

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

Our ref: SO/2025/124928/01-L01
Your ref: 24/01086/FUL
Date: 28 April 2025

Dear Sir/Madam

**CHANGE OF USE FROM EXISTING BARN TO 2NO' RESIDENTIAL DWELLINGS
AND ANCILLARY EXTERNAL ALTERATIONS AND LANDSCAPING, SURFACE
WATER - WATERCOURSE, MAINS**

LOWER TOWN HOUSE BARN TOWNHOUSE ROAD LITTLEBOROUGH

Thank you for referring the above application to the Environment Agency. 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 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:

- 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 1 in 100-year flood event 35% climate change. Consequently, the development proposals are inadequate:

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

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- Resistance and resilience measures. As this is a change of use development and raised finished floor levels are not an option to reduce flood risk, we would expect the FRA to demonstrate that resistance and resilience measures have been incorporated into the design of the development. More information on resistance and resilience measures can be found here: <https://www.gov.uk/government/publications/prepare-your-property-for-flooding>.
- In addition, the existing finished floor levels are not clear within the submitted documents. The FRA states the 'FFL of the barn is estimated to be nominally 150mm above courtyard level at 158.00m AOD' however, other drawings reference different FFLs. We ask the applicant to clarify this level so we can properly assess the flood risk posed to the development.

Overcoming our objection

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

Environmental permit - Advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506. 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.

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