

Rochdale Metropolitan Borough Council
Development Control

Our ref: SO/2025/125078/05-L01
Your ref: 25/00541/FUL

Sent via email

Date: 8 September 2025

Dear Planning Team

Demolition and site clearance of existing teaching block b and outbuildings and erection of new teaching building (use class f1), repair and alterations to retained teaching buildings, revised means of access, car parking, cycle parking, drainage, infrastructure, landscaping and ancillary works

Hopwood Hall College, Rochdale Campus, St Marys Gate, Rochdale OL12 6RY

Thank you for consulting us on the above. We maintain our **objection** for the reasons detailed below.

Flood Risk

We **object** to this application because it fails the second part of the flood risk exception test. We recommend that planning permission is refused on this basis.

Reasons:

This application lies within Flood Zone 3a, which is land defined by the planning practice guidance (PPG) as having a high probability of flooding. As shown in the Flood Zones and flood risk tables of the PPG, development classified as more vulnerable is only appropriate in these areas if the exception test is passed alongside the sequential test.

The National Planning Policy Framework (paragraph 165) makes it clear that both elements of the exception test must be passed for development to be permitted. Part 2 of the test requires the applicant to demonstrate, via a site-specific flood risk assessment, that the development will be safe, without increasing flood risk elsewhere. Where possible, the development should reduce flood risk overall.

In this instance the developer's flood risk assessment fails to:

- Demonstrate that the development is 'safe' for its designated lifetime.
- Consider whether flood risk will be increased in the surrounding area
- Address the opportunities presented by this development for reducing flood risk
- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels. Consequently the development proposes inadequate.
- Flood storage compensation for the 1 in 100 35% climate change. This must be level for level or volume for volume outside the flood zone 3 35% climate change outline.
- Raised finished floor levels

Response 1.01 – Correct, the out of bank 2d level is higher than in channel, where it spills into the floodplain. So you must compensate for this including 35% climate

change. The EA will not confirm the validity of this model, if Roscoe wish to challenge this, please provide your detailed modelling and the Environment Agency will review this within 4 weeks of submission.

Response 1.02 – Even though the boundary has changed, this site is still at risk from the 100 year 35% climate change 2d out of bank level, again as previously stated this must be compensated for. Please can the LPA ensure the sequential and exception test are still valid.

- Flood zone 3 must be scoped back into this FRA, as its clearly still relevant looking at the product 4 “Page 16” clearly shows out of bank flooding for the 1% 35 and 70% (green colour range)

Response 1.03 – It isn’t clear how can the applicant confirm its outside of the flood zone 3 outline. The product 4 “Page 16 shows out of bank flooding for the 1% 35 and 70% (green colour range) encompassing the whole site.

- Flood compensation must be provided for the 100 35%
- Finished floor levels must be above 1 in 100 35% 600mm freeboard. The applicant is thinking of in channel levels there, no consideration for the 2d out of bank level. See Page 28 to 35 of the Product 4 clearly shows 2d AOD levels above the 119m ‘bank level’.

Response 1.04 – The applicant will need to confirm how they have got to this “Since submission, we have reviewed the latest Environment Agency Flood Map for Planning, which confirms the site is within Flood Zone 2 and outside the extent of Flood Zone 3, including the 1 in 100-year 35%.

- Climate change outline.” Page 16 as above again clearly shows the risk in green colours.
- We disagree with all comments in response 1.04, this all must be reviewed with correct interpolation of the product 4 data we have supplied. We have NOT supplied the velocities, so not sure how they confirm there is no risk without the data. This must be requested from inforequests.gmmc@environment-agency.gov.uk

Response 1.05 – As above, must be considered.

Response 1.06 – Incorrect, as per the product 4 “Page 16 shows out of bank flooding for the 1% 35 and 70% (green colour range) encompassing the whole sit, so the SUDS tanks will be redundant during inundation.

Overcoming our response

The applicant will need to address those matters raised above.

Note to LPA

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Should you have any queries regarding this response, please contact me.

Yours faithfully

Miss Jennifer Wilson
Planning Specialist

Direct e-mail spplanning.rfh@environment-agency.gov.uk