

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. Planning Application 23/00795/FUL.

We write in response to the most recent Environment Agency consultation regarding the proposed development at Warwick Mill, Oldham Road, Middleton, M24 1AZ.

The Environment Agency provided comments in a letter received on 10th June 2024 (reference SO/2023/123448/03-L01) and a subsequent conversation with the Council Planning Officer. The below summarises the points raised by the Environment Agency (*italic text*) and provides our response ([blue text](#)).

A draft version of this response (RCEF79519 Warwick Mill EA Response 20240703.pdf) was provided to the Environment Agency for review followed by a meeting on 11th July 2024. At the meeting the Environment Agency indicated that the information supplied herein with regards to provision of floodplain compensation storage is sufficient to allow them to remove their objection. With regards stilted development, the Environment Agency advised that provision of robust Planning Conditions could be an acceptable route via which to alleviate this element of their objection.

Environment Agency position

Letter received on 10th June 2024: *Regarding the issue of the noted increases in flood risk elsewhere when comparing the baseline and post-development flood outlines - the current development proposal offers no compensatory volumetric loss to offset the impact from the Loom development within the floodplain. While we agree the mechanisms are complex, where loss or obstruction of the floodplain occurs resulting in demonstrated adverse impacts elsewhere - development proposals should be sympathetic and include valid efforts to incorporate compensation and suitable mitigation to ensure compliance with the NPPF and PPG paragraph 049.*

Conversation with Planning Officer: *Regarding the volumetric loss of flood plain, which although shown as minimal within the modelling, would still be contrary to national policy and EA guidance. The EA are looking for it to be demonstrated if off-site impacts are tangible in the first place, and if the volumetric loss of the flood plain can be compensated for, whether this be through manipulation of land levels on or off-site to provide no net loss of flood-water storage.*

Meeting on 11th July 2024: *The response provided below provides sufficient information to allow the objection to be removed.*

Response

[The opportunity to incorporate floodplain compensation on site has been explored. The design event used is the 1 in 100 year +35% CC scenario. Floodplain storage can provided up to this level as presented below.](#)

[In the existing baseline scenario, the footprint of the London House building and another smaller building on this part of the site are within the floodplain extent. In the proposed development scenario these buildings are demolished and replaced by the proposed Loom building - the footprint of which is also in the floodplain extent. This is shown in Figure 1.](#)

