



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

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Council's Reference: 25/00418/OUT

Location: Land Bound To The North By Brightley Brook, Pilsworth Fisheries, Pilsworth Road & Heywood Distribution Park; The West By Whittle Brook; The East By Birch Industrial Park & Agricultural Fields; And The South By The M62 Corridor.

Proposal: Application for outline planning permission (all matters reserved) for a national-scale employment development, comprising Storage & Distribution (Use Class B8) and Industrial (Use Classes B2, E(g)(ii) and E (g)(iii)) uses (including, but not limited to, Logistics, Manufacturing Processes and Data Centres), with supporting ancillary uses including Hotel (Use Class C1), Commercial, Business & Service (Uses Class E (a-g)), Education (Use Class F1(a)), Local Community (Use Class F2(a-c) uses, Sui Generis uses (in accordance with the Uses Schedule), and associated demolition works, landscaping, drainage, ecological enhancements, highway works, cycleway and footpath linkages and other ancillary infrastructure.

National Highways Ref: NH/25/11021

Referring to the consultation on a planning application dated 1 May 2025 referenced above, in the vicinity of the M62 and M66 motorways that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

~~a) offer no objection (see reasons at Annex A);~~

- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

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

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

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

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

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: 	Date: 21 May 2025		
<table style="width: 100%; border-collapse: collapse;"><tr><td style="width: 50%; vertical-align: top;">Name: Adam Johnson National Highways Piccadilly Gate Store Street Manchester M1 2WD</td><td style="width: 50%; vertical-align: top;">Position: Spatial Planner</td></tr></table>		Name: Adam Johnson National Highways Piccadilly Gate Store Street Manchester M1 2WD	Position: Spatial Planner
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¹ Where relevant, further information will be provided within Annex A.

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

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

Summary of Prior Work

Tetra Tech has been appointed by the Northern Gateway Development Vehicle LLP (NGDV) to provide transport planning advice in relation to development proposals at the Northern Gateway (NG) site. A Transport Assessment (TA) has been submitted as part of this outline planning application (all matters reserved) for an employment development, including logistics, warehousing, industrial uses, with other supporting uses.

The NG site was allocated in the *Places for Everyone Joint Spatial Plan* (PfE) as site JPA1.1 for the delivery of the following:

- Around 1,200,000sqm of employment floorspace;
- Around 1,200 dwellings;
- A new primary school; and
- An appropriate range of supporting and ancillary services and facilities, such as a new local centre, hotel, leisure and conference facilities.

Paragraph 11.27 of the PfE states the following regarding the access strategy from the SRN:

“The allocation clearly has excellent access to the motorway network but will benefit from improved linkages between Junction 19 of the M62 and Junction 3 of the M66. The local authorities will continue to explore opportunities for a new junction at Birch which could provide additional accessibility and be of benefit to the allocation in the longer term.”

The indicative transport mitigation for the site, presented in Appendix D of the PfE, includes the following ‘necessary’ measures for the SRN:

- M66 Junction 3 / Pilsworth Road junction upgrade;
- M62 J19 / A6046 Heywood Interchange – intervention to be determined; and
- M66 Junction 2 / A58 – localised junction improvements.

The current development proposals associated with planning application 25/00418/OUT are:

- Up to 600,000sqm of employment floorspace, comprising:
 - B2, E(g)ii and E(g)(iii) totalling 180,000sqm
 - B8 (including Data Centres) totalling 420,000sqm
- Potential supporting uses of up to 5,000sqm

Whilst the submitted planning application only includes a proportion of the overall allocated development quantum, a key requirement of both the local planning authorities and National Highways is that the transport infrastructure requirements for the SRN need to be determined for the whole allocation, to support the phased delivery of the site.

Scoping and Pre-application Engagement

National Highways has engaged with a number of stakeholders throughout the pre-application stage, including:

- NGDV;
- Tetra Tech, transport consultants to the NGDV;
- Rochdale Borough Council;
- Bury Council;
- Transport for Greater Manchester (TfGM);
- Greater Manchester Combined Authority (GMCA); and
- Pell Frischmann, transport consultants to the local authorities.

The pre-application scoping discussions have been held over a period of three years, from 2022 up to the submission in 2025. The key activities are listed below, as per Table 1.1 of the TA:

- 9x Transport Steering Group (TSG) meetings – various dates
- Transport Technical Meeting to discuss Tetra Tech's Transport Assessment Scoping Note Update (TASNU) and Addendum – Sept 2024
- National Highways' response to TASNU & TASNU Addendum - Nov 2024
- 5x Highways Technical Working Group Meetings - Jan-Apr 2025
- National Highways' response to Tetra Tech Technical Note 10 and the Transport Model Local Model Validation Report (LMVR) – March 2025

In response to the final item listed above, a Technical Note was provided by Tetra Tech to National Highways on Friday 9th May, which was during the 21-day period for National Highways to respond as a statutory consultee.

The overall approach to pre-application engagement has been welcomed by National Highways. Notwithstanding, whilst elements of the TA methodology may have been agreed in principle during this period, the formal review process could only commence

following the submission of the planning application, which is now the case. National Highways is only able to reach a final view on the application once a full suite of information has been provided and subjected to a detailed technical review.

