

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

Our ref: SO/2025/125059/03-L01
Your ref: 25/00519/FUL
Date: 25 July 2025

Dear Sir/Madam

***REF: FE0012-ROS-XX-XX-T-D-0050* FRA* APPLICATION FOR ENABLING WORKS COMPRISING SITE CLEARANCE, SITE REMEDIATION, ARCHAEOLOGICAL INVESTIGATIONS, TEMPORARY MEANS OF ACCESS(ES) AND TEMPORARY MEANS OF ENCLOSURE, INSTALLATION OF UTILITY AND DRAINAGE INFRASTRUCTURE AND ASSOCIATED WORKS IN ORDER TO PREPARE THE SITE FOR REDEVELOPMENT**

HOPWOOD HALL COLLEGE ROCHDALE CAMPUS ST MARYS GATE ROCHDALE OL12 6RY

In reference to recent email correspondence from Plan Red (dated 24th July) and the accompanying Flood Risk Assessment in support of the above proposals (ref: FE0012-ROS-XX-XX-T-D-0050 December 2024 Revision 3), we would like to provide the following comments.

Environment Agency position

In the absence of an acceptable flood risk assessment (FRA), we are maintaining an objection to this application at this current time.

Reasons

As previously advised, the application site lies within Flood Zone 3/2 which is land defined by the planning practice guidance as having a high/ medium probability of flooding. The National Planning Policy Framework (paragraph 181, footnote 63) states that an FRA must be submitted when development is proposed in such locations.

Whilst we acknowledge that the application is seeking permission for site enabling works, the FRA as submitted has not made an appropriate assessment of flood risk

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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mitigation or impacts because of the scope of works being proposed, particularly where excavation will be taking place which will alter land levels (up to depths of 2m).

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which demonstrates that development is safe without increasing risk elsewhere.

The FRA will need to review the existing flood model and associated data to compare this against the post site work levels. This can be requested from inforequests.gmmc@environment-agency.gov.uk

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it. Guidance on how to prepare a flood risk assessment can be found at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

Advice to LPA

If you are minded to approve this application for major development contrary to our flood risk objection, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2021.

This statutory instrument prevents you from issuing planning permission without first referring the application to the Secretary of State for Housing, Communities and Local Government (via the National Planning Casework Unit) to give them the opportunity to call-in the application for their own determination. This process must be followed unless we are able to withdraw our objection to you in writing. A failure to follow this statutory process could render any decision unlawful, and the resultant permission vulnerable to legal challenge.

Notwithstanding the above, a flood risk permit will be required.

Environmental permit - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Please forward a copy of this letter to the applicant.

Yours sincerely

Mrs. SYLVIA WHITTINGHAM
Planning Advisor

Direct e-mail SPPlanning.RFH@environment-agency.gov.uk