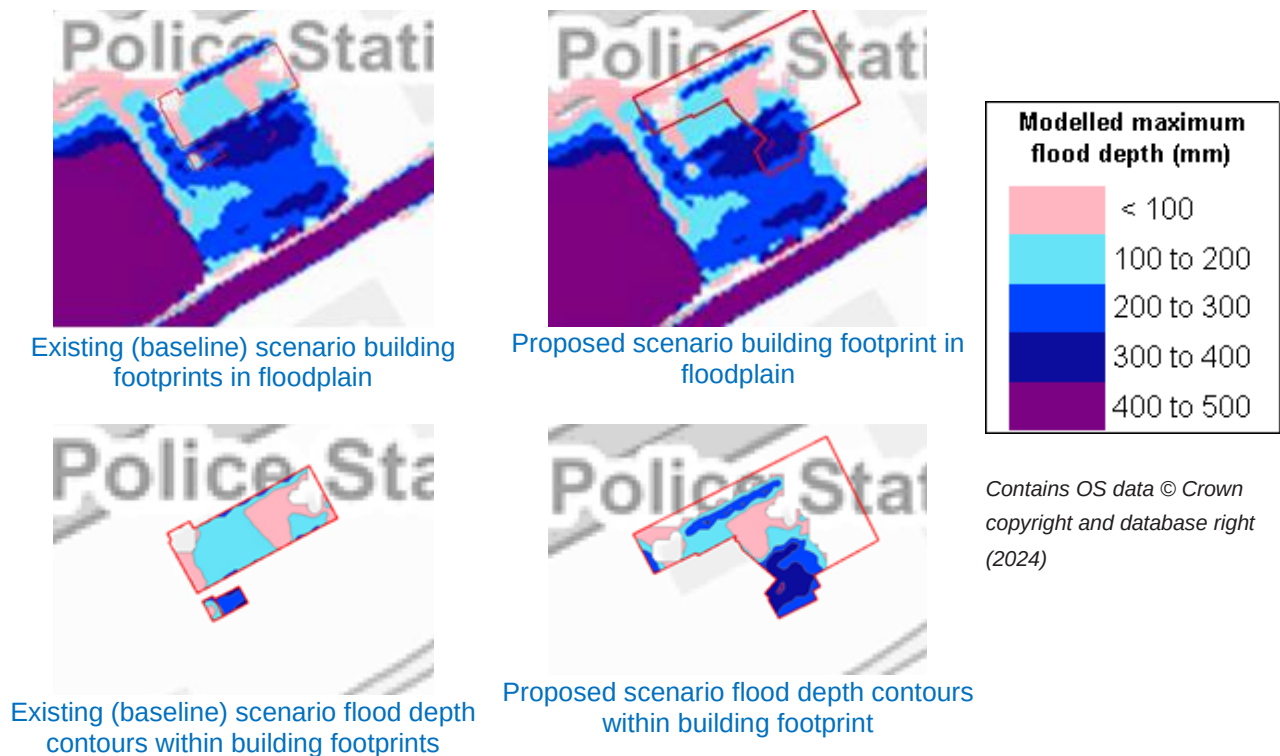


Figure 1: Flood depths within building footprints (baseline and proposed) 100 year +35% floodplain

The top water level during the 1 in 100-year plus 35% climate change allowance is 78.98 m AOD. The depth results have been contoured into 100 mm slices and the area impacted (and thus volume i.e. area x 100 mm) at each slice has been calculated. This has been undertaken for both baseline and proposed footprints allowing the difference (floodplain gain/loss) on a slice by slice basis. This is shown in Table 1 below.

It can be seen that Slice A and E have very negligible volumes of floodplain loss (less than 2m²) and at Slice D there is an 'automatic' floodplain gain through implementing the proposed demolition and relocation of the building(s). Therefore the focus has been on providing the required volume at Slices B and C which are the slices witnessing more substantial floodplain loss.

Slice ID	Water level slice (m AOD)	Depth slice (mm)	Floodplain volume loss (m3)	Floodplain volume gain (m3)	Volume required to be provided for compensation (m ³)	Additional volume (m ³) provided in the 100 m ² lowered compensation storage area	Floodplain Volume provided by implementing the proposed development including lowering compensation area
A	78.88 to 78.98	400 to 500 mm	0.24	0.00	0.24	10	9.76
B	78.78 to 78.88	300 to 400 mm	9.34	0.53	8.81	10	1.19
C	78.68 to 78.78	200 to 300 mm	13.08	3.13	9.95	10	0.05
D	78.58 to 78.68	100 to 200 mm	15.01	21.27	-6.26		6.26
E	78.48 to 78.58	100 to 0 mm	14.80	13.18	1.61		-1.61

Letter received on 10th June 2024: Regarding the ground floor car park being constructed above the floodplain on stilts, we can confirm that we do not consider this to be a suitable method of developing in a flood risk area, but rather mitigation of risk by design. The use of stilts reduces the impact on the development but does not guarantee that the floodplain will be retained in the same way as a designated compensation scheme (which is a form of risk substitution).

GMA architects have produced a drawing showing the proposed development flood risk and mitigation area. This is provided as Annex A.

