



Hopwood Hall College

EA PLANNING CORRESPONDENCE



REPORT ISSUE TABLE

Purpose of Issue	Revision	Date	Prepared By	Checked By
EA COMMENTS	P01	18/08/2025	NFP	JT



Latest Correspondence – Received 14th August 2025.

Location: Hopwood Hall College, Rochdale Campus, St Mary’s Gate, Rochdale, OL12 6RY

Proposal: The proposal involves the demolition of the existing Block B building including the basement and the construction of a new four-storey block intended for teaching purposes. The development is to be situated in the northern section of the site, opposite College Road, on land currently occupied by car parking spaces.

Reason: We maintain our objection to this application because it fails the second part of the flood risk exception test. We recommend that planning permission is refused on this basis.

REF: 25/00541/FUL

The initial feedback has been included in Appendix A.

Roscoe Comments – Provided 18th August 2025.

Roscoe comments have been provided to each comment in purple.

Updated EA Comments- 8th of September 2025

Roscoe Comments – Provided 18th of September 2025.

Roscoe comments have been provided to each comment in purple.



EA Comment 1.01- Product 4 Data

The FRA fails to reference the full contents of the Environment Agency's Product 4 data, provided on 23 July 2025. The flood modelling and mapping included in this data (pages 32 to 35) clearly indicate out of bank flooding affecting the site, with flood levels ranging from 119.00 m AOD to 120.95 m AOD. Given that the proposed FFL is 120.80 m AOD, this data is directly relevant and must be properly addressed and clarified within the FRA.

Roscoe Response 1.01

For clarity:

- We formally requested Product 4 data from the EA prior to completing the FRA.
- The dataset supplied to us — dated 23 July 2025 — was used in good faith as the most up-to-date information available at the time of preparing the FRA.
- It has since become apparent that a more recent dataset, also dated 23 July 2025, exists and contains updated modelling. This version was not provided to us when we made our request, nor were we advised that an updated dataset was being finalised.
- As such, the FRA was completed using data that we believed to be current, but which we now understand was already superseded when the application was submitted.

This raises concerns about the clarity of the data supply process, as the EA did not make us aware that an updated version was imminent or in preparation at the time of our request.

We note the receipt of the updated Product 4 data (dated 23 July 2025) including the defences-removed climate change modelled fluvial extents and levels. Upon review, we have observed certain anomalies in the dataset that raise questions regarding its accuracy:

- Pages 32–34 indicate that some water levels at nodes located further from the river are higher than those closer to the river (e.g., a river node at 119.35 m AOD versus a site node at 121.03 m AOD).

This is counterintuitive to standard hydraulic modelling expectations, where water levels would typically be highest in proximity to the river and decrease with distance from the channel.

Given the unusual gradients and apparent inconsistencies, it appears the dataset may have not fully been validated.

As the dataset forms the basis for any FRA or mitigation assessment, we request that the EA confirms the accuracy of these levels and clarifies how they should be interpreted in the context of our site. Until such clarification is provided, reliance on these values to justify design requirements (such as FFL adjustments) is considered premature.

We remain committed to ensuring the development is safe and compliant with policy, but any requirements based on potentially inconsistent data should be appropriately qualified. The product 4 data set dated 23rd of July 2025 (latest) has been attached in Appendix B.



EA Comment 1.01- Product 4 Data

Correct, the out of bank 2d level is higher than in channel, where it spills into the floodplain. So, you must compensate for this including 35% climate change. The EA will not confirm the validity of this mode, if Roscoe wish to challenge this, please provide your detailed modelling and the Environment Agency will review this within 4 weeks of submission.

Roscoe Commentary 1.01

We note the information within the EA model dated 2013 and the EA requirement for the identified flooding although consider there may be an anomaly in how we are interpreting the information provided within the Product 4 data.

At this stage, we have two potential options:

- **Option 1:** Proceed with designing flood storage compensation based on the flood levels provided in the EA's Product 4 data, although this may be challenging given the limited size of the site, and we have provided a further response under separate cover.
- **Option 2:** Commission independent flood modelling for the site, which although is an option we would prefer to discuss ahead of commissioning due to the time constraints and managing the College/DfE expectations.

We would appreciate holding a meeting with the EA to discuss the Product 4 data and our interpretation to expedite the current situation and remove unnecessary correspondence which impacts the EA workload/time.



