

Our Ref: 4714/2021-06-17/JA/LLFA/01
17 June 2021

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Dear Helen

FORMER MONDI/HOLCOMBE MILL, BRIDGE STREET, RAMSBOTTOM, BURY

I refer to your email to Matt Grant dated 23 April 2021 presenting the Lead Local Flood Authority's (LLFA) drainage comments associated with planning application ref: 65844 *"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"* at the above site.

By way of background, Weetwood prepared a Flood Risk Assessment report¹ and a Drainage Assessment report² to accompany the planning application. The Flood Risk Assessment was supported by detailed hydraulic modelling based upon the Environment Agency's (EA) Mid Irwell hydraulic model. The Weetwood hydraulic modelling was submitted to the EA for review on 19 October 2020.

The EA provided a consultation response letter on 28 October 2020 (ref: SO/2020/120565/01-L01) objecting to the planning application on the basis that it had not reviewed the Weetwood hydraulic modelling (submitted on 19 October 2020) and because it had concerns relating to safe access/egress. The EA commented that *"where prior evacuation of occupants or refuge within the proposed dwellings would be essential to the safety of the development the Council's emergency planners must be satisfied that this would be possible prior to determination of the application"*.

Weetwood prepared a letter³ to you dated 6 November 2020 addressing the points raised by the EA in its 28 October 2020 consultation response letter. The letter also confirmed that Weetwood was preparing a Flood Plan⁴ in line with the recommendations of the Flood Risk Assessment. The Flood Plan was submitted to you on 19 November 2020 but appears not to have been uploaded to the Planning Portal.

The EA provided a second consultation response letter on 20 November 2020 (ref: SO/2020/120565/02-L01) confirming that the Weetwood hydraulic modelling is *"acceptable and fit for purpose"* and confirming that the last outstanding point related to safe access/egress.

The EA provided a final consultation response letter on 29 December 2020 (ref: SO/2020/120565/03-L01) acknowledging receipt of Weetwood's letter to you (submitted on 6 November 2020) and the intention to prepare a Flood Plan (submitted on 19 November 2020).

Finally, Bury Council prepared Planning Policy Comments relating to flood risk dated 2 March 2021. Weetwood responded to the points raised in an email dated 16 March 2021, submitted to you by Matt Grant (Lichfields) on 17 March 2021. The email reiterated that the final outstanding issue relating to flood risk relates to safe access/egress and that the Flood Plan should be discussed with the Bury Council Emergency Planners and the Emergency Services. It also highlighted that the LLFA had not yet provided a consultation response to the planning application.

¹ Holcombe Mill, Ramsbottom, Flood Risk Assessment, Final Report v1.2, August 2020, Ref: 4714/FRA/Final/v1.2/2020-08-07

² Holcombe Mill, Ramsbottom, Drainage Assessment, Final Report v1.0, August 2020, Ref: 4714/DA/Final/v1.0/2020-08-07

³ Letter from J Aldridge (Weetwood) to H Leach (Bury Council), 6 November 2020, Ref: 4714/2020-11-06/JA/EA/01

⁴ Holcombe Mill, Ramsbottom, Flood Plan, Final Report v1.0, November 2020, Ref: 4714/FP/Final/v1.0/2020-11-18

This letter responds to the comments raised by the LLFA in your email to Matt Grant dated 23 April 2021. The points raised are reproduced below (in plain text) and have been dealt with in turn (in *italicised* text):

1. 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 and would leave all parties open to criticism.

Appendix F of the Flood Risk Assessment presents a comparison of pre and post development flood risk. The flood risk comparison was informed by detailed hydraulic modelling and as stated above, the EA has confirmed that the Weetwood hydraulic modelling is “acceptable and fit for purpose”.

The flood risk comparison plots indicate that flood risk directly upstream of Bridge Street either reduces or does not change post development. United Utilities’ public sewer record (Annex 1) indicates that the surface water drainage infrastructure serving Kenyon Street discharges to the River Irwell upstream (north) of Bridge Street. As such, the proposed development would not exacerbate flooding issues on Kenyon Street.

2. Although the [Flood Risk Assessment] 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.

This statement is incorrect. The flood risk comparison plots presented by Appendix F of the Flood Risk Assessment confirm that upstream flood risk either reduces or does not change. It appears that the reviewer has confused the assessment of the accuracy of the truncated hydraulic model presented by Appendix C of the Flood Risk Assessment with the comparison of pre and post development flood risk presented by Appendix F.

Regardless, Section 4.1.1 of the Flood Risk Assessment confirms that the difference in modelled levels output from the original EA Mid Irwell hydraulic model and the truncated model relate to model instabilities upstream of the site. The instabilities are present in the EA’s original Mid Irwell hydraulic model and the issues causing these instabilities were resolved for the purposes of the Weetwood hydraulic modelling to ensure that the outputs could be relied upon. As stated above, the EA has reviewed the Weetwood hydraulic modelling and has confirmed that it is “acceptable and fit for purpose”.

I would like to re-iterate that the hydraulic modelling presented in the Flood Risk Assessment confirms that upstream flood risk either reduces or does not change as a result of the proposed development.

3. Any submitted proposal would need to address the upstream effects or provide mitigation measures to render any increased risk redundant.

This statement is not relevant because the proposed scheme is already shown to either reduce or have no impact on upstream flood risk (see points 1 and 2 above).

4. The [Flood Risk Assessment] / 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.

This is not a valid reason to object to the scheme and a requirement to confirm alternative future maintenance arrangements, in the extremely unlikely event that United Utilities refuses to adopt the site drainage, could be secured by an appropriately worded planning condition.

5. Exceedance flow plans should be produced for the layout.

Exceedance Flow Plans are provided in Annex 2.

6. 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.

A walkover survey of the former mill race (Goyt) and receiving stream has been undertaken by Eccleston Homes and the associated photographs are provided in Annex 3. The photographs clearly illustrate that the inlet to the mill race to the north of Bridge Street has been sealed. The survey also confirms that the dimensions of the culverts at the site have been appropriately represented within the hydraulic model.

7. Have the outfall arrangements for the watercourse receiving the drainage outfall been adequately assessed to ensure flooding due to runoff being unable to outfall to the river is not a factor.

The walkover survey has confirmed that water leaves the site via a 600 mm diameter culvert before discharging to the River Irwell via a 750 mm diameter culvert. It is proposed to restrict the rate at which surface water is discharged from the proposed development to the former mill race to 142.5 l/s. Both the 600 mm and 750 mm diameter culverts have ample capacity to carry this flow.

8. 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.

This point has been addressed in points 1 and 2 above. To be clear, the proposals are shown to reduce or have no impact on upstream flood risk and the hydraulic modelling undertaken by Weetwood has been reviewed and approved by the EA. The EA has already provided 3 consultation response letters and it appears that the LLFA has not reviewed the information available before preparing these comments.

I trust that the above satisfactorily addresses the comments provided by the LLFA and that you are now able to focus on resolving the final outstanding issue (i.e. the Flood Plan that was provided to you on 19 November 2020).

Yours sincerely



James Aldridge BEng (Hons) MSc MCIWEM
Technical Director

Enc: Annex 1 – United Utilities public sewer record
 Annex 2 – Exceedance Flow Plans
 Annex 3 – Walkover survey of mill race / stream