



Hopwood Hall College

EA PLANNING CORRESPONDENCE



REPORT ISSUE TABLE

Purpose of Issue	Revision	Date	Prepared By	Checked By
EA COMMENTS	P01	30/07/2025	NFP	JT



First Correspondence – Received 30th June 2025.

Location: Hopwood Hall College, Rochdale, OL12 6RY.

Proposal: Enabling works- site clearance, including the removal of vegetation and debris, removal of existing areas of hardstanding, construction of temporary site access and haul roads, installation of temporary site compounds and welfare facilities such as cabins and storage areas.

Reason: The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in Paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the National Planning Practice Guidance (NPPG). As a result, the FRA does not adequately assess the flood risks associated with the proposed development.

REF: SO/2025/125059/01

Roscoe Comments – Provided 30th July 2025.

Roscoe comments have been provided to each comment in purple.



EA Comment 1.01- Identify how people will be kept safe from the identified flood hazards

While the applicant states they will sign up to flood warnings, it must be noted that the Environment Agency cannot guarantee that a flood alert or warning will be issued ahead of the onset of flooding. It is important to reiterate that the Environment Agency cannot guarantee that a warning will be issued for every flood event. Our warning service operates on a best-efforts basis using available data and forecasting and therefore should not be the sole mitigation measure relied upon.

ROSCOE Response 1.01

In section 4.0 – we have detailed key measures that will be implemented as a part of a site-specific flood emergency evacuation plan (FEEP). key measures include:

- Site operatives will be registered with the Environment Agency’s Flood Warning Service.
- Safe access and egress routes have been identified and maintained throughout the works.
- All staff will be briefed on site-specific evacuation procedures.
- Welfare units will be located in areas of lowest flood risk on site.
- Materials, equipment, and plant will be stored securely and positioned to avoid damage or displacement during a flood event.

While site personnel will register for the Environment Agency’s Flood Warning Service, reliance on this system alone is not assumed. A formal Flood Warning and Evacuation Plan (FWEP) will be implemented, with trained staff on site at all times. Emergency response procedures will be rehearsed and triggered based on on-site monitoring (e.g. rising river levels or heavy rainfall), not solely on EA alerts. Welfare units will be located in areas of lowest risk and will be easily and safely evacuated. There will be no sleeping accommodation or public access to the site during enabling works. Additionally, a safe access and Egress Route has been provided in Figure 4.1 of the FRA.



EA Comment 1.02- Consider how a range of flooding events (including extreme events) will affect people and property.

The proposed cabin store lies within Flood Zone 3, which is classified as high risk. In its current form, the development would not meet the requirements for a Flood Risk Activity Permit (FRAP).

ROSCOE Response 1.02

The current FRA explores flood risk from watercourses, surface water, overland flows, groundwater, reservoirs and sewers. The updated Flood Risk Assessment now considers a range of flood events, including the 1% AEP (1 in 100-year) event and the impact of climate change through both the +35% and +70% allowances, in line with national guidance. Modelled flood levels obtained from Environment Agency Product 4 data have been used to assess how both present and future fluvial flood scenarios could affect the site. The site's lowest elevation (119.58 m AOD) has been compared with nearby modelled levels, confirming that the enabling works remain outside of the predicted flood extent even under upper-end climate change conditions. The cabins have been placed away from Flood Zone 3.



EA Comment 1.03- Appropriately account for the impacts of climate change

FRA does not include an assessment of future flood risk using the Environment Agency’s climate change allowances. As stated in the NPPG, all developments—including temporary works—must consider the effects of climate change within the FRA.

ROSCOE Response 1.03

The Flood Risk Assessment has now been updated to incorporate an assessment of future flood risk in accordance with the Environment Agency’s latest climate change guidance. Modelled flood levels for the 1% Annual Exceedance Probability (AEP) event plus both the central (+35%) and upper-end (+70%) climate change allowances have been obtained from the EA’s Product 4 data. The site’s topography has been compared against these levels to confirm that the enabling works remain outside the predicted flood extents under both scenarios. Mitigation measures, including the strategic placement of welfare units, the absence of any below-ground works, and the implementation of a site-specific Flood Warning and Evacuation Plan, have been adopted to ensure resilience to climate change-driven flood risk. This satisfies the requirements of the NPPF and PPG for all developments, including temporary works.



EA Comment 1.04- Provide adequate flood risk mitigation measures for the lifetime of the development.

The FRA fails to demonstrate resilience to expected flood levels. In particular, the following measures are either missing or insufficient:

- Finished floor levels
- Safe access and egress routes

ROSCOE Response 1.04

The FRA has been updated to include specific mitigation measures that ensure resilience to predicted flood levels, including those associated with climate change. Although the enabling works are temporary, the proposed welfare units and compound areas will be located on higher ground within the site, with the lowest proposed floor level set at a minimum of 120.00 m AOD, which is safely above the modelled 1% AEP +70% climate change flood level of 119.35 m AOD. This provides at least 0.65 m of freeboard to allow for uncertainties.

