



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Bruce Parker (Head of Planning & Development)
Operations Directorate
North West Region
National Highways
PlanningNW@nationalhighways.co.uk

To: Rochdale Borough Council

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 25/01018/FUL

Location: Land At Waterfold Lane Heap Bridge Bury BL9 7JY

Proposal: Residential development of a 100% affordable housing scheme comprising of one, three storey block of 24 apartments and a row of 6 terraced dwellinghouses, alongside creation of access, landscaping, drainage and other associated works

National Highways Ref: NH/25/13341

Referring to the consultation on a planning application referenced above, dated 20th October 2025 in the vicinity of the M66 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

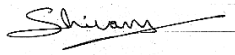
- ~~a) offer no objection;~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningNW@nationalhighways.co.uk

Signature: 	Date: 10/11/25				
<table style="width: 100%; border-collapse: collapse;"><tr><td style="width: 50%; vertical-align: top;">Name: Shivam Sagwal</td><td style="width: 50%; vertical-align: top;">Position: Asst. Spatial Planner</td></tr><tr><td colspan="2" style="padding-top: 10px;">National Highways Piccadilly Gate Store Street Manchester M1 2WD</td></tr></table>		Name: Shivam Sagwal	Position: Asst. Spatial Planner	National Highways Piccadilly Gate Store Street Manchester M1 2WD	
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National Highways Piccadilly Gate Store Street Manchester M1 2WD					

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

National Highways Comments

National Highways has been consulted by Rochdale Borough Council to comments on planning application mentioned above, the proposed site for the development sits in a very close proximity of the SRN hence National Highways have following comments and require more information before we can issue our final comments.

RRRAP :

As the proposed development is adjacent to the motorway with hazards within 15m of the highway boundary and high-risk hazards within 100m of the edge of carriageway the developer will need to produce a RRRAP/CD377 assessment to determine the suitability/requirement of road restraint in the area. This will also act as a record that an assessment has been done. The developer will need to check the RRRAP user guide for details in how to fill these hazards in.

NH would expect the RRRAP will need to include,

- Proposed/existing trees within the development
- Drainage attenuation pond when at full depth
- Proposed fencing
- Any proposed places of congregation
- Proposed public buildings.

Proposed Attenuation Pond:

we please ask for clarification of the proposed attenuation pond at the northern tip of the site? We need to confirm that this is a pond with battered slopes and not an excavation for an underground storage tank. We would expect to see a cross-section through the proposed design when details become available.

Also, The fence appears to follow the highway boundary. It isn't clear whether the fence is intended to replace the existing boundary fence hence further clarification is required on this.

Conclusion:

As per the points raised above, National Highways would recommend a holding recommendation and advise the council not to issue any decision until 13th January 2026. This will help applicant produce the information required and to be assessed by National Highways.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.