



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

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To: Rochdale Borough Council

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

Council's Reference: 25/00381/OUT

Location: Land North And East Of Stakehill Industrial Estate, Middleton

Proposal: Outline planning application (with all matters reserved except the means access) for the development of up to 314 residential dwellings (Use Class C3) and employment uses (Use Class B2/B8 including ancillary office space (Use Class E)) comprising up to 13,047sqm Gross External Area together with associated parking, highway infrastructure, works to public rights of way, areas of public open space, landscaping, drainage, ecological enhancements and other works ancillary thereto.

National Highways Ref: NH/25/10931

Referring to the consultation on a planning application referenced above, dated 23rd April 2025 in the vicinity of the A627 J2 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

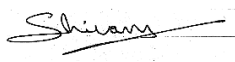
- ~~a) offer no objection;~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at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

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

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

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

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

Signature: 	Date: 09/02/26				
<table style="width: 100%; border-collapse: collapse;"><tr><td style="width: 50%; vertical-align: top;">Name: Shivam Sagwal</td><td style="width: 50%; vertical-align: top;">Position: Asst. Spatial Planner</td></tr><tr><td colspan="2" style="padding-top: 10px;">National Highways Piccadilly Gate Store Street Manchester M1 2WD</td></tr></table>		Name: Shivam Sagwal	Position: Asst. Spatial Planner	National Highways Piccadilly Gate Store Street Manchester M1 2WD	
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¹ Where relevant, further information will be provided within Annex A.

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

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

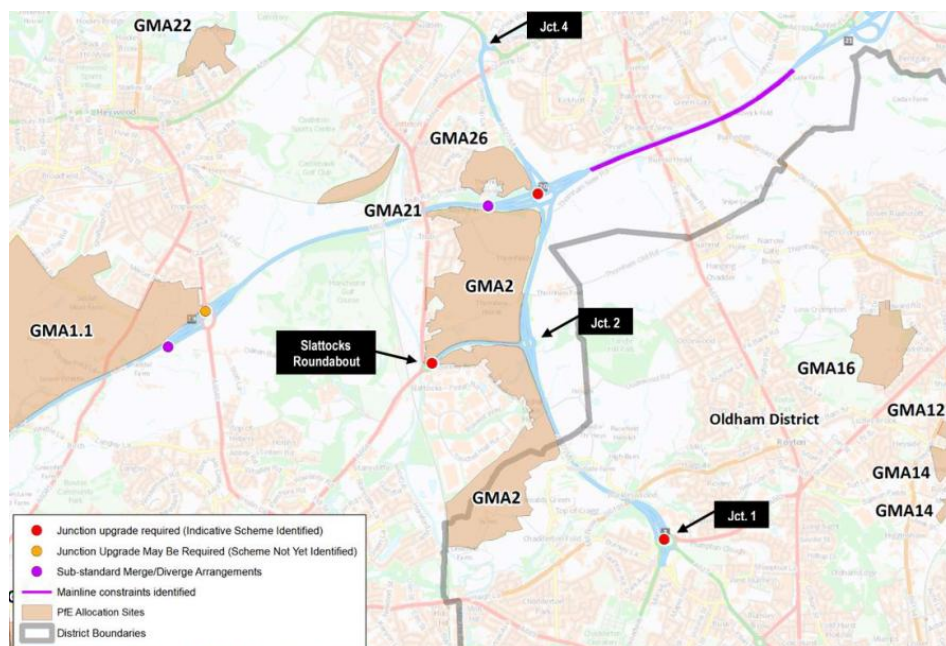
National Highways Comments

Background

The *Places for Everyone* (PfE) Stakehill site allocation is shown in the figure below as 'GMA2', though became known as JPA2 in the adopted version of the PfE.

The PfE *SRN Future Work Programme report* (SYSTRA) recognised that the Stakehill allocation would have a significant impact on the M62 and A627(M) corridors. This report also identified the SRN links and junctions which would/may require upgrades in the future, as shown in the figure below. This includes:

- Upgrading the M62 J21 WB merge and J20 WB diverge
- Improvements to M62 J20, stated as being potentially developer-funded.
- Improvements to A627(M) Junction 1, stated as being potentially developer-funded.
- Improvements to the A627(M) Slattocks Roundabout, stated as being potentially developer-funded.
- Upgrade to slip roads at A627(M) Junction 2



The PfE Statement of Common Ground (SoCG) between National Highways and the GM Authorities recognised that *“further detailed assessment work will be undertaken as the plan for growth is both refined and delivered through the Local Plan process, Masterplans, Supplementary Planning Documents and/or Planning Applications... Any requirement for enhancement of the SRN, and at interfaces with the Local Road Network, will be further assessed in more focused analyses.”* The SoCG also advocates *“Masterplanning (including phasing) of the larger sites to better understand the timescales within the plan period when significant impacts are expected as a result of the PfE allocations.”*

Two nearby site allocations of Trows Farm (GMA26 on the figure above) and Castleton Sidings (GMA21) were also identified in the PfE evidence as having an impact on the M62 corridor. Both sites have now come forward through the planning process and are both consented. From National Highways’ perspective, there is a desire to avoid further piecemeal development and ensure that a holistic approach is taken to assessing the impacts of the full Stakehill allocation to identify the appropriate mitigation and a strategy to fund and deliver it.

