

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

Our ref: SO/2025/125406/02-L01
Your ref: 25/01140/DOC
Date: 08 January 2026

Dear Sir/Madam

**ADDITIONAL INFORMATION SUBMITTED (WATER MONITORING PLAN)
SUBMISSION OF DETAILS TO COMPLY WITH CONDITION 3 (REMEDIATION
STRATEGY) OF PLANNING PERMISSION 25/00541/FUL**

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

Thank you for referring additional information relating to the discharge of condition 3 (Remediation Strategy), We have reviewed the submitted 'Monitoring Programme for Hopwood Hall College, Rochdale by Tier Consult Group (dated Dec. 2025) ref. TE1880-TE-00-XX-RP-GE-008-V01', and we would like to make the following comments.

Environment Agency position

Following review of the above-mentioned document, we have identified the following points which we believe need further consideration:

- We recognise the location of the sampling points for the River Roch are considered safe locations, but the downgradient sampling point is, in our opinion, too far from the development area to be useful. At this location we believe that it will either allow too much dilution in the watercourse (beyond the permitting based approach of three or four stream widths downstream) or runs the risk of additional unconnected contamination being introduced from other possible sources. We recommend that a close sampling point is considered even if it is from the river crossing immediately downstream of the development site.

- With reference to the exceedance of Water Quality Standards the primary aim will be to assess (up, to mid, to downstream) whether concentrations of relevant contamination have or is increasing. This then should be considered in the context of the relevant environmental quality standard. This reflects the approach contained within the Environmental Protection Act 1990. If an upward trend is identified over the period of three rolling weekly sampling events, then appropriate action should be taken and, if on the fourth event, confirmed then contingency action should be enacted which is likely to include cessation of works on site until such time that the significant contaminant linkage is identified and mitigated.
- We do not recognise references to trigger levels being set based on three orders of magnitude exceedances. In this circumstance the Environment Agency would have cause to consider this a significant release of contamination or pollutants to Controlled Waters without the benefit of an environmental permit which is contrary to the Environmental Permitting Regulations 2016.
- Should the trend analysis over three consecutive sampling events be identified then we should be informed immediately.
- We are happy to accept the list of organic and inorganic contaminants of concern that have been put forwards in terms of a sampling suite for the surface water monitoring programme. However, in regard of the relevant standards put forward in Appendices D of the report, these refer to groundwater standards, not surface water samples. Therefore, these water quality standards are not appropriate and therefore should be put aside and relevant surface water environmental quality standards apply.

Based on the information submitted to date, the monitoring programme is not currently considered sufficient to enable the discharge of Condition 3 attached to planning permission 25/00541/FUL.

Once further details have been provided to address the points above, we would be pleased to review the submission and comment further.

Please forward a copy of this letter to the applicant.

Yours faithfully

Mrs. SYLVIA WHITTINGHAM
Planning Advisor

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