

Rochdale Metropolitan Borough Council  
Development Control  
Number One Riverside  
Smith Street  
ROCHDALE  
Lancashire  
OL16 1XU

**Our ref:** SO/2025/124928/02-L01  
**Your ref:** 24/01086/FUL  
**Date:** 21 July 2025

Dear Sir/Madam

**\*\*ADDITIONAL INFO RECEIVED\*\* CHANGE OF USE FROM EXISTING BARN TO 2NO' RESIDENTIAL DWELLINGS AND ANCILLARY EXTERNAL ALTERATIONS AND LANDSCAPING | LOWER TOWN HOUSE BARN TOWNHOUSE ROAD LITTLEBOROUGH**

**SURFACE WATER - WATERCOURSE, MAINS LOWER TOWN HOUSE BARN TOWNHOUSE ROAD LITTLEBOROUGH**

Thank you for referring further details regarding the above application to the Environment Agency

**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 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:

Consider how people will be kept safe from the identified flood hazards. No consideration has been provided to breach overtopping, including depth, level and velocity, this can be requested, including reports from

[inforequests.gmmc@environment-agency.gov.uk](mailto:inforequests.gmmc@environment-agency.gov.uk)

Page 21 & 22 of the Product 4 indicates at "Node 1 & 2" a 1% AEP + 35% level of Node 1 - 158.36 and Node 2 158.29. This is above the crest of the embankment and noticeably above the 158.00aod FFL.

Environment Agency  
Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

Consider how a range of flooding events (including extreme events) will affect people and property. NPPF (National Planning Policy Framework) and the associated Planning Practice Guidance (PPG) clearly state that residual risks must be considered in an FRA.

- Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event. This is for the local authority to provide acceptance.
- 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. Consequently, the development proposals are inadequate:
  - Flood storage compensation
  - Raised finished floor levels
  - Resistance and resilience measures
  - Safe access and egress routes
- Section 2.3 the image depicting the flood zones is incorrect. This was updated in March 2025 with new outlines. So, does the evacuation route going north seem to have road access by means of escape?
- Additionally, 2.4, the applicant is relying on the EA's flood warning service. We are not legally obliged to provide flood warnings, however we do so under our public service commitments, however, we cannot always guarantee they will receive a flood warning in time for means of escape.

### **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.

Please forward a copy of this letter to the applicant.

Yours faithfully

**Mrs. SYLVIA WHITTINGHAM**  
**Planning Advisor**

Direct e-mail [SPPlanning.RFH@environment-agency.gov.uk](mailto:SPPlanning.RFH@environment-agency.gov.uk)