

Rochdale Metropolitan Borough Council -
Development Control
SMITH STREET, ROCHDALE, OL16
1XU

Reference: PA-0009820/01
Customer reference: PL/2026/0692
25 August 2026

Erection of a mixed-use building comprising of a self-storage facility (Use Class B8) and ground floor commercial units (Use Class E) together with associated access, car parking, servicing infrastructure and landscaping.

Old Hall Street Middleton Rochdale M24 1AG

Dear Ryan Killeen,

Thank you for consulting us on the above application on 4 August 2026.

Environment Agency Position

We have no objection in principle to the proposed development, but we take this opportunity to make the following comments.

Land contamination

The previous use(s) of the development site relating to cotton mill and garment factory suggest that the land may be affected by contamination. Land contamination can harm human health, soils, ecosystems, property, drinking waters supplies, groundwater and surface water.

Land contamination is a material planning consideration. The planning decision should ensure that the site is suitable for its proposed use, considering any risks from contamination and any proposed land remediation. The planning application should therefore be supported by adequate site investigation information, prepared by a competent person. After remediation is carried out, as a minimum, the land should not be capable of being determined as contaminated land under [Part IIA of the Environmental Protection Act 1990](#). This approach is supported by paragraph P2(1-3) of the National Planning Policy Framework.

The previous use(s) of the site may present an unacceptable risk of contamination that could be mobilised during site works and construction, potentially leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a secondary aquifer A.

The proposed development will be acceptable, if a planning condition is included requiring the submission and validation of a detailed land contamination management strategy for unsuspected contamination during the enabling, construction and/or development works. By cleaning up land contamination, it will be helping to protect and improve the groundwater quality that supports existing drinking water supply, future supply of drinking water and other environmental uses.

Without this condition we would object to the proposal in line with paragraphs P2(1-2) and P3(1-2) of the National Planning Policy Framework because it cannot be guaranteed that the development will contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate or will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until further investigation and a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason(s)

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraphs P2(1-2), P3(1-2), and P2(1-3) of the National Planning Policy Framework.

Advice to LPA

Flood risk standing advice

The proposed development falls within Flood Zone 2, which is land defined in the planning practice guidance as being at risk of flooding.

We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>.

We recommend that you view our standing advice in full before making a decision on this application. We do not need to be consulted.

Installations and Amenity

The proposed development is within 500m of one or more industrial or waste management site that is regulated by the Environment Agency through the Environmental Permitting (England and Wales) Regulations 2016. The location of this site(s) can be found on Defra's Data Services Platform, available at - [https://www.gov.uk/guidance/access-the-public-register-for-environmental-information#environmental ...](https://www.gov.uk/guidance/access-the-public-register-for-environmental-information#environmental...)

The Environment Agency issues Environmental Permits for installations or waste management operations. A permit will require that operators demonstrate they have taken all reasonable measures to prevent pollution of the environment and harm to human health. Pollution can include air quality impacts, odours, noise, pests, water quality and ground water impacts. If prevention is not possible, the operator must take steps to minimise the impact from pollution instead. In some cases, this is unlikely to eliminate all emissions and there could be impacts to the environment which may cause local residents some concern. When a new development is built near to an existing permitted facility this does not automatically trigger a review of the Environmental Permit and we will regulate this in line with our [Environment Agency enforcement and sanctions policy - GOV.UK](#).

Planning authorities must satisfy themselves that in land use terms the proposed development is suitable for this location given the proximity to a regulated site/s as described above and the scope of the permit as granted. Planning policy requirements (paragraph PM4(1-3) of the NPPF) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them.

Please note that in accordance with national planning policy (paragraph DM7(1) of the NPPF), planning decisions should assume that permitting regimes will operate effectively. Applicants should be advised to consider our 'Environmental Permitting Guidance' which can be found at: [Check if you need an environmental permit - GOV.UK](#).

Advice to Applicant

Environmental permit

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.

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.

If you have any questions regarding our response, please contact spplanning.rfh@environment-agency.gov.uk.

Yours sincerely,

Tiana Kazi,

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spplanning.rfh@environment-agency.gov.uk

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