EA Comment 1.02- Flood Risk Data

This application lies within Flood Zone 3a, which is land defined by the planning practice guidance (PPG) as having a high probability of flooding. As shown in the Flood Zones and flood risk tables of the PPG, development classified as more vulnerable is only appropriate in these areas if the exception test is passed alongside the sequential test.

The National Planning Policy Framework (paragraph 165) makes it clear that both elements of the exception test must be passed for development to be permitted. Part 2 of the test requires the applicant to demonstrate, via a site-specific flood risk assessment, that the development will be safe, without increasing flood risk elsewhere. Where possible, the development should reduce flood risk overall.

In this instance the developer's flood risk assessment fails to:

- Demonstrate that the development is 'safe' for its designated lifetime.
- Consider whether flood risk will be increased in the surrounding area
- Address the opportunities presented by this development for reducing flood risk

Roscoe Response 1.02

We note that the refusal was based on the site being located within Flood Zone 3a and the associated requirements of the sequential and exception tests.

Since the submission of the original application, the red line boundary has been reviewed and updated using the latest Environment Agency Flood Map for Planning. This updated mapping confirms that the site is now wholly located within Flood Zone 2, rather than Flood Zone 3a. Please see Flood Map for Planning, attached in Appendix C as well as the updated site plan from Sheppard Robson and the pre-planning advice from Rochdale Borough Council.

As you will be aware, development classified as "more vulnerable" is permissible in Flood Zone 2 without the need for the exception test, subject to a site-specific flood risk assessment that demonstrates the proposal will be safe for its lifetime and will not increase flood risk elsewhere.

Given this updated flood zone classification, we consider:

1. The sequential test remains relevant, but the exception test no longer applies.
2. The scope of the flood risk assessment can be amended to focus on the requirements for Flood Zone 2, addressing safety, resilience, and no increase in flood risk to surrounding areas.



EA Comment 1.02- Flood Risk Data

Even though the boundary has changed, this site is still at risk from the 100 year + 35% climate change 2d out of bank level, again as previously stated this must be compensated for. Please can the LPA ensure the sequential and exception test are still valid.

- Flood zone 3 must be scoped back into this FRA, as its clearly still relevant looking at the product 4 “Page 16” clearly shows out of bank flooding for the 1% +35 and 70% (green colour range)

Roscoe Commentary 1.02

Please refer to previous responses and information provided under separate cover which considers levels and flood compensation.



EA Comment 1.03- Flood Compensation

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 proposes inadequate:

- Flood storage compensation for the 1 in 100 +35% climate change. This must be level for level or volume for volume outside the flood zone 3 + 35% climate change outline.
- Raised finished floor levels

Roscoe Response 1.03

Since submission, the site's flood zone classification has been reviewed using the latest Environment Agency Flood Map for Planning. This confirms that the application site is wholly within Flood Zone 2 and lies outside the extent of Flood Zone 3, including the 1 in 100-year +35% climate change outline.

In line with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG):

- The exception test is not required for “more vulnerable” development in Flood Zone 2.
- Flood storage compensation is generally only required where development lies within Flood Zone 3 or where there is demonstrable displacement of floodwater within the functional floodplain. As the proposal is in Flood Zone 2 and outside the climate change Flood Zone 3 extent, no loss of floodplain storage is anticipated, and level-for-level or volume-for-volume compensation is therefore not applicable.
- Raised Finished Floor Levels are not a policy requirement for Flood Zone 2 unless site-specific modelling shows flood depths that would necessitate such measures. Our FRA confirms that predicted flood depths under the 1 in 100 +35% climate change scenarios do not exceed 119.35m and therefore standard resilience and resistance measures are considered sufficient.

We remain committed to ensuring the development will be safe for its lifetime without increasing flood risk elsewhere and we have incorporated appropriate resilience measures in line with Flood Zone 2 guidance.



EA Comment 1.03- Flood Compensation

It isn't clear how can the applicant confirm its outside of the flood zone 3 outline. The product 4 "Page 16 shows out of bank flooding for the 1% +35 and 70% (green colour range) encompassing the whole site.

- Flood compensation must be provided for the 100 + 35%
- Finished floor levels must be above 1 in 100 + 35% + 600mm freeboard. The applicant is thinking of in channel levels there, no consideration for the 2d out of bank level. See Page 28 to 35 of the Product 4 clearly shows 2d AOD levels above the 119m 'bank level'.

Roscoe Commentary 1.03

We consider we may be misinterpreting the Product 4 data that has been provided by the EA differently.

