

APPENDIX 2.2

EIA SCOPING OPINION



ROCHDALE
BOROUGH COUNCIL

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT
ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 2017 (AS
AMENDED): REGULATION 15 SCOPING OPINION**

APPLICATION REFERENCE: 22/01417/SCO

Name and address for correspondence:	Applicant name:
Barton Willmore (now Stantec) 7 Soho Square London W1D 3QB	Barton Willmore (now Stantec)

Part 1 - Particulars of Application

Date of Application: 31 October 2022

Proposal:	Request for a scoping opinion in relation to a proposed hybrid planning application for the development of up to 1500 dwellings, with new local centre, green infrastructure, ecological enhancements, SuDs, play areas, new pedestrian and cycle routes and associated access
Location:	Land At Stakehill Lane, Middleton

Part 2 - Particulars of decision

Date Decision Issued: 15 February 2023

Daniela Ripa
Interim Head of Planning Services

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
(ENGLAND AND WALES) REGULATIONS 2017: REGULATION 15 SCOPING OPINION
AS AMENDED BY TOWN AND COUNTRY PLANNING AND INFRASTRUCTURE
PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (AMENDMENT) REGULATIONS
2018) [THE 2017 REGULATIONS (AS AMENDED)]**

22/01417/SCO - Land at Stakehill Lane, Middleton

**Scoping opinion in relation to a development of up to 1500 dwellings, with new local
centre, green infrastructure, ecological enhancements, SuDs, play areas, new
pedestrian and cycle routes and associated access**

BACKGROUND AND SUMMARY

This Scoping Opinion has been prepared on the basis of the information contained within the accompanying Scoping Report (ref: 31599/A5/EIAScoping Rev 02) prepared by Barton Willmore now Stantec. The Scoping Opinion is sought on the topics and issues that are required to be addressed and reported in the Environmental Statement (ES) to support any future planning application.

The Scoping Report refers to the proposed development as a residential led development. Redrow Homes Ltd and a number of landowners [the Applicant] are working with a project team to design a residential-led development [the proposed development] on land at Stakehill, Middleton in Rochdale [the Site]. The proposed development includes up to 1,500 homes, a local centre, SUDs and play areas, pedestrian and cycle routes and associated access. Further guidance on the type of application to be submitted is detailed below.

The applicant is working towards the submission of a hybrid planning application [the Application] to Rochdale Borough Council (RBC), as the Local Planning Authority (LPA).

Any planning application would be considered having due regard to the development plan, which comprises:

- Saved policies within the Rochdale Unitary Development Plan (2006)
- Rochdale Core Strategy (2016)
- Greater Manchester Joint Minerals Development Plan (2013)

The following plans are in draft form:

- Places for Everyone
- Rochdale Borough Allocations Plan

The Scoping Report has been the subject of consultation in accordance with the Environmental Impact Assessment (EIA) Regulations. Copies of consultation responses have been forwarded to the Applicant and are also included within this Scoping Opinion.

Regulation 15 (6) of the EIA Regulations requires that before adopting a scoping opinion the authority must take into account:

- a) any information provided by the Applicant about the proposed development;
- b) the specific characteristics of the particular development;
- c) the specific characteristics of development of the type concerned; and,
- d) the environmental features likely to be significantly affected by the development.

Whilst every ES should provide a full factual description of the development, the emphasis of it will be the main environmental effects to which the development is likely to give rise. Impacts which have little or no significance need only very brief treatment to indicate that their possible relevance has been considered. Also, projects with the potential to create cumulative effects will be considered as part of the assessment.

SUMMARY

The Council has reviewed the applicant's position as set out in the Scoping Report (ref: 31599/A5/EIAScoping Rev 02) (recorded on the planning file), alongside the consultation responses received (recorded on the planning file).

The Council agrees that the following topics will be scoped in to the ES:

- Landscape and Visual Effects
- Biodiversity
- Cultural Heritage
- Transport and Access
- Air Quality
- Noise and Vibration

The following topics were considered and it is agreed that there is no requirement for them to be scoped in to the ES:

- Water Resources and Flood Risk
- Land Contamination
- Agricultural Land
- Wind Microclimate
- Daylight, Sunlight and Overshadowing
- Waste
- Lighting
- Accidents and Disasters

A number of disciplines have been scoped out which the Council disagrees with:

- Climate Change and Greenhouse Gases
- Population and Human Health

Topics	Your Opinion	Council Opinion	Comments
Landscape and Visual Effects	Significant	Significant	Comments in Chapter below
Biodiversity	Significant	Significant	Comments in Chapter below
Cultural Heritage	Significant	Significant	Comments in Chapter below
Transport and Access	Significant	Significant	Comments in Chapter below
Air Quality	Significant	Significant	Comments in Chapter below
Noise and Vibration	Significant	Significant	Comments in Chapter below
Population and Human Health	Not Significant	Significant	Based on a maximum of 1,500 dwelling, the proposed development would generate an estimated population of around 3,600 residents¹ which will add pressure on educational establishments, health services (of which there are none within a 2.5km radius from the centre of the site), green infrastructure including play spaces and sports facilities. The baseline should consider the above alongside existing, walking, cycling and public transport routes. The Habitats Regulations Assessment for the PfE Plan (June 2021) states that the site is in close proximity to the motorway network and may lead to potential impacts from cumulative air pollution caused by increased traffic generation. The Council consider that the impacts to population and human health will be significant such as to warrant inclusion within the EIA.
Water Resources and Flood Risk	Not significant	Not significant	
Land Contamination	Not significant	Not significant	
Agricultural Land	Not significant	Not significant	
Wind Microclimate	Not significant	Not significant	

¹ Based on an average household size of 2.4 for England, ONS 2021

Daylight, Sunlight and Overshadowing	Not significant	Not significant	
Waste	Not significant	Not significant	
Lighting	Not significant	Not significant	
Accidents and Disasters	Not significant	Not significant	
Climate Change and Greenhouse Gases	Not Significant	Significant	In July 2019, the Council declared a Climate Emergency and a responsibility to take action to reduce carbon emissions. The Council's Draft Climate Change and Sustainability Strategy 2020-2025, coupled with requirements set out in the Development Plan and national guidance including the updated 2022 IEMA Guidance, sets out a broad range of considerations which relate to primary mitigation. The Council consider it would be appropriate to scope in Climate Change and Greenhouse Gases.

SPECIFIC COMMENTS ON THE SCOPING REPORT

Population and Human Health

Based on a maximum of 1,500 dwelling, the proposed development would generate an estimated population of around 3,600 residents² which will add pressure on educational establishments, health services (of which there are none within a 2.5km radius from the centre of the site), green infrastructure including play spaces and sports facilities. The baseline should consider the above alongside existing, walking, cycling and public transport routes. The Habitats Regulations Assessment for the PfE Plan (June 2021) states that the site is in close proximity to the motorway network and may lead to potential impacts from cumulative air pollution caused by increased traffic generation. This is confirmed in the Scoping Report, which states that the site is partially located within the Greater Manchester Combined Authority Air Quality Management Area, declared for exceedance of annual mean nitrogen dioxide objective. As a result of scoping in Air Quality effects on the existing residential receptors and future residents and users of the proposed development, it follows that this should also be considered within the section on Population and Human Health.

² Based on an average household size of 2.4 for England, ONS 2021

There are also a number of likely significant socio-economic effects of the development that should be considered by the ES and includes:

- Generation of temporary construction employment through the construction phase on the existing construction employment in the Borough. The additional demand for construction works should be compared against baseline construction employment in the Local Impact Area (LIA) to establish the change this represents.
- Increase in the resident labour force during the operational phase on the current and potential future resident labour force of the LIA and Borough. The proposed development's resident population should form the basis for estimating its resident labour force and the level of likely demand for services below.
- Demand for primary and secondary education places during the operational phase on the educational facilities, including primary and secondary schools. The demand for school places can be estimated through consultation with the Local Education Authority. The additional demand for places should be assessed against current and likely future capacity of schools in the LIA to absorb additional demand;
- Demand on health services during the operational phase on the health facilities, including GPs
- Provision of sports facilities and changes to health and well-being through physical activity levels and the demand for managed and natural green spaces, including children's play spaces during the operational phase on the current supply of such facilities. Associated impacts on health and well-being should be described qualitatively drawing on published evidence about the health benefits of physical activity and access to green space.

