



Hardy's Gate Bridge Flood Gates

Planning Statement

June 2023

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June 2023

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1 Introduction

1.1 Purpose of Document

This Planning Statement has been prepared by the BAM Nuttall Mott MacDonald Joint Venture (BMMJV) on behalf of the Environment Agency (EA). This Statement supports the Planning Application for the construction of the Hardy's Gate Bridge (HGB) Flood Gates (FG), which will consist of a one slide-operated FG on the southern limit of HGB, as well as one swing-operated FG on the northern extent of HGB. The two FGs will extend across Dumers Lane, to provide protection during a flood event. Each FG has been designed to achieve minimum level of 69.85m AOD based on the likelihood of a 1-in-100-year event, with an additional allowance of 50% to allow for the effects of climate change.

Before the submission of this Planning Application, the EA, in partnership with Bury Council, have implemented an extensive scheme to enhance flood protection in various places along the River Irwell, Greater Manchester, as part of a Flood Risk Management Scheme (FRMS). This scheme has been delivered in several phases, with Phase 1 approved in March 2019 (Reference: 63559). Phase 1 included a series of sheet-piled walls / embankment on the southern extent of Bury as well as the northern limit of Radcliffe near Close Park and Dumers Lane. Phase 2 of the scheme has included:

- Full Planning Permission obtained for development at Warth Business Park (Reference: 64788);
- Full Planning Permission obtained for development at Keswick Drive (Reference: 64789);
- Full Planning Permission obtained for development at Lower Hinds York Street, Redvales Business Park, and Bury Point (Reference: 64790; and 65171);
- Full Planning Permission obtained for development at Bury Grammar School, southern and eastern boundary of the sports pitches (Reference: 65745);
- Full Planning Permission obtained for development at Hardy's Gate Bridge (inc. Raised Parapet / Debris Cable) (Reference: 65746);
- Full Planning Permission obtained for development Land North of York Street (Reference: 66353);
- Full Planning Permission obtained for development at Bealeys Goit (Reference: 66459); and
- Full Planning Permission obtained for development at Hutchinson's Goit (Reference: 66697).

This Statement will serve to contextualise the planned HGB FGs across Dumers Lane, examine the proposed HGB FG development in line with the National as well as Local Plans, as well as

offer extra information in terms of the EA flood defence scheme for which the HGB FGs will be an essential feature in case of an extreme flood incident.

1.2 Submission Documents

Technical documents have been drafted for submission alongside this Statement for the HGB FG development. These are defined within Table 1.1: Submission Documents.

Table 1.1: Submission Documents

Document (Alphabetical):	Document Reference:
Appendix A – Phase 2 Site Location Plan	ENV0000389C-MMD-DZ-4ZZ-DR-C-0213360-S2-P01
Area for Permitted Development Plan	ENV0000389C-BMM-DZ-4ZZ-DR-T-0213472-S2-P04
Bat Survey Report	ENV0000389C-BMM-DZ-4ZZ-RP-EN-0301088-P01
Flood Risk Assessment	ENV0000389C-BMM-DZ-4ZZ-RP-Z-0215016-P05
General Arrangement Plan	ENV0000389C-BMM-DZ-DL-DR-C-0213666-P02
Historic Environment Technical Note	ENV0000389C-BMM-DZ-4ZZ-TN-EN-0301086
Level 2 Historic Building Recording Report	ENV0000389C-BMM-DZ-4ZZ-RP-EN-0301085
Northern Flood Gate (inc. Surface Finish Plan; Utilities Plan; Section; and Pilaster Extension Detail)	ENV0000389C-BMM-DZ-DL-DR-C-0213663-P02
Planning Statement	ENV0000389C-BMM-DZ-4ZZ-RP-PL-0805019
Southern Flood Gate (inc. Surface Finish Plan; Utilities Plan; Section; Pile Cap Detail; and Typical Beam Section)	ENV0000389C-BMM-DZ-DL-DR-C-0213664-P02

1.3 The Applicant

Founded to conserve as well as enhance the environment across the UK, the EA remain responsible, within England, for:

- Regulating Major Industry and Waste;
- Treatment of Contaminated Land;
- Water Quality and Resources;
- Fisheries;
- Inland River, Estuary and Harbour Navigations; and

- Conservation and Ecology.

The EA oversee the threat of an extreme flood incident from either main rivers, reservoirs, estuaries, or the sea. The EA maintain that their intentions are to enhance the resilience of people as well as businesses to the harm an extreme flood incident could cause and to oversee the sustainable use of resources.

1.4 Pre-Application Consultation

Consultation has been undertaken in line with the EA's Communications Plan which details communication and engagement aims and objectives in relation to the wider FRMS, along with the various channels of communication to be used.

An Action Plan has been developed as part of the above Communications Plan to log consultation events throughout the course of the FRMS, identify the target audience, and record the outcome of each activity.

Bury Metropolitan Borough Council (BMBC / Council) are a partner in the wider scheme and have therefore been involved throughout the development, attending monthly progress meetings ensuring that they were able to advise on any key issues raised during design development.

The EA have also made regular contact with the local residents affected by the FRMS, ensuring that they were kept up to date with the design and finishes. Public engagement events were held in December 2018 and June 2019, providing an opportunity for the wider community to review the design of the proposed development, and provide feedback.

