



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

Our Ref: 70105820

25 June 2026

Dear Sir/Madam,

**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017
REQUEST FOR SCREENING OPINION RELATING TO A PROPOSED WORKS AT ROCK
NOOK MILL, LIGHTOWLERS LANE, LITTLEBOROUGH, OL15 9EW**

On behalf of our client, Gay O'Gara Properties (Ireland) Ltd we write to request an EIA screening opinion in relation to proposed development at Rock Nook Mill, Littleborough, OL15 9EW for the erection of a new apartment building on the former Rock Nook Mill site with additional residential properties on surrounding land.

This is a formal request under the Town and Country Planning (Environmental Impact Assessment) ("EIA") Regulations 2017 ("the Regulations"). It has been prepared having regard to the Regulations and to Planning Practice Guidance ("PPG"). Regulation 6 requires a person making a request for a screening opinion to provide the following:

- A plan identifying the site (Appendix 1);
- A description of the development, including in particular (i) a description of the physical characteristics of the development and, where relevant, of demolition works;
- A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- A description of the aspects of the environment likely to be significantly affected by the development;
- To the extent the information is available, a description of any likely effects of the proposed development on the environment resulting from (i) the expected residues and emissions and the production of waste, where relevant; and (ii) the use of natural resources, in particular soil, land, water and biodiversity; and
- Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

This letter concludes that the proposals do not constitute development requiring an Environmental Impact Assessment (EIA).

BACKGROUND AND PROPOSALS

The application site extends to approximately 5.32 hectares (ha) and is split into four development parcels, as well as an additional site which is proposed for open space. It is located along the Rochdale Canal, running parallel with the railway line to Manchester/Leeds, and the A6033 which links Rochdale with Todmorden and West Yorkshire. The site lies within the Rock Nook Conservation Area.

The site to the North includes the site of the former five-storey Rock Nook Mill (originally built in 1892), the elevated car park to the East and the site of the disused Summit Quarries to the North-East. The site to the South includes the areas of vacant land.

The applicant was previously progressing plans to refurbish Rock Nook Mill and convert the building into flats with associated parking, with additional residential development on land in close proximity to financially support the costly refurbishment and conversion of the Mill. These proposals were the subject of pre-application engagement with Rochdale Council.

However, in August 2023 following the collapse of part of the mill, the building was deemed to be in a very dangerous condition and to pose a significant safety risk by Rochdale Council. As such the mill unfortunately had to be demolished.

The applicant is now seeking to provide a new landmark building on the site of the former Rock Nook Mill which will include flats and associated parking. In order to re-provide a landmark building within the conservation area, the proposed scheme retains proposals for additional residential properties on surrounding land.

The application site is split into five areas as follows:

Area 1 – Former Rock Nook Mill

This area is the site of the former five storey Rock Nook Mill (originally built in 1886). The site is located on Lightowlers Lane adjacent to the Rochdale canal, situated between the two existing Fothergill Engineering Fabrics Mills to the north and south. The mill had been subject to significant fire damage and in August 2023, following the collapse of part of the mill, the building was deemed to be in a very dangerous condition and pose a significant safety risk by Rochdale Council. As a result, the mill unfortunately had to be demolished. The site is currently partly cleared. Land to the rear of the mill slopes significantly.

This site will be home to a five-storey proposed apartment block which will reflect and respect the scale, massing and siting of the former landmark mill on the site. The proposal will create 38No spacious 1, 2 and 3 bed apartments and include a community room, a resident's room, roof garden, resident's courtyard and undercroft parking with 37 no parking spaces.

Area 2– Disused Quarry

This area is an elevated disused car park and vacant land to the northeast of the former Rock Nook Mill. The site forms part of the former Summit Quarries which was closed in 1928. At this location the site sits higher than the site of the former Rock Nook Mill, however the land itself is

generally flat with the land immediately to the east sloping steeply towards the former quarry face. To the north of the site are existing dwellings located on Timbercliffe.

This will be the location of four escarpment houses. These dwellings will be an irregular and angular form to blend into the contours of the landscape and reflect the industrial past of the quarry. The properties will be built in natural materials such as stone and wood to reflect the wider landscape. It is proposed that these houses will be two storey with terraces and balconies facing west to take advantage of the spectacular views across the valley towards Rochdale. Properties will also feature garages and parking as well as wrap around gardens. Landscaping will be provided around the dwellings to ensure that they assimilate into the surrounding valley. This site forms part of the enabling works to support the erection of a high-quality apartment block on the former Mill site.