The socio-economic effects should be informed by a full analysis of the relevant baseline conditions, using recognised data sources principally from the Office for National Statistics (ONS), but also other appropriate evidence base including Department for Education, National Health Service, the Council, the Indices of Multiple deprivation and Police Crime Data.

The Council consider that the impacts to population and human health will be significant such as to warrant inclusion within the EIA.

Water Resources and Flood Risk

As the site is located entirely within Flood Zone 1 and at a low risk of flooding from a variety of sources, it is agreed that water resources and flood risk can be scoped out of the ES.

However, the Lead Local Flood Authority (LLFA) will require information of the sustainable drainage strategy to assess whether the Site, beyond the Phase 1 development, can support the large number of houses and associated paved areas. The LLFA's full response is appended.

Land Contamination

It is agreed that the land contamination can be scoped out of the ES.

However, it should be noted that the site falls within the defined Development High Risk Area; therefore within the site and surrounding area there are coal mining features and hazards, which would need to be considered. The Coal authority records indicate that the site is likely to have been subject to historic unrecorded underground coal mining at shallow depth associated with thick coal seam outcrops. The Council consider that this matter can be scoped out of the ES but a Coal Mining Risk Assessment, or equivalent report for the site should be submitted, which considers in detail the risks posed to the development by the coal mining legacy.

Landscape and Visual Effects

The Scoping Report does not meet the requirements of the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) as there is little information presented within the Landscape and Visual Effects Chapter. The Guidance states that for LVIA, Scoping should be expected to consider the following:

- The extent of the study area – The Guidance states that scoping should identify the area of landscape that needs to be covered in assessing landscape effects. The study area should include the site itself and the full extent of the wider landscape around it which the proposed development may influence in a significant manner. It is the Council's opinion that the study area should be based on the extent of the Landscape Character Area likely to be significantly affected either directly or indirectly as well be based on the extent of the area from which the development is potential visible, i.e. the Zone of Theoretical Visibility which has not been submitted. The Study Area should be defined as part of the Scoping exercise.
- Sources of information – a full list of the planning and legal context relevant to landscape and visual matters should be provided.
- The possible effects that might occur – The Scoping Report should start to consider:
 - The changes to the landscape character (Urban Fringe Farmland Landscape Character Area), the individual landscape elements within the site (e.g. fields, hedgerows, trees, boundary vegetation) and the landscape character of the site itself. Notably, the evaluation needs to consider both the Landscape Character Area and the historic landscape characterisation including historic features such as archaeological remains, buildings and landscape features.
 - The changes to the visual amenity experienced by receptors including but not limited to, residential receptors to the west of the Site in the housing area of Slattocks; users of the cricket club and the church; residential receptors within the farms that are excluded from the red line, particularly Thornfields Farm which is sensitive to development to development due to its high points at 175-180AOD and its visual prominent from area to the west; users of public rights of way crossing the site; users of Tandle Hill Country Park;

Thornham Primary School and Thornham House to the south; road users travelling along Manchester Old Road, the M62 and the A627; users of the existing industrial developments (Birch Business Park and Stakehill Industrial & Distribution Park)

- The main receptors to be considered – the Report has started to consider the landscape and visual receptors but full details should be provided with Viewpoints agreed with the Council.
- The extent and the appropriate level of detail for the baseline studies – the summary provided in the Scoping Report is appropriate and should be expanded upon in the LVIA. In terms of the baseline conditions, consideration should be given to the cricket club as a recreational association to the site which currently enjoys open views across the site.
- Methods to be used in assessing significance – this should include both a written assessment of the significance but also a visual assessment, using photomontages from agreed viewpoints
- The approach to assessment of cumulative landscape and visual effects – this should distinguish clearly between what are considered to be significant and non-significant effects and will likely be informed by planned and committed development proposed within the Study Area.

Biodiversity

Greater Manchester Ecological Unit has confirmed that the range of ecological surveys identified by the Scoping Report is in line with their recommendations and have no additions to the scope of the ecological assessment. However, whilst protected species have been scoped in the assessment, the site is circa 200m east of the Rochdale Canal which is a Special Area of Conservation (SPA) and a Site of Special Scientific Interest (SSSI). Hopwood Woodlands, a Local Nature Reserve (NR), is also located approximately 500m west of the site.

The ES should assess the potential for the proposal to affect designated nature conservation sites, including completing an Appropriate Assessment. A full assessment of the direct and indirect effects of the development on the features of special interest within the SPA, SSSI and LNR should be completed and appropriate mitigation measures identified, to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically. Further information is provided in the consultation response from Natural England, appended.

Cultural Heritage

The Scoping Opinion proposes that a Chapter of ES will be included considering the impact on cultural heritage, including the built historic environment and archaeological assets.

However, the chapter only proposes an assessment of the impact on listed buildings within 1km of the site. It does not propose an assessment of the impact on non-designated heritage assets or the nearby Castleton Conservation Area. Nor is any reference made to the University of Salford Historic Environment Assessment (HEA).

The Conservation Officer has responded with a list of heritage and non-designated heritage assets which will require consideration with the ES, including but not limited to those that are most likely to be affected as below:

- Church of St John (grade II)
- Thornham Parish War Memorial (grade II)
- Castleton South Conservation Area
- St Johns CE Thornham Primary School
- Thornham Lane Parsonage
- Toll Bar Cottage
- Newhey and Sapling Farm, Chesham Avenue
- Hopwood Arms Farm
- Richard Bentley Smalley Memorial Hall
- Thornham Fold
- Rochdale Canal

The ES chapter should include all heritage assets within 1km the site, including non-designated heritage assets and Conservation Areas. The majority of these are set out within the HEA. This HEA should be used as a baseline for assessing the impacts of the development on the built heritage.

The Council's list of non-designated heritage assets are available to view on the website at: [About non-designated heritage assets | Non-designated heritage assets | Rochdale Borough Council](#). Currently these assets are not available to view in map form.

Transport and Access

The Scoping Report states that an assessment will be undertaken of the likely significant effects of the proposed development on the environment in respect of transport and access. This chapter has been reviewed by the Council's Highways Services (HS), Transport for Greater Manchester (TfGM) and National Highways (NH). The information provided within the chapter includes no details of the areas to be covered in a Transport Assessment. Therefore HS, TfGM and NH have started to outline what they would expect to see in any transport input provided to accompany a Planning Application. Their response is appended in full but the Council would urge the Applicant to engage with all parties to ensure that a scope of assessment is agreed ahead of submission of the planning application.

Alongside this, the cumulative impacts of development on M62 J20 and A627 (M) corridor will need to be appropriately considered; with the approach agreed between the relevant parties i.e. Rochdale Borough Council, Neighbouring LPAs / TfGM / NH.

Air Quality

In respect of the chapter on Air Quality, an assessment should be made and submitted as part of the application of the impact of the development on surrounding private water supplies. A number of properties in the vicinity rely on water from the development site for their domestic drinking supply and the development of the land must not interfere with the supply.

It is likely that the Council will require a financial contribution to install NO_x monitoring tubes and / or Pollution Monitoring Equipment at agreed locations as an integral part of the development. This equipment would be installed pre-commencement and operate for at least five years after the development has been completed. On this basis, you may wish to carry out more in-depth data collection at this stage, in order to better inform the EIA.

Noise and Vibration

In respects of noise and vibration the Scoping Report appropriately sets out how subsequent noise and vibration impact assessments and construction/site management plans (for all aspects/stages) will be carried out and therefore the Council has no further comments.

