

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

**Our ref:** SO/2025/125059/01-L01  
**Your ref:** 25/00519/FUL  
**Date:** 25 June 2025

Dear Sir/Madam

**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**

Thank you for referring the above application to the Environment Agency. We object to the proposed development, and we would like to make the following comments.

**Environment Agency position**

In the absence of an unacceptable flood risk assessment (FRA), we object to this application and recommend that planning permission is refused.

**Reason(s)**

The application site lies within Flood Zone 3 and 2, which is defined by the planning practice guidance as having a high and medium probability of flooding, respectively. The National Planning Policy Framework (paragraph 173, footnote 59) states that an FRA must be submitted when development is proposed in such locations.

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission.

While we appreciate there is some assessment of flood risk in the preliminary risk assessment, and this proposal is for site clearing, for a site in FZ2 and 3 and especially with relatively recent flood history we would expect this to include recommendations for a method statement or risk management plan, including for example overnight placement of plant and site debris/waste, including to minimise the displacement of flood waters to locations off-site. Flood risk during and after-site clearing works must be demonstrated to be managed in an enforceable way.

Environment Agency  
Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

**Overcoming our objection**

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall.

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>.

If this proposal reaches the point that we are content to remove our objection, it will still require a flood risk activity permit:

**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](mailto: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 faithfully

**Mrs. SYLVIA WHITTINGHAM**  
**Planning Advisor**

Direct e-mail [SPPlanning.RFH@environment-agency.gov.uk](mailto:SPPlanning.RFH@environment-agency.gov.uk)