIAL USE (5 NO. UNITS), THE RETENTION OF A CHIMNEY AND THE DEMOLITION OF A DERELICT BUILDING, TOGETHER WITH ENGINEERING OPERATIONS TO CREATE A DEVELOPMENT PLATFORM AND ASSOCIATED PARKING, LANDSCAPING, DRAINAGE, THE LAYOUT OF INTERNAL ESTATE ROADS AND FOOTWAYS AND OTHER ASSOCIATED WORKS FORMER MONDI/HOLCOMBE MILL, BRIDGE STREET, RAMSBOTTOM, BURY, BL0 0BS

Thank you for referring further details regarding the above application to the Environment Agency.

Environment Agency position

We have reviewed the following additional information:-

- Letter from Weetwood ref: 4714/2020-11-06/JA/EA/01
Annex 1 to letter – Flood Hazard Rating (1% AEP 35%CC)

We note the comments in point 2 responding to our query raised regarding the differences in modelled 1%AEP extents. The applicant has confirmed this relates to more accurate topographic survey of Bridge Street level being added to the model. Our river modeller who reviewed the detailed modelling suspected this was the reason for the differences. The model appears to use Bridge Street deck level at 127.3m which appear to correspond with the topographic survey in the FRA when also taking into account the upstream defence wall levels.

With regard to point 3 and safe access/egress, the hazard information provided shows that there would be no dry access/egress available for the development during a design flood when the impacts of climate change are considered over the lifetime of the development. The hazard mapping for the 1% AEP 35%CC event shows some areas of

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Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.
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Bridge Street would have “low” hazard but there is localised areas of “moderate” hazard. We assume these hazards have been derived using the methodology in Flood Risks to People methodology’ (FD2321/TR11) and the ‘Framework and Guidance for Assessing and Managing Flood Risk for New Development’ (FD2320/TR22). If so this suggests that there would be “danger to some” in relation to occupants accessing the development site during a 1% AEP 35%CC event. The letter suggests consideration of access/egress for emergency services is more appropriate as refuge could be taken within the proposed dwellings during a flood. Paragraph: 054 of the NPPF PPG states:

When considering safety, specific local circumstances need to be taken into account, including:

- the characteristics of a possible flood event, eg the type and source of flooding and frequency, depth, velocity and speed of onset;*
- the safety of people within a building if it floods and also the safety of people around a building and in adjacent areas, including people who are less mobile or who have a physical impairment. This includes the ability of residents and users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood;*
- the structural safety of buildings, and;*
- the impact of a flood on the essential services provided to a development.*

It may not be appropriate to rely on emergency services to ensure the safety of the development and your emergency planners should provide comment on this. The applicant has not provided a hazard assessment in relation to the 1%AEP 70%CC event although flood extents for this event have been mapped and provided in the FRA. These suggest depths of flooding considerably more to most of Bridge Street adjoining the site. Although this increase is considered the “upper end” under the current climate change allowances, it would be advisable to assess the hazards associated with the 70%CC increase. Climate change allowance are due to be updated in 2021 following the most recent UKCP18 rainfall projections and are likely to increase.

Ultimately, the safety of the proposed development would be reliant on a flood warning and evacuation plan and/or refuge within dwellings or upper floors in the case of the converted buildings.

We note point 4 relating to the applicant’s intention to produce a flood plan for the LPA. We recommend that your emergency planners consider this in line with the NPPF PPG paragraphs 057 and 058. You may want to consult the emergency services regarding the content of this as the development could increase the scale of any rescue that might be required.

Once details have been submitted to address the above, we will be please to comment further.

Please forward a copy of this letter to the applicant.

Yours faithfully

Mrs SYLVIA WHITTINGHAM
Planning Advisor

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