

RESPONSE TO ENVIRONMENT AGENCY OBJECTION

Proposal: Conversion and Subdivision of Warwick Mill to 135 No. Apartments (Use Class C3) and Flexible Commercial Space (Use Class E) Including Works of Demolition and Formation of Interior Atria, Parking at Lower Ground-Floor Level and Demolition of London House and Erection of Building to Provide 146 No. Apartments (Use Class C3) (281 Total), and Flexible Commercial Space (Use Class E) Formation of External Car Parking, Public Realm, Landscaping, Alteration to Existing Vehicular Access and Creation of Additional Vehicular Access to Oldham Road (A669) and Associated Internal and External Additions and Alterations

We write in response to the consultation comments received on 14th February 2024 (reference SO/2023/123448/02-L01) in regard to the proposed development at Warwick Mill, Oldham Road, Middleton, M24 1AZ. Each of the points raised in the Environment Agency letter are reproduced in *black italic text* below, with our response in [blue text](#) beneath.

EA comments

We maintain our objection to the proposals. The revised FRA has not shown that the proposal (specifically the “Loom” element) would not increase flood risk elsewhere.

We note the discussion in section 9 regarding the river modelling that has been undertaken. The results presented in tables 2 and 3 regarding baseline and post development flood levels are largely within the site boundary. They do not show potential change outside the boundary although there is reference to change elsewhere in paragraph 9.14. This states that there would be increases in flood levels downstream of 20-25mm.

The difference maps show small scale ‘patches’ of increased depth at the McBride site; these are minimal in magnitude (<0.025m) and scale – see [Figure 1](#). These ‘patches’ occur only in the 1 in 100 year plus 35% climate change event; they are not apparent in the 1 in 75 year and 1 in 100 year events. The increases in flood depths are within and on the edge of an already extensive floodplain extent. See **Error! Reference source not found.** showing the proposed 1 in 100 year plus 35% climate change event flood extent with the 1 in 100 year plus 35% climate change depth difference at the McBride site.

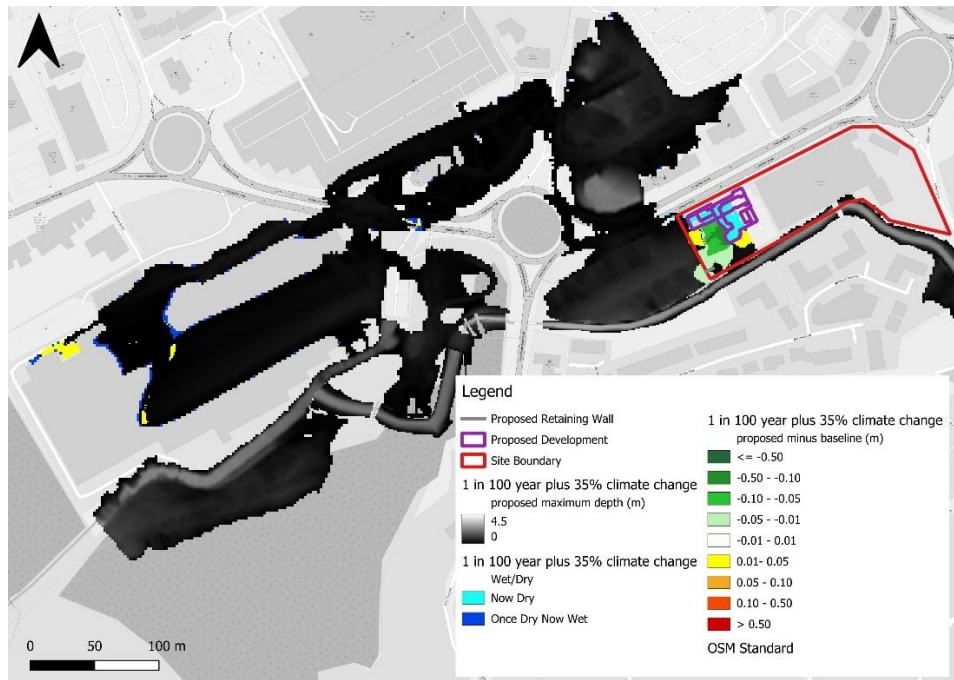


Figure 1: Proposed 1 in 100 year plus 35% climate change maximum depth, wet/dry and proposed minus baseline difference plot.

The report states "Overall the proposed development results in no significant increase in flood risk to off-site receptors". The increase would appear to be due to ground level raising for the proposed "Loom" development without provision of any compensatory flood plain storage. This is contrary to the NPPF and the guidance in PPG paragraph 049.

Formal level for level compensation calculation have not been undertaken for the proposed development because this type of calculation does not accurately reflect the true nature of flood storage on the site, nor recognise the nature of the flooding mechanisms across and within the vicinity of the site and how this is changed by the proposed design.

Level for level compensation approach is appropriate in cases where the mechanism of flooding comprises water spilling out of bank directly onto the site where it accumulates and is stored as a volume of floodplain with a flat surface (uniform maximum flood level). However these principles do not apply in this case as the site itself is in a flow path (see Figure 2); as such there is continuous movement of water through the site and this is reflected in the sloping nature of the floodplain (non-uniform maximum flood levels).

