

Our Ref: 4714/2020-11-06/JA/EA/01
6 November 2020

Attn: Ms H Leach
Bury Metropolitan Borough Council
Town Hall
Knowlsley Street
Bury BL9 0SW

London Office
70 Cowcross Street
London
EC1M 6EJ

Contact: James Aldridge
0203 7575 444
james.aldridge@weetwood.net
www.weetwood.net

Dear Helen,

FORMER MONDI/HOLCOMBE MILL, BRIDGE STREET, RAMSBOTTOM

I refer to the planning application for the 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 (application ref: 65844).

Weetwood prepared a Flood Risk Assessment (FRA) dated 7 August 2020 (ref: 4714/FRA/Final/v1.2/2020-08-07) to accompany the planning application at the site. The Environment Agency (EA) has subsequently provided its formal consultation response to Bury Metropolitan Borough Council (MBC) by way of a letter dated 28 October 2020 (ref: SO/2020/120565/01-L01).

The Environment Agency raised four points within its consultation response letter in relation to flood risk. Each point has been reproduced below (*italicised*) and Weetwood's response follows:

- 1. 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.*

The hydraulic model files were provided directly to the EA for review on 19 October 2020. The EA therefore has everything that it requires to confirm that as indicated, the proposals have a negligible impact on flood risk elsewhere, in accordance with the requirements of the NPPF.

- 2. From the mapping presented in Appendix D there appears to be some slight variation in the 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, "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.*

The differences in the extent of flooding presented by the "Baseline" and "Proposed" scenario models when compared to the "Truncated" model and the EA's unaltered model result from the model updates described in Section 4.1.2 of the FRA. Topographical survey information for the proposed development site and Bridge Street, including the walls along the northern edge of the Bridge Street carriageway, has been incorporated into the "Baseline" and "Proposed" scenario hydraulic models. The walls prevent flooding of Bridge Street in the 1% AEP event, fully explaining the differences in the flood outlines.

3. *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 250 mm during the design 1% AEP +35%CC event but it is not clear whether this would be high velocity. Flood hazards associated with access/egress to the site should be identified in the FRA.*

A model output plot presenting the hazard rating for the proposed scenario 1% AEP +35%CC event is provided as an annex to this letter. The plot indicates that there is a small area directly north of the site access with a moderate hazard rating but that the hazard rating along Bridge Street is generally low. Safe access and egress is therefore considered to be available, particularly for emergency services vehicles, which is considered to be more relevant given that safe refuge is provided within the proposed residential dwellings.

4. *Section 5.6 of the FRA recommends a flood plan be prepared with Bury Council emergency planners but no outline of 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.*

Weetwood is currently preparing a Flood Plan for the proposed development. This will be submitted to Bury MBC in due course and will show that flooding can be managed safely.

Yours sincerely



James Aldridge BEng (Hons) MSc MCIWEM
Technical Director

Enc: Annex 1 – Flood Hazard Rating (1% AEP +35%CC)