Cumulative Effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Noting the boundary of Rochdale and Oldham, consideration of cross boundary plans or projects is likely. Oldham Council have confirmed that nearby planning applications can be found on their online mapping system:

<https://maps.oldham.gov.uk/webmap/?initialDialog=layersDialog&mapName=Proposalsmap>
 Alongside the three planning applications within your Scoping Report (Refs: 20/01439/FUL, 15/01183/OUT and 16/01399/HYBR), the Cumulative Effects chapter should consider the following:

Site and Planning Reference	Description of Development	Planning Status	Distance from the Site
Land south of Cowm Top Lane, Castleton 22/01190/FUL	Residential development comprising 495 dwellings with associated access, car parking, landscaping and infrastructure	Pending Consideration	200m north
Castleton Sidings Policy JPA20	Delivery of around 125 dwellings, a temporary rail halt and car parking	Places for Everyone Draft Allocation	500 north west
Land at Royle Road, Castleton 18/01399/FUL	Erection of 201 dwellings and a block of 24 apartments including the demolition of existing structures together with associated ground works to the north of the site, public open space, landscaping and vehicular access from Royle Road	Granted subject to conditions - 12 August 2020	1.5km north
Land off Don Street, Middleton 21/00744/FUL	Residential development of 311 dwellings (Use Class C3) with associated infrastructure, landscaping and access	Granted subject to conditions - 13 September 2022	2km south west

APPENDIX A

Coal Authority

The site falls within the defined Development High Risk Area; therefore within the site and surrounding area there are coal mining features and hazards, which would need to be considered in relation to the determination of any planning application.

The Coal Authority records indicate that the site is likely to have been subject to historic unrecorded underground coal mining at shallow depth associated with thick coal seam outcrops.

Whether or not any future proposal for the redevelopment of this site is to be accompanied by an Environmental Statement is for the decision of the LPA. However, as part of any formal planning application, the applicant will need to submit a Coal Mining Risk Assessment, or equivalent report for the site, which considers in detail the risks posed to the development by the coal mining legacy within the site. In this regard we note the submitted EIA Scoping Report (October 2022, prepared by Barton Wilmore), which does not appear to consider coal mining legacy.

Conservation Officer

Designated Heritage Assets	☒	- Church of St John (grade II) - Thornham Parish War Memorial (grade II) - Castleton (South) Conservation Area - Scowcroft Farmhouse (grade II) - Rochdale Canal Slattocks top lock (number 54) and adjoining bridge (grade II)
Non-Designated Heritage Assets	☒	- St Johns CE Thornham Primary School - Thornham Lane Parsonage - Toll Bar Cottage - Newhey and Sapling Farm - Hopwood Arms Farm - Richard Bentley Memorial Hall - Rochdale Canal - Thornham Fold

Summary

Further information and amendments required.

Significance Assessment

The application site covers land off Thornham Lane, to the east of Manchester Old Road, which connects Castleton to Middleton. The site is one of the Borough's main allocations, within the draft Places for Everyone document, which is currently at examination.

The current proposal and scoping request covers the northern portion of this site allocation, the area bordered by Thornham Lane, the A627(M) and Thornham New Road. The red line boundary also encloses a parcel of land to the south of Thornham Lane, although no development is shown on this portion of the site.

The northern site is largely undeveloped, with undulating agricultural fields. The only buildings fully enclosed by the site boundary include: the grade II listed Church of St John and its associated War Memorial (also grade II) and Thornfields Farm, which although depicted on the mid-19th century OS map appears to consist of modern buildings and a rebuilt farmhouse.

As part of the GMSF land allocations (the predecessor to PfE), a Historic Environment Assessment was carried out by the University of Salford. This identified key heritage assets likely to be affected by the site allocation. As this proposal only covers a portion of this allocation, the assets listed below are most likely to be affected.

Nevertheless, the ES chapter should consider all assets within a 1km buffer as set out within the scoping report (further comments on this below). A list of these assets is also provided in the table above.

Church of St John (grade II)

The Church of St John lies to the north of Thornham Lane and is accessible both from Thornham Lane and Church Avenue to the east. It was constructed in 1906 to 1907 to a design by architect R. B. Preston. The Church was listed at grade II in May 2003. The Church is identified as being of both aesthetic and communal values.

The Church's setting adds to its significance. The Church has group association with the war memorial and graveyard. The wider setting is also of importance. The church has a clearly defined curtilage, marked by mature trees and landscaping. It is well screened in views from Thornham Lane, but intermittent views are possible. Views are also possible from the west of the site along Church Avenue. The rural setting of the Church adds to its significance. The University of Salford Report notes that this wider landscape adds to the tranquillity of the Place of Worship.

Thornham Parish War Memorial (grade II)

Thornham War Memorial was originally dates from 1921, and was rededicated following WW2. The memorial was listed in 2018 for its architectural and historic interest, as well as its group value with the Church of St John.

The setting of the War Memorial is primarily that of the Church and graveyard. However, as with the Church, the surrounding rural landscape does add to the sense of tranquillity within the graveyard and the solemnity of the space as a place of remembrance.

Castleton South Conservation Area

The Castleton (South) Conservation Area is located c 100m to the north of Site 1 (Northern). The character of the conservation area is a result of the industrial development of Castleton throughout the 19th century, particularly after the arrival of the Manchester & Leeds railway in 1839. The special architectural and historic interest of the Castleton (South) Conservation area lies predominantly in its distinctive townscape as a result of this rapid expansion in the industrial revolution.

St Johns CE Thornham Primary School

Originally constructed as a Church to serve the Parish in 1845. It served a double function, acting as a school, alongside its religious use, until the opening of St John's Church in 1907. The School was extended in the 20th and 21st centuries, and has undergone some unsympathetic alterations including the installation of UPVC windows. It nevertheless remains of some architectural interest and has been identified as a non-designated heritage asset.

Thornham Lane Parsonage

Thornham Lane Parsonage dates from c.1870 and is marked on the 1891 map as a parsonage. It originally served the Church and School, before serving as the parsonage for the Church of St John after it was constructed in 1907. This is an attractive two storey rendered building with a stone roof and contains a number of interesting features. It has also been identified as a non-designated heritage asset for its architectural and historic interest.

Toll Bar Cottage

Toll Bar Cottage is located on the southern side of Thornham Lane, on the corner with Stake Hill Lane. The date of Toll Bar cottage is unclear. It does appear to be on the first edition OS map, but this cannot be confirmed. There was however, a toll in this location, clearly marked on the first edition map. Local research indicates that the Toll Cottage was badly damaged by a fire in the 1960s. Nevertheless, it is still of some historic interest and is considered to be a non-designated heritage asset.

Other non-designated heritage assets

Further research has recently been provided by local residents, and this has resulted in additional buildings being identified as being of local interest and worthy of consideration as non-designated heritage assets. A review of buildings pre-dating 1851 has also been undertaken, and where these have not been heavily altered they have also been included. Those closest to the site include:

Newhey and Sapling Farm, Chesham Avenue

This farm is clearly depicted on the first edition OS map:



Some of the original buildings appear to remain, including the barns and farmhouse, which are brick built structures, with stone slate roofs. These original farm buildings are surrounded by modern agricultural sheds.

Hopwood Arms Farm

This building along Manchester Road is also depicted on the first edition OS map. It would appear to originally have been a public house, before being replaced by the 'new' Hopwood Arms located on the other side of Manchester Road. Given its historic interest, it is considered to be a non-designated heritage asset.

Richard Bentley Smalley Memorial Hall

The Memorial Hall was constructed in 1930, responding to a need for a community facility in the local area. Central to the funding of the Hall was a donation made by the widow of

Richard Smalley, a local resident who had passed away in 1929. The Hall was opened in November 1930.

The Hall is an attractive stone building with interesting architectural features, it is a key feature on the entrance to Thornham Lane and has clear communal and architectural value. For these reasons it has been included as a non-designated heritage asset.

Thornham Fold

Thornham Fold consists of several farms: Thornham Fold Farm, Cinder Hill Farm and Tandle Hill Farm. It also includes a public house, known as Tandle Hill Tavern. The farms and public house are all depicted on the first edition OS map and to varying degrees appear to retain the original buildings. As such they meet the criteria for assessment as non-designated heritage assets.

Rochdale Canal

The Rochdale Canal runs to the west of the application site on the other side of Manchester Road. The first trans-Pennine canal, opened in 1804, it runs from Sowerby Bridge to Manchester, running through Castleton. Along with the railway, which arrived in the 1840s, the canal was central to the industrialisation of the area, and some of the surviving mills still front onto the canal today. The Canal is identified as a non-designated heritage asset for its architectural and historic interest.