2 Proposed Development

2.1 Site Introduction

Located around 11-kilometres north-west of central Manchester as well as 2.5-kilometre south-east of central Bury, the Radcliffe and Redvales FRMS domain covers various residential areas that bound the River Irwell on either side. Based on the location of the Radcliffe and Redvales area, the HGB FG development will be within the administration of both BMBC as well as the Greater Manchester Combined Authority (GMCA).

The Planning Application for which this Statement has been drafted, concerns the HGB FG development, shown within the attached General Arrangement Plan (Document Reference: ENV0000389C-BMM-DZ-DL-DR-C-0213666-P02). The HGB can be found around 2.1-kilometre north-east of central Radcliffe. The HGB carries Dumers Lane across the River Irwell for approximately 40-metres. As above, the Planning Application will be for the construction of the HGB FGs to alleviate the extent of the flood risk within the Radcliffe and Redvales area, as well as offer further flood protection on the River Irwell.

Further detail of the HGB FG development, such as the requirement for the development, the proposal's compliance with the relevant National and Local Planning Policies, as well as the design of the development will be described within the course of this Statement.

2.2 Planning History

Table 2.1 below summarises the recent development within the area of, or near the HGB. The search considered all Planning Applications which were within approximately 50-metres of the HGB and have been determined since 2018. Furthermore, the search considered development found more than approximately 50-metres from the HGB if the development was deemed to be of importance in connection with the HGB FG development.

Note, Table 2.1 summarises those development which are considered to be of relevance to the HGB based on information available via the BMBC website, on or before 1st June 2023.

Table 2.1: Planning History

Application Reference:	Application Address:	Application Description:	Application Status:
67775.	Hardy's Gate Bridge, Dumers Lane, Bury.	Lawful Development Certificate For Proposed Modifications To The Existing Bridge Parapets (Both Sides), Including Localised, Partial Removal Of Existing Masonry And Reinstatement Of The Current Edge	Approved 17/12/2021.

Application Reference:	Application Address:	Application Description:	Application Status:
		Protection With Metal Safety Railings. Localised Strengthening Of The Upper Bridge Spandrel Walls Directly Below The Bridge Parapets (Internal Vertical Steel Dowels). Modifications To The Footway Surfacing In The South West Corner To Accommodate Fixings For A 3m Length Of Demountable Flood Defence.	
66900.	Land To West Of Metrolink Line At Warth Road; Land To West Of Bury Road; Land To East Of Whitefield Road; Land To West Of Hardy's Gate Bridge; And Land To North Of York Street, Bury.	Non-Material Amendment Following Approval Of Planning Permission 65171: At The Western Extent, A Change From Concrete L-Wall To A Sheet Piled Wall.	Approved 26/07/2021.
66762.	Hardy's Gate Bridge, Dumers Lane, Radcliffe, M26 2QJ.	Raising Of The Upstream Parapet By 250mm And Installation Of Debris Cables Upstream Of The Bridge As Previously Approved. Further Work Including Raising Of The Pedestrian Footpath By 200mm, Installation Of A Trief Kerb And 1.2m Pedestrian Handrail.	Approved 20/05/2021.
66570.	Land Near Hardy's Gate Bridge, Bury.	Non-Material Amendment Following Grant Of Planning Permission 65171: Minor Re-Alignment Of The Sheet Piles Forming The Flood Defence Wall And Relocation Of The Access Ramp.	Approved 12/03/2021.
66231.	Land To West Of Metrolink Line At Warth Road; Land To West Of Bury Road; Land To East Of Whitefield Road; Land To West Of Hardy's Gate Bridge; And Land To North Of York Street, Bury.	Variation Of Condition 2 (Approved Plans) For The Realignment Of The Flood Defence Adjacent To Hardy's Gate Bridge.	Approved 21/02/2021.
65746	Hardy's Gate Bridge, Dumers Lane, Radcliffe, M26 2QJ.	Raising The Upstream Parapet Level Along The Full Extent Of Hardy's Gate Bridge By 0.25 Metres To Provide Additional Flood Protection; Strengthening Of The Parapet By	Approved 14/09/2020.

Application Reference:	Application Address:	Application Description:	Application Status:
		Reinforcing Dowel Bars; Installation Of Twin Stainless Steel Debris Cables Spanning The River Immediately Upstream Of The Bridge.	
65171.	Land To West Of Metrolink Line At Warth Road; Land To West Of Bury Road; Land To East Of Whitefield Road; Land To West Of Hardy's Gate Bridge; And Land To North Of York Street, Bury.	Various Flood Defence Proposals Including Sheet Piled Walls, Concrete L-Walls And Earth Embankments, Finished In A Manner Consistent With The Local Aesthetic.	Approved 28/07/2020.
64790.	Land To West Of Metrolink Line At Warth Road; Land To West Of Bury Road; Land To East Of Whitefield Road; Land To West Of Hardy's Gate Bridge; And Land To North Of York Street, Bury.	Proposal A: A Series Of Sheet Piled Walls And Concrete Walls Across 4 Sites. Proposal B: Erection Of An Embankment And Retaining Wall At Land To West Of Metrolink Line At Warth Road.	Approved 22/01/2020 (Proposal A). Refused 22/01/2020 (Proposal B).

2.3 Background of Flood Risk Management Scheme

The HGB FGs will form an essential feature of the Radcliffe and Redvales FRMS.

Whilst there is no recorded historical flooding within the area, an extreme flood event – measured to be the worst on record – occurred on the River Irwell on the 26th December 2015. The harm associated with this flood event was considered to be extensive. More than 700 homes / businesses were affected as well as critical infrastructure such as substations which caused further electrical failures to around 1500 properties. The main wastewater treatment plant polluted the floodwater too.

