

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

Our ref: SO/2020/120565/01-L01
Your ref: 65844
Date: 28 October 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 the above application to the Environment Agency. We would wish to make the following comments.

As indicated in our response to the previous application for this site (ref: 65217) we would refer you to the sequential test of the National Planning Policy Framework (paragraph 158). If the LPA deem the site suitable for residential development, the requirements of the exception test of NPPF would also need to be met. We note a document has been submitted in relation to the sequential and exception tests.

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA) we object to this application and recommend that planning permission is refused.

Reason(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the development's flood risks. In particular, the FRA fails to:

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Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.
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- consider how people will be kept safe from the identified flood hazards especially in relation to access/egress provision for the development
- consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event.

We have reviewed the FRA by Weetwood (final report v1.2 dated August 2020) and note that the proposed development has been revised since the previous application we commented on (ref: 65217). As indicated in our previous comments for this site, the applicant's consultant has used the Environment Agency's existing river model in the assessment and truncated/amended it for the purposes of the FRA. We have not been provided with the model files and therefore, our comments are based on the content of the FRA. If the proposals and modelling are revised we would recommend that the model files are also provided in any further consultation with us to enable a detailed review of the model changes. The revised proposals and assessment appear to show only localised negligible increase in risk elsewhere but we will only be able to confirm this after review of the detailed modelling.

From the mapping presented in appendix D there appears to be some slight variation in flood extents on the site in relation to the 1% AEP event. The "truncated model accuracy 1% AEP event" (4714_005-EA_Q100_d/A) outline appears to show flood routes across Bridge Street on to the site. The Environment Agency's published flood map outlines for the 1% AEP event also shows this. However, the "Baseline Scenario 1% AEP event" (4714_026_Q0100_d/A) and the Proposed Scenario 1% AEP event" (4714_034_Q0100_d/A) outlines does not show flooding across Bridge Street. Some further clarification and comment on the differences would be welcomed. Tabulated levels for the node points of the model would also help to show why there appear to be differences.

There are remaining concerns regarding the safety of the development in relation to access/egress. There is only one access/egress route onto the site and the FRA confirms that this would be flooded during the design flood event. There does not appear to be any indication to show that the route to or from the development onto Bridge Street would be safe or have flood depths of "low hazard". The mapping in appendix D shows depths on Bridge Street of up to 250mm during the design 1% AEP +35%CC event but it is not clear whether this would be high velocity. Flood hazards associated the access/agrees to the site should be identified in the FRA. The proposed development must be safe to comply with the second part of the exception test of NPPF.

Section 5.6 of the FRA recommends a flood plan be prepared with Bury Council emergency planners but no outline of a plan is provided. 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. We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

Advice to the LPA/Applicant

The planning practice guidance to the National Planning Policy Framework 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 local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the Planning Practice Guidance (PPG).

We will be pleased to comment further after the detailed river modelling has been provided and the above points have been clarified.

Please forward a copy of this letter to the applicant.

Yours faithfully

Mrs SYLVIA WHITTINGHAM
Planning Advisor

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