

Environmental Statement Volume 2,

Appendix 2.2: EIA Scoping Opinion Consultee Comments

- Bury Council (BC) Conservation Officer;
- BC Environmental Protection (Contamination and Air Quality);
- Rochdale Borough Council (RBC) Conservation Officer;
- Coal Authority;
- Greater Manchester Archaeological Advisory Service (GMAAS);
- Historic England (HE);
- Natural England (NE);
- Environmental Agency (EA);
- Greater Manchester Environment Unit (GMEU);
- Lancashire Wildlife Trust;
- Health and Safety Executive (HSE);
- Trafford Council;
- Stockport Council;
- Greater Manchester Minerals and Waste;
- United Utilities;
- National Highways; and
- Transport for Greater Manchester (Tfgm)

The application is supported by a comprehensive Scoping Report that considers all the above ground built heritage assets scoped into the report. There are no conservation areas within the Bury Council area of the project assessment area.

The report has assessed and summarised the heritage baseline which is agreed with. The Council also agrees with the scoping methodology and assessment criteria and the assets that have been included and that full heritage assessments of significance will be submitted as part of the Environment Statement.

The Council is satisfied that the scope, approach and methodology in including and assessing the above ground built heritage assets and is appropriate and proportionate with regard to the ES.

From: [REDACTED]
To: [REDACTED]
Subject: FW: Initial Consultation on Planning Application: 71262, Land at Heywood/Pilsworth, bounded by M66, M62, Pilsworth Road & Queen Elizabeth II Way: Contaminated Land and Air Quality
Date: 11 November 2024 11:09:24
Attachments: [image001.jpg](#)



Hi

Please find below the response from the contaminated land section on contaminated land and air quality.

Regards

[REDACTED]

[REDACTED]

Team Leader – Development Management
Department for Business, Growth & Infrastructure
LPA Team of the Year Winner



Under the General Data Protection Regulation as supplemented by the UK Data Protection Act 2018, by providing your personal information you are giving your consent for us to use and collate your personal data to enable us to perform the contract we have entered into with you to process your planning application, enquiry or representation and comply with our legal obligation to carry out a public task/function and provide a planning service. To find out how we process your personal information please read our Privacy Notice at <https://www.bury.gov.uk/index.aspx?articleid=14263>

From: [REDACTED]
Sent: 11 November 2024 10:49
To: [REDACTED]
Subject: Initial Consultation on Planning Application: 71262, Land at Heywood/Pilsworth, bounded by M66, M62, Pilsworth Road & Queen Elizabeth II Way: Contaminated Land and Air Quality

Hi [REDACTED],

Please find our comments regarding the application for an Environmental impact assessment (EIA) scoping opinion for proposed Northern Gateway site (JPA 1.1) below.

Contaminated Land

Ground Conditions and Contamination were considered within Chapter 12 of the [Northern Gateway \(JPA 1.1\), Environmental Impact Assessment \(EIA\) Scoping Report, Turley, reference NORM3018, dated 17 October 2024](#). The application area covers land in both Bury Council and Rochdale Council, with much of the area within Bury comprising agricultural land. The scoping area has been divided into different coloured zones (referred to as Quarters) as shown on the [Spatial Referencing Plan](#). A [Contaminated Constraints Plan](#) has been produced.

At a recent meeting with the applicant's consultants, Tetra Tech we requested that all plans be produced showing the Council's boundaries for clarity and that a copy of the Geo-environmental and Geotechnical Desk Study dated April 2024, referred to in Chapter 12, also be submitted at the earliest opportunity.

The scoping assessment concluded that the potential risk of mining and ground collapse was an effect likely/significant during construction and operation within the Orange (partially within Bury), Yellow (Majority in Bury), Purple (Rochdale only) and Azure Quarters (Majority in Bury). This aspect will be carried forward to be considered within the Environmental Impact Assessment and Environmental Statement.

The following contaminated land aspects have been considered to have an unlikely or not significant effect:

- Potential Risk of Exposure to Contamination
- Potential Risks from the Release/Migration of Contamination to Controlled Waters
- Potential Risks from Ground, Landfill and Mine Gas to Human Health and the Built Environment
- Potential Risks from the Presence of Unstable and Compressible Ground (non-mining related) on Human Health and the Built Environment

Any risks identified from the above aspects are likely to be mitigated during construction by Remedial Actions that may have been identified following site investigation and risk assessment undertaken during subsequent planning applications for the development areas/schemes as they come forward.

The assessment is satisfactory and for any subsequent application that comes forward for development the following planning conditions may be recommended:

CL01 - SITE CHARACTERISATION & RISK ASSESSMENT

CL02 - REMEDIATION STRATEGY & VERIFICATION

CL03- REMEDIATION & VERIFICATION

CL04 - UNEXPECTED CONTAMINATION

CL05 - IMPORTED SOIL

Air Quality

Air Quality was considered within Chapter 9 of the Scoping Report. The site is

partially located within an Air Quality Management Area (AQMA), which has been declared due to exceedances of the annual mean Air Quality Objective (AQO) for nitrogen dioxide (NO₂). This encompasses the M62 to the south and the M66 to the west and are the principal sources of atmospheric emissions around the Site.

The assessment identified that changes to concentrations of NO₂, PM₁₀ and PM_{2.5} as a result of emissions from development generated traffic would have a likely and significant effect to all spatial zones during construction and operation. Exposure to elevated NO₂, PM₁₀ and PM_{2.5} concentrations associated with vehicle exhaust emissions on the local road network would have a likely and significant effect during operations for the Pink (Bury only) and Purple (Rochdale only) Quarters. An Air Quality Constraints report has already been produced (August 2021) and we have provided comments on this and agreed with the recommendations for a Detailed Air Quality Assessment (DAQA) to include Construction Phase and Mitigation Measures Report to be submitted to support a planning application when it comes forward. Furthermore, it is likely that the following condition maybe recommended in addition:

AQ01 - ELECTRIC VEHICLE CHARGE POINTS

All residential:

- 1 no. electric vehicle (EV) charging point (minimum 7kW*) per dwelling/parking space.

Residential more than 10 parking spaces:

- Cable routes to be provided for all parking spaces which do not have access to an electric vehicle charging point.

New buildings other than residential or mixed use and more than 10 spaces:

- A minimum of 1 no. electric vehicle (EV) charging point (minimum 7kW*) and at least one in every five remaining parking spaces must be provided with cable routes.

Certification and photographic evidence of the installation of the agreed electric vehicle charge points shall be submitted to Local Planning Authority for approval prior to the development being brought into use. The infrastructure shall be maintained and operational in perpetuity.

*Mode 3, 7kW (32A) single phase, or 22kW (32A) three phase, and for 50kW Mode 4 rapid charging may be required. British Standard BS EN 61851-1:2019 to be used. Further information regarding minimum standards can be found at <https://www.gov.uk/transport/low-emission-and-electric-vehicles>.

The following effects were considered unlikely to be significant and maybe managed by mitigation where identified:

- Nuisance and disturbance as a result of dust from construction activities
- Nuisance and disturbance as a result of odour from the Pilsworth South Landfill Site

This Section is satisfied that the assessment carried out is appropriate.

Regards,

[Redacted]

[Redacted]

Environmental Protection
Bury Council

[Redacted]

[Redacted]

[Redacted]

CONSERVATION CONSULTATION RESPONSE

Conservation Officer	
Date	18 November 2024
Application Reference	24/01039/SCO
Address	Northern Gateway, South Heywood
Proposal	Environmental impact assessment (EIA) scoping opinion for proposed Northern Gateway site (JP 1.1)

Heritage Assets Impacted

Designated Heritage Assets (Rochdale)	☒	- Lower Whittle Farmhouse (grade II) - Alkrington Hall (grade II*) - Birch Conservation Area
Non-Designated Heritage Assets (Rochdale)	☒	- Various – see appraisal and heritage plan map

Summary

General comments and concerns re Birch Conservation Area

Significance Assessment

This scoping opinion relates to the northern gateway site allocation JP 1.1, which is identified as part of the recently adopted Places for Everyone Joint Development Plan Document. The following sections of allocation 1.1 are relevant to heritage:

Paragraph 17 - *"Take appropriate account of relevant heritage assets, and their settings, including Brick Farmhouse and Lower Whittle Farmhouse Grade II Listed Buildings in accordance with Policy JP-P2"*

Reasoned justification paragraph 11.38: *"There are two Grade II Listed buildings within the allocation boundary and known significant archaeological sites, notably at Meadow Croft Fold. In addition, there are a number of potentially significant archaeological sites, locally listed buildings and structures throughout and adjacent to the allocation. Any development would need to consider the impact on their setting through the completion of a Heritage Impact Statement. There will be a need to undertake detailed archaeological work including field walking and*

evaluation trenching, leading to further investigations and recording and, if necessary, preserving features in situ."

The northern gateway site allocation lies across both Rochdale and Bury. These comments relate solely to the heritage assets within Rochdale. The site in its current condition is largely rural, with dispersed farmsteads and roads surrounded largely by open agricultural fields. Around the peripheries of the site are the M66 and M62 motorways and Birch Industrial Estate sits in the middle of the Rochdale portion of the site.

This scoping opinion is supported by an Environmental Impact Assessment. Chapter 15 of this assessment deals with built heritage. Alongside the assessment, the applicant has provided heritage asset plans and an initial heritage appraisal. The EIA scoping opinion covers a larger area than the allocation, as it covers land which may be the subject of potential highway works, including large areas of Birch Conservation Area.

Many of the isolated farmsteads have been identified as non-designated heritage assets. The applicants have liaised with the LPA to identify the NDHAs both within and adjoining the site as part of this assessment. The grade II Lower Whittle Farm also lies on the periphery of the site. Despite its distance from the site boundary, Alkrington Hall (grade II*) has also been scoped in, due to the potential impact on designed views.

Comments on EIA Scoping report and methodology

Use of Design Manual for Roads and Bridges

The applicant has used the methodology from the Design Manual for Roads and Bridges to establish the relative value or importance of heritage assets, and the magnitude of impact. This does not directly align with the assessment as set out within the Planning (Listed Buildings and Conservation Areas) Act 1990, or relevant planning policy, including Chapter 16 of the NPPF and at a local level policies JP-P2 and Rochdale CS policy P2. However, the applicant has provided an initial heritage assessment, to be read alongside the scoping report, which does assess the impact on significance in accordance with the relevant legislation and policies.

Identified designated heritage assets

The report scopes in Lower Whittle Farm (grade II) and Alkrington Hall (grade II*). Given the proximity of the former and the potential impacts on setting and designed views for the latter, it is appropriate for these sites to be scoped in for assessment.

It is acknowledged that the site boundaries have changed several times. However, Birch Conservation Area appears to be missing from sections 15.3 to 15.15. Given that the highway works have the potential to result in substantial harm to the significance of the Conservation Area, through the demolition of key buildings, it is essential that the impacts are fully assessed.

Identified non-designated heritage assets

The applicant has been liaising with the LPA to identify non-designated heritage assets, which have the potential to be affected by the works. Not all of these are mentioned within the EIA scoping report (such as Birch Mill and associated terraces). However, the applicant has confirmed that these will be included and assessed, and they are shown on the accompanying heritage asset plan.

All non-designated heritage assets within the site should be assessed as part of the EIA and the impact on their significance considered. This is particularly important where they are proposed for demolition and within the Birch Conservation Area.

