

Joshua Lee
Manchester City Council
Development Control
PO Box 488
Manchester
Lancashire
M60 2JT

Our ref: SO/2024/124423/01
Your ref: 140061/FO/2024
Date: 23 September 2024

Dear Joshua Lee,

Erection of single storey building to form 5 garages associated with adjoining flats.

2 Ladybarn Crescent Manchester M14 6UU

Thank you for consulting us on the above application on 6th September 2024. We object to the proposed development and 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, the FRA fails to sufficiently address:

- Flood storage compensation

Furthermore, the FRA states on Page 12 that the western side of the site is within Flood Zone 3b. Clarification should be provided on why the western side of the site is considered to be within Flood Zone 3b, including reference to the Places for Everyone Strategic Flood Risk Assessment.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses

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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

Flood Zone 3b, The Functional Floodplain

This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. A functional floodplain will normally comprise:

- land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or
- land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding)

Local planning authorities should identify these areas within their Strategic Flood Risk Assessments and their boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)

For more information, please see the Planning Practice Guidance: [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-and-coastal-change)

Charged Planning Advice

Should you wish us to review any technical documents or want further advice to address the environmental issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available [here](#).

If you would like more information on our planning advice service, including a cost estimate, please contact us at SPPlanning.RFH@environment-agency.gov.uk.

If you are minded to approve the application contrary to our objection, please contact us

to explain why material considerations outweigh our objection. This will allow us to make further representations.

Please forward a copy of this letter to the applicant.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

Chris Nugent
Planning Advisor

SPPlanning.RFH@environment-agency.gov.uk