

FAO Bob Melling

Rochdale Metropolitan Borough Council -
Development Control
Smith Street,
Rochdale,
OL16 1XU

Reference: PA-0010839/01

Customer reference: PL/2026/0746

09 September 2026

Section 73 application to vary planning permission 22/01068/FUL to allow alterations to the approved layout, levels, drainage strategy, parking provision and house types, including the reduction in dwelling numbers from 52 to 46, provision of 100% affordable housing, and associated landscaping and infrastructure works.

Former Oakenrod Primary School, Bury Road, Rochdale, OL11 4EE

Dear Bob Melling,

Thank you for consulting us on the above application, on 19 August 2026.

Environment Agency position

Landscape and Ecological Management Plan – Condition 6

We do not support the suggested variation to Condition 6 as proposed in the submitted 'S73 Planning Conditions Schedule', because we are concerned that 'details of any site remediation and/or removal of demolition spoil within the riparian area' may be considered within 'works of site preparation or clearance'.

We have requested any details of any site remediation and/or removal of demolition spoil within the riparian area are included in the Landscape and Ecological Management Plan, so do support the approach of any site preparation or clearance to be excluded from Condition 6.

This information is required to ensure the protection of wildlife and supporting habitat, in accordance with Policy G6 and G7 of the Rochdale Core Strategy (2016), and N2(1-2) and N6(2-3) of the National Planning Policy Framework.

Further to this, we would advise that the Landscape and Ecological Management Plan condition is updated to include the following measures to reflect the submitted plans on any future decision notice:

Condition

No development shall commence until a Landscape and Ecological Management Plan, including long-term design objectives, any site remediation or clearance of spoil, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to and approved in writing by the Local Planning Authority. The Landscape and Ecological Management Plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority. The scheme shall include the following elements:

- details of maintenance regimes
- detailed landscape schedule including species predominantly based on native species for areas exterior to private amenity dwellings
- details of any new habitat created on site including new attenuation basin
- details of removal of existing spoil heaps/demolition waste associated within the former school site within retained riparian greenspace area.
- details of retained habitats including pond, woodland and scrub areas
- details of coordinated invasive species management for the species identified within the Oakenrod School site (Invasive Weed Management Plan, dated 07 August 2026) in context with flood compensation requirements (DR-C-9001/P01) and landscape reinstatement proposals of scheme site
- details of treatment of site boundaries and/or buffers along River Roch and retained wetland.
- details of conservation management prescriptions over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan including timings.

Reasons

The Agency notes from recently visiting site that there were evident demolition spoil mounds in identified riparian/wildlife area, but unclear from existing submitted landscape masterplan (322-DAC-PL-001/P1) as to how these areas are to be restored and remediated to enhance the ecological value of retained riparian/wildlife area.

It is also noted in submitted drainage plans (DR-C-0900/P02) that new attenuation basin is to be constructed in riparian area, but the current indicative landscape masterplan (322-DAC-PL-001/P1) does not indicate how this new sustainable drainage wetland will be appropriately soft landscaped and sensitively managed in the long term.

The current landscape masterplan also does not indicate how retained wetland area, any if existing scrub and woodland areas in riparian area are to be retained or managed positively in the long term and coordinated with planned invasive species management (detailed in Invasive Species Management Plan dated 07 August 2026) of site, with aim to hopefully preserve and preferably enhance these new and existing habitat's biodiversity value.

To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy and adopted policies G6, G7 of the Rochdale Core Strategy, and JP-G2, JP-G3 & JP-G8 of Places for Everyone Joint Development Plan

Invasive Species Management Plan – Condition 7

We have no objection to the proposed variation of Condition 7, we have reviewed and are satisfied with the submitted Invasive Species Management Plan.

Riparian buffer

In addition, to the proposed condition changes, we would like to make further comments regarding the River Roch riparian buffer. We note that the submitted site plan DR-A-91-100 Rev.P03 indicates the retention of a minimum 10m riparian buffer along the River Roch. Development that encroaches on watercourses can have a potentially severe impact on their ecological value through construction and degradation of riparian habitats. Therefore, we consider that further detail should be sought in regards to this aspect of the development and would recommend that the Local Planning Authority include the following condition on any decision notice.

Condition

No development shall take place until a scheme for the provision and management of a minimum 10 metre wide buffer zone alongside the River Roch has been submitted to, and approved in writing by, the Local Planning Authority (LPA). Thereafter, the development shall be carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the LPA. The buffer zone scheme shall be free from built development including lighting, domestic gardens, new retaining structures, non-native plant species and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone
- details of any planned river bank regrading works along the River associated with flood attenuation (DR-C-9001/P01) and reinstatement of this disturbed area.

- details of integrated and coordinated invasive Japanese knotweed management (Invasive Weed Management Plan, 07 August 2026) and post reinstatement proposals where excavation is required.
- details of any site remediation and/or removal of demolition spoil associated with former school site within riparian area.
- details of any new retaining wall structures exterior to 10m buffer zone.
- details demonstrating how the river and ecological receptor will be protected during development's construction phase
- details of any new site surface water connections to river.
- details of any new environmentally designed footpaths, fencing, lighting, etc within wildlife corridor.

Reasons

This is to ensure the protection and where feasible enhancement of River Roch wildlife corridor. Land alongside the River Roch is particularly valuable for wildlife and it is essential this is protected and where feasible enhanced as part of scheme proposals.

Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy, adopted policies G6, G7 of the Rochdale Core Strategy, and JP-G2, JP-G3 & JP-G8 of Places for Everyone Joint Development Plan.

In addition, this approach is supported by paragraphs N2(1), N2(1-2) and N6(2-3) of the National Planning Policy Framework which recognises that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

The approach is also supported by Section 40 of the NERC Act 2006 as amended by section 102 Environment Act 2021, which establishes a general duty on public authorities, to conserve and enhance biodiversity through the exercise of its functions.

Flood risk – Condition 4

We have no comments to make in regard to amendments proposed to Condition 4 on 22/01068/FUL. We advise you to also consult with the relevant Local Lead Flood Authority for their advice on surface water drainage which falls within their remit.

Advice to the applicant

Herbicides

Our approval is required for the use of herbicides in or near water. This is to ensure that the herbicides will not have a detrimental effect on the riverine habitat. A copy of

the application form required can be found
at: <https://www.gov.uk/government/publications/application-to-use-herbicides-in-or-near-water>.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact spplanning.rfh@environment-agency.gov.uk.

Yours sincerely,

Emily Fisher,
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