Initial assessment of impact on heritage assets

The submitted documents identify the heritage assets most likely to be impacted on by the development. Any harm to the significance of designated heritage assets will need clear and convincing justification and will need to be assessed against NPPF policies 207 or 208 accordingly. Where the proposed works impact on non-designated heritage assets, a balanced judgement will need to be had, having regard to the scale of any harm or loss and the significance of the asset. Where heritage assets are proposed to be demolished, these works will need to be justified. Wherever possible, the scheme should look to retain the isolated farmsteads, which as a group make a fundamental contribution to the area's character and history. The cumulative impact of the loss of farmsteads should be considered, potentially also as part of the impact on the wider landscape.

There are significant concerns regarding the impact of the highway proposals on Birch Conservation Area and it may be the case that the proposed works result in substantial harm to this designated heritage asset. The applicant is urged to review the highway works, to prevent any demolition works within the Conservation Area and provide mitigation for any changes to the setting of this heritage asset.



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Mansfield
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T: 01623 637 119 (Planning Enquiries)
E: planningconsultation@coal.gov.uk
W: www.gov.uk/coalauthority

For the attention of: Ms H Leach – Case Officer

Bury Metropolitan Borough Council

[By email: development.control@bury.gov.uk]

7th November 2024

Dear Ms Leach

Re: 71262 - Environmental impact assessment (EIA) scoping opinion for proposed Northern Gateway site (JPA 1.1); Land At Heywood/Pilsworth, Bounded By M66, M62, Pilsworth Road, & Queen Elizabeth II Way

Thank you for your notification of the 22nd October 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the site there are recorded coal mining features present at surface and shallow depth including; mine entries and probable coal workings. These features may pose a potential risk to surface stability and public safety.

The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

The EIA Scoping Report, dated October 2024 and prepared by Turley states that a Coal Mining Risk Assessment has been prepared for the site. The summary within the report identifies risks posed by shallow mine workings and collapse of mine entries.

Although we concur that risks posed by past coal mining activity need to be considered and addressed on this site we have no preference as to whether or not the CMRA forms part of the EIA or is submitted as a stand-alone document.

We look forward to commenting on the CMRA document in due course once a formal planning submission is made.

If you would like to discuss this matter further, please contact me on the above number.

Yours sincerely

[Redacted signature]

[Redacted name]

Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority by the Local Planning Authority and/or information that has been published on the Council's website for consultation purposed in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the applicant for consultation purposes.

In formulating this response the Coal Authority has taken full account of the professional conclusions reached by the competent person who has prepared the Coal Mining Risk Assessment or other similar report. In the event that any future claim for liability arises in relation to this development the Coal Authority will take full account of the views, conclusions and mitigation previously expressed by the professional advisors for this development in relation to ground conditions and the acceptability of development.





GMAAS
Greater Manchester Archaeological Advisory Service

Greater Manchester Archaeological Advisory Service
School of Science, Engineering & Environment
Room LG20
Peel Building
University of Salford
Salford M5 4WX

Helen Leach
Team Leader – Development Management,
Department for Business, Growth & Infrastructure,
Bury Council,
Town Hall,
Knowsley Street,
Bury BL9 0SW

Date: 11th November 2024

Dear Helen

RE: Archaeological Consultation: Application 71262 - Environmental impact assessment (EIA) scoping opinion for proposed Northern Gateway site (JPA 1.1) - Land at Heywood/Pilsworth, bounded by M66, M62, Pilsworth Road & Queen Elizabeth II Way

Thank you for consulting GMAAS on the above application for a Scoping Opinion with regard to archaeological considerations.

The enquiry site is of considerable archaeological interest, as has been demonstrated by several investigations that have previously identified significant evidence for a deserted medieval settlement and associated iron-smelting activity. This was confirmed most recently via an extensive programme of archaeological evaluation trenching and test pitting that was undertaken to inform the Northern Gateway development proposals and uncovered rare physical evidence for tap slag from an iron furnace of probable medieval date, together with considerable quantities of other types of smelting slag and some evidence for ore roasting. An interesting assemblage of medieval and post-medieval pottery was also recovered from the excavated trenches and test pits. A report presenting the result from this evaluation was prepared by L-P Archaeology in December 2022. Recommendations for further analytical work on the dataset are set out in the report, including radiocarbon dating of charcoal in some samples recovered from the fieldwork, although GMAAS is unclear whether this recommended analytical work has been progressed. Securing an absolute date for the iron-working activity through scientific techniques such as radiocarbon dating will be crucial to informing a robust assessment of the site's archaeological significance.

The application is supported by a comprehensive Scoping Report prepared by Turley in October 2024, which includes a detailed section that considers archaeological matters associated with the proposed development. This summarises the baseline conditions, identifies areas of potential archaeological interest within the proposed development site and presents a broad strategy to offset the harm of development on the archaeological resource. The Scoping Report concludes that archaeology as an environmental topic should be 'scoped in' to the EIA process. The preparation of an archaeological desk-based assessment that will form an Appendix to the Environmental Statement is also committed to in the Scoping Report.



GMAAS, The University of Salford. Peel Building
0161 295 4467 www.salford.ac.uk email: i.f.miller@salford.ac.uk



AGMA
ASSOCIATION OF
GREATER MANCHESTER
AUTHORITIES

GMAAS concurs with the conclusion drawn by the Scoping Report and agrees that archaeology should be scoped in to the EIA process due to the likely significant effects of development on the archaeological resource. GMAAS is content that the scope, approach and methodology set out in the Scoping Report to assessing the archaeological resource is appropriate and proportionate to the preparation of an ES Chapter on archaeology.

Notwithstanding the conclusions drawn from the forthcoming ES Chapter, it may be anticipated that further intrusive archaeological investigation of the site will be required in advance of construction work for the proposed development, although this could be secured in due course via a condition attached to planning consent.

Yours sincerely



Heritage Management Director





Historic England

Mr Ryan Grant
Rochdale Borough Council
Development Management
Number One Riverside, Smith Street
Rochdale
OL16 1XU

Direct Dial: +447990339949

Our ref: PL00797266

11 November 2024

Dear Mr Grant

24/01039/SCO | Environmental impact assessment (EIA) scoping opinion for proposed Northern Gateway site (JPA 1.1) | Northern Gateway, South Heywood

Thank you for your consultation to Historic England to request a scoping opinion for the above site.

We agree with the outcome of the Environmental Impact Assessment Scoping Report (Turley, October 2024) that built heritage should be scoped into the EIA. We are content with the potential significant effects and sensitive receptors that have been identified in the report for inclusion in the EIA.

Yours sincerely,

[Redacted]
Inspector of Historic Buildings and Areas
[Redacted]



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Date: 12 November 2024
Our ref: 492304
Your ref: 24/01039/71262/SCO



H.Leach@bury.gov.uk
development.management@rochdale.gov.uk

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Sir/Madam

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Northern Gateway site (JPA 1.1)

Location: Rochdale/Bury

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated and received by Natural England on 28 October 2024.

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](#).

In addition, we have the following specific comments to make:

Places for Everyone Joint Development Plan (2022 to 2039) Policy JP-C8: Transport Requirements of New Development

Planning applications which are required to be accompanied by a Transport Assessment will also need to consider air quality impacts on Holcroft Moss, within the Manchester Mosses Special Area of Conservation (SAC).

Any proposals that would result in increased traffic flows on the M62 past Holcroft Moss of more than 100 vehicles per day or 20 Heavy Goods Vehicles (HGVs) per day must devise a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles and provide a contribution towards restoration measures in accordance with the Holcroft Moss Habitat Mitigation Plan.

Places for Everyone Joint Development Plan (2022 to 2039) Policy JPA1.1 Heywood/Pilsworth (Northern Gateway)

The Environmental Impact Assessment should include all environmental requirements set out in Policy JPA1.1 Heywood/Pilsworth. We support the inclusion of reference to peat surveys in line with the requirement to *Undertake hydrological and ground investigations to determine the extent and quality of any peat identified in the south-western part of the site to inform the potential for restoration and the comprehensive masterplanning of the site which should ensure that the loss or*

deterioration of any irreplaceable habitat is avoided. The Environmental Impact Assessment should clearly demonstrate the findings of ground investigations.

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.

Please send any new consultations or further information relating to this consultation to consultations@naturalengland.org.uk.

Yours faithfully


Senior Officer Strategic Planning
Cheshire to Lancashire Team

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.

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 180-181 and 185-188) 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 conserve and enhance 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

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 187 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

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 186 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 180 and 181). 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

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.

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.

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

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 180 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.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including [draft Planning Practice Guidance](#), can be found [here](#)

The statutory [biodiversity metric](#), together with ecological advice, should be used 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 104. 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 180 and 181 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 217 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) ^[1]. A 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 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.

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

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 or biodiversity opportunity areas.

Bury Metropolitan Borough Council
Town Hall
Knowsley Street
Bury
BL9 0SW

Our ref: SO/2024/124512/01-L01
Your ref: 71262
Date: 12 November 2024

FAO: Helen Leach

Environmental Impact Assessment (EIA) Scoping Opinion for Proposed Northern Gateway Site JPA 1.1

Northern Gateway, South Heywood

Thank you for referring the above Environment Impact Assessment (EIA) Scoping Opinion Request to the Environment Agency (EA).

To inform our EIA Scoping Opinion below, we have reviewed the following report:

- Northern Gateway JPA 1.1. Environmental Impact Assessment (EIA) Scoping Report. Prepared by Turley. Date: 17th October 2024.

The report submitted provides an overview of environmental matters that will be considered as part of the forthcoming Environmental Statement (ES) for the overall development.

We welcome the assessment reached that the proposed development meets the criteria set out by the EIA Regulations (2017) and acknowledge that the proposal constitutes an EIA development. We do not seek to dispute this determination or the intention to undertake an Environmental Impact Assessment / ES. We note the EIA Scoping Opinion request falls across Bury Council's and Rochdale Borough Council's administrative boundaries. We would advise the contents of our EIA Scoping Opinion is applicable to both Councils.

It is understood the assessment undertaken considers the overall Places for Everyone (PfE) site allocation under JPA 1.1 (excluding the consented South Heywood development) and associated supporting highways infrastructure. We are aware the intended forthcoming planning application boundary is yet to be determined but welcome the approach presented to ensure likely significant effects 'project-wide' are fully considered at this stage.

We welcome the recognition that the EIA process is iterative which will be influenced by the progress made on understanding baseline conditions; details of forthcoming development proposals; and, subsequently, likely effects the forthcoming development poses and associated mitigation proposals (paragraph 2.4). We welcome the intention to 're-scope' where necessary as the project design emerges and address such matters within the forthcoming ES.

We acknowledge that the applicant will undertake an ES in support of the proposed development. As part of this initial intended scope, for environmental matters relevant to the EA's focus and remit, the following topics have currently been 'scoped-in' to the ES:

- Biodiversity

Environment Agency
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

- Hydrology, Flood Risk and Water Quality
- Ground Conditions and Contamination
- Climate Change

We would take this opportunity to provide the following advice and guidance to the applicant:

Flood Risk

We welcome the intention to undertake a Flood Risk Assessment (FRA) and associated flood modelling exercise to support the forthcoming ES.