Area 3 - Lock 44 Canalside

This area is located to the south of the most southerly Fothergill Engineering Fabrics Mill on the eastern side of the canal. The area is currently a vacant plot of flat land covered with grass. To the north the site is bordered by existing trees, further north are existing agricultural fields and a scrap/storage yard.

This site is vacant land, close to Lock 44 of the Canal on the eastern side. The scheme proposes four detached dwellings, 33 terraced properties and public open space for community use. The site is split into two parcels by an access road. The northern part of the site includes the four detached dwellings, the open space and a row of 11 terraced dwellings. The southern site contains the remaining 22 terraced dwellings, with three rows in a U Shape forming a courtyard setting.

The four detached dwellings will front the canal to the north of the site. These properties will include a garage, parking, and gardens to the front and rear. The design of these properties takes reference from the industrial nature of the area and have an industrial aesthetic, whilst embracing a contemporary aesthetic to reflect modern day living and needs. These are large family dwellings with generous gardens. The properties will feature recessed balconies facing the canal to make the most of the canal side views and setting in the landscape. There is open space for residents and community use located to the rear of these properties which can be accessed between the dwellings.

There will also be 33 terraced properties separated into four rows. The terraced properties will be a garden cottage style to reflect existing and former cottages in the area often built for workers of the mills. These existing cottages have a simple vernacular and are often set around a communal outdoor space. The proposed cottages will feature front and rear gardens and parking. The terraces in the southern part of the site are sited in a 'U formation' with a courtyard setting to encourage community. The proposed cottages will have a more modern appearance to avoid poor pastiche copies of existing stone cottages in the locality.

This site forms part of the enabling works to support the erection of a high-quality apartment block on the former Mill site.

Area 4 – East Gale

This area is located to the south of Greenvale Mill and to the west of the existing canal. This site comprises a long strip of land bordered by the canal to the east and the railway line to the west. The site is currently vacant land accessed via a bridge over the canal. Part of this site will be used

by the Environment Agency to construct part of the 'Rochdale and Littleborough Flood Risk Management Scheme – Littleborough Phase 1' which already benefits from planning permission and will assimilate into the proposed residential layout. Please refer to the below for details on the wider flood alleviation scheme.

This site is vacant land, located to the west of the Canal, close to Lock 44. This part of the scheme proposes 15 no. detached dwellings on this development parcel, plus a large area of landscaping.

These dwellings are laid out in a linear form to follow the elongated nature of the site. These dwellings are spaced generously to allow for views between the dwellings and across the site. The proposed dwellings have been designed to take inspiration from both the historic canal and industrial heritage of the area and are proposed to be of a modern design with materials such as dark charred wood and concrete. They have been designed to blend into the landscape with their elongated form and materials. The properties are two and a half storeys, set into the sloping nature of the site featuring a garage, parking and wrap around gardens.

The area to the east comprises a large, elongated strip of land for landscaping and mitigation for biodiversity net gain, to encourage wildlife and greenery as well as providing an aesthetic buffer from the flood defence works.

The site also retains access to the flood mitigation scheme currently under construction by the Environment Agency to the west of the railway line, which will provide flood defences for the area.

Area 5 – Proposed Bowling Green/Public Open Space

This site is existing vacant land, located to the north of Greenvale Mill and adjacent to the canal. The area will provide a meaningful space to the overall amenity provision on the site for use by existing and future residents. The site is flat with some trees lining the borders of the site.

Other – Land Given Over to flood alleviation Scheme

This area is located to the west of East Gale, on the opposite side of the railway line. This area forms a component of the 'Rochdale and Littleborough Flood Risk Management Scheme – Littleborough Phase 1'. This area does not form part of the planning application but is under the ownership of the applicant. This land has been given over to the Environment Agency for flood alleviation works to defend the wider Littleborough area from flooding including the proposal sites. These works have been granted planning permission and works have begun on site. Please note these works span this parcel of land and part of the 'East Gale' site.

This land does not form part of the planning application but is under the ownership of the applicant. The applicant has given this land over to the Environment Agency to ensure that essential works can be carried out to protect the area from flooding as part of the 'Rochdale and Littleborough Flood Risk Management Scheme'. The applicant is supportive of the proposals, understanding the great community benefits and therefore has worked with the Environment Agency to allow works to be undertaken on their land.