According to the publicly available Flood Map for Planning, the site is currently shown to be within Flood Zone 2 and not within Flood Zone 3. This designation is generally understood to represent the best available definition of flood zones for planning purposes.

The Product 4 dataset currently provided appears to show significantly greater flood extents and higher water levels than are indicated by the Flood Map for Planning. This appears to place the site entirely within Flood Zone 3, which conflicts with the published mapping.

The Product 4 data for this location may contain modelling differences which we would like to discuss — for example, it appears the modelled 2D floodplain levels are well above the local bank levels and surrounding ground levels, which may not be physically realistic for this reach.

Considering the above the options would be to:

- Raise the FFL 1 in 100 + 35% + 600mm which will be $120.99 + 600\text{mm} = 121.59\text{m AOD}$
- Potentially commission our own flood modelling data for the EA to review which may not be the optimum solution
- Review the Product 4 Node information in relation to the proposed FFL



EA Comment 1.04- Floodplain compensation storage

There is no mention of floodplain compensation storage within the FRA. The Product 4 data provided clearly shows that areas of the site are subject to flooding, and any potential displacement of floodwater must be mitigated through appropriate compensation measures. These measures must be located outside of the 1 in 100-year + 35% climate change extent, the boundaries of which can be provided by the Environment Agency upon request.

Roscoe Response 1.04

Since submission, we have reviewed the latest Environment Agency Flood Map for Planning, which confirms that the site is wholly within Flood Zone 2 and outside the extent of Flood Zone 3, including the 1 in 100-year + 35% climate change outline.

In line with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG):

- Floodplain compensation is typically required where development would displace floodwater within Flood Zone 3 or the functional floodplain.
- As the site is within Flood Zone 2 and outside the 1 in 100-year +35% climate change extent, there is no displacement of floodwater within Flood Zone 3, and therefore no requirement for level-for-level or volume-for-volume compensation storage.
- Our proposals involve no alteration to existing ground levels and therefore do not result in any loss of floodplain storage.

We acknowledge the Product 4 data indicate parts of the site may be affected in extreme events such as the 1 in 1,000-year scenario. In recognition of this, the scheme will incorporate proportionate resilience and resistance measures appropriate for Flood Zone 2 development, potentially including:

- Raised electrical sockets, wiring, and services above predicted flood levels.
- Non-return valves on drainage and sewer connections.
- Sealing of entry points for pipes and ducts to reduce water ingress.
- Provision of safe access/egress routes during flood events.
- Preparation of a flood evacuation plan for site occupants – Note one has been included for the construction stage, and we will speak to HHC about including within their management procedures.

These measures will ensure the development is safe for its lifetime without increasing flood risk elsewhere, in line with policy requirements for Flood Zone 2.

We would like to further discuss with the LPA to consider if the floodplain compensation is required given the site's current flood zone classification, absence of ground level alterations, and inclusion of proportionate resilience and resistance measures.



EA Comment 1.04- Floodplain Compensation Storage

The applicant will need to confirm how they have got to this “Since submission, we have reviewed the latest Environment Agency Flood Map for Planning, which confirms the site is within Flood Zone 2 and outside the extent of Flood Zone 3, including the 1 in 100-year + 35%.

- Climate change outline.” Page 16 as above again clearly shows the risk in green colours.
- We disagree with all comments in response 1.04, this all must be reviewed with correct interpolation of the product 4 data we have supplied. We have NOT supplied the velocities, so not sure how they confirm there is no risk without the data. This must be requested from inforequests.gmmc@environment-agency.gov.uk

Roscoe Commentary 1.04

The EA comments are noted however we consider a meeting may assuage their concerns and ensure Roscoe are interpolating the data correctly.

We understand we have options available including:

- Assume the site is in FZ3 and adjust the FRA accordingly which also means raising the FFL to 121.59m AOD.
- Provide our own flood modelling data as suggested above although our comments are noted above

We have also responded to this under separate cover with supporting documentation.



EA Comment 1.05- Hazard Risk Rating Curve

In addition, the applicant is expected to provide a hazard risk rating curve using flood depth and velocity data from the Environment Agency. This should include an assessment of flood hazard based on depth, velocity, and onset of flooding, consistent with standard hazard rating methodologies. Given the vulnerability classification of the proposed development and the flooding characteristics outlined in the Product 4 data, it is reasonable and justified for the Environment Agency to request this information as part of a robust FRA.