Conversation with Planning Officer: The EA are generally seeking to ensure that the new building provides an appropriate treatment in the flood plain, stilted development is generally viewed as inappropriate by the EA

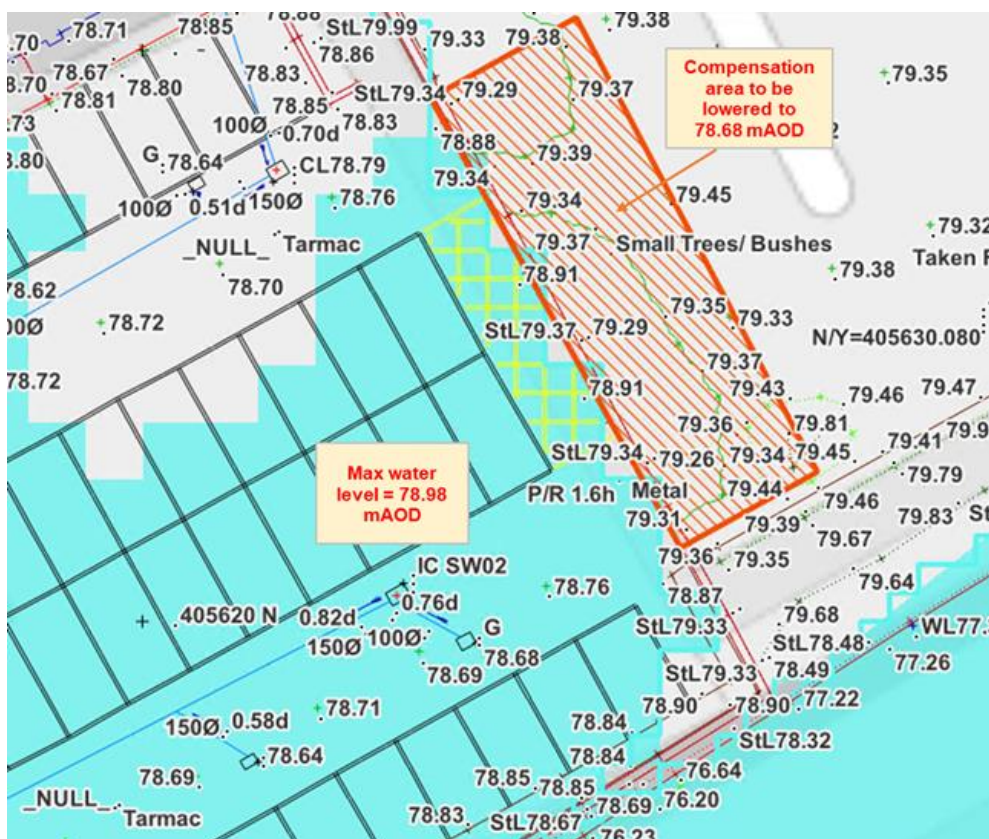


Figure 2: Area of proposed lowering adjacent to floodplain. Floodplain is shaded turquoise, existing site levels re shown as black labels.

GMA architects have produced a drawing showing the proposed development flood risk and mitigation area. This is provided as Annex A.

The above demonstrates that a feasible solution can be implemented on site to provide the required compensatory flood storage.

Environment Agency position

Letter received on 10th June 2024: Regarding the ground floor car park being constructed above the floodplain on stilts, we can confirm that we do not consider this to be a suitable method of developing in a flood risk area, but rather mitigation of risk by design. The use of stilts reduces the impact on the development but does not guarantee that the floodplain will be retained in the same way as a designated compensation scheme (which is a form of risk substitution).

Conversation with Planning Officer: The EA are generally seeking to ensure that the new building provides an appropriate treatment in the flood plain, stilted development is generally viewed as inappropriate by the EA

who would be looking for the developer to demonstrate that alternatives have first been considered and discounted.

Meeting on 11th July 2024: The response provided below provides justification for why stilted development is necessary in the context of wider proposed development requirements and constraints. The provision of specific Planning Conditions to minimise risk of the floodplain part of the site being detrimentally altered over the future development lifetime is required to remove the objection.

Response

The architects for the scheme GMA Architects have provided additional information and context which demonstrates why wider site constraints mean that silted development is required.

Review of Site Constraints in Relation to Flood Risk

The existing Warwick Mill development is outside of the Flood Risk Area, whilst the adjacent site of the new development known as the Loom building, lies within the flood plain.

Initial investigations into the siting of the Loom development and the determination of the ground floor levels were greatly influenced by the existing Warwick Mill building and associated land levels. There is a significant fall across the total site from East to West adjacent to Oldham Road of approximately 4.8m, with Warwick Mill on the higher ground and outside of the flood plain.