Assessment

Comments on Scoping Opinion 22/01417/SCO

The scoping opinion application includes a report setting out what will accompany the EIA application. This report proposes that a Chapter of ES will be given over to considering the impact on cultural heritage, including the built historic environment.

However, the chapter only proposes an assessment of the impact on listed buildings within 1km of the site. It does not propose an assessment of the impact on non-designated heritage assets or the nearby Castleton Conservation Area. Nor is any reference made to the University of Salford Historic Environment Assessment.

The ES chapter should include all heritage assets within 1km the site, as well as Conservation Areas. The majority of these are set out within the University of Salford Historic Environment Assessment. This HEA should be used as a baseline for assessing the impacts of the development on the built heritage.

The Council's list of non-designated heritage assets are available to view on the website at: [About non-designated heritage assets | Non-designated heritage assets | Rochdale Borough Council](#). Currently these assets are not available to view in map form.

Comments on Masterplan PREAPP/00091/22

Church of St John

The rural setting of the Church of St John contributes to the tranquillity of the site. The HEA carried out by the University of Salford noted that development on the site has the potential to impact on the tranquillity of the setting. To mitigate this harm it proposed increasing the density of the tree line surrounding the Church and the use of low level, dispersed development.

The masterplan indicates that a green buffer would be retained along Thornham Lane, as well as surrounding the Church of St John. This would help to reduce the impact of the development, but it is important that the additional landscaping suggested is also implemented. The proposed use of the land adjacent to the Church is not clear. The HEA

suggests that this could be public open space. I would like to see the proposals for this land developed as part of the scheme. I would also like to see a greater buffer between the Church and the new development, particularly along the western edge, as I am not convinced that the current buffer would be sufficient to protect the Church's rural setting

It is also important that the housing closest to the Church is low level and low density to prevent an abrupt transition between the rural surroundings of the Church and the new development. Further work is required to the currently proposed layout to achieve this. No house types are provided, but the turning heads and large dwellings would appear to result in a suburban form of development, which would be at odds with the surrounding rural area. The house types and layout along this boundary need to be reviewed.

It is important that this area provides a rural transition. This could be achieved through larger, more irregular plots, mature landscaping, including hedgerows and a variety of lower level house types.

The position of the road and the turning heads also needs rethinking. This could take the form of a rural lane, or the road could be relocated to the rear of the properties, so that the houses front directly onto the new area of open space.

Impact on Newhey Farm

This farm pre dates 1851. The original farmhouse and barn appear to remain, but it is surrounded by modern agricultural buildings to east. These have compromised its immediate setting, but are not out of character given their rural nature. To west of site modern housing, which also compromises setting. The site provides a rural backdrop to the farm, which makes a modest contribution to its significance.

The current proposal shows terraced dwellings with back gardens backing onto the farm. To improve the visual relationship between the farm and the dwellings, a greater buffer should be included and the house types and boundary treatments closest to this non-designated heritage asset should be reviewed.

Impact on other assets

The indicative layout shows the dwellings to be located away from Thornham Lane, with a buffer provided. More consideration needs to be given to how the boundaries of the development interact with this buffer. As it stands, the plots have their side elevations facing onto these buffer areas. This creates an awkward transition and needs further development. As with the Church of St John, it would be preferable for the house types closest to Thornham Lane to have a more rural character and to front onto the open space. Landscaping should be used to soften this boundary.

General Comments

As part of the pre-application advice enquiry a draft design code has been submitted. However, this appears to be in its very early stages and does not include any real details (most tables are left blank). The area closes to the Church is referred to as the heritage area, but there are no details of this. Further information is required before I am able to comment on this design code.

Environmental Protection: Air Quality and Noise

An assessment should be made and submitted as part of the application of the impact of the development on surrounding private water supplies. A number of properties in the vicinity rely on water from the development site for their domestic drinking supply and the development of the land must not interfere with the supply.

In respects of noise and vibration the scoping report appropriately sets out how subsequent noise and vibration impact assessments and construction/site management plans (for all aspects/stages) will be carried out.

Greater Manchester Archaeological Advisory Service

The applicant has submitted an EIA Scoping Report (Barton Willmore, now Stantec, October 2022 Land at Stakehill, Rochdale: Environmental Impact Assessment Scoping Report).

In Section 3 of the report, 'Scoping', Cultural Heritage is a topic summarised as being Scoped-In to the ES, with further detail provided regarding the methodology in Chapter 6, where Cultural Heritage is described as concerning "designated and non-designated (above ground) built heritage assets and (below ground) archaeological assets within the site and surrounding area". To enhance baseline conditions that have already been collated, it is proposed that the ES will be supported by a combined built-heritage and archaeological Desk-Based Assessment to identify sites within the boundary and within a 1km study area that may be affected by development.

The DBA will utilise a number of key information sources, including Historic England's National Heritage List for England (NHLE), Greater Manchester Historic Environment Record (GM HER), local archives, mapping, aerial imaging and documentary sources to compile a gazetteer of all known and potential heritage assets. A site visit will also be undertaken to record on-site characteristics, surface features, geographical/geological features that may have a bearing on previous land use, as well as those that may constrain subsequent archaeological investigation. This is a welcome aspect of the scoping methodology, though I would suggest that significant topographical features, i.e. hillslopes, breaks of slope, ridges overlooking lower ground, watercourses etc. are also identified and described in detail within the DBA as these may be useful when developing evaluative strategies. It has been noted in an historic assessment carried out by Salford Archaeology 2019 that the site may include areas for the survival of prehistoric remains (i.e. areas of free-draining sands and gravels), or palaeo-environmental potential (i.e. Slattocks Peat).

It is noted in the summary of Chapter 6 of the Scoping Report that Rochdale Borough Council is likely to require a geophysical survey and the targeted palaeo-environmental assessment of Slattocks Peat. As I advised in a response to pre-application consultation regarding this site (dated 31st October 2022), best-practice would advocate carrying out these evaluative works (inclusive of post-geophysical survey evaluation trenching) early in the application process, as results can help to inform the developing masterplan and mitigate against significant impacts on cost and timetabling, especially if significant archaeological areas are identified. It might even be advantageous for some/all of these works to be undertaken early enough for the results to be presented within the ES.

Overall I can confirm that GMAAS is happy with the proposed inclusion and treatment of cultural heritage, including archaeology, as set out in Section 6 of the Scoping Report, and agree that it should be scoped in during production of the ES.

Greater Manchester Ecological Unit

I note that biodiversity has been scoped in that the range of surveys is in line with my recommendations as provided at pre-app and have no additions to the scope of the ecological assessment.

I would however note that whilst they have included protected sites in the scope of the assessment, I would have specifically highlighted the proximity to the Rochdale Canal SAC and SSSI

Greater Manchester Waste and Minerals

The applicant should address the Greater Manchester Minerals Plan 2013. The applicant will need to provide a statement in respect of minerals to support the application. It may be that it can be dealt with outside of the Environmental Report.

Highway Authority

The size of the proposed development will require the submission of a Transport Assessment (TA) which should be drafted in line with current guidance. Although future applications are likely to phase development we would expect that any traffic impact assessment on both existing and proposed junctions takes into account the full development potential for all of the site. The site is located close to junctions onto the Strategic Road Network and the overall impact of development traffic would be considered by National Highways. At this stage we would suggest that the scope of any future Transport Assessment is agreed with both National Highways and Transport for Greater Manchester.

Traffic generation figures for the proposed development should reflect the sites semi-rural location. We would also expect that realistic trip assignment onto the surrounding highway network is included within the TA so that the impact of the development can be fully assessed.

The accident data within the TA should include all roads and junctions that would be affected by development traffic.

We would also ask that any future application includes a Travel Plan. As the site is not in a sustainable location we would expect that future TA's and Travel Plans should identify how sustainable access can be improved. Future applications should assess links into the local Bee Network which can be viewed via <https://mappinggm.org.uk/> . Highways are likely to request a financial contribution towards improvements to the Bee Network as part of the planning process.

