

REFORD

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30th March 2026

Planning Officer
Bury Metropolitan Borough Council
Town Hall
Knowsley Street
Bury
BL9 0SW

Dear Planning Officer

Planning reference: 72688

Location: Unit 3, Irwell Industrial Estate, Lower Woodhill Road, Bury, BL8 1AR

Proposal: Demolition of existing buildings and erection of a building comprising of a boiler workshop unit; extension to an existing unit (Use Class B2 and ancillary staff accommodation / office) and associated works

We refer to the consultation response from the Environment Agency dated 10th March 2026 in which the Environment Agency objected to the above planning application. The Environment Agency stated that the flood risk assessment submitted with the application fails to adequately address the following:

Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for the 1 in 100 plus 35% climate change event. Consequently, the development proposals are inadequate.

- *Raised finished floor levels*
- *Flood storage compensation*

The submitted scheme FRA proposed that the front elevation doors to the new (southern) industrial unit would be opened at times of (potential) flooding to allow water to enter the

building and then drain via a low corner point on the unit. |

Further review and information is therefore now provided.

Raised finished floor levels

The Irwell Management Catchment Peak River Flow climate change central allowance for the 2080's is 35%. The design flood for the development site is therefore the defended 1% AEP plus 35% event, for which the modelled level appropriate for the development site is 80.98m AOD taken from the Mid Irwell model using Node 10, which is just upstream from the confluence of the 'Main Rivers' the River Irwell and the Woodhill Brook, and this level is similar to that which was used for an approved industrial bale store building on the eastern side of the site yard in 2021 (LPA reference 66114/FUL); that level and new building proposal being accepted by the Environment Agency and planning permission granted.

We reference that the 2025 national guidance for preparing a flood risk assessment: standing advice on the gov.uk website states that where floor levels cannot be raised to meet the minimum requirement then the design **should be appropriately flood resistant and resilient** (our emphasis) by:

- using flood resistant materials that have low permeability to at least 600mm above the estimated flood level
- making sure any doors, windows or other openings are flood resistant to at least 600mm above the estimated flood level
- using flood resilient materials (for example lime plaster) to at least 600mm above the estimated flood level
- raising all sensitive electrical equipment, wiring and sockets to at least 600mm above the estimated flood level
- making it easy for water to drain away after flooding such as installing a sump and a pump
- making sure there is access to all spaces to enable drying and cleaning
- making sure that soil pipes are protected from back-flow such as by using non-return valves

It will not be possible for the floor level of the northern building extension to be raised to provide a minimum 600mm freeboard to the 1% AEP plus 35% event as it is planned that the new extension will have a similar floor level to the building to which it will be attached. It is therefore intended to prioritise excluding flood water from the building extension should it arise and to incorporate all flood resilience measures as above, where possible. The ground floor of the extension is to be used for storage purposes only and, with the incorporation of

the above accepted mitigation measures, will be in line with Environment Agency advice provisions to limit damage.

It is not possible for the floor level to the proposed new (southern) workshop and repair building to be raised to provide a minimum 600mm freeboard to the 1% AEP plus 35% event due to the size, weight and access provisions of vehicles and equipment the business deals with (heritage / other trains and carriages and large equipment). As such, It is intended that the floor level of the new replacement building will not be any higher than the floor level of the three existing buildings on the site that have been present for many years and are to be demolished and the new building will be allowed to flood, via a water entry strategy being utilised should a flood event occur. It is now proposed to enable a free flow of flood water via a gap to be left at ground level under the external cladding on two sides of the building. This is the same strategy that was put forward for the approved industrial bale store building on the eastern side of the site yard in 2021 that was accepted by the Environment Agency (and the same planning advisor as commenting on this current planning application).

Other flood resilience measures outlined in the 2025 national guidance as above will be incorporated to the building also, where possible. It is also relevant that the office area within the proposed unit is above the 1% AEP plus 35% event, therefore the more sensitive area of the unit would not be at risk of flooding.

Flood storage compensation

The proposals will not alter existing ground levels at the site. For this development, it is proposed to provide flood storage compensation by allowing the new replacement (south) building that will comprise a workshop and repair building to flood should a flood event occur, via allowing a water entry strategy to be implemented to assist with the free flow of flood water at the site that can passively and naturally drain back into the system.

As outlined above, an enhanced strategy to enable a free flow of flood water is now included via a gap that is to be left at ground level under the external cladding to the building on two opposite sides of the building. This is the same strategy that was put forward for the approved industrial bale store building on the eastern side of the site yard in 2021 that was accepted by the Environment Agency (and the same planning advisor as commenting on this current planning application).

The flood storage compensation to be provided is greater than the volume lost by the construction of the new building; the footprint of the new replacement building that would be allowed to flood is 837m², the office area is above the 1% AEP plus 35% event and not included, and this area is more than adequate to compensate for the footprint area of 397m² that would be lost developing the site.(As assessed in the FRA).

We trust the above will enable the Environment Agency to remove its objection to the development.

Yours sincerely,

Bob Ford

Bob Ford
DIRECTOR
REFORD Consulting Engineers Limited