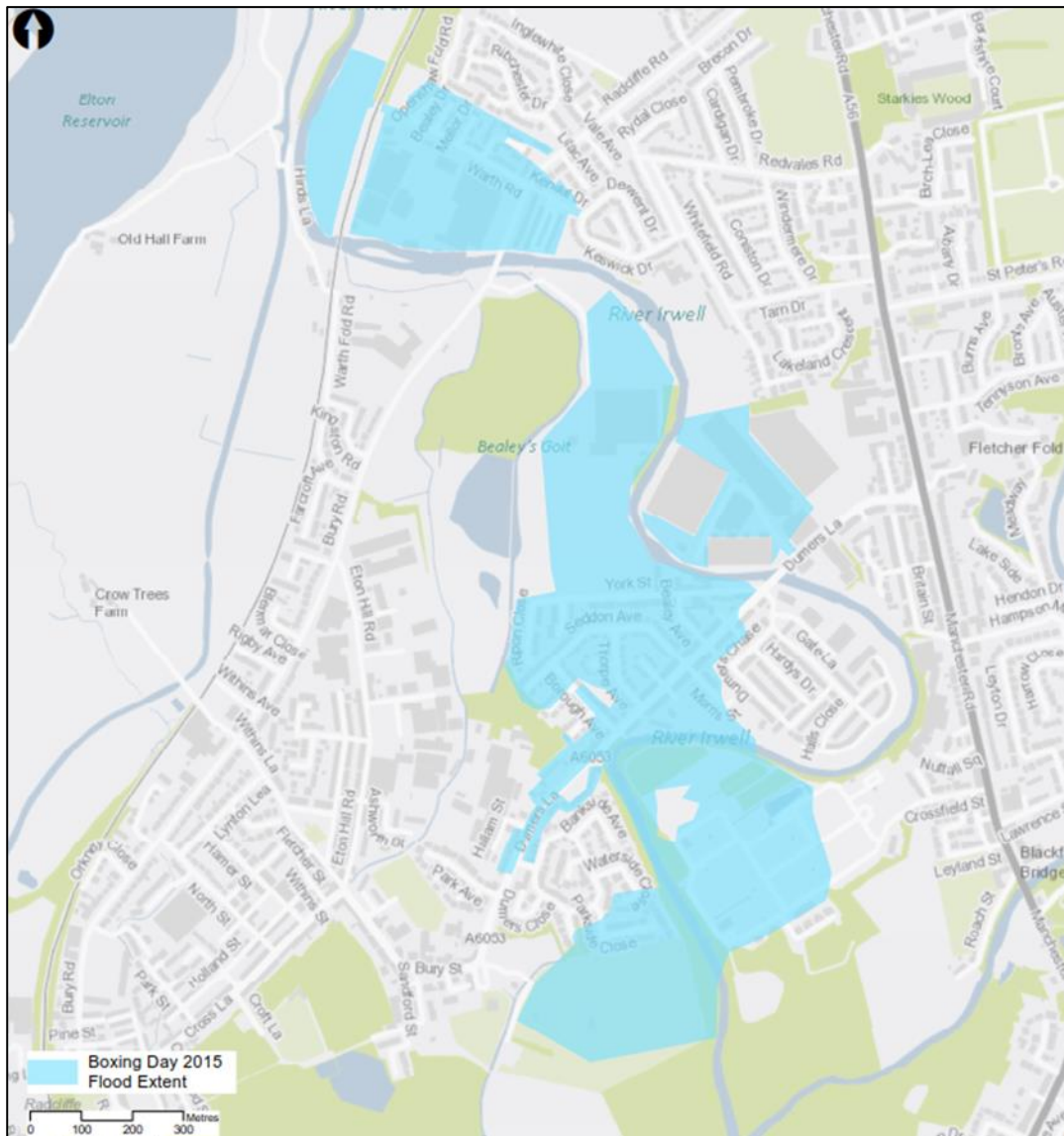
Photo 2.1: Flooding at Kendall Drive (Dec. 2015)



This extreme flood event was caused because of excessive rainfall from Storm Eva, which led to an intense fluvial flood from the River Irwell. Nevertheless, other sources such as surface water as well as the channel constraints associated with the River Irwell contributed towards the size of the flood within the area. Affected areas included Openshaw Fold Road, Radcliffe Road, and Warth Road. The extent of this flood incident has been illustrated in Figure 2.1: Extents of Historic Flood Event, below.

Even with this recent extreme flood event, there remain zero formal flood-associated infrastructures on the River Irwell within the Radcliffe and Redvales area. The implication of similar future flood events would, in all likelihood, cause more substantial harm to the area because there are several considerable residential / commercial developments planned for within the River Irwell floodplain.

Figure 2.1: Extent of Historic Flood Event



The EA have assessed several measures to resolve the flood risk near the Radcliffe and Redvales area, with an examination of these measures carried out to identify which could be utilised to reduce or alleviate this flood risk. Feasible flood-alleviation measures consisted of:

- Alleviate the flood hazard toward the source;
- Alter or redirect the flood 'path'; and
- Control the flood hazard at the 'receptor'.

Each of the measures were then assessed in line with the intention of the entire FRMS for the River Irwell. In turn, the assessment identified several favourable measures. Of these, the EA identified Option 5C as the preferred measure.

