



Proposed Construction of the New Saddleworth School

Response regarding flooding and sports use

February 2016



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1.0 Introduction

This document has been prepared by WYG on the instruction of Interserve Construction (on behalf of the Secretary of State for Education) in respect of a planning application for a new Saddleworth School in Diggle, Saddleworth (application reference PA/337301/15). The document seeks to respond to comments raised in an objection to the planning application by Mr Mark Brooks (dated 31 January 2016) and also a very similar (undated) letter from five local Saddleworth Parish councillors to Sport England.

This report is structured in the same format as the responses. Extracts from the letters are provided in bold and our response is below in italics.

2.0 Functional Floodplain & Flood Risk

We, the undersigned (see attached petition, Appendix 2) are writing to you to ask Sport England to object to Oldham Council's proposals to re-locate Saddleworth school to a site where proposed sport pitches will be located on a "functional floodplain" (Floodzone 3b for planning purposes). A 'functional floodplain' is defined as 'land where water has to go during times of flood' i.e. to prevent flooding further downstream. The field on which sports facilities are proposed floods every year, often several times a year after heavy rain events, when Diggle Brook (a main river) overtops. This is best illustrated via a photo of the most recent flood event [Photo 1 below] taken from within the field proposed for sport pitches on 26th December 2015. The arrow points to the edge of the field where the footbridge over the river enters the field.

The all-weather and grass sports pitches are not proposed in a designated functional floodplain, nor are the running track and cricket wickets. These are proposed beyond the area which recently flooded. Further, in order to create a level playing surface, the proposals include ground works which will result in the areas for the planned sports facilities being elevated around 2.65m above the area of the site which is currently prone to flooding.



The submitted Flood Risk Assessment (FRA) identifies that a very small part of the application site lies within Flood Zones 2 and 3 (Section 3 of the FRA). This is a very small area immediately adjacent to the Diggle Brook in the southern area of the site. No buildings and no sports pitches are proposed in this area.

The FRA and modelling work which has been undertaken when designing the scheme has progressed beyond the level of detail provided in the Environment Agency Flood Maps. The latest detailed Diggle Brook Hydraulic Model data provided by the Environment Agency has been plotted on to the site specific topographical survey to identify the extent of the areas that would flood during a 1 in 100 year flood event. A copy of the relevant plan showing the modelled extent of flooding is contained within Appendix 1.

The assessment undertaken within the WYG FRA has identified an area of flooding within the south western part of the playing field, but no other flooding upstream. It is recognised that additional flooding has occurred in the Boxing Day 2015 flood and this may be due to other reasons further downstream of the site (e.g. localised blockages, lack of maintenance within Diggle Brook or the River Tame, etc.

However, in Flood Risk terms the 'lower' area of the playing field would be defined as being within Flood Zone 3a; not Flood Zone 3b as stated.

It should be noted that within the Oldham Strategic Flood Risk Assessment, the extent of the Flood Zone 3a area is greater than that identified within the above assessment and this is due to the model data used within the SFRA being superseded by the later flood data provided by the Environment Agency and utilised within the FRA.

Notwithstanding all of the above, the FRA, which was prepared prior to the Boxing Day 2105 floods, acknowledges that during extreme flood events a wider area of the playing fields site can be subject to flooding. In response to this, the development has been designed so that the ability of the site to flood during these times will not be compromised and as such the flooding will have no adverse impact on the proposed development or flooding downstream.

Importantly, the area proposed for the sports pitches and other sports facilities remains within Flood Zone 1 (low risk of flooding), contrary to the misinterpretation of the letters submitted by local residents / councillors.



It is clear to see from the above photo and attached photos [Photos 2-6] that the field is not suitable for the location of sport facilities. In addition, Diggle Brook is a fast flowing river and during times of flood presents considerable hazard.

This is not true. Sports Pitches and Playing Fields are designated within the Planning Practice Guidance (Flood Risk & Coastal Change) under Table 2 (Flood Risk Vulnerability Classification) as being "Water Compatible" and as set out within Table 3 of the PPG "Water Compatible" use is deemed to be an appropriate development in Flood Risk terms in areas of Flood Zone 3a. In the event that further or additional evidence identified the area as Flood Zone 3b, then the proposed end use would still be acceptable in flood risk terms. Notwithstanding this, as set out above, the proposed sports pitches are proposed within Flood Zone 1.

Pupils will only be permitted on the school field under supervision for a number of other, unrelated reasons, and therefore management of access to and use of the playing field during times of flood will be controlled just as at any other time. Further, access to and egress from the playing field is via the higher level of the remodelled field ensuring a safe route off the field if that were required. We do not therefore consider that the site presents a hazard. The photographs provided in the letters show that in the recent extreme Boxing Day flooding, the flood water was generally very shallow and barely covered the grass surface.