It is estimated that this scheme will better protect approximately 723 homes and 489 businesses from flooding. Planning permission has been granted for Phase 1 works of this scheme and construction began on site in February 2024 and continue to progress. The flood alleviation works at this site once constructed will seek to defend the Littleborough area from flooding including the proposal sites.

Summary

Access to the site is from Lightowlers Lane. It is considered that the site has a good level of accessibility for a semi-rural location with good active travel routes and good proximity to public transport links, many of which can be accessed without the need for a car.

Areas 1 and 2 are in Flood Zone 1 (area at low risk of flooding). Most of Area 3 is in Flood Zone 1. Area 4 is in Flood Zone 3.

Flood alleviation schemes brought forward by the Environment Agency in proximity to Area 4 are underway to provide flood protection for the area and Littleborough as a whole. The entire site is located within the Rock Nook Conservation Area.

The proposal includes 94 dwellings in total across the five sites; the site location plan can be found at **Appendix 1**.

PLANNING HISTORY

The site itself contains no recent planning history.

Adjacent to the site planning permission (20/00082/FUL) was granted in 2020 for Phase 1A of the Rochdale and Littleborough Flood Risk Management Scheme. The flood alleviation works included: temporary access works to Gale and a conveyance culvert under the railway line; and works to bridges to improve conveyance. Phase 1A Enabling works started in Spring 2021 following the approval of the planning application.

A subsequent application for Phase 1B was submitted and approved in 2022 (LPA ref: 22/00485/FUL). Phase 1B includes the creation of access into Gale West from a new road junction on Todmorden Road. A new bell mouth and pull-in would be created to allow vehicles to pull off the road and park up while the gate is opened. Phase 1 works on the Littleborough Flood Risk Management Scheme began in February 2024 and continue to progress.

The above flood alleviation works led by the EA are underway in Littleborough and will protect over 700 houses, over 450 businesses and will provide protection for the proposed dwellings located in Area 4 (East Gale).

ESTABLISHING WHETHER EIA IS REQUIRED

The European Court of Justice has made it clear that demolition works are capable of constituting EIA development. The government-issued National Planning Practice Guidance (NPPG) states that demolition proposals can fall within Schedule 2 of the 2017 EIA Regulations (particularly Schedule 2.10(b) - urban development projects). The NPPG states LPAs *“will need to consider whether demolition projects are likely to have significant environmental effects and require a screening opinion to be issued”* (Paragraph: 016 Reference ID: 4-016-20170728).

A Screening Opinion is sought under Regulation 6(1) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of the proposed development as outlined above.

The determination of whether an EIA is required rests on the consideration of whether the development is:

- Schedule 1 Development – in which case an EIA is necessary; or
- Schedule 2 Development – in which case an EIA is necessary only if the development is likely to have significant effects upon the environment as referenced within Schedule 3 of the Regulations.

The proposed development does not fall within one of the categories of development listed in Schedule 1.

EIA development is also defined as any Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location. Schedule 2 includes development listed in Schedule 2 where;

- Any part of a development is to be carried out in a sensitive area; or
- Any applicable threshold or criterion in the corresponding part of Column 2 of that table is exceeded or met in relation to that development.

The site is not located within a “sensitive area” such as a Site of Special Scientific Interest (‘SSSI’), National Park, Broads, World Heritage Site, Scheduled Ancient Monument or Area of Outstanding Natural Beauty.

Schedule 2 of the Regulations details development types where an EIA could be required, subject to certain thresholds being exceeded and subsequent screening against Schedule 3 of the Regulations.

Column 1 – Description of development	Column 2 – Applicable threshold and criteria
10 Infrastructure projects (b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;	i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or (ii) the development includes more than 150 dwellings; or (iii) the overall area of the development exceeds 5 hectares.

The proposal comprises an urban development project, the application site is approximately 5.32ha, which exceeds the 5ha threshold which warrants EIA screening. Therefore, the proposed development may trigger the need for an Environmental Impact Assessment.