Option 5C would fulfill the aims of the FRMS as well as ensure sufficient defence to an extreme flood incident when compared to the other identified measures. Option 5C has been revised as the FRMS has developed.

To fit with the FRMS schedule as well as ensure that sufficient finance could be secured for the development, the FRMS had to be split into phases:

- Phase 1: Close Park and Dumers Lane (downstream element); and
- Phase 2: Tork Street, Redvales Business Park, Bury Point, Keswick Drive, Warth Business Park, and Lower Hings (upstream elements).

Phase 1 received Planning Permission around March 2019 (Reference: 63559), with construction completed. Construction is almost complete for Phase 2.

2.4 Proposed Development

The HGB FG development will be comprised of one slide-operated FG on the southern limit of the HGB, as well as one swing-operated FG on the northern extent of the HGB. For illustration, refer to the submitted General Arrangement Plan (Document Reference: ENV0000389C-BMM-DZ-DL-DR-C-0213666-P02). The two FGs will extend across Dumers Lane to secure the HGB if an extreme flood event were to occur. Each FG has been devised to achieve minimum level of 69.85m AOD based on the likelihood of 1-in-100-year event, with an additional allowance of 50% for influence of the climate change.

The southern FG will measure approximately 18.890-metres end-to-end as well as 1.3-metre vertical. This FG will move across Dumers Lane between the two HGB support pilasters found on either side of the HGB wall. The FG on the southern extent of the HGB will retract behind the defence wall when in store. The slide-operated FG will either be moved into place with mechanical winch or manual. Provision has been included within the development for two braces that will be suitable for application onto the Dumers Lane tarmac surface to reinforce the FG in the event of an extreme flood incident. Refer to the Southern Flood Gate Plan (Document Reference: ENV0000389C-BMM-DZ-DL-DR-C-0213664-P02) for illustration.

The FG on the northern elevation of the HGB will extend across Dumers Lane, between the two HGB pilasters, which are to be raised around 0.66-metre to enable the FG to be installed. Based on the design of the northern FG, the FG will both connect as well as disconnect at the centre of Dumers Lane, with the removeable central FG post to be placed on the pile cap foundation that will be installed flush with the surface of Dumers Lane. Each FG on the northern elevation of the HGB will be around 1-metre tall as well as extend approx. 6.88-metre from the HGB wall to the centre of Dumers Lane. Therefore, the collective dimension of the FG on the northern elevation of the HGB will be around 1-metre x 13.76-metre when in use. The kerb on Dumers Lane will be amended to allow for minimum footpath width of 1.6-metre. When in store, the Flood Gate will be

affixed to each HGB wall. Refer to Northern Flood Gate Plan (Document Reference: ENV0000389C-BMM-DZ-DL-DR-C-0213663-P02) for illustration.

Construction Methodology

2.5 Construction Management

2.5.1 Hours of Work

It has been assumed that construction of each FG will take place within the hours of 08:00 to 18:00 (Mon. to Fri.). Construction either before or after these times will be discussed with those who could be affected, with large construction deliveries to be limited to extreme circumstances. Vehicle movement will be confined to off-peak times (09:00 to 15:00) also. This will increase the amount of traffic movements within this period because of the reduced workable timeframe. However, this is considered to have less of an effect on local residences and businesses than the alternative, which would be to have an extended timeframes and affected peak time traffic.

2.5.2 Traffic Management

Mott MacDonald forecast that the installation of the FG on Dumers Lane will take approximately 4 weeks to complete. It has been assumed that the installation of each FG will be accomplished with one-lane closure on Dumers Lane. Therefore, whilst the installation of each FG will cause some minor disruption to the traffic movement on Dumers Lane, the inconvenience will be minor as well as brief in terms of the timeframe. Furthermore, because the installation of each FG will be accomplished with one-lane closure on Dumers Lane, traffic movement will be able to proceed in the construction phase of the HGB FG development.

2.5.3 Site Compound

The EA will confirm the preferred Site Compound before the commencement of construction. The EA have identified available land near York Street that could be used for a Site Compound for the HGB FG development. The area near York Street has been used as a Site Compound for previous elements of the Radcliffe and Redvales FRMS.

3 Planning Policy Review

3.1 Introduction

Section 3 of this Statement provides an extensive review of the National as well as Local Planning Policy which are considered to be of relevance to the HGB FG development. Where needed, demonstration in terms how the HGB FG development will conform to these has been mentioned below.

3.2 National Planning Policy

3.2.1 National Planning Policy Framework (NPPF)

The NPPF summarises the Government approaches toward development and remains based on the 'Presumption in Favour of Sustainable Development', which encompasses three interrelated as well as interdependent features – Economic; Social; and Environmental:

These features of the NPPF are summarised consistent with Para. 8 of the NPPF:

- Economic Objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- Social Objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- Environmental Objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Furthermore, in line with Para. 11C of the NPPF, those responsible for the determination of Planning Applications should attempt to approve the development without delay on the basis that the development would conform with the up-to-date Local Plan. This would be considered demonstration of the 'Presumption in Favour of Sustainable Development'.

Likewise, Section 38(6) of the Planning and Compulsory Purchase Act 2004 (Act 2004) introduced several responsibilities on the Local Planning Authority (LPA) to examine Planning Applications consistent with the up-to-date Local Plan unless the material considerations were to indicate

otherwise. Where an LPA does not have an up-to-date Local Plan, the NPPF summarises that each Planning Application should be approved unless the NPPF were to indicate clear reason for refusal, or that the harm that would be caused because of the development would neither balance nor compensate for the benefit associated with the development.

