

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

Our ref: SO/2023/123586/04-L01
Your ref: 23/00986/DOC
Date: 04 July 2025

We have previously advised

Dear Sir/Madam

****ADDITIONAL INFORMATION RECEIVED** SUBMISSION OF DETAILS TO
COMPLY WITH CONDITION 14 (PILING ASSESSMENT) ON PLANNING
PERMISSION 21/01146/FUL**

**FORMER AKZO NOBEL SITE, OFF HOLLINGWORTH ROAD, LITTLEBOROUGH,
ROCHDALE**

Thank you for referring further details to address the above discharge of condition 14. We do not recommend the discharge of condition 14 and we would like to make the following comments.

Environment Agency position

We have reviewed the submitted reports pursuant to the application to discharge condition 14 attached to planning permission 21/01146/FUL for the proposed redevelopment of land at the Former Akzo Nobel Site, Off Hollingworth Road, Littleborough, Rochdale.

A check of the records has identified that we have already seen the reports which were provided to us, by email, at the end of June 2025.

The planning authority was previously advised that whilst some remediation works have been undertaken on site the submissions of these reports do not sufficiently demonstrate the success and scope of the works.

We also identified that the operations on site may have included materials (raw and produced) products that could be classified under the generic terms of PFAS compounds.

PFAS [per- or polyfluoroalkyl substances] have emerged as a significant contaminant of concern in the UK. PFAS [per- or polyfluoroalkyl substances] substances are known to be highly persistent in the environment, can be extremely mobile depending on their carbon chain length and very difficult to destroy when in an environmental setting. We have recommended to the local authority that further ground investigation and assessment would be required to address these issues more fully.

Piling and ground improvement solution

We have reviewed submissions associated with the piling and ground improvement solutions. We highlighted that the report considered the possible risks associated with the proposed development, however there is no conclusive indication of what piling solution will be used for ground improvement and those possible risks are speculative as the actual condition of the site is largely unconfirmed and previous ground investigation has not been sufficient.

We believe that the Hydrogeological Review & Groundwater Piling Assessment by Eastwood Consulting Engineers (dated August 2023) confirmed our position, that the standard of ground investigation and assessment on site is insufficient or refers to reports that we consider to be out of date – 2009 rather than now, especially as 15 years have passed between then and now.

We also highlighted that in that time remedial science and environmental quality standards have evolved and changed meaning that it is entirely in keeping with the National Planning Policy Framework guidance document to consider the condition of the site now rather than in 2009.

We have previously provided guidance and narrative as to how to show that the choice of piling solution being proposed now meets the necessary low risk options that are required for the protection of controlled water receptors. The most recent work (again included in this submission) did not assess the current site conditions in terms of contemporary risks to controlled waters. Please be advised that these needs be addressed.

Should the LPA decide to discharge this condition we ask to be updated.

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