

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

Our ref: SO/2025/124995/03-L01
Your ref: 25/00200/FUL
Date: 22 December 2025

Dear Sir/Madam

****ADDITIONAL INFO RECEIVED - FRA** PART DEMOLITION OF AN EXISTING PRODUCTION UNIT. REMOVAL OF TWO TEMPORARY STORAGE AND MANUFACTURING UNITS. CONSTRUCTION OF A NEW TWO STOREY EXTENSION TO THE EXISTING PRODUCTION UNIT AND THE CONSTRUCTION OF A NEW WAREHOUSE EXTENSION TO THE EXISTING WAREHOUSE. CLOSURE OF ONE EXISTING SITE ACCESS POINT AND RE-OPENING OF A PREVIOUS SITE ACCESS POINT FROM TODMORDEN ROAD INCLUDING RE-CONFIGURATION AND CREATION OF ADDITIONAL CAR PARKING CORROSION RESISTANT PRODUCTS LTD**

TODMORDEN ROAD LITTLEBOROUGH ROCHDALE OL15 9EG

Thank you for submitting additional information to the Environment Agency (EA) regarding the above application. We maintain our objection, on Flood Risk and Biodiversity grounds, and we would like to make the following comments.

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA) we object to this application and recommend that planning permission is refused.

Reasons

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to consider:

- Different climate change allowances have been used to assess future flood risk than those advised in 'Flood risk assessments: climate change allowances', without adequate justification.
- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate and a suitable lifetime of development has not been used. We would expect a minimum of 75 years to be used for this development.

For any proposed development which includes the erection of new buildings (as opposed to a change of use for existing buildings), the EA would require that they incorporate finished floor levels above the 1 in 100 year (1% AEP) flood event, as well as including an appropriate allowance for climate change for the relevant catchment, and a minimum of 300mm but ideally 600mm of freeboard. As the site sits in the Irwell management catchment and the development is classified as 'less vulnerable', the central climate change allowance for the 2080s epoch of 35% should be applied. For more information on assessing future flood risk please see ['Flood risk assessments: climate change allowances'](#).

If a development does not provide the above requirements for finished floor levels, they must provide adequate justification for this. For example, we may consider allowing lower FFLs where unavoidable physical constraints exist such as the presence of essential infrastructure above the site (e.g. pylons or low-hanging electricity lines). The justifications described in the provided FRA are not considered by the EA to be sufficient reason to not apply the correct climate change allowances or freeboard to the proposed finished floor levels.

We would also expect the proposed development to avoid any hard standing development within Flood Zone 3 so as not to displace any flood waters; if this is not possible, as a minimum flood compensatory storage must be provided to offset any loss in floodplain volume. Flood compensatory storage must be provided on a level-for-level and volume-for-volume basis. For the purposes of floodplain compensation, the 1-in-100-year flood level plus a 35% allowance for climate change should be used. The FRA must also demonstrate that the proposed development will not result in any increase in flood risk to third parties.

Furthermore, the flood risk data used in the provided FRA is not up-to-date and does not reflect the current mapping. All our flood risk mapping products including the Flood Map for Planning were updated in 2025 as part of our New National Flood Risk Assessment (NaFRA 2), and we would expect to see the most recent flood zones and levels being used as part of any assessment. You can request an updated product 4 for your site on our [Flood Map for Planning](#) service or by emailing our Customers and Engagement team at inforequests.gmmc@environment-agency.gov.uk.

The LPA should also consider whether the development fulfils the requirements of the sequential test; the submitted sequential test document uploaded to the planning portal [ref 66254-FUL-SEQUENTIAL-TEST-383542, prepared by Harris Lamb, uploaded 26/08/2025] appears to have been prepared for an unrelated site.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

Advice to LPA - Sequential test

What is the sequential test and does it apply to this application?

In accordance with the NPPF (paragraphs 175-177 (inc. footnote 62)), development in flood risk areas

should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case.

Development is in a flood risk area if it is in Flood Zone 2 or 3, or it is within Flood Zone 1, and your strategic flood risk assessment shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater.

The only developments exempt from the sequential test in flood risk areas are:

- Householder developments such as residential extensions, conservatories or loft conversions
- Small non-residential extensions with a footprint of less than 250sqm
- Changes of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)
- Applications for development on sites allocated in the development plan through the sequential test and:
 - < >the proposed development is consistent with the use for which the site was allocated; and
 - there have been no significant changes to the known level of flood risk to the site, now or in the future, which would have affected the outcome of the testDevelopment where no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future

Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience.

Who undertakes the sequential test?

It is for you, as the LPA, to determine an appropriate area of search and to decide whether the sequential test has been passed, with reference to the information you hold on land availability. You may also ask the applicant to identify any other 'reasonably available' sites which are on the open market and to check on the status of identified sites to determine if they can be considered 'reasonably available'. Further guidance on the area of search can be found in paragraphs 027-030 of the planning practice guidance [here](#).

What is our role in the sequential test?

We can advise on the relative flood risk between the proposed site and any alternative sites identified - although your strategic flood risk assessment should allow you to do this yourself in most cases. We wouldn't advise whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate. Further guidance on how to apply the sequential test to site specific applications can be found in the planning practice guidance [here](#).

Biodiversity

We acknowledge receipt of the submitted ecology report in response to our earlier objection. However, further information is required before we can reconsider our position. Specifically:

- The report recommends additional water vole surveys. As the outcomes of these surveys may influence the development layout, we cannot withdraw our objection until the surveys are completed and submitted.

Buffer Zone

No undeveloped buffer zone has been proposed. While we recognise that the site may not currently represent optimal habitat, any justification for a reduced buffer zone must be clearly articulated. The proposed buffer should be appropriate to the site context and must remain free from development.

Once details have been submitted to address our concerns, we will be happy to comment further.

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