Any future TA should review public transport links into the development site and how they could be improved to increase patronage. In consultation with TfGM we are likely to secure potential improvements through the planning process.

The development would require the construction of a major junction onto a classified road we would require the submission of a detailed general arrangement drawing to fully assess pedestrian, cycling and HGV facilities along with any capacity issues.

As stated previously the site is not in a sustainable location in terms of access to local amenities and a regular public transport service therefore we would expect that parking levels are in line with Councils parking standards. Driveways and parking areas are required to be SUDs compliant.

There are existing public rights of way across the site and any diversion or closure either temporary or permanent must be supported by the appropriate legal process. Again a review of pedestrian links into and around the site should be reviewed with potential improvements identified.

We are likely to ask for a review of the existing Traffic Regulations Orders on the surrounding highway network with the potential addition or extension of existing Orders.

The size of the potential development would require the submission of a Construction Management Plan to minimise any impact on the highway network.

Lead Local Flood Authority

Location & Proposed Development

Land At Stakehill Lane, Middleton. Request for a scoping opinion in relation to a proposed hybrid planning application for the development of up to 1500 dwellings, with new local centre, green infrastructure, ecological enhancements, SuDs, play areas, new pedestrian and cycle routes and associated access.

Documentation Reviewed:

Relevant text from the Scoping report:-

2.18 The Applicant is proposing to submit a hybrid planning application (part in outline, part in detail) for the proposed development of up to 1,500 new homes across the site, of which approximately 300 dwellings will form part of Phase 1 of the proposed development (the detailed element), with the remaining up to 1,200 units in outline. The proposed development will also comprise a new local centre, green infrastructure comprising planting, ecological enhancements, SuDS and play areas, new pedestrian and cycle routes and associated access.

Sustainable Drainage Considerations

Phase 1 (approx. 250 dwellings) Drainage viability:-

The Drainage Officer has provided a Drainage Consultation on PreApp/00091/22 which covers the preliminary housing proposal for approx. 250 dwellings at the Stakehill site. Interpretation of the existing land contours could indicate that most of the land within Phase 1 of the site falls within the catchments of the unnamed stream on the western boundary of the site.

However, land beyond the 'Phase 1' boundary does not appear to be currently part of the catchment for the small unnamed stream that starts at 'The Dell' and continues south west, crossing under the west end of Thornham Road and continues on a southern track under Hopwood Farm House and beyond.

It is doubtful that any other parts outside the Phase 1 boundary can be legitimately claimed to drain to the unnamed western streamway. It is therefore not at all clear how any sustainable drainage would be implemented for any later phases of the site's development, because there is no known stream and no current presence of surface water drainage infrastructure to which attenuated water from the northern and eastern areas could discharge. No information has yet been provided in the Scoping information.

The Scoping document states:- 3.7 A Flood Risk Assessment (FRA) and a Sustainable Drainage Strategy will be submitted in support of the planning application which will outline how the proposed development will include appropriate drainage and landscaping to reduce the risk of flooding.

Until a Sustainable Drainage Strategy has been provided, it is not possible to assess whether the rest of the site, beyond Phase 1, has a sustainable drainage strategy to support the large number of houses and associated paved areas.

Natural England

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 03 November 2022, and received on 28 November 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant

planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on environmental assessment, natural environment and climate change.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Annex A – Natural England Advice on EIA Scoping

General Principles

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on environmental assessment and natural environment.

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;

- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Noting the boundary of Rochdale and Oldham, consideration of cross boundary plans or projects is likely.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The National Planning Policy Framework (paragraphs 174-175 and 179-182) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the natural environment.

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a duty to have regard to conserving biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites **International and European sites**

The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**:

- Rochdale Canal Special Area of Conservation.

European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>

The ES should thoroughly assess the potential for the proposal to affect nationally and internationally designated sites of nature conservation importance, including marine sites where relevant. European sites (Special Areas of Conservation (SAC) and Special Protection

Areas (SPA) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). In addition paragraph 181 of the National Planning Policy Framework (NPPF) requires that potential SPAs, possible SAC, listed or proposed Ramsar sites, and any site identified or required as compensatory measures for adverse effects on habitat (European) sites, potential SPAs, possible SACs and listed or proposed Ramsar sites have the same protection as classified sites (NB. sites falling within the scope of regulation 8 of the Conservation of Habitats and Species Regulations 2017 are defined as 'habitats sites' in the NPPF). Under Regulation 63 of the Habitats Regulations, an appropriate assessment must be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically.

Should a likely significant effect on a European/Internationally designated site be identified (either alone or in-combination) or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process. Further guidance is set out in Planning Practice Guidance on appropriate assessment

<https://www.gov.uk/guidance/appropriate-assessment>

This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.

Nationally designated sites

The development site is within or may impact on the following **Site of Special Scientific Interest**:

- Rochdale Canal Site of Special Scientific Interest.

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 180 of the NPPF. Further information on the SSSI and its special interest features can be found at www.magic.gov.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A

of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants. Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A DLL scheme for GCN may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.

The ancient tree inventory provides information on the location of ancient and veteran trees. Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

The ES should use an appropriate biodiversity metric such as Biodiversity Metric 3.0 together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* (3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 174 and 175 of the NPPF. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

As set out in paragraph 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of

the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).

- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and

The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg).³A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development
<https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions
<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on

³ Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts. Further information is available from the Committee on Climate Change's (CCC) Independent Assessment of UK Climate Risk, the National Adaptation Programme (NAP), the Climate Change Impacts Report Cards (biodiversity, infrastructure, water etc.) and the UKCP18 climate projections.

The Natural England and RSPB Climate Change Adaptation Manual (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's Nature Networks Evidence Handbook (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's Carbon Storage and Sequestration by Habitat report (2021) and the British Ecological Society's nature-based solutions report (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies, biodiversity opportunity areas or Local Nature Recovery Strategies.

National Highways

INTRODUCTION

PREAMBLE

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. National Highways are responsible for operating, maintaining and improving the Strategic Road Network (SRN) in England, in accordance with the Licence issued by the Secretary of State for Transport (April 2015) and Government policies and objectives.

National Highways approach to engaging with the planning system is governed by the advice and guidance set out in:

The Strategic Road Network Planning for the Future - A guide to working with National Highways on planning matters (2015).

The document is written in the context of statutory responsibilities as set out in National Highways Licence, and in the light of Government policy and regulation, including the:

- National Planning Policy Framework (NPPF);
- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development ('the Circular').

As a statutory consultee in the planning system, National Highways has a regulatory duty to co-operate. Consequently, National Highways are obliged to give consideration to all proposals received and to provide **appropriate, timely and substantive** responses.

National Highways desire to be a proactive planning partner goes beyond this statutory role, but follows the spirit of the Licence which stipulates that National Highways should:

“Support local and national economic growth and regeneration”

DEVELOPMENT OVERVIEW

Redrow Homes Ltd are working with Greater Manchester Combined Authority (GMCA) and partners to bring forward a Hybrid Planning Application for the development of around 1,500 dwellings, an extension to the existing primary school, a new local centre and blue/green infrastructure on land to the north of Slattocks within the jurisdiction of Rochdale Borough Council.

It is proposed that the application would be submitted in two parts, with the detailed element covering the development of Phase 1 (dwellings to the west of the site) then an outline element for the remaining dwellings.

BACKGROUND

The Stakehill site is included as an allocation (Allocation JPA 2) in GMCA's Places for Everyone (PfE) joint development plan (which has been submitted to the Secretary of State for Levelling Up, Housing and Communities) to be removed from the Green Belt and development (to include) for:

- Around 150,000 sqm of high quality, adapted, employment floorspace within 'green' employment park setting
- Provide around 1,680 high quality homes

The prospective applicant is seeking advice for the site in advance of adoption of PfE; no weight can be given to the allocation at this time and as such the developer is seeking to develop a 'Very Special Circumstances' case.