Paragraph 18 of the National Planning Practice Guidance (PPG) states that it should not be presumed that developments above the indicative thresholds should always be subject to assessment, and each development needs to be considered on its merits. In making this

determination, local planning authorities (LPAs) must consider the relevant “Selection Criteria” identified in Schedule 3 of the Regulations. Schedule 3 identifies three broad criteria which should be considered, namely:

- The characteristics of the development (e.g. size, cumulation with other development, use of natural resources, quantities of waste and pollution generated, risk of accidents and risks to human health);
- The location of the development (e.g. the environmental sensitivity of the location); and
- The types and characteristics of the potential impact (i.e. the magnitude and spatial extent; nature; transboundary nature; intensity and complexity; probability; expected onset, duration, frequency and reversibility; cumulation with other existing and/or approved development; possibility of effectively reducing the impact).

PPG (paragraph 018, ID 4-018-20170728) confirms that not all criteria from Schedule 3 will be relevant in every case.

The same paragraph of PPG states:

“Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced. See the indicative thresholds and criteria. The table also gives an indication of the types of impact that are most likely to be significant for particular types of development.”

EIA SCREENING

Regulation 4(6) states that the ‘selection criteria’ set out in Schedule 3 should be applied when determining whether Schedule 2 development is EIA development. The Schedule 3 selection criteria relates to the ‘characteristics of development’, ‘location of development’ and characteristics of the potential impact, considered below:

Schedule 3: Selection Criteria for screening Schedule 2 development

Characteristics of development

The characteristics of development must be considered with particular regard to:

Criteria	Appraisal of the Scheme
1. Characteristics of Development (a) The size and design of the whole development;	The site exceeds the 5ha threshold in the EIA Regulations 2017.

Criteria	Appraisal of the Scheme
(b) Cumulation with other existing development and/or approved development;	There is one major approved planning application at Sladen Mill Halifax Road Littleborough Rochdale OL15 0LB located to the east of the site (approximately 400m from area 4). Outline planning permission for up to 35 dwellings was approved in October 2015, subsequent reserved matters and discharge of conditions applications have been approved. Aerial imagery shows that the site has also been cleared. There are no other major approved developments near the site.
(c) The use of natural resources, in particular land, soil, water and biodiversity;	The use of land and soil will be typical for a development of this nature. In terms of the use of water, the proposal will not be unusual in terms of its use and is expected to be served in the same manner as any other residential development, ie without any need for significant upgrading or any new sources of water being required. In terms of drainage and flood risk, a sustainable drainage system will be incorporated, such that effects are minimised and run-off is controlled. Proposed plans have been updated following discussions with the Environment Agency, to ensure the scheme does not conflict with the Rochdale and Littleborough Flood Risk Management Scheme (FRMS) and benefits from the defences. In terms of biodiversity this is explored further below. There are opportunities for mitigation both within the red-line areas of the proposed development and other nearby land under the ownership of the applicant.
(d) The production of waste;	The production of waste associated with the proposed development will be typical of a residential development of this scale. Details on construction waste will be submitted alongside the application. Whilst operational waste is inevitable, it will be dealt with in accordance with Council guidelines and is subject to the waste hierarchy. Refuse and recycling

Criteria	Appraisal of the Scheme
	bins will be provided and are likely to be conditioned as part of any planning application.
(e) Pollution and nuisances;	The proposed development would not generate a significant level of environmental pollution or noise. During demolition and construction of the proposed development, good practice measures will be adopted to minimise dust generation that might otherwise give rise to dust nuisance for existing properties located nearby. Once a contractor is appointed a Construction Management Plan will be submitted as part of a discharge of condition application. The site is not within Air Quality Management Area (AQMA), the nearest AQMA is to the Southwest is approximately 20 miles away from the site and the M62 approximately 3 miles to the southeast. Therefore there will be no impact. The application will be accompanied by a full assessment of the proposals with regard to traffic and transport, ecology, drainage and flood risk, noise and site conditions which confirm the location is suitable for the proposed use.
(f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;	The risk of major accidents or disasters is minimal.
(g) The risks to human health (for example, due to water contamination or air pollution).	Risk to human health from air pollution is low, because the number of vehicle movements are not predicated to have a significant effect upon air quality or traffic generation in the area. The risks to human health from water contamination is low because no water resources will be affected. Land will be disturbed as part of the demolition and construction phases. Measures will be taken to remediate the site and mitigate risks to human health if required.

Criteria	Appraisal of the Scheme
	As such, it is not likely to lead to an increase in risks to human health due to the nature of the development.