Arup has recently been commissioned by TfGM to produce a ‘Stakehill Transport Framework’ for the whole Stakehill allocation, with NH and WSP attending an inception meeting on Fri 2nd May. The work will involve setting a ‘Vision’ for the allocation, undertaking traffic assessments for a Business as Usual and a Vision-led scenario, and identifying mitigation. The work is expected to take a number of months to complete. It is unclear how the submitted Transport Assessments for the live planning applications for Stakehill North and Stakehill South fit into that work and timeframe, but the findings of the Arup study will be critical to NH understanding the impacts of the whole allocation, what mitigation is required, and how this is delivered/funded. It would therefore be premature for NH to come to a final view on the two live applications until that work is completed. *It may be useful for NH to discuss this issue with the LPA (and possibly TfGM).*

Stakehill North application & Transport Assessment (Sept 2023)

In September 2023, National Highways was consulted on a planning application for the northern parcel of the Stakehill allocation (Ref. 23/00650/HYBR). WSP reviewed the submitted Transport Assessment produced by SCP and raised a number of comments (see *attached NW080*), which included (but were not limited to):

- The TA does not reference the DfT Circular 01/2022 or fulfill the requirements of this document;
- Recognise the mitigation requirements stated in the Places for Everyone Plan (PfE) for allocation JPA 2 Stakehill;
- Be cognisant of the content of the Statement of Common Ground between National Highways, Greater Manchester Combined Authority and the Local Authority;

- Provide queue survey results or site visit observations / photographs to provide baseline information on the current operation of SRN junctions;
- Provide details of any committed developments included in the assessment and confirm that this has been agreed with the LPA. Ensure that the full JPA2 allocation is included as a committed development.
- Clarify how the TA takes account of the PfE transport evidence base work produced by SYSTRA, which identified that a number of sites would have a cumulative impact on this part of the SRN, particularly M62 Junction 20.
- Conduct further analysis / surveys to describe current levels of queuing back from SRN study area junctions.

National Highways placed a holding recommendation on the application to allow time for the comments to be addressed. The application is currently still not determined. National Highways then met with Rochdale Borough Council on 1st March 2024 to discuss the application, and its position on the wider Stakehill allocation including potential mitigation requirements and the need for a masterplanned approach, in line with the approach set out in the PfE.

Stakehill South EIA Scoping Opinion (May 2024) & Transport Assessment (May 2025)

In May 2024, WSP reviewed an EIA Scoping Opinion for the same parcel of Stakehill South which is subject to the current planning application. WSP raised a number of comments relevant to the TA (*see attached NW018*), with the key comments below:

- *“it is essential that scoping discussions are also held regarding the scope of the Transport Assessment to support the planning application, once a transport consultant is appointed”* – There has been no further correspondence from the developer’s consultant team since the response was made to the EIA Scoping Opinion. No TA scoping discussions have been held with NH, where advice could have been given on NH’s requirements.
- *“the Transport Assessment...should be prepared in accordance with the policies set out in DfT Circular 01/2022”* – There is no reference to the Circular in the TA, and the TA does not adhere to some of its core principles such as adopting a vision-led approach.
- *“the Transport Assessment will need to consider the potential cumulative impacts of development on the SRN. DfT Circular 01/2022 states that all ‘relevant’ developments should be considered, i.e. developments which are consented or allocated where there is a reasonable degree of certainty will progress to a planning application within the next 3 years, and assuming the full amount of development to be built. Consistent with National Highways’ comments on application 23/00650/HYBR, the Transport Assessment for this proposed development should account for the impact of the full JPA2 allocation, so that any mitigation required to support the whole allocation can be identified. The assessments and mitigation identification should also account for the other*

relevant developments presented in the table above, along with any other relevant developments or schemes confirmed through discussion with the local planning authority.” – The TA does not discuss relevant/committed development, and there is no evidence that an appropriate cumulative impact test has been undertaken to fulfil the requirements of the Circular.

- *“the PfE evidence base documents include the SRN Future Work Programme report, produced by SYSTRA. From National Highways’ perspective, the PfE work and the identified mitigation measures in the SRN Future Work Programme report should be the starting point when identifying mitigation measures to address the cumulative impact of the proposed development and other ‘relevant sites’ as per the requirements set out in the DfT Circular 01/2022. “ – The mitigation measures identified in the PfE evidence for M62 J20 and the A664/A661 Slattocks roundabout have been tested in the TA without any amendments, however this appears to be based on the traffic generated by this development only (see point above regarding the need to consider all relevant development). There is no reference to how the mitigation will be funded or delivered – (the SRN Future Work Programme report identified these schemes as being potentially developer-funded). There is no reference to mitigation at any other SRN junctions where there are forecast to be traffic impacts, and no measures identified for non-car modes to encourage modal shift and potentially support a Vision for the whole site. The submitted TA does not follow the principles set out in the PfE SoCG – there is a lack of focused analysis and further detailed assessment, with the initial mitigation schemes identified for the SRN in the PfE evidence modelled like-for-like without any further consideration or details of funding/delivery.*

Recommendation on Stakehill South Application

As set out above, there are fundamental issues with the Transport Assessment submitted for the Stakehill South site, primarily relating to the lack of adherence to the approach agreed in the PfE and SoCG between National Highways and the GM Authorities around the need for a master planned approach for the whole allocation and other relevant development, to identify mitigation requirements and a suitable strategy to deliver these; and a lack of adherence to the DfT Circular 01/2022 in terms of adopting a Vision-led approach. Following AECOM’s detailed review of the TA, we recommend they discuss these issues and their other comments with the transport consultants who are producing the TA.

Hence, it is requested from the Local Planning Authority that no decision is to be issued till **12th May 2026**, until the issues raised above are resolved.

Standing advice to the local planning authority

The Climate Change Committee’s [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift

away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

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

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