The new sports facilities will be of lower quality than current facilities as they will be located in a zone of increased flood risk: sports facilities at the current site in Uppermill are located within Flood Zone 1 (lowest risk) whereas the sport facilities at the proposed new site are in Flood Zone 3 & 3b (the highest flood risk + functional floodplain (3b)). They are also in the highest risk category from surface water flooding.

The sports pitches at the existing school site as well as at the proposed site are both located within Flood Zone 1. Both sites are also categorised as Critical Drainage Areas. The proposed pitches which actually be more usable and represent an improvement as they will be newly created pitches with newly installed drainage to Sport England requirements. In comparison, the existing school pitches are prone to water logging and are frequently unusable. Further, the proposed pitches will allow greater use on the school site unlike the existing pitches which do not conform with pitch size requirements and as such pupils have to use the pitches at Churchill Fields in Greenfield which are located in Flood Zones 2 And 3 and flood frequently.

3.0 Ground Conditions



Ground investigation work has already indicated that the proposed field is unsuitable for sports facilities. The ground investigation that took place in 2013 within the field for proposed sport facilities found elevated contamination levels and ground water encountered at shallow depths of 0.5 metres. [See Saddleworth School Geoenvironmental Desk Study, Mott MacDonald, October 2013].

WYG has undertaken a review of all existing geo-environmental information pertaining to the site (as reported in the WYG Geo-environmental Desk Top Study, December 2015). Our review included the information provided by the October 2013 report that Mr Brooks cites. No site investigation holes or soil tests had been undertaken in the area of the proposed sports field prior to October 2013 and so the presence of elevated contamination in this area of the site had not been established up to that point. The Mott MacDonald report lists fertilisers and pesticides as potential contaminants arising from the agricultural use of the land but goes on to rate the potential risk to site users from such contaminants as low to moderate, and arising from ingestion, inhalation or dermal contact with affected soil. The records reviewed show that this part of the development site has always been agricultural land. The theoretical risk posed by fertilisers and pesticides will be mitigated in large part by the proposed raising of site levels across most of the sports field area. In order to satisfy the anticipated planning conditions, soil used to achieve the new elevated site levels will be validated as being suitable for incorporation in the development.

The WYG review of information also addressed site investigation data obtained by others in November 2013 i.e. post-dating the Mott MacDonald report. Some of this later phase of investigation was undertaken in the sports field area. Only apparently localised deposits of Made Ground (assessed by WYG as a potential source of ground gas) were encountered, on the NW part of the sports field area, with the potential risk to receptors rated as low to moderate.

Any identified land contamination will be dealt with through the planning regime prior to occupation of the new school. Further site investigations are planned, to inform a further consideration of land contamination for this development site. Some of these investigations will be carried out on the sports field area. A suitable remediation strategy addressing identified land contamination issues will be devised for the development site. Development works will be undertaken in accordance with the strategy and the works will be validated to ensure that the site is suitable for use, as required by the National Planning Policy Framework.

Based on the information available currently, the site is not considered to be unsuitable for development due to land contamination.



As noted above, the proposed raising of site levels in preparation for the installation of the sports facilities will help to mitigate any potential impacts from shallow groundwater but in any event, the position of the groundwater table is not considered to have a material bearing on the suitability of this part of the development site for the intended use as a sports field.

4.0 Canal Flooding

Sport facilities will be located within the Huddersfield Canal Hazard Zone and will be at risk from canal overtopping, being immediately adjacent to the canal [please refer to Photo 3 showing surface water flooding from the canal towpath into & across the field proposed for sport facilities].

The canal should not over top. Through our discussions with the Canal and River Trust, they have advised that any overtopping that does occur is usually as a result of a blockage of a lock by-pass facility, a lock gate being left open or vandalism. Overtopping is rare and usually such overflows are relatively minor in nature with depth and velocity being low and not presenting a hazard. Overtopping would therefore represent a practical issue in terms of sports pitch use. There is no requirement to make design changes to cater for such a rare event, however Interserve are currently investigating installing land drainage or similar to divert any water entering the sports field site by way of overtopping from the canal to ensure that this will not affect the proposed sports pitches.

The sport fields at the current Uppermill site are not situated between a river and canal and are in the lowest flood category (Flood Zone 1).

As mentioned previously, the current sports field is prone to water logging and as such its use is compromised.