It is noted that the design event flood levels will be established from the flood modelling exercise intended to be undertaken to understand baseline flood risk and support the forthcoming planning application. We recommend that a range of return periods are included and considered within the assessment of flood risk. We note the intention to steer development into lower areas of flood risk and would advise, in addition to siting development in Flood Zone 1, ensuring built development is also located outside of the 1 in 100 year plus appropriate climate change extent.

We further welcome the intention to incorporate flood alleviation measures to reduce flood risk associated with the Whittle Brook; Hollins Brook and Brightly Brook where appropriate. As part of the forthcoming development, interventions which provide multi-functional benefits to manage flood risk from surface water runoff and watercourses where ecological enhancements could also be incorporated would be welcomed.

We would advise the applicant seeks opportunities as part of the proposed development by, but not limited to, achieving better than greenfield run off rates for surface water discharges and / or implement natural flood management techniques prior to surface water discharging to watercourses. We would further advise for surface water drainage connections intended to be made to designated 'main rivers', the EA also have a preference for outfalls to be set back from the river bank. Such proposals would contribute to the development having a positive effect on the environment in this location.

We note Section 4.18 states watercourses may need to be culverted to enable primary and secondary access routes. Please note, the EA is opposed to culverting of any watercourse as a result of the adverse; flood risk; ecological; geomorphological; human safety; and aesthetic impacts. We would strongly advise alternative options to culverting are sought for access for either the purposes to facilitate construction and / or the final intended development proposals.

We advise technical reporting to support the forthcoming planning application should include details of schemes to:

- Dispose of foul and surface water
- Install oil and petrol separators
- Install trapped gullies

- Treat and remove suspended solids from surface water run-off during construction works

Design considerations for the above schemes should not only be isolated to dealing with the management of flood risk but also demonstrate how proposals contribute to enhancing the wider environment, such as, considerations of Water Framework Directive (WFD) objectives and implementation of ecological enhancement where possible (as outlined below).

For further advice on planning considerations from a flood risk perspective, we would advise consulting the following:

- The 'Flood Risk and Coastal Change' pages of the Planning Practice Guidance: <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>.
- Guidance on the contents of a site-specific Flood Risk Assessment: <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

Sustainable Drainage Systems

Approved Document Part H of the Building Regulations 2000 establishes a hierarchy for surface water disposal, which encourages a SUDS approach. Under Approved Document Part H the first option for surface water disposal should be the use of SUDS, which encourage infiltration such as soakaways or infiltration trenches.

In all cases, it should be established that these options are feasible, can be adopted and properly maintained and would not lead to any other environmental problems. For example, using soakaways or other infiltration methods on contaminated land carries groundwater pollution risks and may not work in areas with a high water table. Where the intention is to dispose to soakaway, these should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

Flood Risk Activity Permits

There are designated 'main rivers' within the Northern Gateway development boundary and, therefore, proposed activities on / near the watercourse may require an Environmental Permit granted by the EA. The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal) ▪ on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert

- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

The granting of planning permission does not necessitate the grant of an environmental permit or vice versa. Therefore, we advise consultation is sought with the EA at the earliest opportunity to determine any flood risk activity permitting requirements for the proposed development. For further guidance on this topic matter please also refer to: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Water Framework Directive and Biodiversity

We note there are several watercourses located within the site red line boundary. Land alongside watercourses is particularly valuable for wildlife and, therefore, it is essential such areas are either protected or enhanced. The retention of a continuous unobstructed watercourse corridor is an essential requirement for the preservation of wildlife habitat, flood flow conveyance and future watercourse maintenance / improvements.

[The Water Environment \(Water Framework Directive\) \(England and Wales\) Regulations 2017 \(WFD Regulations\)](#) and associated [North West River Basin Management \(RBMP\)](#) require that water bodies are protected from deterioration and pollution whilst advocating the restoration and enhancement of water bodies to promote recovery. New proposals should aim to contribute to the attainment of 'Good Ecological Status' for WFD waterbodies.

We welcome the intention to produce a WFD Assessment to not only determine potential impacts but to also explore potential enhancement opportunities for the waterbodies located within the development site boundary (paragraph 2.120). The Whittle Brook (Irwell) (GB112069061250) waterbody within the development site has an ecological classification of 'moderate', including biological water quality, as a result of the previously intensive managed farmland within the assessment boundary. Therefore, there are potential opportunities which could be incorporated into the intended development proposals to improve water quality of the waterbodies within the site boundary through the adoption of good environmental practice.

We note the PfE policy under JPA 1.1 requires the proposed development to '*make provision of new, high quality, publicly accessible multi-functional green and blue infrastructure including the integration and enhancement of existing features such as Brightly Brook, Whittle Brook and Castle Brook.*' Therefore, we would advocate ecology and water quality as well as flood risk is actively considered within the scheme and seek to implement potential interventions (i.e. in-channel / riparian enhancements), where possible, which contribute to achieving the overarching objectives of the WFD.

The Flood Risk, Hydrology and Water Quality section should consider the hydromorphological baseline of watercourses within the study area. Hydromorphology is a supporting ecological element under the WFD and impacts to this element will require assessing as part of the proposed WFD Assessment. A site walkover survey undertaken by a suitably qualified geomorphologist is highly recommended.

Any physical works to the channel as a result of the forthcoming development may have an impact on the hydromorphology of watercourses as a receptor and will need to be assessed accordingly (i.e. alongside effects established under Table 11.1). Based on the identified need for multiple new crossings i.e. on the Whittle Brook and associated

tributaries; multiple new site surface water drainage connections; and as yet to be determined riparian boundary treatment along the multiple waterbodies within this site, there is a potential risk of increases in flows and erosion to existing waterbodies, and possibility to create new hydrological and connectivity issues. An assessment of impact to this receptor should be informed by the baseline hydromorphology survey.

Under section 10.14 of the Biodiversity topic, we would recommend invertebrates, particularly in regards to macro-invertebrate assemblage within the existing watercourses that flow through the site, be retained within the scope to determine the scheme's impacts during construction. This is based on the intended watercourse crossings for access; surface water connections; and yet to be determined riparian boundary strategy along the watercourses.

Biological monitoring of certain watercourses provides the vehicle to potentially identify interventions to improve the water quality status of the Whittle Brook WFD waterbody and ensure best environmental practice is adopted across the development site and catchment area. Therefore, in addition to considerations under Table 10.2, watercourses need to be assessed for aquatic invertebrate assemblages as key ecological receptors linking with wider catchment waterbodies, including the river Roch / Irwell, with significant fisheries value that will potentially be susceptible to environmental impacts on development that occurs within the riparian corridor.

We welcome the intention to produce a Landscape and Biodiversity Strategy with key objectives to *'protect and enhance existing features'* and ensure connectivity of existing blue and green assets (paragraph 4.64). We recommend that as part of this strategy, proposals ensure existing hydrological connectivity is protected as part of scheme design and look to improve this where ecological / Biodiversity Net Gain (BNG) assessments identify impediments along key blue infrastructure assets within the scheme boundary. It is also recommended that this strategy looks to strengthen, enhance and expand identified important habitats (paragraph 10.8) and key ecological networks as outlined in the England Biodiversity Strategy.

Biodiversity Net Gain

We note the intention to produce a BNG strategy to support the forthcoming development proposals. It is recommended, based on the intention to include new access crossings over watercourse; new surface watercourse connections into existing watercourses; and yet to be determined riparian corridor proposals, a baseline Riverine Metric Assessment is conducted as part of the wider BNG assessment for the site.

Whilst we note the intentions to create an 'ecological mitigation area', an integrated green and blue infrastructure network (i.e. incorporating natural flood management techniques) could create new or enhance habitats; improve water quality; and help achieve the 10% net gain in biodiversity sought as part of the Biodiversity Net Gain (BNG) strategy for the site. We would advise that government guidance makes it clear that mitigation and / or enhancements in line with the North West RBMP under the WFD can contribute towards the total BNG for a development. <https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng>.

Ground Conditions and Contamination

Based on the information it has identified that the site may have a history of previous industrial land use which might have led to adversely elevated concentrations of land

contamination which may pose a significant risk of significant harm to 'controlled water' receptors. We recommend that developers should address the associated risks to controlled waters by:

- Follow the risk management framework provided in Guidance on Land contamination risk management ([LCRM](#)), when dealing with land affected by contamination
- Refer to our [Guiding principles for land contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the [contaminated land](#) pages on gov.uk for more information
- Refer to ['The Environment Agency's approach to groundwater protection'](#)

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person and in accordance with BS 10175 (2001) Code of practice for the investigation of potentially contaminated sites.

Further to the above, we have the following additional advisories with regards to the management of waste:

Waste on-site

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- the [position statement](#) on the Definition of Waste: Development Industry Code of Practice

- The [waste management](#) page on GOV.UK

Waste to be taken off-site

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the [hazardous waste](#) pages on GOV.UK for more information.

Permitted Sites

We acknowledge a permitted site, namely 'Pilsworth South landfill', is in proximity to the project assessment boundary. We would advise consideration is given to the development layout / uses in the northern section of the development boundary to incorporate a sufficient buffer from the permitted site to occupants of the forthcoming development site.

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Should you have any queries on the contents of this letter, then please do not hesitate to contact me.

Yours faithfully

[Redacted Signature]

Green Growth Team Project Manager

Direct e-mail [Redacted Email Address]

71262 – Land at Heywood/Pilsworth, bounded by M66/M62, Pilsworth Road & Queen Elizabeth II Way

Thank you for consulting the GMEU on this cross-boundary application

Ecological Survey Scope (Figure 10.1)

I do not fully agree with the ecological survey scope. Whilst accepting that the yellow areas are not directly impacted at this stage and therefore do not require as detailed an assessment, I do not agree with only a high-level assessment as certain groups of wildlife, in particular species associated with the pondscape and to a lesser extent, farmland priority species will utilise the whole site. I therefore recommend that the yellow areas are included for any detailed surveys associated with amphibians, aquatic invertebrates and farmland priority species.

European Protected Sites

I agree with the response from Natural England that the Manchester Mosses SAC, needs to be considered with regards the potential increase in traffic along the M62 past the Holcroft Moss part of the SAC. I would also recommend that the same issue is addressed for the potential increase in traffic through the South Pennines SPA and SAC. I note that Environment Statement has also scoped in the Rochdale Canal SAC and all other international and nationally designated sites within 20km. Whilst I support this measure, other than the two sites noted, I would not expect there to be any significant effects on any other sites.

Non-Statutory Protected Sites & LNR's

I agree with the scoping report that the potential effect on local sites should be scoped-in given the scale of the proposals and the potential for increased recreational disturbance, given some housing is proposed. Whilst for the majority of such sites within 2km negligible effect is likely, Hollins Vale and Pilsworth Fisheries are in very close proximity and hydrologically linked and will require more detailed assessment of the potential effects.

Other Habitats

Whilst, accepting that the majority of the site is low ecological value grassland. there are two significant habitat types on the site that need more detailed assessment. These are:

- the pondscape across the site which will become fragmented even if the ponds are retained and;
- the Whittle Brook/Castle Brook Valleys/corridors, which whilst retained are likely to be degraded by physical modifications (eg surface water drainage outfalls, crossing points) and recreational disturbance.