In terms of safe access and egress, a Flood Warning and Evacuation Plan has been developed and will be implemented during the enabling phase. The site team will be registered with the Environment Agency's Flood Warning Service, and safe routes leading northwards out of the floodplain have been identified and mapped, allowing evacuation before or during a flood event. A site access and egress plan is included within the FRA (see figure 4.1 of the FRA) showing designated dry routes based on topography and available flood mapping. These combined measures demonstrate that the enabling works can be carried out safely, with appropriate resilience to flood risk throughout their duration.



EA Comment 1.05- existing and proposed levels across the site

Additionally, although the applicant has advised that no ground level changes are proposed, the FRA lacks confirmation of existing and proposed levels across the site. The only reference is within Section 2.0, which notes a fall from 125.00m AOD to approximately 123.00m AOD north to south. Greater clarity and detail are required.

ROSCOE Response 1.05

The FRA has been updated to clarify site levels and confirm that no changes to existing ground levels are proposed as part of the enabling works. The works are temporary in nature and include site clearance, removal of hardstanding, installation of temporary access routes, and siting of welfare units and compounds — all of which will be placed on existing, unaltered ground.

Topographic survey data confirms that the site generally slopes from approximately 119.65 m AOD along the northern boundary to a low point of 119.58 m AOD near the southern edge, adjacent to the River Roch. the FRA has been revised accordingly to reflect this full variation in levels across the site. A topographic plan showing existing ground levels and proposed levels for the enabling works is now included within the FRA appendix A for clarity. No cut-and-fill, ground lowering, or deep excavations are proposed, and therefore, the existing flood risk profile will remain unchanged throughout the enabling works.



EA Comment 1.06- Evaluating the need for a Flood Risk Activity Permit

Moreover, as per current FRAP guidance, any activity within 8 metres of a designated main river or its floodplain requires a Flood Risk Activity Permit. The current submission does not provide sufficient evidence to determine whether the proposal complies with this requirement.

ROSCOE Response 1.05

A drawing has been produced and attached as Appendix B which displays that all site works will be at least 8m away from the designated main river, with an additional 2m buffer which means that we are at least 10m away in total and the proposal is fully compliant with this requirement.



EA Comment 1.07- All of the development is in “flood zone 2”

Section 4.2: States that “all of the development area is within Flood Zone 2.” This is incorrect. The site lies entirely within Flood Zone 3, including allowances for a minimum of 35% climate change. Please refer to the attached PDFs for verification.

Section 9.2: Again, incorrectly identifies the site as being within Flood Zone 2 and states it is at a "medium risk of fluvial flooding." In fact, the site lies wholly within Flood Zone 3 with 35% climate change allowance.

ROSCOE Response 1.07

The previous Flood Risk Assessment (FRA) referenced in Sections 4.2 and 9.2 has now been superseded. A new standalone FRA has been prepared specifically for the enabling works, which correctly identifies the site's flood zone designations based on the latest Environment Agency Flood Map for Planning and modelled climate change data.

The updated FRA acknowledges that the site is located partly within Flood Zone 2 and partly Flood Zone 3, including consideration of the 1% AEP event with 35% and 70% climate change allowances. All flood risk assessments and mitigation strategies in the new FRA have been based on this corrected classification. The outdated references in the earlier FRA are no longer applicable to the enabling works proposal.



EA Comment 1.08- product 4 data

Section 9.3: Claims that “a suitable drainage strategy has been developed to ensure new surface water flows are capable of not causing flooding in a 1:100-year storm event plus 40% climate change allowance.” However, there is no evidence that any fluvial climate change scenarios have been considered, even for extreme events.

EA “Product 4” data: There is no evidence that the applicant has requested or incorporated “Product 4” flood data (levels, flows, velocities, and depths). This is a critical omission, as it is unclear how the flood risk has been properly assessed without it.

ROSCOE Response 1.08

Roscoe has obtained and reviewed Product 4 flood data from the Environment Agency as part of the preparation of the new FRA for the enabling works. While the Product 4 dataset did not include flood level information directly at the site, it did provide climate change modelled fluvial node data for nearby points along the River Roch.

The two relevant nodes closest to the site indicate modelled flood levels of 119.01 m AOD for the 1% AEP event with +35% climate change, and 119.35 m AOD for the 1% AEP event with +70% climate change (with defences removed). These levels have been used to inform the assessment of flood risk and resilience within the enabling works FRA. The lowest site elevation is approximately 119.58 m AOD, indicating that the site lies marginally above the modelled flood levels, with freeboard of up to 0.57 m.

While full datasets for flood depth, flow, and velocity were not provided for the site specifically, the available node data has been appropriately applied to demonstrate that flood risk has been assessed in line with EA climate change guidance. References to this data and its interpretation have been included in the revised FRA.