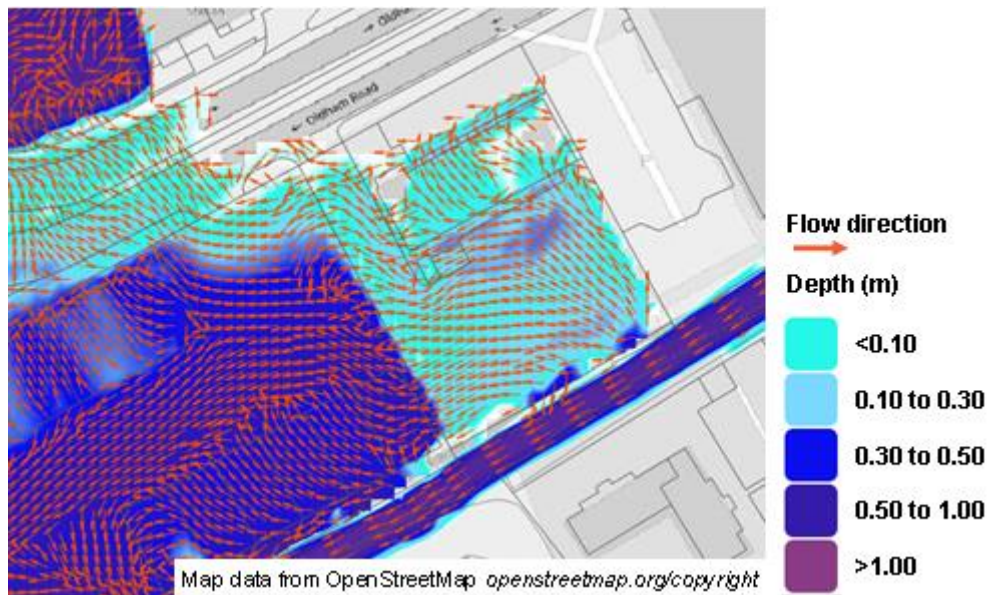


Figure 2: Flood depths and flow arrows showing movement of floodplain flows across the site (1 in 100 year plus 35% climate change event)

This understanding of the particular nature of flooding mechanisms was one of the primary drivers for undertaking hydraulic modelling exercise because such an approach is far more accurately able to capture the complex movement and storage of flows within the whole hydraulic system compared to a site-limited level for level compensation calculation exercise. The hydraulic modelling exercise and results are able to capture the flooding mechanisms more accurately and are therefore better able to demonstrate the impact of the proposed design on flood storage and flood risk on the site and wider area.

Referring to the flood extents in fig 7 showing the proposed scenario, it is stated that the levels of the ground floor car park would be constructed on stilts with a void below to allow flood water to pass beneath. As outlined in PPG paragraph 049, voids should not normally be relied upon for compensating for any loss of floodplain storage due to their operational limitations and long-term maintenance issues.

It is important to note that the carpark 'void' area is not 'new' floodplain compensation rather it is allowing the existing flood flow route across the site in large flood events to remain available.

The carpark 'void' area is a height of approximately 1.85m. The area will not be used for storage of materials and water will be able to flow freely through the area; there will be a maintenance regime to avoid silting up and blockage of screens. Therefore, the area will remain functional as a floodplain storage area when required during extreme flood events. It is considered unlikely that the area could become silted up.

There is no additional information to clarify whether the proposals will retain any access provision to the bank top of Wince Brook. The plans show a green buffer to the channel, but it is not clear whether pedestrian and/or vehicle access would be possible and if so, via what route. Clarification of the proposed developments, proximity to the bank top of Wince Brook and available access points to the watercourse should also be provided. The provision of occasional vehicular access to the bank top should be identified.

A plan is appended which identifies the access points and confirms pedestrian and vehicular access to the brook bank top will be provided.