Location of development

Schedule 3 of the Regulations requires that the environmental sensitivity of geographical areas likely to be affected by development must be considered with particular regard to;

Criteria	Appraisal of the Scheme
(a) the existing and approved land use;	The surrounding land uses include pockets of residential development adjacent to the site and larger residential areas to the east and west. There are commercial and industrial uses to the north and south, as well as open green space and farmers fields further afield. The existing site comprises of allocated land in the Adopted Rochdale Core Strategy (RCS) key allocations are as follows: Green Belt, Protected Open Land and the Rock Nook Conservation Area. The application will be supported by a suite of documents that demonstrate the proposed development can suitably be accommodated on the existing site and that the principle of development is acceptable.
b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;	There are no known areas on, under or around the location of the site which contain important, high quality or scarce resources.
(c) the absorption capacity of the natural environment, paying particular attention to the following areas: (i) wetlands, riparian areas, river mouths;	There would be no impact upon absorption capacity on the natural environment on the basis that none of the following are present on site:

Criteria	Appraisal of the Scheme
(ii) coastal zones and the marine environment; (iii) mountain and forest areas; (iv) nature reserves and parks; (v) European sites and other areas classified or protected under national legislation; (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; (vii) densely populated areas; (viii) landscapes and sites of historical, cultural or archaeological significance.	• Wetlands, riparian areas, river mouths; • Coastal zones and the marine environment; • Mountain and forest areas; • Areas in which there has been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; and • Densely populated areas. Biodiversity The site has no statutory or non-statutory designation for nature conservation. The site is immediately adjacent to The Rochdale Canal Site of Special Scientific Interest (SSSI) and Site of Biological Importance (SBI) with direct hydrological linkage to The Rochdale Canal Special Area of Conservation (SAC) approximately 1 mile south and less than half a mile from the South Pennines SPA designated for its breeding birds and susceptible to recreational disturbance. The proposal will be supported by a Biodiversity Net Gain Report and Metric. Landscape The site falls within National Character Area 36 (Southern Pennines). The site also falls within the Landscape Character Type of Open Moorlands and Enclosed Upland Fringes (West / South Pennines) in The Greater Manchester Landscape and Sensitivity Study The Special Area of Conservation and Site of Special Scientific Interest are around 1.4 Kilometres to the south west. The South Pennine Moors Special Area of Conservation, Special Protection Area and Site of Special Scientific Interest is approximately 900m north east of the site.

Criteria	Appraisal of the Scheme
	It is anticipated that the findings of the updated LVIA (following the demolition of the Rock Nook Mill) will demonstrate that the site will be able to accommodate the proposed residential development without causing undue harm or significant adverse effects on the landscape character or visual amenity, subject to appropriate landscape mitigation.

Types and Characteristics of the Potential Impact (Schedule 3 Part 3)

Schedule 3 states that the likely significant effects of the development on the environment must be considered in relation to criteria set out in subsections 1 and 2 above (characteristics and location of development), with regard to the impact of the development on the factors specified in Regulation 4(2), taking into account eight considerations (a-e).

Criteria	Appraisal of the Scheme
(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);	These effects are considered in detail below.
(b) the nature of the impact;	
(c) the transboundary nature of the impact;	
(d) the intensity and complexity of the impact;	
(e) the probability of the impact;	
(f) the expected onset, duration, frequency and reversibility of the impact;	
(g) the cumulation of the impact with the impact of other existing and/or approved development;	
(h) the possibility of effectively reducing the impact.	

POTENTIAL ENVIRONMENTAL EFFECTS

Having regard to the Regulations, the key likely issues associated with the proposal on this site are considered below. The most significant issues are dealt with first before consideration of other issues which may also be of relevance.

Landscape

The sites falls within National Character Area 36 (Southern Pennines). The sites also falls within the Landscape Character Type of Open Moorlands and Enclosed Upland Fringes (West / South Pennines) in The Greater Manchester Landscape and Sensitivity Study. The Special Area of Conservation and Site of Special Scientific Interest are around 1.4 Kilometres to the southwest. The South Pennine Moors Special Area of Conservation, Special Protection Area and Site of Special Scientific Interest is approximately 900m northeast of the site

Therefore a Landscape and Visual Impact Appraisal (LVIA) was undertaken by Trevor Bridge Associates, in 2022, however due to passage of time and unfortunate demolition of the Rock Nook Mill this will have to be updated, however a brief overview of its findings are a useful indication of the impact of the proposal on the landscape which are set out below.