5.0 Site Suitability

There has been no feasibility work carried out to check if the proposed sports facilities are suitable for their intended use & will be of equivalent quality, except the ground investigation work that indicates that they are not.

As set out above, the fact of the matter is that the ground condition of the proposed sports field is, or will be made, suitable for the intended sports facilities. We are not aware of any other investigations



that the objectors believe are necessary. The proposed sports field has been subject to detailed design works from a multi-disciplinary team comprising civil engineers, flood risk experts, geo-environmental professionals and landscape architects. The quality of the proposed facilities will exceed that of the existing school by virtue of the number of facilities provided, the dimensions of the proposed pitches and the fact that they will be adequately drained to avoid water logging.

6.0 Use Compatibility

The Flood Risk Assessment submitted with the planning application has been applied to the area covered by school buildings only. The report has assumed that sports facilities constitute a 'water compatible' flood risk within Flood Zone 3b & therefore flood risk to sport facilities does not need to be considered!

This is not true and demonstrates a misunderstanding of the relevant policies and classification of the site and development. The FRA submitted in respect of the application refers to the entire site area. In line with requirements, Section 4.2 identifies that the sequential assessment is not applied to the proposed sports field as it is a 'water compatible use'.

It is evident from the Environment Statement and the photos and ground investigation work carried out so far that sports facilities are to be sacrificed to flooding and therefore will be sub-standard, and unusable.

This is not true. The sports facilities will not be sacrificed to flooding. Part of the site provides a useful function allowing areas to flood as necessary and this will be allowed to continue in order to reduce the flood risk down-stream. Further, surface water storage tanks will be provided on the northern part of the site, which will be occupied by the school buildings, to reduce surface run off by 50% from current runoff levels thus reducing the future downstream flooding along Diggle Brook. The pitches will be more usable than the ones at the existing school.

We also understand that Sport England are concerned with the poor state of Churchill playing fields (2km downstream in Uppermill) – also situated in Flood Zone 3. Local residents are outraged that Oldham Council would even consider placing new sports facilities within a 'functional floodplain' (Flood Zone 3b) upstream. Should the functional



floodplain be compromised by proposed earthworks, it will increase flooding downstream, making the problems at Churchill & flooding in Uppermill worse.

Churchill playing fields are located in Flood Zone 3 and the School currently relies on the use of these for some aspects of the school's use as the facilities on the existing school site are sub-standard. The proposed new school will actually reduce the risk of flooding down-stream due to the reduction in run-off rates and the continuing ability of the site to store flood water in extreme events.

7.0 All-weather pitch

The floodlit AWP shown on the current plans does not meet with any of the Football Associations published dimensions for pitches and can only accommodate a pitch for U9-U10 use i.e. does not cater for the age of the children at the school. The area is simply too restricted to cater for all the necessary requirements.

The principle of the proposed AWP has been agreed with Sport England previously. The existing school AWP is long and narrow and does not meet with any standard pitch sizes, or even proportions, and it does not have the required 3m runoff. The proposed new AWP will have the same surface area but will be constructed to recognised proportions and it will provide a 3m runoff. It will therefore represent an improvement over the current pitch.

The Planning Statement submitted in support of the planning application sets out the significant improvements of the proposed school facilities compared to those of the current school. The relevant extract is repeated here for ease:-

Sports Provision

6.75 High quality sports facilities are a fundamental element of the design and layout, which has evolved to incorporate input from key stakeholders, particularly Sport England. All of the formal sports facilities are located towards the south of the site with the internal sports facilities and changing rooms, MUGAs, all-weather pitch and playing field all being adjacent to each other. Not only does this result in efficiencies in the operation of the school but makes out-of-hours community use easier to manage and more attractive. Additionally the self-contained sports facilities benefit from directly adjacent parking.



6.76 The proposed development will provide well planned hard and soft sports areas. The approach taken to the provision of facilities has been to re-provide those of the current Uppermill school site and to provide enhanced facilities wherever possible. Although there is no direct loss of sports facilities as a result of this application (i.e. it does not involve building over current sports facilities), the relocation of the school will inevitably result in the existing facilities being lost and therefore in assessing the acceptability of the new school proposals, the policy relating to loss of sports provision should be considered. Part (g) of Policy 23 of the Joint DPD should be used in this case and this states that the loss of open space will be permitted where *'a replacement facility which is at least equivalent in terms of usefulness, attractiveness, quality and accessibility, and where appropriate quantity, to existing and future users is provided...'*

6.77 The existing Saddleworth School has the current sports facilities:-

- 4-court sports hall,
- one gym,
- one fitness studio,
- one 'Saddleworth Bespoke' sized all-weather floodlit sports pitch,
- one grassed playing field of 4,565 sq.m. of which only 4,130 sq.m. is level,
- one multi-use games areas (MUGA) of 575 sq.m,
- two informal hard-surfaced games areas of 586 sq.m and 615 sq.m. and
- a long jump run-up and sand pit.

