

16 May 2025

Rachel Carney
Rochdale Borough Council

Via Planning Portal

Dear Rachel

Planning application for Enabling Works in connection with proposed New Education Building at Hopwood Hall College, St Mary's Gate, Rochdale
Willmott Dixon Construction Ltd
Portal reference: PP -13984073

On behalf of Willmott Dixon we are submitting a planning application for enabling works in connection with the wider redevelopment to provide a new Education Building to replace existing Block B at the Rochdale Campus of Hopwood Hall College.

The enabling works are described in the application form as follows:

Application for enabling works comprising site clearance, site remediation, required 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

Should there be a pause in progress to the main works contract then the area would revert in the meantime to its present use for car parking to serve the College. We would invite a condition to control this to provide certainty to the authority.

The intention of the enabling works is to permit a start on works in Q3 2025 on site preparation once the exam period at the College has been completed (to avoid unnecessary disturbance) and to ensure that the wider works programme remains on target for the College with the main works scheduled to start in Q4 2025. Those main works will be subject to a further full application which will be submitted shortly following the recent public consultation.

In broad terms the enabling works will seek to clear the main development area for the new building of all substructures to a depth of circa 2 metres and prepare the site for development. This will include the removal of existing services and utilities and installation of new infrastructure and connections. The site will then be prepared with a foundation pad to receive development, but this application does not seek approval for foundation details or piling which is for the main works application, though information is provided on foundation design to understand and contextualise the proposals.

The application site boundary to the eastern side is drawn to avoid a sewer easement and therefore no planning condition for working / protection will be required as this will be covered in

the main works application. Accompanying this submission are Utilities Surveys and United Utilities' Easement Local Practice working note. A compliance condition to work to the requirements of the practice note would be acceptable.

Drainage submission details include the Flood Risk Assessment & Drainage Statement and supporting details on manholes, attenuation tanks and standard details (all prepared by Roscoe). These relate to the design and layout of the future main works application and proposed new education building. This information should be considered in that context, but any approval and planning condition needs to be confined to the delivery of the enabling works. In practice the main works application will supersede any long-stop verification and connection matters.

The same approach applies to ground conditions and remediation. In addition to the supporting evidence and surveys, including the Remediation Strategy, is correspondence between Adrian Read, Tier, and Jonathon Parr, EHO Rochdale Council, which covers a degree of technical matters. The intention is this application will bring in the Environment Agency and other technical consultees and complete the review with the Remediation Strategy now available. Crucial to the purpose of the enabling works application is that no standard pre-commencement condition is applied to resubmit and agree all the details. We would anticipate the works can commence in accordance with the Remediation Strategy without delay (allowing for any revision during the application process itself if considered necessary by officers).

The wider tree survey, schedule and summary letter prepared by ADAS supports the submission. It demonstrates the works area has no trees which would be affected.

A hoarding plan is provided by Willmott Dixon which will be used for the duration of the enabling works. At this stage it is not proposed to use solid wooden hoardings as there is a need for flexibility during the site preparation works on how the fencing is positioned and stabilised as the works develop. At later stages a 'permanent' hoarding more typical of development sites will be installed.

The submitted Archaeology Desk-based Assessment makes recommendations for future investigations, specifically agreed with GMAAS is that; *'... an archaeological evaluation (in the form of trial trenches or a strip, map and record evaluation) to confirm the presence or absence of buried archaeological remains and, if present, their extent and significance. Should significant archaeological remains be encountered during the archaeological evaluation, further excavation may be required to offset the harm of the development to the buried archaeological resource.'*

Practically the presence of a large concrete slab beneath the existing car park (explained within the ground investigation report) presents a problem to undertake trial trenches or a strip until the area it covers is exposed and broken up. This can be agreed and controlled through a methodology (Written Scheme of Investigation) but may require a phased approach to allow development to start to enable the site to be opened up. We will seek to collaborate with officers and GMAAS on this matter.

BNG exemption

The application site is previously developed land and contains no existing landscape or vegetated parts. This is confirmed through the topographic survey, tree constraints plan / survey and preliminary ecological assessment submitted.

Note the PEA is intended to support the wider application site. The recommendations do not apply to this enabling works application and should not be read to be. However, they provide context for the wider application which are nonetheless useful.

Because there is no existing habitat of any description within the red line application area the BNG exemption applies, as there is no qualifying habitat to ascribe a baseline to. For this reason, no metric is submitted to demonstrate the exemption.

EIA

Officers have asked that EIA is considered on the enabling works on the basis it is to form part of a wider regeneration project.

The application site area is 0.56 ha and well under the 1-hectare threshold for an urban development project as set out in Part 10 (b), Schedule 2 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, (the 'EIA Regulations').

The wider scheme application area will be a little over the threshold at 1.03 ha. Drawing on the wider scheme the proposals are for the erection of a new education building to replace existing Block B, alongside other works for parking, landscaping, and ancillary facilities. It is our view that the main works do not pass the threshold to warrant an EIA for the following reasons:

- The replacement Block B building has a proposed floorspace of 7,059 m² (GEA) compared to the combined existing Block B and Block C which is to be replaced at circa 6,860 m² (GEA). This is approximately a 3% difference in floorspace, for a building that is also four storeys, though without a basement level in the replacement building. This is clearly not a building of significantly greater scale nor is markedly different in impact. The site is previously developed and has been occupied by previous structures and has expected contamination present. However, the site is not highly contaminated as set out in the accompanying site investigation reports and does not display unusual characteristics for an urban site.
- On other key issues to consider, though the building is marginally larger in size the design occupancy for students is marginally lower by 35 places (944 existing places vs 909 proposed), a 3.5% reduction; therefore the proposal will not give rise to any material change in operation of the college campus so far as trip generation and traffic impacts.
- The college building uses will not give rise to significant emissions or noise, and the location on the edge of the town centre is not particularly sensitive to such matters; there is no material change to existing circumstances.
- Having considered the characteristics of the development, its location and the types and character of potential impacts arising from the development in Schedule 3 of the EIA Regulations, it is our view that EIA is not justified for the proposal.

It therefore follows that this enabling works application is not an EIA development either.

Conditions

The purpose of the enabling works application is to facilitate a rapid start on site and our approach is to avoid the use of pre-commencement conditions through upfront approval of relevant details. We acknowledge the application process may lead to standard conditions being sought, especially by third party consultees working to boilerplate replies. We will collaborate with officers to respond to such conditions / details promptly and a way forward that can capture any relevant development controls without placing undue constraints. The example on the archaeology matter above is case in point.

Submission documents

A list of the application submission is appended. As a bespoke enabling works submission this falls outside the scope of standard validation requirements in the checklist. Instead, the list reflects the previous discussions and emailed list of proposed documents.

We look forward to receiving confirmation of receipt and validation of the application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R Purser', with a horizontal line drawn underneath the signature.

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