

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

Our ref: SO/2026/125621/01-L01

Your ref: 72688

Date: 10 March 2026

Dear Sir/Madam

**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**

**UNIT 3, IRWELL INDUSTRIAL ESTATE, LOWER WOODHILL ROAD, BURY, BL8
1AR**

Thank you for referring the above application to the Environment Agency. We object to the proposed development, and we would like to make the following comments.

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.

Reasons

The submitted FRA [prepared by Reford Consulting Engineers Limited, dated December 2025] does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA 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 event 35% climate change. Consequently, the development proposals are inadequate
 - Raised finished floor levels
 - Flood storage compensation

For any proposed development which includes the erection of new buildings (not including the proposed extension to an existing building) the Environment Agency would require that they incorporate finished floor levels above the 1 in 100 year (1% AEP) flood level, as well as including an appropriate allowance for climate change for the relevant catchment, and a minimum of 300mm but ideally 600mm of freeboard. As the site sits in the Irwell management catchment and the development is classified as 'less vulnerable', the central climate change allowance for the 2080s epoch of 35% should be applied. For more information on assessing future flood risk please see ['Flood risk assessments: climate change allowances'](#).

If a development does not provide the above requirements for finished floor levels, they must provide adequate justification for this. For example, we may consider allowing lower FFLs where unavoidable physical constraints exist such as the presence of essential infrastructure above the site (e.g. pylons or low-hanging electricity lines). The justifications described in the provided FRA are not considered by the EA to be sufficient reason to not apply the correct climate change allowances or freeboard to the proposed finished floor levels.

Furthermore, the proposed flood compensatory scheme is not considered a suitable form of flood compensation as it would pose an unacceptable flood risk to the development. Flood compensatory storage must be provided for all development located in Flood Zone 3 on a level-for-level and volume-for-volume basis, using the 1 in 100 (1% AEP) flood level plus the relevant 35% climate change allowance. This should ideally be provided in the form of depressions or swales and must be freely connected to the floodplain, where floodwater can passively and naturally drain back into the system.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

Advice to applicant - Environmental permit – Flood risk activities

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river

- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit Flood risk activities: environmental permits - GOV.UK or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Advice to applicant - Flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit [Sign up for flood warnings - GOV.UK](#). It is a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit [Prepare for flooding: Protect yourself from future flooding - GOV.UK](#).

To get help during a flood, visit [What to do before or during a flood - GOV.UK](#).

For advice on what to do after a flood, visit [What to do after a flood - GOV.UK](#).

Advice to LPA - Flood warning and emergency response

Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. We therefore do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out this type of role /responsibility during a flood.

[Planning practice guidance](#) (PPG) 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 are fundamental to managing flood risk, we advise LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 (inc. footnote 63) of the NPPF and the guiding principles of the PPG.

We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuations.

Please forward a copy of this letter to the applicant

Yours faithfully

Mrs. SYLVIA WHITTINGHAM
Planning Advisor

Direct e-mail PPlanning.RFH@environment-agency.gov.uk