Sections from the NPPF considered to be of relevance to the HGB FG development have been summarised below.

3.2.2 Building A Strong, Competitive Economy

The Government are committed to economic improvement with the introduction of Local Plans that cultivate the specific circumstances needed for businesses to either invest, expand, adapt or innovate.

The HGB FG development will contribute toward the reduction of the flood risk within the immediate area. The HGB FG development will defend critical infrastructure and homes as well as offer confidence to businesses to either invest or expand with an assurance that the HGB FG development would alleviate the threat on an extreme flood incident.

3.2.3 Making Effective Use Of Land

Each Local Plan will need to recommend the effective utilisation of land. Furthermore, the effective utilisation of available land will need to be carried out without harm to the natural environment.

As above, the HGB FG development will defend land from an extreme flood incident as well as enable unused land to be developed because of this defensive infrastructure. Likewise, the HGB FG development has been devised with consideration of effective utilisation of functional land, with the southern FG to be obscured behind the defence wall when in store to minimise the area needed for the infrastructure.

3.2.4 Achieving Well-Designed Places

Sustainable development remains an important consideration which the HGB FG development will need to realise. Each Local Plan will need to ensure that development will function well and enhance the area across the lifetime of the development.

As above, the HGB development has been devised to ensure minimal harm to the visual appearance of the HGB. For instance, the southern FG will be obscured behind the defence wall when in store to minimise the view. Likewise, the northern FG will be affixed to the HGB wall when in store to minimise harm to the visual appearance of the HGB.

3.2.5 Meeting The Challenge Of Climate Change, Flooding And Coastal Change

Each LPA will need to ensure that the flood level will either be reduced or be unaffected because of an approved Planning Application. The flood level cannot be worsened.

Mott MacDonald have drafted a Flood Risk Assessment (FRA) for the HGB FG development (Document Reference: ENV0000389C-BMM-DZ-4ZZ-RP-Z-0215016-P05). The FRA demonstrates that, after construction, the FRMS will defend the area from an extreme fluvial flood as well as ensure that the flood levels will remain unaffected elsewhere. Furthermore, the FRA confirms that the HGB will be sheltered from an extreme flood incident because of the FRMS infrastructure.

3.2.6 Conserving and Enhancing the Natural Environment

Each Local Plan will need to ensure that the decisions that are informed in line with enhance the environment. The LPA will need to ensure that the HGB development will neither worsen nor exacerbate an unsuitable level or soil, air, or noise pollution.

Whereas the HGB FG development could cause some disturbance or inconvenience in the construction phase, these will be brief or impermanent – thus allowable. When in place, the HGB FG development will neither worsen nor exacerbate the level of pollution in the immediate area.

3.2.7 Conserving and Enhancing the Historic Environment

Each LPA will need to ensure that the decisions that are informed in line will enhance the historic environment. The LPA will need to ensure that minor harm to the HGB will be offset with the benefit of the HGB FG development – defence from an extreme flood incident.

The HGB remains an asset of minimal historic value – neither Listed nor recorded on the Greater Manchester Historic Environment Record. Therefore, minor harm would be offset with the benefit of the HGB FG development.

3.3 Planning Practice Guidance (PPG)

Beside the NPPF, various PPGs have been produced. Each PPG focuses on an individual or specific development-associated topic. The PPGs considered to be of relevance to the HGB FG scheme are summarised below.

3.3.1 Before Submitting an Application (BSAA PPG)

The BSAA PPG summarises the function of formal 'Pre-Application' consultation, with the aim to illustrate the benefit of consultation with the LPA before submission. For instance, 'Pre-Application' consultation could enhance the effectiveness of or timeframe for the decision as well as increase the likelihood of success.

The Council have been involved with the FRMS as well as the HGB FG development. For that reason, the input from the Council has informed various decisions associated with the HGB FG development. Furthermore, the Council have been able to confirm the core issues that would need to be resolved before submission to increase the likelihood of success.

3.3.2 Design: Process And Tools (DPT PPG)

As above, sustainable development will be fundamental. The DPT PPG summarises that sustainable development could be reached with an effective or collaborative approach toward each phase of the development. Furthermore, sustainable development will need to allow for:

- Context;
- Identity;
- Built Form;
- Movement;
- Nature;
- Public Spaces;
- Uses;
- Homes and Buildings;
- Resources; and
- Lifespan.

The HGB FG development will be consisted of one slide-operated FG on the southern limit of the HGB, as well as one swing-operated FG on the northern extent of the HGB. The form or structure of the HGB FG development has been devised in consideration of the above characteristics summarised within the PPG.

3.3.3 Flood Risk and Coastal Change (FRCC PPG)

The FRCC PPG summarises information about how to resolve the flood level associated with the development to ensure that the extent of the flood hazard will remain reasonable. To alleviate the flood hazard, defensive infrastructure or land to compensate could be introduced.

The FRMS will lead to critical infrastructure being able to be defend more than 870 homes or business from an extreme flood incident. As above, the HGB FG development has been devised to achieve minimum level of 69.85m AOD based on the likelihood of 1-in-100-year event, with an additional allowance of 50% for influence of climate change.

Mott MacDonald have produced an FRA for the HGB FG scheme (Document Reference: ENV0000389C-BMM-DZ-4ZZ-RP-Z-0215016-P05).