6.78 The proposed new school will include the following:-

- four court sports hall,
- one purpose-built fitness suite,
- one purpose-built activity studio,
- one 'Saddleworth Bespoke' sized all-weather floodlit sports pitch,
- one grassed playing field of 5,005 sq.m which will accommodate an U15-U16 football pitch of 91 metres by 55 metres with 3 metre run off areas (in line with the Football's Association's 2012 specifications as set out in 'The FA Guide to Pitch and Goalpost Dimensions'),
- two formal, fully fenced porous macadam multi-use games areas (MUGA's),



- one informal, unfenced MUGA,
- one half court – basketball practise key,
- 100m natural turf 6-lane running track,
- an area for practise cricket wickets,
- a synthetic long jump run-up and sand pit, and
- area for throwing events.

6.79 In terms of the existing school, the sports facilities suffer from the following problems:-

- neither the all-weather pitch nor the grass pitch are square,
- both pitches lie beneath overhanging tree canopies which causes problems with leaf fall and does not meet Sport England standards,
- the all-weather pitch does not meet with Sport England standard-sized pitch requirements and further the pitch is too long and narrow to even replicate the proportions of a standard sized pitch,
- the grass field is not of sufficient size to accommodate an U15-U16 football pitch,
- the playing field is regularly subject to flooding,
- the playing field playing surface is poor,
- the sports facilities are not conveniently located and arranged to enable easy community use, and
- there are limited athletics facilities.

6.80 Due to the deficiencies of the current facilities, students usually have to walk half a mile to the Churchill playing fields in Greenfield to use the facilities there for football, rugby and athletics. In contrast the proposed school offers the following improvements and additions:-

- an U15-U16 grass football pitch in line with FA requirements and incorporating drainage,
- an all-weather pitch of standardised proportions, with the required 3 metre run off areas with no overhanging tree canopies,
- additional sports provision,
- one additional informal MUGA,
- a basketball practise key,
- 100m grass running track,
- practise cricket wickets ,



- an area throwing events, and
- pitches which are not subjected to regular flooding.

6.81 The school includes the following sports in its curriculum:-

- **All weather pitch** - football, hockey, rounders, athletics, fitness and lacrosse, and
- **Playing field / grass pitch** – Rugby, football and athletics.

6.82 The provision of the new facilities would enable all of these school sports to take place on the new school site, except for running events which would require use of an off-site 400 running track. Football matches will now be able to take place at the school given that the new pitch will conform to competition standard.

6.83 In terms of the surface specification of the all-weather pitch, this will be determined in consultation with guidance in 'Selecting the Right Artificial Surface' (Sport England, December 2010) and agreed with Sport England. The Lighting section of the ES (Section 14) sets out the specification of the floodlighting.

6.84 In addition to improvements in the sports pitches, the new sports facilities will be located immediately adjacent to the school buildings and changing rooms and are easily accessible by the disabled also.

6.85 From the above analysis it is clear to see that the new school will provide replacement sports facilities which are at least equivalent in terms of usefulness, attractiveness, quality, accessibility, and quantity and they therefore comply with Policy 23 of the Joint DPD.

(WYG Planning Statement, July 2015)

8.0 Environmental Sensitivity

The playing fields are to be located in an environmentally sensitive area, and there is a conflict between the proposed floodlights and ecological considerations i.e. floodlighting and bats (adjacent to a Site of Biological Importance), disturbance and pollution.



This is not true. The ecological considerations have been fully considered in the submitted Environmental Statement and appropriate mitigation has been put in place. The Greater Manchester Ecology Unit, Canal and River Trust, Natural England and the Environment Agency are all satisfied with the proposals and raise no objections at all, including in relation to the proposed floodlighting.

9.0 Public Opinion

Oldham Council were aware of the conflicts that exist at the pre-planning stage but chose to ignore public opinion & concerns; they acknowledged in writing the need to impose conditions & restrictions on the use of facilities. This approach will not result in facilities that are attractive to the local community and that are financially sustainable in the long term.

Oldham Council has undertaken a significant amount of public consultation in respect of the proposed school, as has Interserve Construction. It is usual and acceptable to impose conditions to restrict the use of planning consents. The proposed hours of operation of the sports facilities (until 22:00 hours) represents a balance between amenity, ecological and sports use. The hours of use will allow significant community use and are sufficient to provide financial viability.