WSP Comment

Paragraphs 21 and 22 of the Circular 02/2013 state the following:

“Where development proposals are consistent with an adopted Local Plan, the Highways Agency does not anticipate the need for engagement in a full assessment process at the planning application stage. In such circumstances, considerations will

normally be limited to the agreement of the details of the transport solution, including any necessary mitigation measures, and to ensuring that the transport impacts are included in the overall environmental assessment provided to the local planning authority, rather than the principle of the development itself.

However, where proposals are not consistent with the adopted Local Plan then a full assessment of their impact will be necessary, which will be based on the performance and character of the strategic road network as determined by the presumption that the Plan proposals will be fully implemented.”

As the proposal sites are emerging allocations only, the forthcoming TAs should fully assess the impacts of the proposals itself, and identify any mitigation required to deliver the site.

PfE STATEMENT OF COMMON GROUND (SoCG)

As part of the PfE process, it should be noted that National Highways and the GMCA have jointly agreed a SoCG. Within the SoCG, the following statements are relevant to the proposed development:

5.9 Rochdale

i. Rochdale Borough Council will continue to work collaboratively with National Highways and neighbouring Local Authorities, in respect of the development coming forward, including proposed allocations ay [sic] Northern Gateway and Stakehill. Most notable is ongoing work with Bury Council related to the proposed Northern Gateway allocation and the associated interfaces between the local street network and the SRN on the M60, M62 and M66.

ii. Rochdale Borough Council will coordinate with National Highways and neighbouring districts in respect of the potential cumulative impact on the SRN of the development pipeline, for example development relating to the proposed Stakehill allocation, with Oldham Council, on the A627(M) corridor.

WSP Comment

As part of the TA cumulative impacts of development on M62 J20 and A627 (M) corridor need to be appropriately considered; with the approach agreed between the relevant parties i.e. Rochdale Borough Council, Neighbouring LPAs / National Highways.

SCOPING

The information provided by Barton Wilmore (now Stantec) includes no details of the areas to be covered in a Transport Assessment/Travel Plan. Therefore, this note sets out what National Highways expect to see in any transport input provided to accompany a Planning Application.

However, we strongly recommend that the transport consultant engages with NH to ensure that a scope of assessment is agreed ahead of submission of the planning application.

TECHNICAL INFORMATION

Rochdale Borough Council (RBC) have provided National Highways with the following information:

- Stakehill Site Boundary Plan
- Stakehill Indicative Masterplan

- Preapplication Covering Letter
- Preapplication Enquiry Form

All of the documents have been prepared by Barton Willmore (now Stantec).

These documents have been provided as part of a pre-application scoping exercise and are therefore reviewed on this basis.

It should be noted that within the Preapplication Covering Letter it makes reference to a Technical Note produced by SCP in 2019 for the proposed development which was not included within the information provided.

WSP Comment

WSP would welcome sight of the SCP Technical Note if it remains relevant for the forthcoming development.

POLICY

No reference within the documents to National Highways Policy and Guidance.

WSP Comment

It is requested that the forthcoming Transport Assessments (TA) is prepared in accordance with National Highways policy and guidance included within Department for Transport 02/2013 Circular and National Highways' 'The Strategic Road Network Planning for the Future – A guide to working with Highways England on planning matters' (2015).

EXISTING CONDITIONS – LOCAL ROAD NETWORK

Within the documents provided no details are provided of the existing conditions on the local road network including base traffic flows.

WSP Comment

WSP request that Barton Wilmore (now Stantec) include, within the forthcoming TA, details of the existing conditions on the local road network including the provision of base traffic flows and the calculations underpinning the network peak.

EXISTING CONDITIONS – STRATEGIC ROAD NETWORK

No details are provided within the documents of the existing conditions at A627 (M) between M62 J20 (Thornham Interchange) and Slattocks Roundabout (including Slattocks Interchange) and M62 J20 (Thornham Interchange).

WSP Comment

WSP request that Barton Wilmore (now Stantec) including details of the existing conditions at the following junctions within the forthcoming TA (this list can be finalised when development trip numbers travelling on the SRN is established):

- A627 (M) between M62 J20 (Thornham Interchange) and Chadderton Roundabout
- A627 (M) Rochdale Bypass
- Slattocks Roundabout
- Slattocks Interchange
- M62 J20 (Thornham Interchange)
- M60 J19
- Chadderton Roundabout

WSP recommend that Barton Wilmore (now Stantec) include surveys with queues recorded and site observations to provide a detailed narrative on the current operation of the Strategic Road Network in the area.

DEVELOPMENT PROPOSALS

DEVELOPMENT QUANTUM

As outlined, the proposals at present consist as follows:

- Up to 1,500 dwellings
- An extension to the existing St John's Primary School
- A new local centre
- Blue and green infrastructure

The indicative site masterplan is shown in Figure 1.

Figure 1 Indicative Site Masterplan



ACCESS

It is proposed that two access points are to be provided for the site. The primary vehicular access point is proposed to be taken from the A664 on land currently occupied by the former All-In-One Garden Centre. A secondary vehicular access point is proposed to be taken from Chatburn Avenue/Thornham New Road.

Within the site it is proposed that a primary loop road linking the proposed dwellings with the A664. It is proposed that this loop road could incorporate a designated cycle lane and bus services but it no further details are provided regarding these.

WSP Comment

The access points are proposed to be located on local roads under the jurisdiction of the Local Highway Authority not National Highways. Therefore, any site access proposals need to align with Local Highway Authority Standards.

WSP would expect to see scaled drawings of each of the access points in order to understand the locations of the junctions and to assess if the operation of any of the site access points would impact the SRN.

PARKING

No details are provided within the documents outlining the proposed levels of car parking.

WSP Comment

Parking is a matter for the Local Planning Authority and not National Highways however National Highways request that details of the parking provision and the location of the proposed spaces are provided in the forthcoming TA.

PERSONAL INJURY COLLISION ANALYSIS

WSP Comment

WSP advise that the study area for analysis of collision data should cover the same extent of the operational assessments including any junctions within the Strategic Road Network. It is recommended that a detailed analysis is provided which includes details on any clusters and the causality of any collisions to be analysed.

WSP request that collision data obtained for this analysis is the latest STATS19 data available for the most recent five year period.

TRAFFIC ASSESSMENT

STUDY AREA

Not details are provided within either set of meeting notes outlining the study area for any assessment.

WSP Comment

WSP advise that the study area for the assessment include, but is not limited to, all the junctions/links where existing conditions data is requested. Once the forecast number of trips for each junction within the requested study area is provided WSP will be in a better position to determine whether operational assessments are required.

BASELINE CONDITIONS

No reference is provided in the documents of how the baseline traffic conditions will be determined.

WSP Comment

WSP request Barton Wilmore (now Stantec) provide further details on how the baseline conditions are determined.

ASSESSMENTS

No reference is provided in the documents of if any traffic assessments will be carried out within the forthcoming TA.

WSP Comment

WSP request that any traffic assessments carried out for the purpose of the forthcoming TA are sufficient to support a planning application. Any assessments carried out should comply with DfT Circular 02/2013 and National Highways' The Strategic Road Network Planning for the Future (2015). As stated in Paragraph 101 of The Strategic Road Network Planning for the Future (2015) any assessments carried out should be for the following scenarios:

- The development and construction phase
- The opening year assuming full build out and occupation (the opening year is the year where any part of the development opens, assuming a full build out)
- Either a date ten years after the date of registration of the associated planning application or the end of the Local Plan period (whichever is greater)

Traffic flow diagrams should be provided for the above scenarios to determine if operational assessments are required to be carried out.

DEVELOPMENT TRAFFIC

No details are provided in the documents for how Barton Wilmore (now Stantec) will determine the forecasted traffic impact of the proposed development.

WSP Comment

Within the TA it is requested that Barton Wilmore (now Stantec) provided appropriate trip rates and associated traffic forecasting that is fit for purpose for a detailed TA for planning application purposes.

Full details should be provided in the forthcoming TAs for Barton Wilmore (now Stantec)'s trip rates, local distribution and assignment assessment to allow WSP to check whether any trip rates and distribution assumed are appropriate.

JUNCTION MODELLING

No junction modelling has been considered within the documents provided.

WSP Comment

Once details are provided on the forecast number of trips during the peak periods for each of the junctions requested WSP will be able to provide details on the scope of assessments required.