Both these habitats have not been surveyed in detail by the GMEU in recent times other than the walkover survey in 2017 where these habitats were noted. Parts of both could potentially qualify as SBI's, the lower end of the Whittle Brook and Castle Brook (near Castle Farm) under the grassland and wetland category of the SBI guidance and the ponds due to the cumulative value of amphibian, aquatic invertebrate and aquatic vegetation.

I therefore recommend these two habitat types are scoped in and more detailed survey information including an assessment against the GM SBI guidelines. The valley it should also be noted likely provides an important refuge for amphibians outside of the breeding season.

Protected and Priority Species

Again given the scale of the development, I agree that protected and priority species should be scoped in.

GCN – I agree that this is the main species issue. It is well known that there is a meta-population scattered across the Northern Gateway with up to date surveys demonstrating the continued presence. The relative importance of this population in terms of regional importance is however not known. Whilst none of the ponds or pond clusters designated as SBI's, this is due primarily to a lack of up to date information on the overall meta-population size, which may well exceed populations found in other ponds that have been designated as an SBI elsewhere in Bury and Rochdale and in Greater Manchester. Therefore, whilst acknowledging that the site promoters have established the presence of gcN across the site, through eDNA surveys, they have not established the size of the population.

For such a major development in my opinion full gcN surveys are required, no matter the licensing approach and number of ponds retained, in order to establish the relative importance of the population, inform mitigation eg maintain connectivity between core ponds and good habitat and the scale of reasonable avoidance measures required if DLL is the preferred mechanism for licensing.

Farmland Protected & Priority Species – Farmland birds such as lapwing, barn owl and brown hare will be displaced with no likelihood of mitigation on the site. For such a large area of farmland, the usual approach of accepting that such species are displaced to the next bit of farmland does not in my opinion apply. The ES should therefore discuss how mitigation would be provided to prevent any significant harm to any species that are likely to become locally extinct as a result of the development.

I accept that other protected species and priority should be scoped in (badger, bats, barn owl, hedgehog etc) given the scale of the development but regard it as unlikely that the value is greater than of local importance.

Aquatic Invertebrates and Plants

Whilst I agree that terrestrial invertebrates can be scoped out, with any potential interest, likely associated with retained habitats along the Whittle Brook valley, as noted above there is an extensive pondscape across this site. Whilst we have no recent evidence that the ponds have any aquatic invertebrate or aquatic plant importance, (in terms of desk top information, it is probable that some ponds were survey as part of the EU pondlife project in the 1990's) neither do we have any evidence that rare species are absent. I therefore recommend that aquatic invertebrates and aquatic plants are included in the Environment Assessment.

Whittle and Castle Brooks

Rivers are potential receptor sites for Environment Assessments. The Whittle Brook in particular appears to be a relatively natural watercourse, with development proposals having the potential to negatively effect its value. I therefore recommend the watercourses are scoped in with an assessment of the potential for negative effects, though not necessarily restricted to, on naturalness, flow rates, chemical water quality, biological water quality, sediment load and riparian habitats.

Peat

Whilst early indications are that restorable peat is not present, this issue should still be covered by the Environment Assessment. It should also cover whether any non-restorable peat present has resource value for use on peat restoration projects elsewhere and whether it may hold any paleo-ecological information that should be assessed prior to use/becoming sealed under development.

Cumulative Effects

Whilst the main part of the pfe allocation it is not the whole part, the ES should therefore when discussing cumulative effects include the proposals south of Simister and between the Hillock Estate and M66. It should also take in to account the proposed improvements to the M60/M66/M62 junction and other pFe allocations.

Conclusion

I am in agreement that biodiversity needs to be screened in owing to the scale of the development.

Issue however that would normally be assessed based on professional opinion cannot be so easily assessed out without detailed surveys for such a large development area.

GM Ecology Unit



The Wildlife Trust for Lancashire Manchester & North Merseyside



The Barn, Berkeley Drive, Bamber Bridge, Preston, Lancashire, PR5 6BY
T: 01772 324129 **E:** info@lancswt.org.uk **W:** www.lancswt.org.uk

Planning and Development
Number One Riverside
Smith Street
Rochdale OL16 1XU

18th November 2024

FAO Ryan Grant

Dear Mr Grant

RE: 24/01039/SCO | ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING OPINION FOR PROPOSED NORTHERN GATEWAY SITE (JPA 1.1)

I have had the opportunity to view the above scoping proposal and I would like to provide the following comments and observations.

2. Approach to EIA

The Extent of Data Collection

Paragraph 2.27: I am not sure what is meant by the term 'limited development' referred to within POSMA and why this means that the same level of baseline data is not required. If this is to be used as the compensation area then a full BNG assessment of the baseline habitat needs to be undertaken. If compensation for S41 species is required such as Lapwing, then the current usage of the land for these species also needs to be assessed, as does the suitability of the land as compensatory habitat for S41 species.

Paragraph 2.29: Ecology- Whilst I agree that where access to surveys has not been possible and data is not obtainable, then the worst-case scenario on habitat value and protected species will be defined; I would also include species of principle importance into this scenario as well.

4. High Level Development Specification

Climate Resilience

Paragraph 4.81: I welcome the intent that green and blue infrastructure and compensatory habitat will be aimed at not only enhancing biodiversity of the site but will also mitigate the anticipated impacts of climate change. I would recommend that where possible, wetland habitats should be prioritised and that these should help to provide wetland corridors following the line of the retained water courses.



10. Biodiversity

Habitats

Paragraph 10.8: Whilst the agricultural fields within the site might be described as species poor, this relates only to their botanical interest. These fields are often of great importance to S41 species, especially ground nesting birds such as Lapwing. These fields cannot be described as of ‘negligible importance’ until full species surveys have been undertaken. Where such species are found to be utilising these fields, the habitats importance for species of principle importance must be recognised.

Assessment Methodology of Effects Likely/Significant

Table 10.3: Background surveys pending/ completed

Habitats: I strongly recommend that in place of phase-one habitat surveys, a full UK Habs assessment needs to be undertaken on the habitats within the site. UK Habs assessments are necessary in order to enter the data in to the BNG metric. Phase-one data has to be translated across and converted into relevant UK Habs classification. It should be noted that UK Habs is a more nuanced approach to habitat classifications and translations across from phase-one surveys are often problematic. The UK Habs translation metric outlines this drawback in terms of phase-one data and states *‘this tool is intended to be used for historic data. Any suggested translation between phase one habitat and metric habitat should not be considered a rule – there may be circumstances where a more appropriate metric habitat may be chosen when ecological expertise is applied’*

Trees: It is important to note that tree quality surveys are undertaken to determine tree health and this is not an estimate of the ecological value of any particular tree. Trees identified in poor health are often found to be important for their biodiversity interest, as they contain deadwood habitat, an important biodiversity asset.

Paragraph 10.18: Whilst a particular effect on a species which is on a list of species of principle importance may not significantly affect its national population, the impact on the local , district or regional populations needs to be assessed and any impacts mitigated/compensated for. The cumulative impacts of development on S41 species is especially important and needs to be assessed and similarly mitigated/compensated. It is important to remember that there are some instances where development can have impacts on national populations.

Limitations and Assumptions

Inaccessible land

Paragraph 10.22: I welcome the intent that unless clear evidence to the contrary, presence of species will be assumed and mitigation proposed on a precautionary basis.

Table 10.4: Survey Scope for Accessible and inaccessible land

Birds: Local bird watchers data and local residents can provide good data.

13. Agriculture and Soils

Technical Baseline

Paragraph 13.14: I would recommend that the peat soil data be discussed and agreed with Natural England.

17. Climate Change

I welcome and agree with the landscape and biodiversity strategy to;

- Protect and enhance existing features, where possible
- Avoid development within areas of higher landscape value/biological value, where possible;
- Ensure that green and blue assets across the Site are connected to enable the greater mobility and movement of species between habitats

Ensuring connectivity of habitats and ensuring the mobility of the species across the landscape is essential in ensuring biodiversity gains. One word of caution is the difficulty in predicting climate change impacts. As I outlined previously, the delivery of a suite of wetland habitats across the site will provide habitats that can help to mitigate against climate change. These habitats should include fen, wet grasslands and ponds.

18. Approach to the Assessment of Cumulative Effects

Step 2: Assessment of In-combination Effects

Paragraph 18.24: I would strongly recommend that the cumulative impact on grasslands (irrespective of botanical diversity) be taken into consideration as S41 species such as Lapwing could be seriously impacted by the loss of large areas of grassland habitat. Ground nesting birds do not require the grasslands to be species rich only that they be open and undisturbed. Species poor agricultural grasslands might therefore wrongly be dismissed and 'scoped out' of the EIA at the expense of S41 ground nesting birds.

I hope these comments prove useful. If you have any further queries or require clarification, please do not hesitate to contact me.

Yours Sincerely

[REDACTED] Signed electronically)

[REDACTED]
Conservation Officer for Greater Manchester

[REDACTED]

From: [PlanningGatewayOne](#)
To: [Ryan Grant \(He/him\)](#)
Subject: RE: Consultation Letter for Planning Application Ref: 24/01039/SCO: Please see attached letter (Our ref pgo-6112)
Date: 29 October 2024 08:20:23
Attachments: [image001.png](#)

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Dear Sir/Madam,

Thank you for your email in relation to Planning Application 24/01039/SCO
HSE (pgo) have no comment to make on the EIA scoping request as we are not an environmental consultation body for EIA purposes.

If this is found to be in respect of a relevant building, HSE (pgo) will be a statutory consultee for any planning application made for the development (as described) and will comment at that time.

Once again thank you for your email, if you require further advice with regard to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-6112) in all future correspondence.

Kind regards

Operational Support for Planning Gateway One
Health and Safety Executive | Building Safety Division
PlanningGatewayOne@hse.gov.uk



-----Original Message-----

From: ryan.grant@rochdale.gov.uk <ryan.grant@rochdale.gov.uk>
Sent: Monday, October 28, 2024 3:57 PM
To: [PlanningGatewayOne](mailto:PlanningGatewayOne@hse.gov.uk) <PlanningGatewayOne@hse.gov.uk>
Subject: Consultation Letter for Planning Application Ref: 24/01039/SCO:Please see attached letter

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**TRAFFORD
COUNCIL**

Ms Helen Leach
Bury Council

Joanne Egeli
Principal Planning and Development
Officer
Trafford Council
Planning and Development
Trafford Town Hall, Talbot Road
Stretford, M32 0TH
Email: joanne.egeli@trafford.gov.uk
Telephone: 0161 912 3181
www.trafford.gov.uk

Date: 15 November 2024

Article 18 Consultation Response

Dear Ms Leach

Location: Land At Heywood/Pilsworth, Bounded By M66, M62, Pilsworth Road
And Queen Elizabeth II Way

Proposal: Article 18 consultation from Bury Council in relation to 71262 -
Environmental impact assessment (EIA) scoping opinion for
proposed Northern Gateway site (JPA 1.1).

Your Reference:
Our Reference: 114813/ART18/24

In response to this consultation, Trafford Council planning department have no comments to make on the above.