3.4 Local Planning Policy

As above, the HGB FG development is in the administrative area of the BMBC as well as the GMCA. Therefore, the HGB FG development will need to consider:

- Bury Council Unitary Development Plan (UDP) (Aug. 1997);

- Bury Council New Local Plan (N/A); and
- Places For Everyone Joint Development Plan (PfE Plan) (N/A).

3.4.1 Bury Council Unitary Development Plan (UDP)

The Council adopted the UDP as the Local Plan on 29th August 1997. The UDP has remained the basis on which the Council determine Planning Applications as well as the source of information for development within the area.

The Council will replace the UDP with the New Local Plan once formally adopted – scheduled for mid-2024 – until such time, saved policies within the UDP remain as the main tool for determining planning applications.

Since the UDP was adopted, the Government have introduced the NPPF. The NPPF summarises that, where the Local Plan has been retained after the introduction of the NPPF, these will be assumed to be material considerations. Weight given to the Local Plan will be based on their adherence to the NPPF.

The Council have exercised an examination to evaluate the adherence of the UDP with the NPPF as well as inform the basis of how much weight should be allocated to each policy of the UDP. On balance, the Council considered the UDP to be consistent with the NPPF, with some minor exceptions to this.

Table 3.1 summarises the UDP as well as the application of the UDP to the HGB FG development.

Table 3.1: UDP Assessment

Policy Reference:	Policy Summary:	Policy Assessment:
EN5 – Flood Protection and Defence	The Council will seek to control development in a manner consistent with flood protection and the maintenance of flood defence systems.	The principle of the proposed scheme is to provide flood protection to a number of homes and businesses from a 1-in-100-year flood event.
H5 – Housing Improvement	The Council will continue to support the improvement of the housing stock and its environment.	The proposed development is part of a wider scheme that will help to reduce flood risk in the area by protecting 873 properties from up to 1-in-100-year flood events.

Policy Reference:	Policy Summary:	Policy Assessment:
OL5/2 - Development in River Valleys	Within the River Valleys, new buildings or the change of use of existing buildings or the change of use of land will not be permitted. The only exceptions considered acceptable will be those where the development would not lead to the division of the open parts of the valleys into sections.	All components of the wider FRMS can be considered crucial to maintaining employment and residential land from an economic perspective by protecting them from 1-in-100-year flood events. Furthermore, the proposed works will not affect the openness of the valley and the work is considered necessary to enable the wider FRMS works to be effective.
EN1/1 – Visual Amenity	Development will not be permitted where proposals would have a detrimental effect on: the visual amenity both within, or viewed from, areas of environmental interest such as the Green Belt, Special Landscape Areas or the river valleys.	The proposed flood gates are not within green belt land or a special landscape area, but nevertheless will be designed and finished in a manner which will have little visual impact to the surrounding area.

3.4.2 Bury Council New Local Plan

Preparation of the New Local Plan began in mid-2016, with consultation about the 'SA Scope Report'. This exercise was followed with further consultation for stakeholders involved within the area on the 'Key Issues and Policy Framework' as well as the 'Call For Site' consultation for those keen to offer land forward for either development or protection, such as landowners or developers. This phase of the New Local Plan closed around October 2017.

From October 2018 until November 2018, the Council requested views via consultation on the 'Policy Directions' for the New Local Plan. The Council followed this exercise with further consultation on the 'Draft New Local Plan' scheduled for around the Autumn of 2022. Reference to consultation on the Draft New Local Plan cannot be found; therefore this consultation exercise would seem to have been rescheduled for an alternative time and will be circulated for consultation soon.

The New Local Plan will become the basis for the determination of future development until around 2037, with various local-level policies to instruct where development should be directed as well as either forbidden or allowed. Whilst the New Local Plan would function in collaboration with the PfE Plan, the New Local Plan will differ somewhat because of the local-specific focus. Nevertheless, because the New Local Plan remains to be adopted, and is not at an advanced stage, the New Local Plan carries minimal influence in the determination of Planning Applications at the moment.

3.4.3 Places for Everyone Joint Development Plan

Within the Greater Manchester area, nine of the Local Councils (inc. Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, and Wigan) have submitted the PfE Plan to the Secretary of State for Levelling Up, Housing and Communities. The PfE Plan, which consisted of contextual evidence, supportive documentation, as well as various representations received within the consultation carried out from 9th August 2021 to 3rd October 2021, were submitted on 14th February 2022. Inspectors have been appointed to hold an independent examination of the PfE Plan.

The PfE Plan has been submitted via the GMCA on behalf of the each of the Local Councils noted above.

If adopted, the PfE Plan will become the central framework for the Greater Manchester area until 2037. The PfE Plan will inform development within each of the nine Local Councils, as well as maximise the utilisation of brownfield land. The PfE Plan will ensure the protection of the Green Belt from unsuitable development and would ensure that development will be supported with either current or future infrastructure.

Table 3.2: PfE Plan Assessment

Policy Reference:	Policy Summary:	Policy Assessment:
JP-S5: Flood Risk and the Water Environment.	The placement of development within the Greater Manchester area will be determined so as to minimise the influence of either the current or future flood hazard level. Core infrastructure could be retrofitted or relocated to increase the resilience to an extreme flood incident.	The proposed development is part of a wider scheme that will help to reduce flood risk in the area by protecting 873 properties from up to 1-in-100-year flood events.
JP-P1: Sustainable Places.	The GMCA intend to transform Greater Manchester into an ideal liveable area, characterised with beautiful as well as varied places. To realise this, development within the Greater Manchester area should be resilient or capable to deal with either an environmental or economic incident.	The proposed development is part of a wider scheme that will help to reduce flood risk in the area by protecting 873 properties from up to 1-in-100-year flood events.
JP-D1: Infrastructure Implementation.	To implement the Plan as well as the infrastructure associated with the Plan, the GMCA will recommend the collaboration with the main infrastructure authorities such as the EA.	The proposed scheme has been submitted on behalf of the EA.