10.0 Existing School Site

Oldham Council has failed to acknowledge that the existing facilities in Uppermill will be superior to those planned, especially if the AWP in Uppermill is upgraded.

The existing facilities are not superior to those planned and the AWP on the existing school site is not capable of being upgraded in size or proportions due to on-site constraints.

Therefore, the Uppermill site option will be a less costly option both financially and environmentally.

The Planning Statement submitted in support of the application explained that redeveloping the existing school site would be more costly (from paragraph 3.29 onwards).



It will also ensure long-term benefit for the school and local community.

The application site was chosen as the preferred site for new school in independent decisions taken by the EFA and by Oldham Council's Members due to the overriding benefits to education that the application site can provide. The benefits of the scheme as a whole are set out in the introduction of the Planning Statement (WYG, July 2015).

The Education Funding Agency's Feasibility Study published in February 2015 has shown that the Uppermill site option is a viable alternative and within budget. The EFA have said that they are happy to go with this choice should Oldham Council give the go ahead.

Sport England, and indeed Oldham Council, is obliged to make decision on the acceptability of the application proposals as submitted, not to consider whether there are any other alternative options. There are no proposals to redevelop the school on the existing site. The choice of site of the proposed new school is therefore not relevant in this context.

The sport fields at the current Uppermill site are not situated between a river and canal and are in the lowest flood category (Flood Zone 1).

This point is addressed above.

Land swap deal: the pitches at the Uppermill site will be sold for re-development, not retained. Oldham council confirmed this in a FAQ document at the pre-planning stage: "the pitch is included in the land swap proposals and the all-weather pitch on the existing site would pass to WRT developments. As they are expected to redevelop the site the pitch would not be retained because it would be replaced at the Diggle site" [See OMBC Report to Cabinet 30 March 2015, p30 'Frequently Asked Questions' & p40 'Thematic list of issues raised by the Public before and after the publication of the EFA Feasibility Study'].

This is the case and the Planning Statement (July 2015) deals with this point as referred to in the extract above; see paragraph 6.76. This application does not directly involve the loss of sports pitches. Any application for subsequent redevelopment of the existing school site will be assessed against relevant policies regarding loss of sports facilities in the usual manner.



There is extreme concern locally that Oldham Council has failed to listen to the issues raised by the public and experts in making their site choice for the new Saddleworth School. All the evidence indicates that replacement pitches will be of inferior quality compared to the current facilities at Uppermill and, in addition to this, availability for use will be restricted. The school and local community will be losing out so that one local developer can benefit.

This statement is disregarded. All of the responses in this statement illustrate that the proposed new school, including its sports facilities, have been designed in full consideration of all relevant matters by a large multi-disciplinary team of technical experts and in full consultation with statutory bodies and interested parties.

The current school site in Uppermill should be retained and the AWP upgraded. This would ensure long-term benefit for the school and local community. The feasibility study carried out by the EFA has shown that this is still a viable option

As explained previously, Sport England is required to comment on the current application proposals, not an alternative site. Notwithstanding this, we wish to point out that the existing school site is so constrained that it is not possible to upgrade the AWP. In both new build options on the current school site investigated by the EFA, the AWP would remain as existing. Therefore, the benefits of the new AWP on the application site would not be capable of being realised on the existing school site. Further, the existing school site is not capable of providing an FA Under 15-16 pitch, nor all the athletics facilities, that the application site can provide. The application site therefore represents the best site to deliver new and improved sports facilities in relation to Saddleworth School.

Sport England may find the existing pitch comparison useful:-



	<i>Existing School</i>	<i>Application Site</i>	<i>Existing Site – Extension to existing school</i>	<i>Existing site – New school on current playing field</i>
<i>Grass Pitch</i>	<i>76 x 43m (approximate)</i>	<i>91 x 55m (FA Under 15-16 size)</i>	<i>76 x 43m (approximate)</i>	<i>74.5 x 46.5m (approximate)</i>
<i>AWP</i>	<i>78 x 37.5m</i>	<i>68.8 x 42m (same area as existing, but re- proportioned to meet Sport England guidelines)</i>	<i>78 x 37.5m</i>	<i>78 x 37.5m</i>

11.0 Conclusion

In conclusion, all of the points raised by objectors can be robustly dismissed. The proposed sports facilities represent an improvement over those of the existing school and they will neither be subject to flooding nor result in greater flooding downstream. On the contrary, the proposed development will reduce the risk of flooding downstream and the pitches will be less likely to become water logged than the facilities on the existing school site.