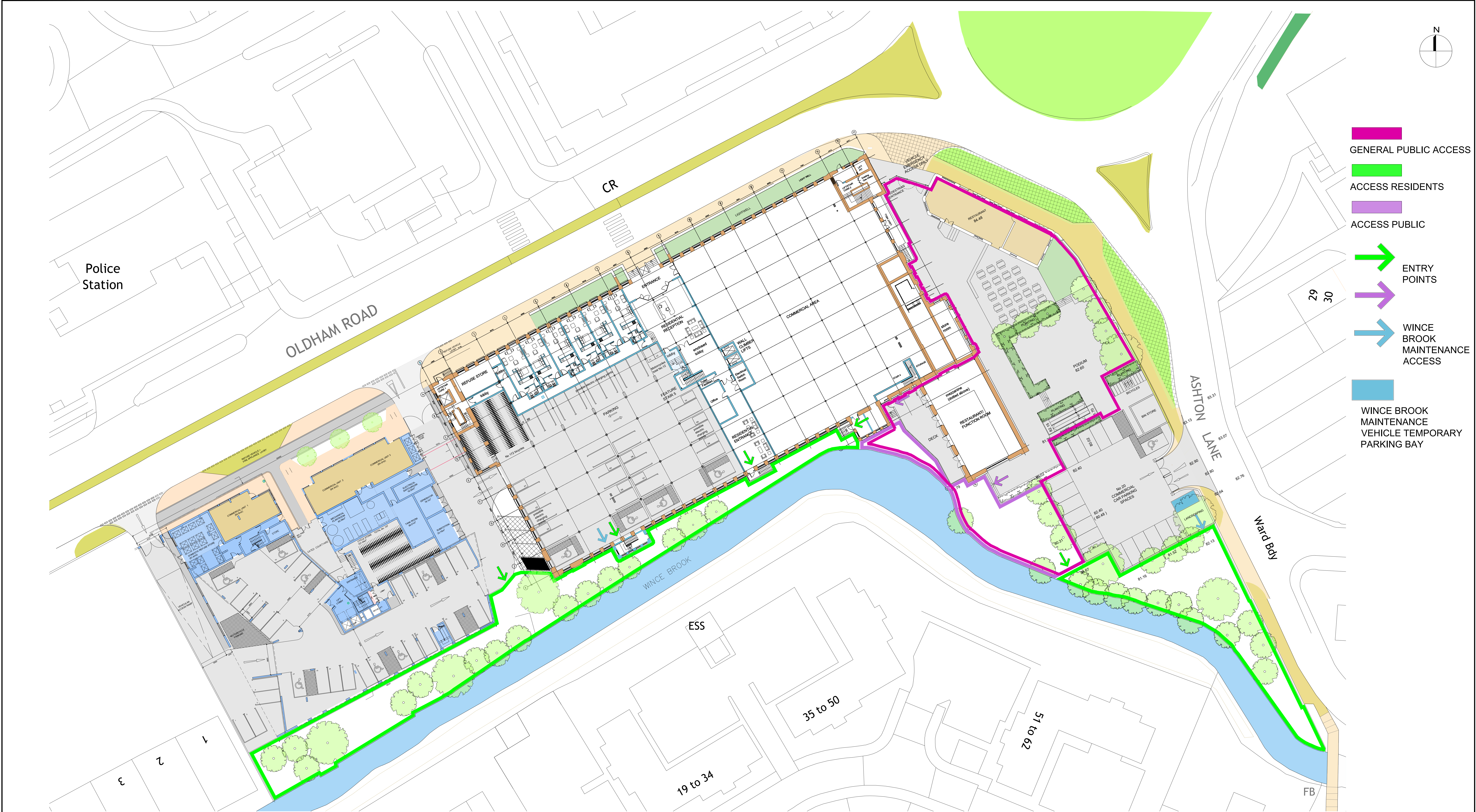
The FRA suggests in section 11 that the sequential test is passed. Whilst the proposed conversion of Warwick Mill would not be subject to the test, the proposed new "Loom" building should be considered. The FRA suggests that the exception tests of NPPF is not required for the proposed development as it is "less vulnerable" use. As indicated in our previous reply, the vulnerability of a development should be based on the highest vulnerability within it for the purposes of assessing it against the sequential and exception tests of NPPF. This is confirmed in NPPF PPG notes to table 2 (Table 2: Flood risk vulnerability and flood zone 'incompatibility'). This is applicable for the London House element which is to be a new construction rather

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than change of use. We recommend the LPA satisfies itself that the sequential and exception tests are being applied appropriately for this proposal.

A sequential and exceptions test has been provided by WSP and is submitted to the Council alongside this response.

We trust that the further information and clarification provided herein allows the Environment Agency to remove their objection.



- GENERAL PUBLIC ACCESS
- ACCESS RESIDENTS
- ACCESS PUBLIC
- ENTRY POINTS
- WINCE BROOK MAINTENANCE ACCESS
- WINCE BROOK MAINTENANCE VEHICLE TEMPORARY PARKING BAY

SCALE 1:500 0 10 20 30 40 50

P01 ACCESS DETAILS UPDATED 01.05.24 <table><tr><th>REV</th><th>DESCRIPTION</th><th>DATE</th></tr></table>			REV	DESCRIPTION	DATE	Notes : ■ Dimensions are to be checked on site before fabrication and construction ■ Any discrepancies are to be immediately notified to the architects ■ Structural measurements are to be taken from the structural engineers drawings ■ Do not scale ■ Copyright reserved by GMA	GMA ARCHITECTURE Architects and Designers UK House 82 Heath Road Twickenham TW1 4BA Telephone 020 8891 5959 Fax 020 8607 9933 Email enquiries@gmaarchitecture.co.uk	DRAWING ISSUE STATUS PLANNING		Client KAM LEI FONG LTD	Scale 1:500@A2	Date June 23	Drawn SJS	Checked IL
			REV	DESCRIPTION	DATE									
			Project WARWICK MILL MIDDLETON MANCHESTER	Drawing Warwick Mill Development Site Plan - Wince Brook Access	Type 01			Client 277/01	WM EH 012	P1				

K:\Warwick Mill, Middleton, Manchester\Drawings\June 2023\Site Plan