Yours sincerely

Head of Planning and Development



STOCKPORT
METROPOLITAN BOROUGH COUNCIL

Planning Services

Place Directorate, Stopford House,
Piccadilly, Stockport SK1 3XE

Helen Leach
Bury MBC

Contact: Jane Chase
Telephone: 0161 474 3550
Email: Jane.Chase@Stockport.gov.uk
Website: www.stockport.gov.uk/planning

Date: 18th November 2024

Dear Ms Leach,

Reference: DC/093905 (Your Ref: 71262)

Proposal: Environmental impact assessment (EIA) scoping opinion for proposed Northern Gateway site (JPA 1.1)

Location: Land At Heywood/Pilsworth, Bounded By M66, M62, Pilsworth Road & Queen Elizabeth II Way

I write with reference to the above site and proposal and further to your consultation.

I can confirm that this Authority has no comment to make on the proposals.

Yours sincerely,

[Redacted]
Assistant Director Place Making and Planning
Chief Planning Officer

From: [REDACTED]
To: [Ryan Grant \(He/him\)](#)
Subject: 24/01039/SCO Environmental impact assessment (EIA) scoping opinion for proposed Northern Gateway Site (JPA 1.1)
Date: 15 November 2024 10:31:29

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Good morning Ryan,

Thank you for consulting minerals and waste on the above EIA scoping opinion.

The applicant proposes to scope out waste as a topic and says that waste arising would be considered through preparation of a Site Waste Management Plan and a Construction Environment Management Plan. This approach appears reasonable.

The applicant proposes to scope out minerals (mineral safeguarding areas) and has submitted a Mineral Safeguarding Assessment alongside the scoping request in support of this conclusion. It would appear a reasonable approach to scope out minerals from the EIA.

I would be grateful to be consulted on the future planning application.

Kind regards,
Philippa

[REDACTED]
Minerals and Waste Planner
Greater Manchester Combined Authority
Email: [REDACTED]
Website: www.greatermanchester-ca.gov.uk

This email is confidential and intended solely for the use of the individual to whom it is addressed. Any views or opinions present are solely those of the author and do not necessarily represent those of the Greater Manchester Combined Authority (GMCA). The contents of this email and any replies to this email may be required to be disclosed under The Freedom of Information Act. If you are not the intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error can you please delete it and notify the sender by telephone on 0161 778 7000. GMCA has made every effort to ensure attachments are free from viruses. However, neither the Authority nor the sender accepts any responsibility for viruses and it is your responsibility to scan any attachments.

Rochdale Council
Bury Council

By email only

Your ref: 71262 and
24/01039/SCO

Our ref: DC/24/2630
and
DC/24/2711

Date: 27-NOV-24

Dear Planning Team

Location: Northern Gateway, South Heywood

Proposal: Environmental impact assessment (EIA) scoping opinion for proposed Northern Gateway site (JPA 1.1)

With reference to the above Scoping Opinion Request (Environmental Impact Assessment), United Utilities (UU) wishes to make the following comments at this early stage regarding the expectations for any future proposals and the scope of any future planning application.

The key areas for consideration by the applicant in the detailed design process and in the preparation of a planning application can be summarised as follows:

- The delivery of sustainable **foul and surface water drainage proposals**;
- **Asset protection** for existing water and wastewater infrastructure which is located within or close to the proposed redline boundary; and
- **Flood Risk and Water Efficiency** - Policy JP-S4: Flood Risk and the Water Environment

Any future planning application must be compliant with the adopted Local Plan – Part One and Part Two.

FOUL AND SURFACE WATER DRAINAGE

We would strongly recommend that an updated, detailed site-wide foul and surface water drainage strategy is prepared to inform any future outline or full planning application at this site. It is critical that any solution is investigated at this stage as the detailed design of the site is intrinsically linked to the strategy for surface water management and to an assessment of any utility constraints and to an assessment of any natural drainage patterns at the site.

Policy JP-S4 requires an integrated catchment-based approach to new development, seeking to ensure sustainable drainage systems are delivered in a holistic and integrated manner, including on larger sites split into different phases. Policy JP 1.1 (Heywood / Pilsworth) states that the *'delivery of the allocation should be guided by an appropriate flood risk and drainage strategy in accordance with Policy JP-S4 which ensures co-ordination between phases of development.'*

Due to the requirements within the policies referenced above, it is expected that **NO SURFACE WATER WILL DISCHARGE TO THE PUBLIC SEWER NETWORK** across both allocations as more sustainable options across the red line boundary will be available as phases start to come forward.

Further information can be under *'A Co-ordinated and Holistic Approach to Infrastructure Delivery across the Site'*.

Hierarchy for Managing Surface Water

As part of any strategy for surface water, future development proposals must fully investigate the hierarchy of drainage options for surface water. The minimum expectation is that no surface water will discharge to the public sewer. In accordance with national planning policy, the surface water hierarchy should be followed:

'Where possible, preference should be given to multi-functional sustainable drainage systems, and to solutions that allow surface water to be discharged according to the following hierarchy of drainage options:

- 1. Into the ground (infiltration);*
- 2. To a surface water body;*
- 3. To a surface water sewer, highway drain, or another drainage system;*
- 4. To a combined sewer.'*

As outlined above, it is expected that no surface water will discharge to the public sewer network. It is critical that the hierarchy for managing surface water is investigated as soon as possible and prior to progressing the detail of any site design as the final outfall for managing surface water could be a critical determinant of site design.

Rights to Discharge to Watercourse or Other Receiving Water Body

Given the importance of surface water discharging to an alternative to the public sewer, we request that all land that is necessary to facilitate a discharge to a watercourse is fully identified within any future submission. The proposal must benefit from the requisite rights of discharge to more sustainable alternatives than the public sewer for the management of surface water, e.g., a right to discharge to a watercourse or other water body. Acquiring a right to discharge / changing permit details can be both a lengthy and costly exercise.

Please note, United Utilities is not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local Flood Authority and / or the Environment Agency (if the watercourse is classified as main river).

A Co-ordinated and Holistic Approach to Infrastructure Delivery across the Site - Policy JP-D1

We request that the applicant provides a site-wide strategy for foul and surface water and a site-wide strategy for clean water supply so that a holistic approach can be achieved which avoids a piecemeal approach to infrastructure delivery and to ensure that the most sustainable and cost-effective approach to infrastructure is achieved. It is critical that the phasing of development is undertaken in accordance with a site-wide strategy for new water and wastewater infrastructure. This should consider how the infrastructure for each phase interacts with the infrastructure required for other phases. At the current stage, it is not clear to us how the applicant proposes to develop / deliver the site and whether this will be done by one developer or by multiple developers. It is critical that the approach to delivery / development is reflective of a holistic infrastructure delivery. We request that any disposal of land is linked to the delivery of your holistic infrastructure strategy, in line with Policy JP-D1 'Infrastructure Implementation'.

In accordance with our above comments, the foul and surface water strategy should fully assess site topography, infiltration potential, all forms of flood risk, existing water features and naturally occurring flow paths to identify where water will naturally accumulate and determine whether pumping may be required. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved.

ASSET PROTECTION

Our assets may be impacted by the proposed development and may need to be diverted and/or protection measures put into place. The location of the assets will be material to the development proposals, so it is deemed to be in the applicants' interest to clarify the exact position of these assets prior to the submission of any formal planning application. It is important to note that we will not permit development over or near our assets.

We strongly advise the applicant engages with us at the earliest possible opportunity to identify the assets which may be impacted by these proposals. Our assets will need to be fully considered as part of the design process, with the potential impacts identified at an early stage and suitable mitigation and protection measures and/or diversions incorporated into the design, construction and ongoing operation of the application site. If the applicant hasn't already done so, they can take advantage of our free pre-development service by visiting our website <https://www.unitedutilities.com/builders-developers/your-development/planning/pre-development-guidance/>.

Where United Utilities assets exist, the level of cover to United Utilities pipelines and apparatus must not be compromised either during or after construction and there should be no additional load bearing capacity on pipelines without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles. Consideration should also be applied to United Utilities assets which may be located outside the applicant's red line boundary. Any construction activities in the vicinity of our assets must comply with our *'Standard Conditions for Works Adjacent to Pipelines'*, a copy of which can be found on our website, and national building and construction standards. It is the applicant's responsibility to ensure that United Utilities' required access is provided within their layout and

that our infrastructure is appropriately protected. The developer would be liable for the cost of any damage to United Utilities' assets resulting from their activity.

Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion of assets to accommodate development will be at the applicant/developer's expense. In some circumstances, usually related to the size and nature of the assets impacted by proposals, developers may discover the cost of a diversion is prohibitive in the context of their development scheme.

Please note the location of our water and wastewater network on maps is only indicative. We recommend the applicant contacts United Utilities for advice on identifying the exact location of our assets. For advice regarding protection of United Utilities assets, the applicant should contact the teams as follows:

Water Assets: DeveloperServicesWater@uuplc.co.uk

Wastewater Assets: SewerAdoptions@uuplc.co.uk

Other Matters for Consideration

Wastewater Adoption – Including SuDS

If the applicant intends to offer wastewater assets forward for adoption by United Utilities, the proposed detailed design will be subject to a technical appraisal by an Adoptions Engineer as we need to be sure that the proposal meets the requirements of United Utilities' Asset Standards. This is important as drainage design can be a key determining factor of site levels and layout. The proposed design should give consideration to long term operability and give United Utilities a cost effective proposal for the life of the assets. Therefore, should this application be approved and the applicant wishes to progress a Section 104 agreement, we strongly recommend that no construction commences until the detailed drainage design, submitted as part of the Section 104 agreement, has been assessed and accepted in writing by United Utilities. Any work carried out prior to the technical assessment being approved is done entirely at the developer's own risk and could be subject to change.

Water Efficiency

We request that the development considers how water efficiency measures can be incorporated into the future detailed design of the site. There are opportunities such as rainwater recycling and water butts and we would encourage the LPA to embrace all water efficiency measures. Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements.

Water efficiency should be a fundamental component of any approach to carbon neutrality and we request that you clearly set out your water efficiency and sustainable drainage expectations in the delivery of new development at this site. A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Water efficiency is therefore a key component of your journey to carbon neutrality.

We wish to again draw the attention of the applicant and LPA to Policy JP-S4 in Places for Everyone document. Policy JP-S4 states that *'residential development should meet the mandatory water efficiency standard of 125 litres/person/day as set out in Building Regulations. District local plans may and should consider setting a tighter water efficiency standard of 110 litres/person/day where there is a clear local need with reference to national guidance on housing optional technical standards'*.

If the applicant intends to obtain a water supply from United Utilities for the proposed development, we strongly recommend they engage with us at the earliest opportunity. If reinforcement of the water network is required to meet the demand, this could be a significant project and the design and construction period should be accounted for.

CONTACTS

We wish to highlight our free pre-application service for developers to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of developers contacting us as early as possible. Enquiries are encouraged by contacting:

Website

For detailed guidance on water and wastewater services, including application forms and the opportunity to talk to the Developer Services team using the **'Live Chat'** function, please visit: <http://www.unitedutilities.com/builders-developers.aspx>

A number of providers offer a paid for mapping service including United Utilities. For more information, or to purchase a sewer and water plan from United Utilities, please visit <https://www.unitedutilities.com/property-searches/>

We request that a copy of this letter is made available to the future applicant.

Yours faithfully

The Planning, Landscape and Ecology Team

From: [REDACTED]
To: [Leach, Helen](#); [Ryan Grant \(He/him\)](#)
Cc: [REDACTED]
Subject: National Highways Response - EIA scoping at land at Heywood/Pilsworth, bounded by M66 and M62
Date: 13 November 2024 07:49:41
Attachments: [image001.jpg](#)
[NW 068 - 002 EIA Scoping Note Review.pdf](#)

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Morning Helen, Ryan

Thank you for your patience on this. We have now heard back from WSP who had been writing up a short report on our behalf, attached for your information.