National Highways' expectation is that the TA includes the following essential elements:

- Compliance with the policies and approach set out in DfT Circular 01/2022;
- Details of the proposed phasing of the development and associated infrastructure;
- Details of forecast development trip generation and distribution for each user class;
- Methodology and calculations of background traffic growth, committed development, other PfE site allocations and wider Atom Valley proposals;
- Assessment of development impact on the Strategic Road Network (SRN);
- Understanding of required mitigation on the SRN, with supporting evidence;
- Identification of suitable mitigation for the SRN, where required;
- Appropriate scenario testing in terms of operational assessment, and merge/diverge analysis;
- Understanding of any potential safety implications of the development on the SRN; and
- Evidenced vision-led planning with realistic targets, supporting commitments and a valid review/monitoring mechanism.

Transport Assessment & Travel Plan

The TA comprises the following sections:

- Introduction;
- The Vision;
- National Policy;
- Local Policy and Guidance Updates;
- Site Context and Existing Conditions;
- The Proposed Scheme and Northern Gateway;
- Emerging Mitigation Works and Mitigation Strategies;
- Approach to Assessment;
- Scope Evolution and Revised Assessment Methodology;
- Multimodal Trip Generation;
- Traffic Impact Assessment - Strategic Modelling;
- Traffic Impact Assessment - Junction Analysis – Overview;
- Traffic Impact Assessment - Junction Analysis - Key Findings;
- Phasing; and
- Summary and Conclusions.

The following information is currently considered missing:

- Travel Plan – it is understood that this has not yet been produced; and
- Road Safety Audits for any proposed changes (highway mitigation) to the SRN.

Chapter 7 of the TA covers 'Emerging Mitigation Works and Mitigation Strategies'. This includes, in section 7.9, a summary of the proposal to provide a new junction at the location of the existing Birch Motorway Service Area on the M62. This proposed scheme has been included in several of the modelled scenarios. Section 14.2 of the TA discusses the phasing of infrastructure alongside phases of the development, and states:

“vi. NH will play a key role in determining whether SRN mitigations (such as potential lane re-configurations at M66 J2, the improvement identified by Bury Council at the M66 J3, or intervention to relieve M62 J19, either an improved J19 or a new M62 access junction) are required and in the timing and design of those.”

“Whilst it is recognised that it is appropriate for the Proposed Scheme to contribute to future active travel, public transport or even road building works, it must be recognised that such works will also serve the wider GMCA and SRN networks and that TfGM, NH and the Highway Authorities will seek funding from other developers and other sources to assist in delivering those mitigations too.”

As stated in the TA extract above, the approach to SRN mitigation (and mitigation relating to active travel and public transport) is reliant on funding sources beyond the developer. The transport submission will need to clearly set out what level of development the developer is able to bring forward based on the mitigation it is able to fund.

To confirm the position of National Highways, in terms of any SRN improvement which is necessary to mitigate the impact of the proposed development, National Policy as set out in the DfT Circular 01/2022 Paragraph 29 states (emphasis added):

*“New connections and **capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process**, as this provides the best opportunity to consider **the cumulative impacts of development** (including planned growth in adjoining authorities) **and to identify appropriate mechanisms for the delivery of strategic highway infrastructure**. However, there cannot be any **presumption that such infrastructure will be funded through a future RIS** [Road Investment Strategy]. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes*

and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.”

There is currently no commitment from National Highways to fund any SRN schemes in this vicinity, until further details of future RIS settlement are known following 2025 Government spending review. As such and with regard to the DfT policy outlined above from Circular 01/2022, the TA cannot rely on National Highways for the delivery of any mitigation for this site and must instead identify any measures required for the initial tranche of development and any future phases identified as part of this planning application.

It should be noted that there may also be the need for further sensitivity tests to be undertaken subject to the outcomes of the Government spending review, to ensure that the assessment scenarios align with the Government spending decisions, however this cannot be confirmed until the outcomes of the review are known.

Northern Gateway Transport Model (NGTM) - Strategic Model (SATURN)

The following information has been provided:

- Model Specification Report;
- Local Model Validation Report (LMVR);
- Transport Forecasting Report; and
- Origin Destination Matrices.

The following information is considered missing and has been requested:

- NGTM model files (Base and Forecast).

National Highways' consultant transport planning team at WSP has attended TSG NGTM meetings and has provided comment on 'planning' inputs to the model and raised questions on how the model is to be used. Given sensitivities around the production of the model, we have appointed AECOM to undertake an independent audit of the NGTM (Base model, LMVR and supporting material) and Forecasting Report.

SRN Operational Assessments

The following information has been provided for review:

- Summarised results of junction operational assessments for M66 J2, M66 J3, M62 J19;
- Review of impacts at M62/M60 Junction 18 (Simister Island); and

- CD122 merge/diverge assessments for M66 J2, M66 J3, M62 J19 and the proposed M62 access solution.

The following information is missing and has been requested:

- Junction model output reports and input files for the following locations:
 - M66 J2 - SRN junction;
 - M66 J3 - SRN junction;
 - M62 J19 - SRN junction; and
 - A6045 Manchester Road/Queen Elizabeth II Way (QEII Way) - located northwest of M62 Junction 19, to understand any potential queuing towards M62 Junction 19.

Our consultants WSP, supported by AECOM for the strategic modelling elements, are continuing to work through the submitted technical information. A detailed technical response will follow, once all missing information is received and a comprehensive review of the submitted information has been completed.

Recommended Non-Approval

Given the scale and importance of the proposed development, the volume and complexity of technical information to review, the need to ensure that the appropriate SRN mitigation is identified and can be delivered, and to allow time for the missing information to be provided, it is recommended that the application should not be approved until **25 July 2025**. We will continue to work with the applicant and their transport consultants to ensure that the site's impacts have been fully assessed, any mitigations proposed can be determined acceptable and approaches to funding determined.

Standing advice to the local planning authority

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

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

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