

Bury Metropolitan Borough Council
Town Hall Knowsley Street

Our ref: SO/2025/124668/02-L01
Your ref: 71426

Date: 23 September 2025

Sent via email

Dear Planning Team

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 consulting us on the above. We maintain our **OBJECTION** for the reasons detailed below.

Flood Risk

We have reviewed the submitted information based on the best publicly available information at this time.

We object to this application because it fails the second part of the flood risk exception test. We recommend that planning permission is refused on this basis.

Reasons:

The FRA currently references flood zone information from 2024. However, the most up-to-date data, including the latest National Flood Risk Assessment (NaFRA) outlines, must be used for any assessment. Please can the FRA be updated accordingly.

The applicant has suggested that the area currently classified as Flood Zone 3 should be reclassified as Flood Zone 2, without any supporting evidence. Please note that the Environment Agency cannot amend flood zone designations outside of our formal flood map challenge process. If the applicant wishes to pursue a formal challenge, they must submit a detailed hydraulic modelling, in line with current best practice which can be found here - [River modelling standards: who they're for and how to use them - GOV.UK](#).

We will then review the submission and determine whether a revision to the flood map is justified.

Residual Risk and Climate Change

We have reviewed the modelling for this location both current published and unpublished internal EA modelling which is not currently available for external distribution. Based on our assessment, there remains a significant residual risk to the development site.

In accordance with the National Planning Policy Guidance (NPPG), the FRA must address residual risk scenarios, including defence overtopping, breach, and failure. The assessment must include relevant data such as flood depth, velocity, and duration, and these should be illustrated using hazard curves consistent with Environment Agency guidance (FD2320).

Climate Change Allowances

It is important to highlight that current flood zone designations do not take account of climate change. Therefore, the FRA must incorporate climate change allowances in line with the latest guidance - Flood risk assessments: climate change allowances - GOV.UK . Where we are unable to provide 1% Annual Exceedance Probability (AEP) climate change model outputs, it is the applicant's responsibility to undertake and submit appropriate hydraulic modelling for our review.

The FRA currently bases design flood levels on a 0.5% AEP event, confirming the unavailability of the 1% AEP climate change data. This approach is not acceptable. Planning Practice Guidance (PPG) and the NPPF clearly state that for developments at risk of fluvial flooding, the 1% AEP event plus appropriate climate change uplift must be assessed.

FFL's are proposed to be set 700mm above the 0.5% AEP level. While this may appear conservative, it does not provide assurance that the development would be safe under the 1% AEP climate change scenario. Therefore, an updated FRA must be submitted using appropriate AEP's and climate change.

Policy Considerations and Objection Status

Should you wish to undertake further modelling all mitigation measures must be developed in accordance with Paragraph 167 of the NPPF and relevant PPG guidance and must be reflected in an updated FRA for the Environment Agency's review.

Given the 'more vulnerable' classification of residential development it is essential that the above matters are fully addressed. Until such time, we maintains its objection to the proposed development.

Finally, please could clarification on "Burghley" drawing reference "BUR-M-113" be provided on a site plan. There is ground flood sleeping proposed so this must be accounted for in an Flood Warning, Evacuation Plan (FWEP).

Overcoming our objection

The applicant will be required to address all those matter above, and an updated FRA submitted accordingly.

Flood warning and emergency response - advice to LPA

Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. We therefore do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out this type of role /responsibility during a flood. Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of

residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 (inc. footnote 63) of the NPPF and the guiding principles of the PPG.

We have considered the findings of the flood risk assessment. We confirm that this indicates that there will be:

- A danger for all people (e.g. there will be danger of loss of life for the general public and the emergency services).

Note to LPA

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice will concern other important environmental issues.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Should you have any queries regarding this response, please contact me.

Yours faithfully

Miss Jennifer Wilson
Planning Specialist

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