Our key comments on the EIA scoping are:

- Overall, the approach set out in the EIA Scoping Note is consistent with the principles of IEMA guidance. A key point of note at this stage is the requirement of the DfT Circular 01/2022 regarding Environmental Assessment in that the impacts from any proposed works to the SRN (including measures to mitigate these impacts) is to be included in the EIA when considering development proposals.
- In the case of the Northern Gateway, the final scale and form of the highway mitigation at the SRN is yet to be determined; however, it recognised at this stage that it is likely to be significant and could potentially require an independent consenting regime via DCO.
- The EIA for the Northern Gateway therefore needs to adequately address this point as construction of works of significant scale at the SRN could potentially give rise to greater environmental impact than the operational phase of the development itself.

In terms of National Highways' role in this process, there are a couple of points which need some clarification. In discussing improvements to M66 Junction 3 and remodelling work associated with the M62, the note states that National Highways will be submitting a planning application for the M66 works, with the M62 works being the subject of a DCO promoted by National Highways. These statements are incorrect and National Highways has made no commitments to undertaking any work in these locations. These locations have been the subject of a PCF Stage 0 study and this work is set to continue, however no commitment can or will be made at this time for the delivery of any scheme.

DfT Circular 01/2022 states at paragraph 29 states:

"29. 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. 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.”

Whilst this might not necessarily need to be a consideration at the EIA scoping stage, it is important that the applicant is aware that National Highways can offer no commitments to deliver any infrastructure here. This is a point that has been raised before and therefore reliance on National Highways delivering a scheme should not be included in any evidence the applicant might submit.

I trust this is useful. If you have any further questions, please let me know.

Kind regards

[Redacted]

[Redacted] | **Spatial Planner**

Cheshire | Merseyside | Greater Manchester

Spatial Planning Team, North West Operations

National Highways | Piccadilly Gate | Store Street | Manchester | M1 2WD

Tel: +44 (0) 7917 426 500

Web: <http://www.nationalhighways.co.uk/>

For information and guidance on planning and the Strategic Road Network in England, please visit:

<https://nationalhighways.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

From: [Redacted]

Sent: 08 November 2024 15:57

To: [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Subject: 71262 - EIA scoping at land at Heywood/Pilsworth, bounded by M66 and M62



National Highways

NORTHERN GATEWAY

EIA Scoping Report Review





National Highways

NORTHERN GATEWAY

EIA Scoping Report Review

TYPE OF DOCUMENT (VERSION) CONFIDENTIAL

PROJECT NO. 70095637

OUR REF. NO. 068

DATE: NOVEMBER 2024

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QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Issue 1			
Date	12/11/2024			
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Signature				
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1 INTRODUCTION

1.1 PREAMBLE

- 1.1.1. National Highways have been appointed by the Secretary of State as a strategic highway company under the provisions of the Infrastructure Act 2015. National Highways is responsible for operating, maintaining, and improving the Strategic Road Network (SRN) in England, in accordance with the License issued by the Secretary of State for Transport (April 2015) and Government policies and objectives.
- 1.1.2. National Highways' approach to engaging with the planning system is governed by the advice set out in:
- The Strategic Road Network: Planning for the Future – A guide to working with National Highways on Planning Matters (2023)
- 1.1.3. The document is written in the context of statutory responsibilities as set out in National Highways' License, and considering 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 01/2022 The Strategic Road Network and the Delivery of Sustainable Development ("the circular").
- 1.1.4. As a statutory consultee in the planning system; National Highways have a regulatory duty to co-operate. Consequently, National Highways are obliged to consider all proposals received and to provide appropriate, timely and substantive responses.
- 1.1.5. National Highways' desire to be a proactive planning partner goes beyond the statutory role, but follows the spirit of the license which stipulates that National Highways should:

1.2 OVERVIEW

- 1.2.1. Northern Gateway Development Vehicle LLP (NGDV) is the Applicant preparing an application for outline planning permission for parts of JPA 1.1 with all matters reserved. The application will be for a predominately commercial project, referred to as the 'Proposed Scheme'. The application will be submitted to Bury Council (BC) and Rochdale Borough Council (RBC) as the local planning authorities (LPAs).
- 1.2.2. The JV has instructed Turley to lead, manage and control the Environmental Impact Assessment (EIA) process for this project in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)¹ (the 'EIA Regulations').
- 1.2.3. The application is being prepared following the allocation of land (JPA 1.1) within Greater Manchester's Places for Everyone (PfE) Joint Development Plan Document in March 2024.
- 1.2.4. Turley's have produced an EIA Scoping Note in order to engage with various organisations including National Highways.



- 1.2.5. National Highways have commissioned WSP to review the Transport Chapter of the Scoping Note. This Note should be read in conjunction with WSP Report Reference *NW 068-001 Northern Gateway TA Scoping Review*, which includes WSP's comments on the proposed scope of Transport Assessment.

2 DEVELOPMENT PROPOSAL

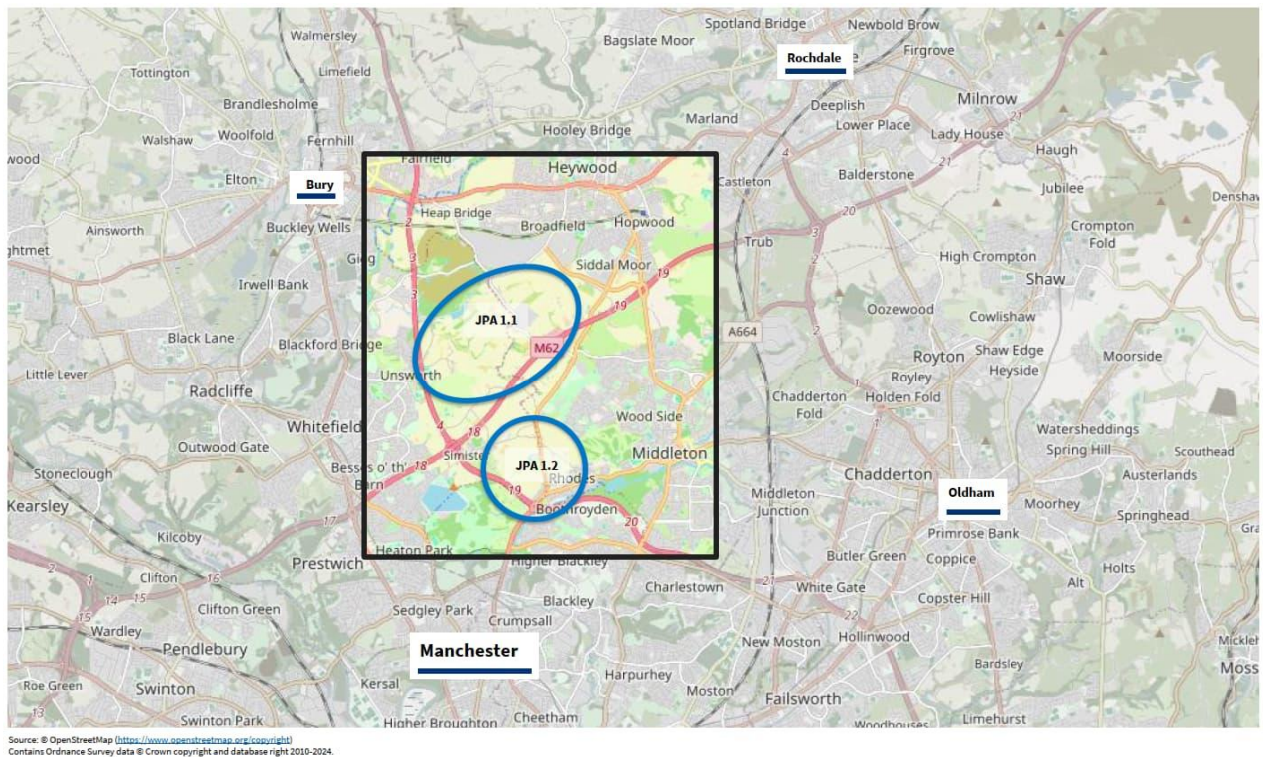
2.1 NORTHERN GATEWAY SITE JPA 1.1

2.1.1. The planning application for the substantive proportions of JPA 1.1 will be submitted by early April 2025, whilst a planning application for JPA 1.2 is expected to be submitted later in 2025. The assessment of JPA 1.2 will be subject to a separate TA Scoping Note. The two sites, which together comprise the Northern Gateway will provide:

- JPA 1.1 (Heywood and Pilsworth) – Up to 1,200,000sqm of industrial, advanced manufacturing and warehousing space across the full development area together with some 1,200 dwellings across the allocation.
- JPA 1.2 (Simister and Bowlee) – A mix of around 1,550 dwellings together with a two-form primary school.

2.1.2. The location of the sites is shown in Figure 2-1.

Figure 2-1 - Location of Northern Gateway (Scoping Note Figure 1-1)



3 POLICY AND GUIDANCE

3.1 APPROACH

- 3.1.1. WSP request that any assessments carried out comply with National Highways Policy and Guidance. Key elements of that Policy and Guidance are set out below.

3.2 DFT CIRCULAR 01/2022, STRATEGIC ROAD NETWORK AND THE DELIVERY OF SUSTAINABLE DEVELOPMENT

- 3.2.1. National Highways Policy as set out in DfT Circular 01/2022 states at Para.55:

The company will engage in the relevant screening or scoping process where a potential impact on the SRN is identified. Environmental assessments must be comprehensive enough to establish the likely impacts on air quality, light pollution and noise arising from traffic generated by a development, **along with the impacts from any proposed works to the SRN and identify measures to mitigate these impacts.** Requirements and advice for undertaking environmental assessments in respect of transport impacts can be found in the DMRB.

- 3.2.2. It is recognised that to support the development of the Northern Gateway allocation, physical change to the SRN at M66 J3 and M62 J19 will be necessary; with the options for such works significant in nature. Whilst the final form of the highway mitigation at the SRN is yet to be determined, it is considered likely that elements of the works will exceed permitted development rights and therefore may be subject to their own separate consenting regime which would likely be via the Development Consent Order (DCO) process.

- 3.2.3. It is stated at Para 2.13 of the EIA Scoping Note that:

The Project for Assessment will be dependent on the highways infrastructure outlined above. The location of the motorway and local road junctions are shown on Figure 2.1. The status of these is varied and they do not currently have planning consent. A summary of their current status is set out below:

- **Junction 3 of the M66** – this has been subject to a study by WSP to test the effectiveness of a junction improvement option by Pell Frischman and will be subject to a planning application submitted by National Highways and/or BC;

WSP Comment - This statement needs to be clarified as National Highway are not planning to submit a Planning application for improvement at M66 Junction 3.

- **Local highway improvements to Pilsworth Road (from Junction 3 of the M66) / Moss Hall Road junction** – these are referred to as the ‘western links’ comprising Moss Hall Road and Pilsworth Road and including the Three Arrows (Pilsworth Road – South) and Fowler Welch (Pilsworth Road - North) junctions. These links and junctions are the subject of a highways operational study being carried out by Pell Frischmann, commissioned by BC; and
- **Remodelling works associated with the M62** – National Highways are undertaking preliminary investigations to understand the case for the delivery of significant motorway remodelling works from Birch Services and Junction 19. This will be subject to a Development Consent Order (DCO) by National Highways.

