

**From:** Leach, Helen  
**Sent:** 23 April 2021 15:49  
**To:** Matt Grant [<mailto:matt.grant@lichfields.uk>]  
**Subject:** RE: Planning Application ref. 65844 - Former Mondi Mill, Ramsbottom [NLP-DMS.FID688556]

Hi Matt

Dave has asked me to provide an update on the Mondi application.

Apologies for my delay in responding as I have been off sick for just over 2 weeks, but I have in the meantime been pulling the various parts together to respond.

1. Viability – As discussions were on-going in relation to flood risk, the viability model would likely need to change should further info or importantly works be needed. We now have a response from A Southgate which is below.
2. See below
3. TfGM have been consulted with your response on the required contribution. To date a response is awaited but will be provided as soon as we receive it.
4. Noted
5. GMFRS – still awaited
6. Open space noted
7. Conservation/Design – The Conservation Officer has concerns about the style and design of the house types as they appear to be ‘off the peg’ designs, which have been replicated at other sites and include features, which are not found within Ramsbottom Conservation Area. However, it is acknowledged that only part of the site is located within the Conservation Area. As such, I would be grateful if the house types on the northern and western boundaries of the site could be amended. The Conservation Area contains 2 storey terraced dwellings, which are typically located in close proximity to each other and ideally this should be reflected along the northern and western boundaries. If this could be achieved, the LPA could be more flexible with regard to the design of the house types on the remainder of the site.

**Drainage Comments:**

There is still scepticism and concern about the validity of the above site from a flood risk perspective. My comments on the outstanding issues are as follows

There are still a number of issues which I don't feel have been clarified, which would need addressing if any application is to be taken forward, as summarised below:

- The significant existing flooding problems upstream of the site are complex in nature and only indirectly influenced by river levels. Some of these areas, particularly Kenyon Street are protected by a river wall, but outfalls from existing surface water drainage pass through this defence and become ineffective once the outfall is submerged by rising river levels. Although the problems are directly from surface water, the level of risk is determined by how quickly river levels rise to submerge the outfalls, so even a small increase may be considered unacceptable. Bearing in mind the long standing historical flooding problems in this area, no increased risk is likely to be considered acceptable and would leave all parties open to criticism
- Although the FRA states that there is only a small increase in flood depths upstream, it is noted that some areas show greater increases in the model and these are dismissed as

“modelling anomalies”. Bearing in mind the sensitivity of these areas, this explanation is not considered adequate

- Any submitted proposal would need to address the upstream effects or provide mitigation measures to render any increased risk redundant
- The FRA / Drainage Assessment refer to potential future maintenance arrangements being via adoption by the sewerage undertaker. This is by no means certain, particularly for any SuDS elements of the proposed scheme. An alternative arrangement must be in place in the event that drainage infrastructure is not adopted
- Exceedance flow plans should be produced for the proposed layout
- There still seems a lack of certainty about the layout and routing of existing drainage infrastructure and whether some elements are sealed off at the upstream end. Full surveys of all drainage assets within the site, including inlets on the upstream side of Peel Bridge and culverts running under it, would be required to ensure modelling assumptions are correct
- Have the outfall arrangements for the watercourse receiving the drainage outfall been adequately assessed to ensure flooding due to run-off being unable to outfall to the river is not a factor?
- The EA need to be involved more in the discussions about the impact of river levels on flooding in general in this area. It's not sufficient to say that increase in flood levels for the river are minor as this has an effect on other flooding sources

#### Viability

The applicant has submitted a viability appraisal suggesting that it is not viable to provide any affordable housing. Our starting point is always the full 25% requirement i.e. 18 affordable units, representing the full range of house types and sizes proposed and pepper potted throughout the development. If this can't be achieved due to viability we will require an overage clause. The VA report will need to be reviewed externally at the applicants expense.

We need proper confirmation that the build costs or abnormals are realistic, and given the limited new build in Ramsbottom in recent years, the sales prices could be higher than anticipated in the VA.

However, before the VA is reviewed, if the transport contribution is a requirement it will need to be incorporated, as will any decisions regarding on site recreation provision. I'm also not sure whether the current VA reflects any changes to layout / levels made as a result of flood risk concerns?

#### Initial comments on the August 2020 VA:

- The VA is now 8 months old, and the housing market has moved on and the sales values may need to be updated.
- The appraisal methodology refers to detailed investigations, studies and reports that have been prepared. If these provide evidence to support the abnormal costs proposed in the report, can these be provided.
- The appraisal methodology refers to 3% contingency but the appraisals in the appendix include a 4% contingency. This should be reduced to 3% and would reduce costs by around £110,000.
- The appraisal includes finance costs of 6.5%. Is the development going to be financed by borrowing?
- The sales agents fees for the affordable units should be reduced to 1%.
- I note that the benchmark land value has been revised downwards from the appraisal submitted with application 65217, however an EUV of £1.9m still seems on the high side, based on the marketing information and evidence from Paul Nolan submitted with the application.

- The table on page 14 refers to Appendix 6 as 15% affordable rather than 25% affordable
- The graph on page 28 refers to the BB3 postcode – please confirm whether it is in fact BL0 data?
- There are slight inconsistencies between square footage of units on the latest planning layout compared to the VA which could be updated if the VA is being updated anyway.
- The appraisal includes £207,795 recreation contribution and £100,000 highways mitigation. If an off site recreation contribution is required it would be £182,223.15 based on the current proposals. However, I note from Fran's comments that due to the flood risk issues recreation may be provided on site subject to long term management arrangements. The viability appraisal will need to reflect this.
- The timing and amount of any highways contribution needs to be confirmed and included in an updated appraisal - the timing of the payment will have an impact on finance costs.

Given the above and the potential amendments likely to arise from the drainage concerns, once your response is put back to the Council, we will seek the viability to be appraised externally at the applicant's expense. This I believe you have confirmed already.

If you need to discuss any of the above, I will be in the office for the next week

Regards

Helen

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