

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

Our ref: SO/2022/122667/04-L01
Your ref: 22/01364/FUL
Date: 24 March 2025

Dear Sir/Madam

****ADDITIONAL INFO RECEIVED**RESIDENTIAL DEVELOPMENT: ERECTION OF UP TO 199 DWELLINGS INCLUDING VEHICULAR ACCESS ON TO SMITHY BRIDGE ROAD, WITH INTERNAL HIGHWAYS, CAR PARKING, FOOTPATHS, CYCLE PATHS, BOUNDARIES, GARDENS, OPEN SPACE AND OTHER ASSOCIATED WORKS**

LAND WEST OF SMITHY BRIDGE ROAD, LITTLEBOROUGH

Thank you for your email dated 6 March 2025 and additional information received by the Environment Agency. We would like to make the following comments.

Environment Agency position

Flood Risk

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning condition is included.

Condition

The development shall be carried out in accordance with the submitted flood risk assessment (ref FRA 21 1165) and the following mitigation measures it details:

Finished floor levels shall be set no lower than 138.0 - 141.50 metres above Ordnance Datum (AOD)

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/ phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reasons

To reduce the risk of flooding to the proposed development and future occupants.

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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Biodiversity

As part of conservation management for retained riparian open space along the River Roch corridor details should be submitted of the treatment and or remediation of poor riverbank habitat around River Roch and retained wetlands.

We note that there are to be two new site surface water drainage connections to the River Roch waterbody, one via new SUD ponds and reuse existing outfall structure, while new upstream surface water connection via swale arrangement (Drwg. 30329/1/1 Rev. N) is discharging in location of environmentally poor and degraded sheet piled bank arrangement that is now being outflanked by river.

Remediation should provide an environmental betterment to the existing sheet-piling, which acts to restrict natural processes, offers no habitat value and is in poor condition. As such, we would not accept sheet piling being 'made good' or 'incorporated into the design'. We are looking for an alternative and more environmentally sympathetic solution along key ecological networks.

We would recommend as part of the new riparian design that the purpose and condition of the existing failing sheet piling is investigated further. We would welcome the removal of the failing revetment and/or replacement (if required) with more environmentally beneficial bio-engineering solution ([Green infrastructure: supporting green river engineering | HR Wallingford](#)), which should preferably interlink with the proposed new surface water connection.

In combination, the riparian habitat enhancement along the River Roch waterbody could go towards improving the Roch (Source to Spodden) (GB112069064720) Heavily Modified water body which is currently failing due to physical modification under the Water Framework Directive and ensure adherence to landscape strategy aims (DAS, 26/11/2024).

Any works along river will also need to adhere to TEP Water Vole survey recommendations (Section 6, TEP, Oct 2024).

Regarding the proposed new wildflower seeding, this is generally more successfully established on fully prepared and weed free soil substrate and recommend the new wildflower grasslands (EM1 & EM8) are created as per wildflower seed suppliers best practice recommendations to maximise establishment and provide greater chance in enhancing existing species poor grassland habitat.

It is also recommended for any new marginal planting (P21-2628_100 Rev. B) of new SUDs pond, that there is avoidance in introducing of generally invasive reedmace (*Typha latifolia*) which may dominant and outcompete other proposed native marginal planting, and potentially also spread into new wetland asset more quickly; and thereby likely increase maintenance upkeep need of new SUDs pond over time.

Advice to the applicant/LPA

As outlined in the advice to applicant / LPA in our previous comments, this development may require a permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the bank of the River Roch. If sheet piling is in need of remediation or new surface water connection to river, the proposed works to the River Roch are likely to require a flood risk activity permit.

Further details and guidance are available on the GOV.UK website:
<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Contaminated Land

The proposed development site appears to have been the subject of past industrial activity which poses a risk of pollution to controlled waters.

We have not undertaken a detailed review of the risk posed to controlled waters from land contamination and would therefore advise that you refer to our published [Guiding Principles for Land Contamination](#) which outlines the approach we would wish to see adopted to managing risks to the water environment from this site.

We also recommend that you consult with your Environmental Health / Environmental Protection Department for further advice on generic aspects of land contamination management. Where planning controls are considered necessary, we would recommend that you seek to integrate any requirements for human health protection with those for protection of the water environment. This approach is supported by Paragraph 109 of the National Planning Policy Framework.

Informative

Advice to LPA/Developer/Applicant

Following discussions between the LPA and the Environment Agency regarding the access road. The access road adjacent to the River Roch is located next to an area where the Environment Agency has a future interest in increasing flood storage capacity as part of its flood risk capital programme. As such the road should be designed and constructed with material which will be able to provide embankment stability to withstand future flood risk events. We understand that the construction of the highway will be a matter addressed through a S38 agreement with the Highways Authority, however if this to be adopted by the Council as Highways Authority through this process, the Council should be satisfied that these issues are taken into consideration.

Please send me a copy of the decision notice and 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