Given the complexity of the network in the vicinity of the site it is advised that Barton Wilmore (now Stantec) consider the use of a dynamic modelling software (such as transyt/Vissim) in order to accurately model the impacts of the development on the safe operation of the SRN in the vicinity of the site.

OTHER MATTERS

Other elements WSP consider relevant to raise to Barton Wilmore (now Stantec) as part of this scoping exercise include:

- **National Highways would welcome the production of a Travel Plan (TP) to accompany the forthcoming TA to encourage less travel and where travel does occur, encourage the use of more sustainable modes.**
- **National Highways would welcome the inclusion of any details on any development phasing if available within the forthcoming TA**
- **Details should be provided on the proposed delivery and servicing arrangements for the development including the number of trips and the distribution of these trips on the SRN**
- **If relevant, details on any mitigation measures proposed should be included within the TA**
- **If applicable CD 122 v1.1.1 compliant merge-diverge diagrams should be provided**

SUMMARY AND CONCLUSION

Redrow Homes Ltd are working with Greater Manchester Combined Authority (GMCA) and partners to bring forward a Hybrid Planning Application for the development of around 1,500 dwellings, an extension to the existing primary school, a new local centre and blue/green infrastructure on land to the north of Slattocks within the jurisdiction of Rochdale Borough Council.

It is proposed that the application would be submitted in two parts, with the detailed element covering the development of Phase 1 (dwellings to the west of the site) then an outline element for the remaining dwellings.

RBC have provided National Highways with a series of documents seeking to scope the methodology for the forthcoming planning application. National Highways have subsequently commissioned WSP to review the documents to comment on the appropriateness of the proposed methodology.

The information provided by Barton Wilmore (now Stantec) includes no details of the areas to be covered in a Transport Assessment/Travel Plan. Therefore, this note has outlined what National Highways expect to see in any transport input provided to accompany a Planning Application.

However, WSP strongly recommend that the transport consultant engages with NH to ensure that a scope of assessment is agreed ahead of submission of the planning application.

Key comments regarding the documents provided are presented below:

As the proposal sites are emerging allocations only the forthcoming TAs should fully assess the impacts of the proposals itself, and identify any mitigation required to deliver the site.

As part of the TA cumulative impacts of development on M62 J20 and A627 (M) corridor need to be appropriately considered; with the approach agreed between the relevant parties i.e. Rochdale Borough Council, Neighbouring LPAs / National Highways.

WSP would welcome sight of the SCP Technical Note if it remains relevant for the forthcoming development.

It is requested that the forthcoming Transport Assessments (TA) is prepared in accordance with National Highways policy and guidance included within Department for Transport 02/2013 Circular and National Highways' 'The Strategic Road Network Planning for the Future – A guide to working with Highways England on planning matters' (2015).

WSP request that Barton Wilmore (now Stantec) include, within the forthcoming TA, details of the existing conditions on the local road network including the provision of base traffic flows and the calculations underpinning the network peak.

WSP request that Barton Wilmore (now Stantec) including details of the existing conditions at the following junctions within the forthcoming TA (this list can be finalised when development trip numbers travelling on the SRN is established):

- A627 (M) between M62 J20 (Thornham Interchange) and Chadderton Roundabout
- A627 (M) Rochdale Bypass
- Slattocks Roundabout
- Slattocks Interchange
- M62 J20 (Thornham Interchange)
- M60 J19
- Chadderton Roundabout

WSP recommend that Barton Wilmore (now Stantec) include surveys with queues recorded and site observations to provide a detailed narrative on the current operation of the Strategic Road Network in the area.

The access points are proposed to be located on local roads under the jurisdiction of the Local Highway Authority not National Highways. Therefore, any site access proposals need to align with Local Highway Authority Standards.

WSP would expect to see scaled drawings of each of the access points in order to understand the locations of the junctions and to assess if the operation of any of the site access points would impact the SRN.

Parking is a matter for the Local Planning Authority and not National Highways however National Highways request that details of the parking provision and the location of the proposed spaces are provided in the forthcoming TA.

WSP advise that the study area for analysis of collision data should cover the same extent of the operational assessments including any junctions within the Strategic Road Network. It is recommended that a detailed analysis is provided which includes details on any clusters and the causality of any collisions to be analysed.

WSP request that collision data obtained for this analysis is the latest STATS19 data available for the most recent five year period.

For any forthcoming TA, WSP advise that the study area for the assessment include, but is not limited to, all the junctions/links where existing conditions data is requested. Once the forecast number of trips for each junction within the requested study area is provided WSP will be in a better position to determine whether operational assessments are required.

WSP request Barton Wilmore (now Stantec) provide further details on how the baseline conditions are determined.

WSP request that any traffic assessments carried out for the purpose of the forthcoming TA are sufficient to support a planning application. Any assessments carried out should comply with DfT Circular 02/2013 and National Highways' The Strategic Road Network Planning for the Future (2015). As stated in Paragraph 101 of The Strategic Road Network Planning for the Future (2015) any assessments carried out should be for the following scenarios:

- The development and construction phase
- The opening year assuming full build out and occupation (the opening year is the year where any part of the development opens, assuming a full build out)

- Either a date ten years after the date of registration of the associated planning application or the end of the Local Plan period (whichever is greater)

Traffic flow diagrams should be provided for the above scenarios to determine if operational assessments are required to be carried out.

It is requested that Barton Wilmore (now Stantec) provided appropriate trip rates and associated traffic forecasting that is fit for purpose for a detailed TA for planning application purposes.

Full details should be provided in the forthcoming TAs for Barton Wilmore (now Stantec)'s trip rates, local distribution and assignment assessment to allow WSP to check whether any trip rates and distribution assumed are appropriate.

Once details are provided on the forecast number of trips during the peak periods for each of the junctions requested WSP will be able to provide details on the scope of assessments required.

Given the complexity of the network in the vicinity of the site it is advised that Barton Wilmore (now Stantec) consider the use of a dynamic modelling software (such as transyt/Vissim) in order to accurately model the impacts of the development on the safe operation of the SRN in the vicinity of the site.

National Highways would welcome the production of a Travel Plan (TP) to accompany the forthcoming TA to encourage less travel and where travel does occur, encourage the use of more sustainable modes.

National Highways would welcome the inclusion of any details on any development phasing if available within the forthcoming TA

Details should be provided on the proposed delivery and servicing arrangements for the development including the number of trips and the distribution of these trips on the SRN

If relevant, details on any mitigation measures proposed should be included within the TA

If applicable CD 122 v1.1.1 compliant merge-diverge diagrams should be provided

Transport for Greater Manchester

Colleagues within TfGM HFAS and UTC have reviewed the updated scoping report and have provided the following comments:

The scoping report does not provide details of the proposed methodology and approach to the TA (it has not defined the scope of the TA).

TfGM HFAS recommend that a preliminary trip generation and trip distribution technical note is issued prior to the TA being written.

The report states that the effects of the developments traffic will use thresholds identified in the Institute of Environmental Assessment (IEMA) 'Guidelines for the Environmental Assessment of Road Traffic' (1993). TfGM would highlight that we have set thresholds and criteria in-house to identify which junctions will require assessing.

As such TfGM would advise the applicant to refer to the previous response issued (pasted below) for the recommended approach to a TA:

Thank you for consulting Transport for Greater Manchester (TfGM) on the above planning application. The following comments are offered as advice on transport issues for you to

balance against other factors and are made in the context of TfGM's role in the planning process, as set out in the footnote below.⁴

Background

TfGM pre-application advice has been requested by Rochdale Council in respect of a proposed residential led development on land at Stakehill in Middleton.

TfGM would suggest that eventually a full Transport Assessment (TA) should be provided as part of the application. The TA should contain the information specified within the following sections of this letter.