The LVIA concluded that the change in land use will clearly affect the local landscape character and have a visual impact on local receptors. However, this has to be seen in the context of many varied landscape types already found in this part of the Roch Valley, many of which are detractors to the landscape. There would be a visual impact, particularly to the east and west of the sites, but it would generally be confined to the lower valley sides. Other than the quarry site all of the proposed development sites are close to the valley floor minimising the impact to the surrounding moorland and to longer distance viewpoints. The retention of existing tree cover in combination with extensive new tree, shrub and hedge planting would aim to break up the massing of new housing and where possible screen views.

An LVIA has been undertaken by re-form landscape architecture in 2026 which considers the new scheme which includes the new five storey building on the former rock nook mill site. The LVIA examines the predicted effects of the proposed redevelopment of Rock Nook Mill and associated land at Rock Nook, Summit, Littleborough, Lancashire, on the local landscape character and visual amenity. The LVIA concludes that the proposals can be integrated without substantial harm to the character of the landscape context. The landscape has moderate capacity to accommodate change, due to the presence of existing development, derelict land, strong topographical enclosure, and established vegetation structure, which together provide a framework within which new development can be assimilated.

Visibility of the Site from both close and long-range views demonstrates the physical and visual containment of the Site within the Roch Valley. It has been demonstrated that the visual and landscape effects can be reduced through effective mitigation, which assimilates the development proposals within the surrounding landscape and ensures that the overall character and integrity of the wider landscape are maintained.

A comprehensive package of landscape mitigation will be provided as part of the development proposals. New landscaping will add substantially to tree and shrub cover in the area and will act not only to filter views, but also to enhance the area. Areas of wildflower planting would also be included where appropriate. The planting will be designed to create new habitats and to encourage biodiversity. All retained and new landscape will be subject to suitable management, agreed with the local authority, ensuring that it remains a viable legacy.

Therefore, it is reasonable to conclude from both LVIA's that the proposal subject to landscape mitigation the proposal could assimilate with its surroundings and would not have a significantly harmful impact on close and long range views.

Biodiversity

The scope of ecological works undertaken in 2020 and 2021 (and, where appropriate, are currently being updated) as follows:

- Preliminary Arboricultural Assessment (PAA)
- Preliminary Ecological Appraisal (PEA) including Preliminary Bat Roost Assessment

Currently the following ecological assessments are being undertaken:

- Bat Surveys
- Biodiversity Metric & Report
- Nesting Bird Survey
- Badger Walkover Survey
- Amphibian Appraisal including eDNA analysis
- Breeding Bird Surveys
- Invertebrate Surveys
- Vascular Plant Survey of neutral and acid grassland areas
- Aerial inspections of tree PRF's identified in GLTA report.

Statutory Designated Sites

The site does not lie within or adjacent to any statutory designations for nature conservation, however the site is located within 5km of two Natura 2000 sites including the South Pennine Moors SAC, SPA, SSSI, SBI and the Rochdale Canal SAC, SSSI, SBI. There is also a further non-designated site located within 2km of the site comprising the Summit Quarry SBI. The site is also located in the impact zone for six SSSIs within the local area.

The SSSI Impact Risk Zone requires that the Local Planning Authority should consult Natural England on likely risks from the following development categories (Ordnance Survey, 2022):

Airports, helipads and other aviation proposals;

Any industrial / agricultural development that could cause air pollution including industrial processes, livestock and poultry units with a floorspace greater than 500m², slurry lagoons and digestate stores greater than 200m² and manure stores greater than 250 tonnes;

General combustion processes exceeding 20 megawatt energy input, including energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis / gasification, anaerobic digestion, sewage treatment works, other incineration / combustion;

Landfill, including inert landfill, non-hazardous landfill, hazardous landfill; and

Any composting proposal with more than 75000 tonnes maximum annual operational throughput including open windrow composting, in-vessel composting, anaerobic digestion and other waste management.

The proposals to develop the site to residential use do not meet any of the above criteria.

The site is sufficiently distant from all other non-statutory designated sites. As such there will be no adverse impact upon non-statutory designated sites in the wider area as a result of the proposed development.