Beside the PfE Plan, the GMCA have introduced an Interactive Policies Map to demonstrate the various land allocations within the Greater Manchester area. The Interactive Policies Map should be viewed in tandem with the PfE Plan to offer further information about the PfE Plan policies. In line with the Interactive Policies Map for the PfE Plan, the HGB FG development will be within an area either identified or allocated for:

- Agricultural Land Classification: Urban;
- EA Flood Zone 2;
- EA Flood Zone 3b;
- Green Infrastructure;
- Risk of Flooding from Reservoirs: Maximum Extent;
- Risk of Flooding from Surface Water Extent: 0.1% Chance;
- Risk of Flooding from Surface Water Extent: 1% Chance; and
- Risk of Flooding from Surface Water Extent: 3.3% Chance.

3.4.4 Bury Council Supplementary Planning Guidance / Supplementary Planning Document

Supplementary Planning Guidance (SPG) or Supplementary Planning Documents (SPD) provide further information about the manner in which the Council will either enforce or implement the various saved policies contained within the UDP.

The Council renamed the SPGs to SPDs consistent within the introduction of the Act 2004, with subsequent advice after the Act 2004 referred to as SPD. The Council SPGs or SPDs considered to be of relevance to the HGB Flood Gate include:

- SPG2: Wildlife Links and Corridors; and
- SPD16: Design and Layout of New Development.

4 Key Considerations

4.1 Principle of Development

The HGB FG development remains considered an essential feature of the FRMS. The FRMS infrastructure has been introduced in several phases, which has included a series of sheet-piled walls / embankment devised to reduce the flood hazard level on the River Irwell. Each HGB FG has been devised to achieve minimum level of 69.85m AOD based on the likelihood of 1-in-100-year event, with an additional allowance of 50% for influence of climate change.

As mentioned above, the HGB FG development will be comprised of one slide-operated FG on the southern limit of the HGB, as well as one swing-operated FG on the northern extent of the HGB. Each FG has been devised to cause minimal visual detriment to the current HGB, whilst also providing sufficient flood protection – their core function. For instance, consistent with Section 2.4 of the Statement, the FG near the southern extent of the HGB will retract behind the defence wall when not required and the northern FG will secure to the HGB wall when stored.

The HGB FG development will be compliant with core National as well as Local Plans, as demonstrated within Section 3 of the Statement.

Therefore, based on the need for the HGB FG development in terms of the importance to the current flood level as well as the clear compliance with core National as well as Local Plans, Mott MacDonald consider the principle of the HGB FG development to be suitable.

4.2 Flood Risk

As above, whilst there is no recorded historical flooding within the area, an extreme flood event – measured to be the worst on record – occurred on the River Irwell on the 26th December 2015. The harm associated with this flood incident was considered to be extensive. More than 700 homes / businesses were affected as well as critical infrastructure such as substations which caused further electrical failures to around 1500 properties. The main wastewater treatment plant polluted the floodwater too.

Allowance of the HGB FG development would achieve minimum level of 69.85m AOD based on the likelihood of 1-in-100-year event, with an additional allowance of 50% for influence of climate change. Therefore, in the event of an extreme flood incident similar to that of 2015, the HGB would be defended from harm because of the one slide-operated FG on the southern limit of the HGB as well as the one swing-operated FG on the northern extent of the HGB.

The utilisation of infrastructure to reduce the cause or the harm connected with an extreme flood incident remains fundamental (NPPF Para. 161c). Likewise, each LPA should ensure that the

flood hazard level remains unaffected elsewhere because the development (NPPF Para. 167). The HGB FG development will both reduce the harm connected with an extreme flood incident similar to that of 2015 as well as ensure that the flood hazard level remains unaffected elsewhere as result of the HGB FG development.

4.3 Ecology

In line with the information contained within Preliminary Roost Assessment (PRA), a survey for the presence of bat roosts has been undertaken. The assessment followed the Bat Surveys: Good Practice Guidelines, which included a commencement time of around 15-minutes before sunset as well as conclusion of the assessment around 1.5 to 2 hours after dusk.

Before the in-person assessment of the HGB, a desk-based assessment with the use of MAGIC demonstrated that there were zero international or national designated sites within around 2-kilometre of the HGB. The desk-based assessment identified a Local Designated Site – Hollins Vale Local Nature Reserve (LNR) – within around 1.2-kilometre of the HGB. Because of the localised nature of the HGB FG development, which will be within the current infrastructure, as well as the sufficient distance between the Hollins Vale LNR and the HGB, the HGB FG development is not considered to result in harm to the Hollins Vale LNR.

Based on the result of the bat survey, the HGB has been assessed to be suitable to accommodate or support 'opportunistic crevice dwellers'. The HGB has been considered unsuitable for bat hibernation.

Therefore, consistent with these results, several recommendations have been raised in terms of how construction of the HGB FGs should be carried out:

- Construction of the HGB FGs should be carried out within the hibernation season (November to March); and
- A qualified Ecologist should brief (i.e. 'Toolbox Talk') the contractor before construction of the HGB FGs commence.