1. Site Specific Comments

- It should be highlighted that TfGM are unable to accept strategic model flows for junction modelling, this is consistent with advice provided across the whole of Greater Manchester.
- A trip generation exercise and distribution diagram should be provided as soon as possible to inform the assessment work required.
- For reference purposes, the modelling carried out for GMSF indicated that mitigation would be required at:
 - M60 Junction 20 – additional lane
 - A627(M)/A664 – signalisation of the roundabout
 - Manchester Rd / Northern Site Access – signalised access junction with pedestrian and cycling facilities

The modelling also showed that the M62 J19 and A627(M) / Broadway junctions would operate above capacity after the construction of the development. Any future TA should cover proposed mitigation measures as part of the assessment work.

- There are a lack of pedestrian facilities along the A664 and any future TA should review the potential for signalised pedestrian crossing facilities (in addition to the access junction) to be installed as part of the development.
- The site is close to the NCN66 cycle route, however, there are currently no facilities for crossing the A664 to access this route. Any future TA should review the potential for these facilities as part of the development.

2. General Comments

Traffic Impact and Transport Modelling Requirements (to be included within a TA)

- I. A description of current baseline traffic conditions in the area.
- II. An analysis of injury accidents during a recent five-year period, commenting on whether there are any underlying patterns of injury accidents that might be affected by the development.
- III. Traffic surveys and queue surveys (weekdays) - scope to be agreed with the Local Highway Authority (LHA), TfGM Urban Traffic Control (UTC) and Highways

⁴TfGM does not have any planning powers and is not a statutory consultee in the planning process. The purpose of the advice offered is to suggest the best way to improve land use / transport integration through the development proposals. Advice is based on the information provided by the applicant, and it is not TfGM's role to undertake detailed verification unless specifically commissioned to do so.

²TfGM control and manage the traffic signals in Greater Manchester, as such any schemes that alter signalised junctions need to be agreed with TfGM. Additionally, where developments impact on signalised junctions, TfGM have a duty of care to ensure that these impacts are satisfactorily mitigated as part of the planning process.

Forecasting Analytical Services (HFAS). TfGM can be contacted in respect of the availability of any traffic counts in the area which could be used for the assessment.

- IV. A clear estimate of the level of new traffic likely to be associated with the development, based on an inspection of similar (and similarly-located) developments across the UK (excluding London) via the TRICS (or similar) database. The assessment work should be undertaken using a person-trip approach and applying the appropriate modal share percentages from local Census data. Other methodologies to determine trip rates are acceptable but these should be fully explained in the TA.
- V. A clearly defined methodology for determining the distribution / assignment of development trips onto the network i.e. understanding of where such new traffic is likely to distribute to/from, based on data sources such as a Census Journey-to-Work statistics and/or vehicle turning proportions at nearby junctions.
- VI. An assessment of traffic levels and impacts at the specified year of opening of the development, and at a future year at least five years later, with due regard for traffic growth (if any).
- VII. An understanding of the likely impacts of the proposed development considered alongside any other nearby committed developments.
- VIII. In the relevant TA, clear diagrams should be provided illustrating the following elements, each individually:
 - Base Flows
 - Committed Development Flows
 - Proposed Flows
 - Proposed Distribution
 - Base plus Committed plus proposed development
 - Future plus Committed plus proposed development
- IX. TfGM HFAS recommends an increase of about 30vehs/hr at a junction as an appropriate threshold for considering the necessity of a traffic impact assessment; this is in preference to a percentage-increase threshold, which tends to favour development in already heavily-trafficked areas.
- X. The scope of the junctions to be assessed by detailed modelling should be agreed with TfGM (UTC) and the LHA in advance and will depend upon the outcome of the trip assessment and distribution exercise. For this reason, TfGM would advise that a trip generation and distribution exercise should be issued before submission of the planning application. Once this is undertaken it will be possible to finalise TfGM requirements in terms of the TA. This will largely depend on the amount of trip generation.
- XI. Clear details of proposed vehicular access arrangements including general servicing arrangements. An engineering drawing should be supplied showing the changes to the road network to fully understand the impact of the proposed development.
- XII. A swept path analysis should be provided for any vehicular access.
- XIII. A review of Traffic Regulation Orders on the surrounding streets in the vicinity of the development.
- XIV. An assessment of the likely environmental/traffic impacts of HGVs during the construction process.

3. Site Accessibility by Sustainable Modes

Walking and cycling should form the natural mode choice for shorter trips, and also provide a viable option to facilitate longer trips through providing easy access to public transport. New developments should connect with, and enhance, existing walking and cycling networks in their vicinity, and also provide high quality facilities and networks for walking and cycling within development sites.

The TA should include a comprehensive review of the existing provision in the vicinity of the site for all pedestrians including those with disabilities. In addition to walking distances and pedestrian desire lines, pedestrian environment (including footway condition and widths) and pedestrian safety and security should be considered. An audit of the footways in the vicinity of the development should be undertaken and improvements identified.

A comprehensive review of the cycling infrastructure in the vicinity of the proposed development should also be undertaken. This should include an assessment of the connectivity of the site with existing cycle routes. The quality and condition of existing infrastructure, cyclist safety and security should also be considered.

The catchment area for cycling, walking and public transport should be captured in maps. The quality of the routes for pedestrians and cyclists should be described and this should include a description of any signing for cycle routes as appropriate.

The TA should provide a review of existing public transport services (including service frequency and location of nearest stations/stops), with a view to supporting improvements to existing public transport services as required, in particular, assess the quality of the surrounding bus infrastructure i.e. upgrade to shelters etc.

The TA should include a plan clearly showing details of the proposed pedestrian and cycle access points serving the site and linkages into the surrounding area. Connectivity with local public transport networks should be highlighted. The applicant should consider measures to encourage access by sustainable modes. Possible measures include but are not limited to the provision of pedestrian crossings, cycleways, cycle parking, new/improved footway ensuring that there are linkages into existing cycle and pedestrian facilities, as well as upgrades to existing bus stops (where appropriate).

TfGM would suggest that a pedestrian survey is carried out in the vicinity of the site, as per guidance <https://www.livingstreets.org.uk/media/1434/street-review-guidance-for-web.pdf> and included as part of the TA.

It should be highlighted that LTN/120 has been introduced by the DfT and this has changed the requirements for the design of cycling provision.

Details of cycle parking facilities for the proposed development (e.g., number of spaces, location and type) should be provided and shown on plan.

4. Mitigation Measures

Impacts of the development should be identified through the above assessment work. The applicant should identify appropriate mitigation to accommodate any increases in traffic generation and increased pedestrian and cyclist movements. Any appropriate mitigation should be identified in conjunction with TfGM UTC and the LHA who will be happy to work with the applicant to agree an approach.

The TA should consider the impact of the development on the existing public transport networks in terms of extension of bus services, additional person trips. Mitigation measures should be considered where appropriate.

5. Travel Plan

A Framework Travel Plan for the development should accompany any future planning application.

6. Other

If there are any changes planned for bus infrastructure, for example relocation of existing bus stops or the creation of new bus parking areas, TfGM would request that the applicant liaise directly with TfGM's bus infrastructure which can be contacted at Shelters@tfgm.com.

7. Suggested Useful Guidance

In relation to walking, the importance of providing and maintaining good quality footways, free from obstruction and wide enough for when they are at their busiest, is critical to encourage and maximise walking levels associated with new developments. Useful guidance on street layouts which encourage walking is provided in Manual for Streets (Department for Transport, 2007). MfS provides guidance on lightly trafficked residential streets, and Manual for Streets 2 (CIHT, 2010) further develops the principles of the first Manual for Streets for application in wider circumstances on busier streets, including town and district centres.

In relation to cycling, infrastructure should be designed in accordance with current Greater Manchester Cycling Design Standards, the latest version of which is available from the TfGM website or by emailing cycling@tfgm.com. In particular, connections to/from and within developments should be designed in accordance with the Key Design Criteria of Safety, Coherence, Directness, Attractiveness and Comfort. A general principle is that infrastructure should be designed to be attractive to those who do not currently cycle, in order to drive the increase in cycling's mode share.

The Bee Network will be the largest joined-up system of walking and cycling routes in the UK and has been developed with all 10 Greater Manchester local authorities. More information on this is available on <https://www.tfgm.com> and TfGM would encourage the applicant to review the map online to determine whether there is an opportunity for this development to connect into the proposed Bee Network.