Critical to the overall development was addressing this fall/change in levels to adequately service the site in terms of required car parking under planning by Rochdale Council, the required fire appliance access throughout the site, and general vehicle servicing of the site.

As Warwick Mill has an established basement level, further excavation was not possible as it would change the character of the building and expose below ground construction. Therefore providing compensation area for suitable mitigation was not possible on the main site area. Using the existing lower ground floor level of Warwick Mill as the main design criteria for setting the access level requirement between the two buildings resulted in the creation of new access off Oldham Road at a natural entry level from this main highway. To minimise using multi accesses off Oldham Road required under planning, it was necessary to provide a one way system of vehicular movement through the Loom site to link into the Warwick lower ground floor level where further vehicle parking was required. To achieve this car park deck to the Loom building, as required by Rochdale Council in terms of providing essential car parking associated with the residential use of the Loom building, it was a priority to provide a one way system of vehicular moment to link into the Warwick Mill level. To achieve this, the car park deck level had to be elevated due to the cross fall in the land which otherwise would have resulted in ramps that would be too steep for vehicular movement and prevent the required adequate access between the two buildings.

Review of Options

Once the criteria for adequate servicing of both sites had been established that satisfied parking standards, highways and fire safety reviews were carried out on the effect of the flood plain and possible mitigation.

Any changing in levels to the river bank adjacent to the existing Warwick Mill could not have been achieved due to the changing of the natural setting of the listed, Warwick Mill, and exposing below ground walls, resulting in the Loom site being reviewed further in terms of opportunities for flood mitigation.

The natural bank of the loom site has a set level which is lower than the ground floor level of the new development. Lowering the car park level further would create greater ramp gradients unsuitable for vehicular access and therefore could not be considered.

The use of a further access off Oldham Road to create an independently serviced site separate to that of Warwick Mill was reviewed but required inappropriate as both buildings were required from the outset to compliment one another and to create a uniform scheme with easy access between the two developments through the use of a linked pedestrian bridge at first floor level to allow interaction between the two sites where the main amenity areas for both buildings are located.