If construction of the HGB FG development cannot be carried out within the hibernation season, an extensive pre-construction assessment will be carried out to assess the presence of 'potential roost features' within the HGB arches. Likewise, if construction of the HGB FG development cannot be carried within non-bird nesting season (March to August), pre-construction assessment will be carried out to ensure there are zero bird nests within the HGB arches.

As above, the HGB has been considered unsuitable for bat hibernation. Therefore, the HGB FG development will neither cause the loss nor decline of an irreplaceable habitat in line with NPPF Para. 180c. Likewise, the HGB FG development will neither cause substantial harm nor the loss of the natural environment near to the HGB consistent with NPPF Para 180a.

The results of the bat assessment are valid for between 12 and 18-months. Refer to the Bat Survey Report (Document Reference: ENV0000389C-BMM-DZ-4ZZ-RP-EN-0301088-P01) for further information.

4.4 Heritage

The HGB remains an asset of minimal historic value – neither Listed nor recorded on the Greater Manchester Historic Environment Record. Nevertheless, the HGB does hold some historic importance as an exemplification of the structure built across the River Irwell to function as the connection from Radcliffe to Bealey's. The HGB replaced an initial structure that had been extended around 1910 to 1911. The HGB remains functional as the structure that carries Dumers Land across the River Irwell as well as intact.

The excavation of the HGB surface for the installation of the HGB FG could have the potential to decrease the historic value of the HGB because of the removal fabric that could have survived from the former HGB. Nevertheless, the depth of the HGB FG development will be too shallow to truncate the historic remains of the HGB. The HGB carries services beneath the surface that are lower than the depth needed for the HGB FG development. Therefore, if historic remains were to be enclosed within the surface of the HGB, these would have been harmed before.

Likewise, to raise the two HGB support pilasters found on either side of the HGB wall could have the potential to decrease the historic value of the HGB because of the installation of new material to the HGB. Nevertheless, the features needed to secure the northern HGB FG to the HGB wall will be minor in size and the two HGB support pilasters found on either side of the HGB wall will be constructed to replicate the sandstone finish. Therefore, the FG will be affixed to non-historic HGB fabric and will allow for the continued appreciation of the limited architectural interest that the HGB possesses.

When in store, the HGB FG found nearest toward Manchester Road will be affixed flush with the HGB wall. Therefore, the placement of these could obscure the visual appearance of the HGB structure – considered to be modest or classical – when in store. Nevertheless, the architectural value of the HGB remains limited as mentioned above. The HGB FG development will neither obscure unique features of the HGB nor decrease the role of the HGB as an important monument within the area.

The 'stone' HGB wall toward York Street would need to be removed to accommodate construction of the slide-operated HGB FG. The HGB wall toward York Street has been deemed to be more recent than the main HGB wall. Therefore, the HGB wall toward York Street will hold minimal historic value. The 'stone' HGB wall would be reconstructed to tie in with the entire HGB FG development.

Some disruption to the historic fabric of the HGB will occur because of the construction connected with the HGB FG development. Nevertheless, the two HGB support pilasters found on either side of the HGB wall will be constructed to replicate the sandstone finish. Likewise, access to the HGB will be maintained as far as would be feasible. The scope to appreciate or observe the architectural value of the HGB will be maintained in the construction phase also.

The inconvenience connected with each HGB FG will need to be balanced or offset with benefit of the FRMS. The need to compensate for harm remains an essential feature of the NPPF (Para. 203). Nevertheless, HGB remains an asset of minimal historic value. Therefore, the LPA will need to balance the minor harm of the HGB FG development with the importance of the FRMS.

The benefits of the scheme are considered to outweigh the minor harm to the HGB, through the provision of flood defence infrastructure, providing 1 in 100-year protection. Furthermore, each HGB FG will contend with the River Irwell to ensure both the continued function of the HGB as well as the conservation of the HGB.

Refer to Historic Environment Technical Note (Document Reference: ENV0000389C-BMM-DZ-4ZZ-TN-EN-0301086) for more information.

Mott MacDonald have drafted the Level 2 Historic Building Recording Report (Document Reference: ENV0000389C-BMM-DZ-4ZZ-RP-EN-0301085) to build an in-depth record of the HGB before the modification.

5 Conclusion

The HGB FG development will form an essential feature of the FRMS for the Radcliffe and Redvales area. The HGB FG development will be comprised of one slide-operated FG on the southern limit of the HGB, as well as one swing-operated FG on the northern extent of the HGB. Each FG has been devised to cause minimal visual detriment to the current HGB, whilst also providing sufficient flood protection – their core function. When in use, the HGB FGs will close across Dumers Lane to defend the road from an extreme flood incident.

Allowance of the HGB FG development would achieve minimum level of 69.85m AOD based on the likelihood of 1-in-100-year event, with an additional allowance of 50% for influence of climate change.

Whereas the HGB FG development will cause some disruption in the construction phase, these are to be brief or impermanent. The impact will be monitored as and mitigated where required. Moreover, when in place, the HGB FG development will neither worsen nor exacerbate the level of pollution in the immediate area. Instead, the HGB FG development will reduce the flood hazard level in the immediate area.

As assessment of the HGB FG development against National and Local Planning Policy has been included within this Statement. In turn, this Statement has been able to demonstrate that the HGB FG development conforms with these. Therefore, Mott MacDonald conclude that the HGB FG development will be suitable development.