WSP Comment - Whilst it is true that National Highways (Network Planning Division) are engaged in ongoing study work (PFC Stage 0A) at M66 Junction 3 and M62 Junction 19, for the avoidance of doubt this statement is not correct in that there is no commitment from National Highways to deliver any remodelling works to SRN between Birch Services and M62 Junction 19; that such works would be subject to a Development consent Order by National Highways.

3.3 NATIONAL HIGHWAYS' PLANNING FOR THE FUTURE

3.3.1. With regards to Environmental Impact the Planning for the Future Guidance sets out that:

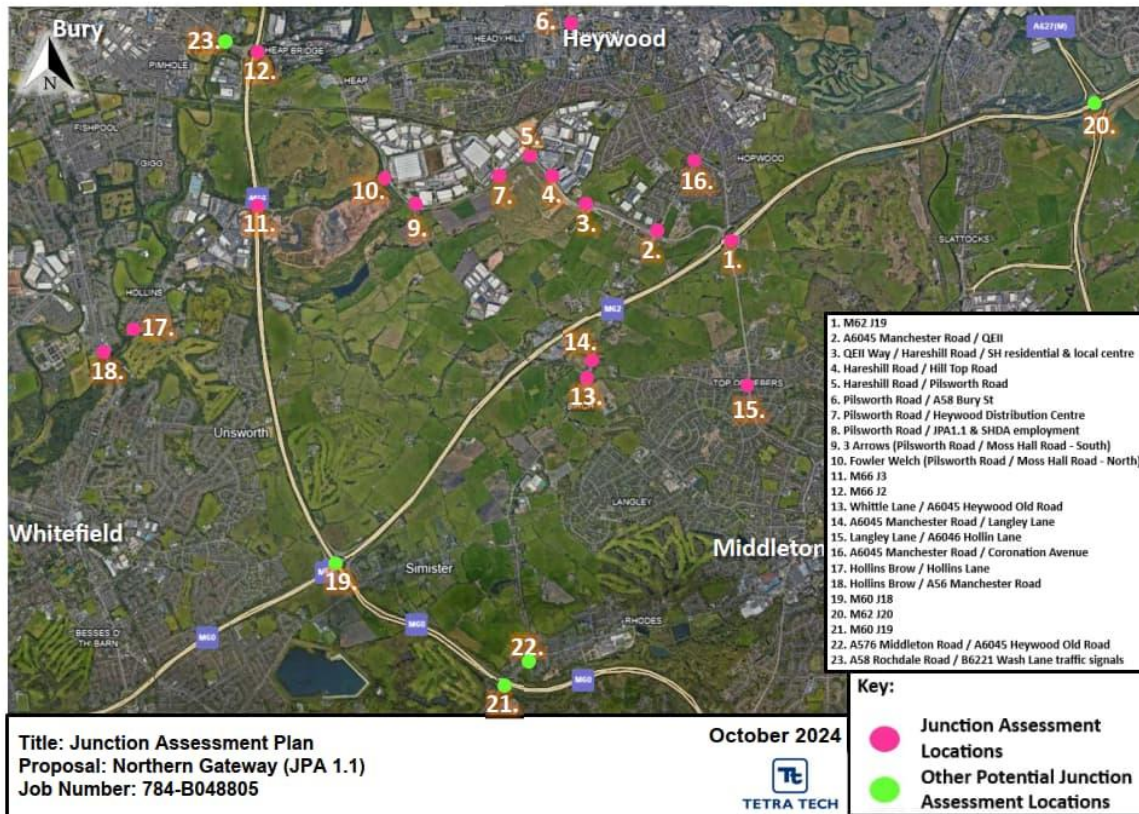
- Paragraph 45. Development promoters will need to provide sufficient environmental information to satisfy the relevant local planning authority, and any other consenting authorities, that all environmental implications of the proposals have been appropriately considered.
- Paragraph 46. We will expect to see measures implemented that fully mitigate all environmental impacts arising from and relating to the interaction between developments and the SRN. There are four aspects to this:
 - The environmental impacts arising from the temporary construction works.
 - The environmental impacts of the permanent transport solution associated with the development.
 - The environmental impacts of the road network upon the development itself (for example, vehicle emissions).
 - The environmental impacts of any decommissioning phase.
- Paragraph 47. If a development promoter wishes to use land within the highway boundary (including landscaped areas) for the storage of construction materials or other such reasons, they should discuss this at the earliest opportunity with the relevant regional spatial planning team.

4 CHAPTER 7: TRANSPORT AND ACCESS

4.1 SCOPE OF SRN ASSESSMENT

4.1.1. The locations of the SRN Junctions to be included in the EIA are illustrated on the following plan taken from the EIA Scoping Note

Figure 4-1 – Junction Assessment Plan (Scoping Note Extract)



4.1.2. The following SRN Junctions assessment location on the plan are considered to be of relevance to JPA1.1:

- Junction 1 – M62 Junction 19.
- Junction 11 – M62 Junction 3.
- Junction 12 – M62 Junction 2.

WSP Comment: Junction Location 19 – M62 Junction 18 (Simister Island) should be included as a junction for assessment for JPA1.1,

4.1.3. The following SRN Junctions assessment location on the plan are considered to be of relevance to JPA1.2:

- Junction 20 – M62 Junction 20.
- Junction 21 – M62 Junction 19.

WSP Comment: Junction Location 19 – M62 Junction 18 (Simister Island) should be considered as a junction for assessment for JPA1.2,

4.2 APPROACH TO EIA

4.2.1. Chapter 7 of the EIA Scoping Note focuses on Transport and Access. It contains information relating to the following, this Note will focus on the sections in Bold:

- **Existing transport conditions including the Highway Network, Active Travel (Walking, Cycling, Wheeling and Horse Riding), Public Transport, Bus Rail and Metrolink.**
- Proposed Scope of Assessment.
- **Effects Likely / Significant.**
- **Assessment Methodology of Effects Likely / Significant.**
- **NGTM Traffic Model & Derivation of Traffic Volumes for ES Assessment.**
- **Overview of Methodology.**
- Severance.
- **Driver Delay.**
- Pedestrian Delay / Amenity.
- Fear and Intimidation.
- **Accidents and Safety.**
- Public Rights of Way.
- Demand for Public Transport.
- Determining the Level of Effect and Significance.
- **Limitations and Assumptions.**

4.3 EXISTING TRANSPORT CONDITIONS

4.3.1. The EIA Scoping Note states that:

7.6 As part of the evidence base submitted in support of the PfE plan, 'Locality Assessments' were produced for each allocation. These Locality Assessments forecast the likely level and distribution of traffic generated by each Allocation and assessed its impact on the transport network.

7.7 The Strategic Road Network impacts are expected to be concentrated at M66 Junction 3 and M62 Junction 19, while the local road network impacts mostly impact on the Pilsworth Road corridor.

4.4 EFFECTS LIKELY / SIGNIFICANT

Table 7.1 of the EIA Scoping Note outlines the effects that are considered likely and significant which will therefore be assessed within the EIA.

Effect	*Receptor	Applicable Stage(s)	Spatial Zone
Increase in severance	Vehicle drivers	Construction and Operation	**The Study Area
Increase in driver delay	Vehicle drivers	Construction and Operation	
Increase in NMU delay	NMUs	Construction and Operation	
Reduction in NMU amenity	NMUs	Construction and Operation	
Increase in fear and intimidation	Vehicle drivers / NMUs	Construction and Operation	
Increase in accidents and reduction in safety	Vehicle drivers / NMUs	Construction and Operation	
Increased demand on Public Transport	Public Transport	Operation	

*For Non-Motorised Vehicles (NMU), such as pedestrians, cyclists, horse riders, etc. Assessors will use judgement on which NMUs are applicable for receptor assessment.

** The study area is based on that considered by the Transport Assessment which identifies 23 junctions in the vicinity of the Site (**Figure 7.1**).

WSP Comment: The effects set out in Table 7.1 are considered appropriate.

4.5 ASSESSMENT METHODOLOGY OF EFFECTS LIKELY / SIGNIFICANT

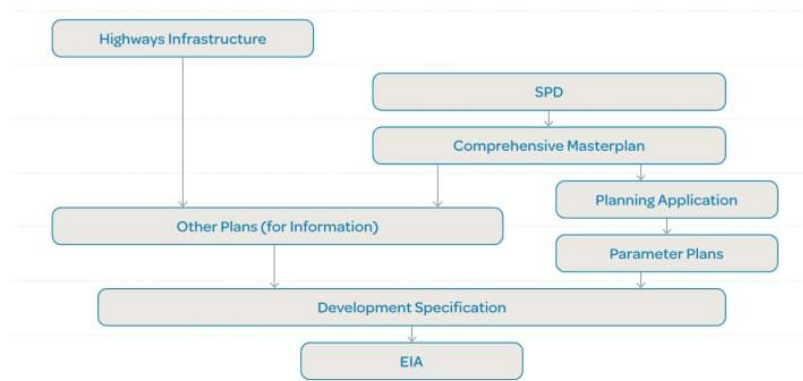
The following transport related information has been identified.

Survey/Study/Analysis/ Evaluation	Overview	Date of Completion
Completed		
Locality Assessment Report	Traffic Assessment to support the allocation of the area in PfE	July 2021

Draft Transport Strategy, Arup	Baseline Study of Transport Conditions and overview of potential mitigation	November 2022
TfGM Active Travel Study, Stage 1 – Draft	Review of Active Travel Provision in the vicinity of the area	November 2022
Model Agreement Statement	A summary of the Transport Steering Group Meeting and the agreed methodology for the preparation of the NGTM	April 2024
Pending/Emerging		
Production of the Northern Gateway Traffic Model (NGTM)	See below	August 2024 onwards
Review of Public Rights of Way	On-site review of Public Rights of Way	August and September 2024
Active Travel Strategy – TfGM	A strategy for active travel	Under determination
Public Transport Strategy – TfGM	A strategy for public transport	Under determination
M66 J3 Improvement	Assessments being undertaken by Pell Frischmann on behalf of the districts	Under determination
Transport Assessment	An assessment of the transport, accessibility and highways.	December 2024
Travel Plan	Management plan designed to encourage safe, healthy and sustainable travel options.	December 2024

WSP Comment: The Northern Gateway SPD is not referenced in the table above; however, it is referenced in the EIA Scoping Note Para 2.61 (Extract 2.1) as replicated below.

Extract 2.1: Structure of Information to Inform the ES



4.6 NGTM TRAFFIC MODEL & DERIVATION OF TRAFFIC VOLUMES FOR ES ASSESSMENT

4.6.1. Baseline traffic data used in the assessments will be taken from the Northern Gateway Transport Model (NGTM).

The following datasets will be extracted:

- Without Development Traffic Volumes; and
- With Development Traffic Volumes.

4.6.2. The EIA will consider:

- 2024;
- 2032;
- 2039; and
- 2047 (+15 Year Scenario from 2032 i.e. 15 years following any remodelling associated with the M62).

4.6.3. Full details of the derivation of traffic volumes are set out in the Transport Assessment Scoping Note Update (TASNU) and the TASNU Addendum.