Protected and Notable Species

The PEA notes that the site contained suitable habitats for badgers, commuting, foraging, and roosting bats, nesting birds, common amphibians, hedgehog, otter, water vole, white-clawed crayfish, and notable invertebrates.

Vegetation and Habitats

The PEA notes that site comprised predominantly semi-improved grassland, with broadleaved woodland, scattered trees and tall ruderal margins. There are also bare ground habitats from viewable areas on Rochdale Canal with broadleaved woodland along the western boundary. Running water, comprising Red Brook, bounded Parcel 1 to the north and west, Parcel 2 to the south and is within Parcel 3. Offsite standing water was immediately adjacent to all parcels attributed to Rochdale Canal. Other habitats included scattered trees, building, wall, and hardstanding. Invasive flora was present throughout the site including Himalayan balsam, Japanese Knotweed, montbretia and rhododendron.

The updated and new ecological reports will describe the appropriate and proportionate measures and recommendations that aim to enhance the value of the site for wildlife such as roosting bats, nesting birds and biodiversity associated with residential developments. The recommendations comprise landscape planting, habitat creation and the application of positive habitat management of retained habitats in the long-term to achieve measurable gains for biodiversity and compliance with the NPPF, local planning policy and best practice.

In the presence of an ecologically informed site layout, and with appropriate mitigation and compensation, it is considered that there will be no significant impact on any statutory or non-statutory designated sites for nature conservation, protected or Priority Species or Priority Habitats.

Transport and Highways

A number of transport and highways studies have been undertaken. A Transport Assessment will accompany the planning application. Early highways work confirms that the site demonstrates a good level of locational sustainability for a rural location.

A technical note has been prepared to support the planning application which specifically addresses highways matters in relation to Area 4. This report concludes that the proposed development of this site can be accommodated without detriment to the operational capacity or safety of the local highway network and that it can be readily accessed on foot, by bicycle and by local public transport services.

Early transport studies indicate that the development will not be detrimental to either highway safety or the free flow of traffic and that its accessibility by other modes will provide genuine alternatives to the use of the private car. It also considered that the site has a good level of accessibility for a semi-rural location with good active travel routes and good proximity to public transport links, many of which can be accessed without the need for a car. It also concludes that

based on trip generation calculations there is not expected to be a material impact on either Lightowlers Lane or its junction with Todmorden Road. The report also found that vehicle speeds along Lightowlers Lane are low and additional vehicle trips can be safely accommodated due to the natural traffic calming occurring on Lightowlers Lane.

A comprehensive Transport Assessment which will detail the impact of the development on the highway network will be submitted as part of the planning application package.

The development will also be supported by a travel plan which will provide information to future residents regarding sustainable travel and will encourage residents to make their journeys to and from the site using sustainable modes including walking, cycling and public transport. This has the potential to reduce the number of single occupancy vehicle trips to and from the site and minimise the traffic related impact of the proposals, including on congestion.

Overall, the expected level of increase in traffic generated by the proposals is not likely to result in any material impact in terms of congestion with the impact of the proposed development in traffic and transport terms likely to be moderate to low impact as it is likely that the development will not generate a substantial number of new traffic movements.

Noise

The site is located to the east of the A6033, however much of the site is separated from the A6033 by green space or industrial buildings. A railway line is also located to the west of the site, in proximity to South Area 2.

The prevailing noise environment across the Site will be determined by a baseline survey, acoustic modelling and the production of a Noise Assessment report for the planning application. The noise assessment will include consideration to outline noise mitigation measures for the proposed noise sensitive areas of the development, i.e. gardens and habitable rooms of the proposed residential dwellings. Mitigation measures may include consideration to scheme layout and design techniques to minimise noise impacts, a demonstration of how building fabric specification could be used to appropriately control the noise impact on internal habitable spaces, and consideration to the attenuation that could be afforded by noise bunds/barriers for external living spaces.

The construction phase of the Proposed Development also has the potential to cause disruption at the nearest existing sensitive receptors to the east and south of the Site. Construction noise and vibration effects would be managed through the implementation of a Construction Environmental Management Plan (CEMP) and therefore adverse significant effects are unlikely. Noise arising from the operational phase of the development, such as potential changes in road traffic noise as a result of development generated traffic, is not expected to be significant at sensitive receptors surrounding the site.

