

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

Our ref: SO/2021/121744/01-L01
Your ref: 131923/FO/2021
Date: 01 December 2021

FAO: Sue Wills

Dear Sue

**CREATION OF A SITE COMPOUND IN RELATION TO IMPROVEMENT WORKS
BEING CARRIED OUT IN THE AREA, SURROUNDED BY 2.4 METRE HIGH
WELDMESH FENCE FOR A TEMPORARY PERIOD OF 15 MONTHS**

**PALMERSTON STREET COMPOUND, PALMERSTON STREET, MANCHESTER,
M12 6PT**

Thank you for consulting the Environment Agency (EA) on the above temporary development proposal. Referral for this application was received on the 26th November 2021.

Environment Agency Position

In the absence of a flood risk assessment (FRA), as submitted, we object to this application and recommend that planning permission is refused.

The proposed development is situated within Flood Zones 2 and 3, which is land defined by the planning practice guidance as having a medium and high probability of flooding respectively.

The National Planning Policy Framework (paragraph 167, footnote 55) states that an FRA must be submitted when development is proposed in such locations. A check of the planning portal submissions for 131923/FO/2021 indicates that an FRA has not currently been submitted by the applicant / agent.

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason and basis for refusing a planning permission.

To address our objection the applicant/agent should submit an FRA which demonstrates that the risks posed by flooding to the proposed development can be appropriately managed.

We also recommend that commentary is also sought from the Lead Local Flood Authority (LLFA) and your emergency planners if not already done so.

Note to Applicant / Agent – FRA sources of information

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available. Our Customer

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

Engagement Team is contactable via: InfoRequests.GMMC@environment-agency.gov.uk.

The Local Planning Authority (LPA) should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your local planning authority (Manchester City Council) to determine what information is available.

Further advice on what to include in an FRA can be found at: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

Note to Applicant / Agent – Flood Resistance and Resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

- *Government guidance on flood resilient construction*
<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>
- *CIRIA Code of Practice for property flood resilience*
https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience.aspx
- *British Standard 85500 – Flood resistant and resilient construction*
<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Note to Local Planning Authority - Flood Warning and Emergency Response

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The [planning practice guidance](#) (PPG) to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners

and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG.

Note to LPA – Sequential Test

In accordance with the National Planning Policy Framework (paragraph 162), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case.

Development is in a flood risk area if it is in Flood Zone 2 or 3, or it is within Flood Zone 1 and your strategic flood risk assessment shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater. .

Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience.

It for the local planning authority to decide whether the sequential test has been satisfied, but the applicant should demonstrate to you, with evidence, what area of search has been used. Further guidance on the area of search can be found in the planning practice guidance [here](#) .

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Please forward a copy of this letter to the applicant / agent. Should you have any queries or questions regarding this response, then please do not hesitate to get in contact.

Yours sincerely

Mr Andy Davies
Sustainable Places Advisor

Direct e-mail andy.davies1@environment-agency.gov.uk