WSP Comment: WSP are providing comment on Transport Assessment Scoping Note Update (TASNU) and the TASNU Addendum separately as part of the Transport Assessment scoping process.

4.7 OVERVIEW OF METHODOLOGY

4.7.1. The Study area includes the 23 junctions identified in the Transport Assessment. The assessments will take account of traffic volume changes along links over an 18 / 24-hour period. The IEMA guidance documents sets out that the following should be assessed further:

- Links that experience a 30% increase in daily traffic or HGV flow; and
- Highly Sensitive Links that experience a 10% to 30% increase in traffic.

4.7.2. Following completion of the net impact assessment, each link will be subject to a qualitative assessment to establish whether it should be included in the assessment, for example, a link may be forecast to be subject to 2 HGV's a day in the Without Development Scenario, and 4 HGV's a day in the With Development scenario, which is a 100% increase and therefore the broad rules would capture this link in the Links for Assessment. However, an increase of 2 HGV's a day is clearly not a significant impact and therefore this link would be removed from the Links for Assessment. On completion of the quantitative review, a final list of "Links for Assessment" will be established and those links will be taken forward in the Assessment within the ES.

4.7.3. Construction traffic flows will be assessed, and mitigation measures set out in the Construction Environmental Management Plan (CEMP) and the Construction Traffic Management Plan (CTMP)

WSP Comment: No comment to add.

4.8 DRIVER DELAY

The junction modelling results included in the TA will be used to establish the 'Links for Assessment'. Any arms of junctions forecast to operate at or over 90% capacity will be assessed further.

The links of interest will then be assessed against the magnitude of impact/change and shall be reported which are Tetra Tech's in house threshold which have been used on ES assessments previously.

Magnitude of Impact (Change)	Change in delay
Large	Over 180 seconds
Medium	>120 to <180 seconds
Small	>60 to <120 seconds
Negligible	<60 seconds

WSP Comment: This is not standard for the SRN but could be useful to provide additional context for non-SRN junction being considered in the EIA.

4.9 ACCIDENTS AND SAFETY

4.9.1. The EIA Scoping Notes states that the Safety Review contained in the TA will be used in the upcoming EIA.

Limitations and Assumptions

- 4.9.2. The EIA Scoping Note states:
- Assessments will be derived from NGTM Saturn Model and materials contained within the associated Transport Assessment. The Transport Assessment will be prepared in accordance with national and local policy. Traffic flow data derived from the Transport Assessment will be derived from the NGTM Saturn Model. The assessments provided are reliant on the robustness of the data sources used by the Transport Assessment, which will be policy compliant, audited by the Highway Authorities and therefore will be robust and fit for purpose.
 - The above methodology is subject to on-going consultation with stakeholders, the Highway Authority, and a review of the outputs from the NGTM Model.

WSP Comment: WSP will continue to liaise with will the transport consultants as the EIA and Transport Assessment are developed.

5 CONCLUSION

5.1 CONCLUDING POINT

- 5.1.1. Overall, the approach set out in the EIA Scoping Note is consistent with the principles of IEMA guidance. A key point of note at this stage is the requirement of the DfT Circular 01/2022 regarding Environmental Assessment in that the impacts from any proposed works to the SRN (including measures to mitigate these impacts) is to be included in the EIA when considering development proposals.
- 5.1.2. In the case of the Northern Gateway, the final scale and form of the highway mitigation at the SRN is yet to be determined; however, it is recognised at this stage that it is likely to be significant and could potentially require an independent consenting regime via DCO.
- 5.1.3. The EIA for the Northern Gateway therefore needs to adequately address this point as construction of works of significant scale at the SRN could potentially give rise to greater environmental impact than the operational phase of the development itself.
- 5.1.4. National Highways Spatial Planning Team is also aware that as part of National Highways M66 Junction 3 /M62 Junction 19 PCF Stage 0 Study, an Environment Constraint Summary has been prepared; however, PCF Study Products 'Technical Reports' are internal National Highways documents at that stage of the PCF process.
- 5.1.5. Notwithstanding, given relationship between the Northern Gateway development and M66 Junction 3 & M62 Junction 19, National Highways Spatial Planning Team will liaise with the National Highways PCF Study Team to establish what/if any information can be shared that could assist with preparation of the EIA.



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CONFIDENTIAL

Your ref: 71262
Our ref: BUR/24/392

Bury Council
Planning Services
3 Knowsley Place
Duke Street
Bury
BL9 0EJ

12th November 2024

Location: Land at Heywood/Pilsworth, bounded by M66, M62, Pilsworth Road & Queen Elizabeth II Way

Development: Environmental impact assessment (EIA) scoping opinion for proposed Northern Gateway site (JPA 1.1)

Dear Sir / Madam

Thank you for consulting Transport for Greater Manchester (TfGM) on the above pre-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.

Background

TfGM pre-application advice has been requested by Bury Council in respect of the proposed Northern Gateway development. The EIA confirms that the development quantum comprises a maximum of 200 dwellings and 1,034,540 m² of floorspace. The use classes are detailed within Table 4.1 of the EIA.

The site is an allocation in the Greater Manchester Plan, Places for Everyone and is covered by policy JPA 1.1.

¹TfGM 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.



Any proposals for this allocation must be in accordance with a comprehensive masterplan that has been approved by the LPA. It shall include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure to support the scale of the whole development in line with Policy JP-D1 'Infrastructure Implementation.'

Development in this allocation will be required to:

1. Be in accordance with a comprehensive masterplan, design code and infrastructure phasing and delivery strategy, in line with Policy JP-D1 'Infrastructure Implementation,' that has been agreed with the local planning authorities;
2. Be of sufficient scale and quality to enable a significant rebalance in economic growth within the sub-region by boosting the competitiveness of the north of the conurbation and should;
3. Deliver a total of around 1,200,000 sqm of industrial and warehousing space (with around 935,000 sqm being delivered within the plan period). This should comprise a mix of high quality employment premises in an attractive business park setting in order to appeal to a wide range of business sectors including the development of an Advanced Manufacturing Park;
4. Deliver around 1,000 additional homes along with a new primary school in the eastern part of the allocation to support the early delivery of the infrastructure and provide a buffer between existing housing and the new employment development;
5. Deliver around 200 new homes, which includes an appropriate mix of house types and sizes and the provision of plots for custom and self-build housing (subject to local demand, having regard to Bury's self-build register and other relevant evidence), in the west of the allocation off Castle Road ensuring that an appropriate buffer is incorporated to separate this part of the allocation from the wider employment area and that appropriate highways measures are in place to prevent the use of residential roads by traffic associated with the wider employment area;
6. Deliver an appropriate range of supporting and ancillary services and facilities, such as a new local centre, hotel, leisure and conference facilities. These should be in accessible locations and of a genuinely ancillary scale that is appropriate to the main employment use of the allocation;



Every journey. Every day.

7. Make provision for new and improved sustainable transport and highways infrastructure having regard to the indicative transport interventions set out in Appendix D in accordance with Policy JP-C8;
10. Ensure the design and layout allows for effective integration with surrounding communities, including active travel links and connections to local services, employment opportunities and over the M62 to proposed new development at Simister/Bowlee (JPA1.2).

Policy JP-D1: Infrastructure Implementation

To ensure the effective development and implementation of the infrastructure needed to deliver the vision and objectives of the Plan: We will:

7. Require applicants to prepare an infrastructure phasing and delivery strategy to be agreed by the local planning authority for sites where build out will be delivered by different developers or in phases. This strategy must outline what needs to be provided by when and who will fund and deliver it.

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

- I. A trip generation and distribution note should be produced as soon as possible, before the submission of a full planning application and TA.
- II. It is critical that the PfE model should not be used for the purposes of the TA. Strategic model flows should not be used to inform junction assessments or for trip distribution purposes. Traffic counts should be collected accordingly with queue surveys.
- III. The M66 Junction 3 improvement (page 91 of the EIA) should be provided and it should be demonstrated that it will help to increase the capacity at the junction.
- IV. With reference to Paragraph 7.50 of the EIA, TfGM UTC require sight of all arms of the junctions and not just those with degrees of saturation above 90 per cent.



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- V. Any junctions which are predicted to have an increase of over 30 vehicles per/hour should be assessed. The junctions to be assessed should be confirmed with TfGM and the Local Authority prior to any data collection and subsequent analysis.
- VI. Traffic modelling should use signal timing information provided by TfGM UTC unit – signal timing information can be provided from gmutc@tfgm.com.
- VII. Following the analysis of the impact of the development traffic, then suitable mitigation should be identified. If there are changes proposed at existing traffic signal installations (junctions and crossings) or there are new traffic signal installations, then TfGM would be happy to meet to discuss any proposals prior to submission of the full planning application and TA.
- VIII. Suitable and substantive sustainable measures should be provided – these should provide real and attractive alternatives to use of the private vehicle trips.
- IX. A review of public transport is required to identify provision for either existing re-routed or new services to support the development. Any improvements for bus provision should be made clear (see 7.20).
- X. The improvements for walking and cycling should be made clear, fitting into the wider area and any future plans for improvements to cycling infrastructure.
- XI. Linkages to railway stations and Metrolink should be included for walking and cycling trips.
- XII. Phasing of the build-out should be made clear – working outwards from the best access for non-car based trips.
- XIII. In order to determine if sites were suitable to be allocated in the Places for Everyone Plan from a transport perspective; high level strategic transport modelling was undertaken using GM wide strategic trip rates. This enabled the development of high level indicative transport mitigation for a single strategic “worst-case” scenario being identified in relation to the Plan allocations. These are contained in Appendix D of the plan and this is shown below.

Necessary

- M66 Junction 3 / Pilsworth Road junction upgrade
- M62 J19 / A6046 Heywood Interchange – intervention to be determined



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- M66 Junction 2 / A58 – localised junction improvements
- M66 Link Road
- Active travel improvements
- Introduction of local bus services to/from/within the allocation
- Moss Hall Road / Pilsworth Road (South) junction upgrade
- A6045 Heywood Old Rd / Whittle Lane additional traffic management measures
- Moss Hall Road / Pilsworth Road (North) junction upgrade
- Hollins Brow / Hollins Lane junction upgrade
- Pilsworth Road (Between M66 Link Road and “3-Arrows” Junction) upgrade to dual carriageway standard

Supporting

- Bus Rapid Transit (BRT) corridor linking Manchester city centre and Rochdale via Heywood Old Road/ Manchester Road
- Potential tram-train on the East Lancashire rail line between Bury and Rochdale

XIV. Additional mitigation beyond that defined in the PfE JPA 1.1 may be required.

2. General Comments

- 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. Up-to-date traffic counts should be used in any assessments - scope to be agreed with the Local Highway Authority (LHA), TfGM UTC and HFAS. TfGM UTC can be contacted in respect of the availability of any traffic counts in the area that 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.



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- 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 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 developer 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 team who 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



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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.

TfGM would encourage the applicant to review the Bee Network map online via <https://www.tfgm.com> to determine whether there is an opportunity for this development to connect into the proposed Bee Network.

I hope you find these comments useful in the pre-application process. Should you wish to discuss any matter further please do not hesitate to contact the Landuse team via the details below.

Yours faithfully

Landuse Team
Highways Department
Transport for Greater Manchester
Email: landuse@tfgm.com



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