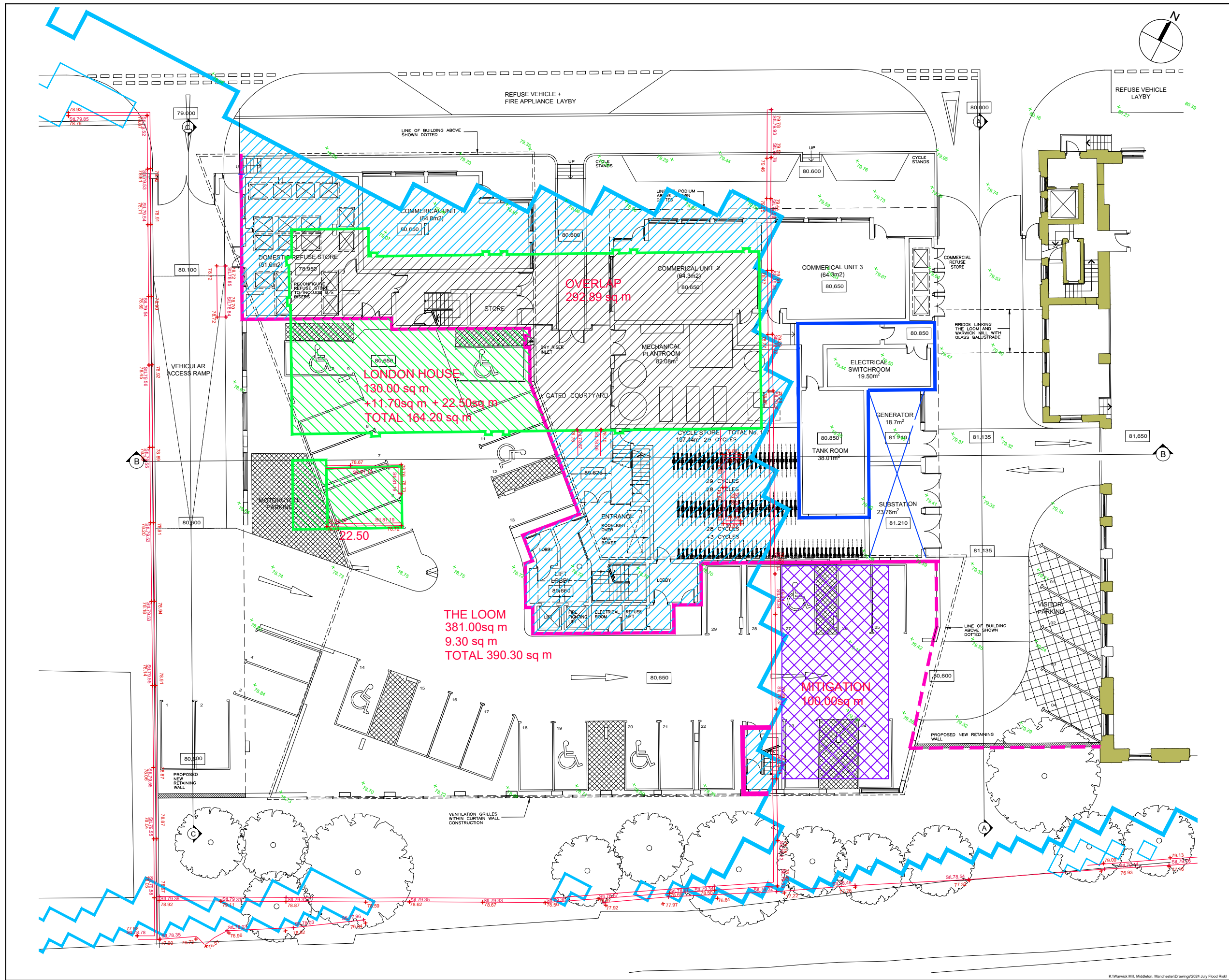
3.0 Development Proposal

- 3.1 Proposals are to replace the existing two-storey residential dwelling with a new elevated two-storey residential dwelling.
- 3.2 The existing dwelling is of a sizeable footprint at ground level, with an elevated external terrace and floor level of around 33.70m AOD.
- 3.3 The new dwelling will be raised above existing ground level on columns and will therefore occupy a much smaller footprint at ground level compared to the existing dwelling. The finished floor levels will therefore be located at an elevated level (34.66-35.26m AOD) to ensure residential accommodation is located above the 1 in 100-year flood level to accord with Environment Agency requirements. This approach will also ensure the free flow of floodwater under and around new building.

Figure 4: Extract from Flood Risk Assessment supporting Approved Planning Application for a residential building

We trust that the information provided herein allows the Environment Agency to remove their objection to the proposed development.

ANNEX A: Proposed development flood risk and mitigation area drawing



- 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

- LEGEND
- FLOOD RISK ZONE
 - AREA OF NEW BUILD IN FLOOD RISK ZONE = 390.30sq m
 - AREA OF OVERLAP BETWEEN THE LOOM + LONDON HOUSE 292.89sq m
 - AREA OF EXISTING BUILDING (LONDON HOUSE) WITHIN FLOOD RISK ZONE 164.20sq m
 - AREA OF PROPOSED MITIGATION 100.00sq m @ 78.68 GROUND LEVEL

REV	DESCRIPTION	DATE
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DRAWING ISSUE STATUS
PLANNING

GMA ARCHITECTURE
Architects and Designers
UK House 82 Heath Road Twickenham TW1 4BA
Telephone 020 8891 5959 Fax 020 8807 9933
Email enquiries@gmaarchitecture.co.uk

Client
KAM LEI FONG LTD

Project **Warwick Mill
Middleton
Manchester**

Drawing
**Residential Development
FLOOD RISK AREAS**

Scale	Date	Drawn	IL
NTS@A1	June 24	MD	IL
Type	Client	TL-FR-101	
01	277-02		