Roscoe Response 1.05

We note the EA's request for an assessment of flood hazard based on depth, velocity, and onset of flooding, in line with standard hazard rating methodologies. While we acknowledge that such assessments are appropriate for certain higher-risk developments, we respectfully submit that in this instance the requirement is disproportionate given the site's flood zone classification and the nature of the proposed scheme. The latest Environment Agency Flood Map for Planning confirms that the site is wholly within Flood Zone 2 and outside the extent of Flood Zone 3, including the 1 in 100-year + 35% climate change outline. In line with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG):

- Flood hazard rating assessments are typically undertaken where flood depths and velocities present a significant safety concern, most often within Flood Zone 3 or where rapid-onset flooding is a risk.
- The FRA demonstrates that predicted flood depths within the site in the 1 in 100 + climate change event is minimal and do not result in unsafe conditions requiring detailed hazard mapping.
- The proposed development will incorporate proportionate Flood Zone 2 resilience and resistance measures (as set out in our earlier response), ensuring safety for the lifetime of the development without increasing flood risk elsewhere.

Given the above, we consider that a full hazard risk rating curve is not necessary or proportionate for this site. Instead, the FRA clearly sets out:

- Predicted flood depths from the Product 4 dataset relevant to the site.
- The resilience and resistance measures adopted.
- Safe access/egress routes during flood events.

This approach aligns with policy expectations for medium-risk Flood Zone 2 sites and ensures that the assessment remains proportionate to the actual level of risk.



EA Comment 1.05- Floodplain Compensation Storage

As above, must be considered.

Roscoe Commentary 1.05

To be further reviewed following consideration of the key points raised within responses 1.01 to 1.04 to allow the matter to be moved forward.



EA Comment 1.06- Attenuation Tanks

While this matter does not fall within the Environment Agency’s direct remit, document reference FE0012-ROS-XX-XX-D-C-0500 P07, dated May 2024, identifies significant risks. Specifically, in the event of flooding to the levels indicated in the supplied Product 4 data, the proposed attenuation tanks would become redundant. This would effectively result in the loss of the SuDS storage capacity intended by the scheme.

Roscoe Response 1.06

We note the observation that, according to Product 4 data, “in the event of flooding to the levels indicated ... the proposed attenuation tanks would become redundant, resulting in the loss of SuDS storage capacity.”

We would like to clarify the following points:

1. Flood Zone Classification: The site is now wholly within Flood Zone 2, outside the 1 in 100-year + 35% climate change extent of Flood Zone 3. As such, fluvial flooding is not expected to affect the site under the design storm for which the SuDS system is intended.
2. Separation of Design Events: The SuDS attenuation tanks are designed to manage surface water runoff from the site (e.g., 1 in 100-year rainfall + climate change), not to provide flood storage for fluvial river events. Even if the site experienced fluvial flooding in an extreme event, this occurs separately from the storm events for which the SuDS system is sized.
3. Location and Levels of SuDS: The SuDS tanks and associated features are located at levels that remain above the predicted flood extents for the relevant design event. Therefore, their intended storage capacity for surface water management is maintained and would not be compromised by fluvial flooding in a Flood Zone 2 scenario.
4. Proportionate Flood Risk Management: The FRA includes resilience and resistance measures suitable for a Flood Zone 2 site, and the SuDS system continues to operate effectively for its intended purpose, ensuring compliance with NPPF and PPG guidance.

In conclusion, the proposed attenuation tanks retain their functionality for surface water management, and the site’s Flood Zone 2 status means that fluvial flooding does not compromise their storage capacity.



EA Comment 1.06- Attenuation Tanks

Incorrect, as per the product 4 “Page 16 shows out of bank flooding for the 1% +35 and 70% (green colour range) encompassing the whole sit, so the SUDS tanks will be redundant during inundation.

Roscoe Commentary 1.05

Our understanding is the proposed attenuation tanks retain their functionality for surface water management, and the site’s Flood Zone 2 status means that fluvial flooding does not compromise their storage capacity. This may be further corroborated with a meeting to close out.



Appendix A: EA Initial Response

As previous correspondence dated 18th August 2025



Appendix B: Product 4 Data

As previous correspondence dated 18th August 2025



Appendix C: Flood Map for Planning, site boundary from Sheppard Robson and initial Rochdale Council Response

As previous correspondence dated 18th August 2025



Appendix D- Updated EA Response

As previous correspondence dated 8th September 2025