Air Quality

The Proposed Development is located in the north of the town of Littleborough, to the East of the A6033. Much of the site is separated from the A6033 by buildings fields and the railway line. The site is not within Air Quality Management Area (AQMA), the nearest AQMA is to the Southwest is approximately 20 miles away from the site and the M62 approximately 3 miles to the southeast.

Changes in local traffic emissions are expected to be the principle of any changes to local air pollutants in the area as a result of the scheme affecting concentrations of NO₂, NO_x, PM₁₀ and

PM2.5. These emissions are likely the nearest AQMAs as they are a significant distance away and are not expected to result in exceedances of the objectives local to the Proposed Development.

The SAC and SSII are around 1.4 Kilometres to the southwest of the site located away from the A6033 and are unlikely to be significantly affected by deposition from emissions from generated traffic using the A6033.

The South Pennine Moors Special Area of Conservation, Special Protection Area and Site of Special Scientific Interest is approximately 900m northeast of the site and are also unlikely to be significantly affected by deposition from emissions from generated traffic using the A6033.

These designated sites are unlikely to be significantly impacted by nutrient nitrogen deposition and ammonia resultant from traffic emissions; and significant effects are not predicted.

Flooding and Drainage

Areas 1 and 2 are in Flood Zone 1 (area at low risk of flooding). Flood Zone 1 has an estimated less than 1 in 1000-year return period. Most of Area 3 is in Flood Zone 1, the river in the south is in Flood Zone 3. Area 4 is in Flood Zone 3 (high risk), a return period of 1% (1 in 100) or more chance of flooding from rivers. The access road to Area 4 is also in Flood Zone 2/3.

Flood alleviation works led by the EA are underway in Littleborough and will protect over 1000 houses and will provide protection for the proposed dwellings located in Areas 3 and 4.

Phase 1A: Enabling works started in Spring 2021 following the approval of a planning application for the works (LPA ref 20/00082/FUL). A subsequent application for Phase 1B was submitted and approved in 2022 (LPA ref: 22/00485/FUL), construction has started and is progressing. It is envisaged that the flood alleviation works will be completed prior to the occupation of any dwellings.

The Other Area as set out in the background and proposals section of this letter is land under the ownership of the applicant which has been given over to the above flood alleviation scheme. Part of the flood alleviation works will also be undertaken on area 4, the applicant has entered discussions with the Environment Agency to ensure that the proposals do not conflict with works on this site and that they benefit from the scheme's protection.

A Flood Risk (FRA) has been prepared following extensive discussions with the Environment Agency which sets out suggested mitigation and further works to ensure that the proposal would not increase flood risk on the site or surrounding areas. Measures include but are not limited to compensatory storage, raised floor levels and attenuation.

Drainage

All methods of surface water discharge will be considered in accordance with the drainage hierarchy set out in Paragraph 080 of the NPPG: Flood Risk and Coastal Change:

- i) into the ground (infiltration);
- ii) to a surface water body;
- iii) to a surface water sewer, highway drain or another drainage system;
- iv) to a combined sewer.

Where off-site surface water discharge is required, surface water will be restricted to greenfield runoff rates and attenuation provided to accommodate the 1 in 100 year plus climate change storm event. The most appropriate method of attenuation storage will be considered. United Utilities will be consulted with regards to foul drainage from the site, with preference given to discharge into mains drainage.

Works for drainage solutions are ongoing and will be submitted with a full application. This will include the location of attenuation on the site and any intersection with the Flood Alleviation works.

Based on the above, development on the site does not have a significant adverse effect on flood risk and drainage and therefore does not constitute EIA development.

Geo-environmental

The above Ground Investigation report was completed and demonstrated there to be a low to moderate risk natural subsidence hazards on site.

A Desk Study/Phase I Geo-environmental Risk Assessment has been prepared to support the planning application. The desk study provides an overview of the potential hazardous substances or conditions on or the near the site whilst establishing the anticipated geological conditions. The assessment concludes that there is no significant risk of contamination with the exception for ground collapse subsidence and recommended a Coal Mining Risk Assessment was undertaken this is discussed further below. It also recommends further investigation in the form of intrusive site works, which will be carried out and mitigate prior to the commencement of any works on site.

There is a coal mining legacy at the site therefore a Coal Mining Risk Assessment has also been carried out which concludes that site investigations to be undertaken in agreement with the Coal Authority should be undertaken to this area to assess the risks from both the Upper Foot seam, and the Upper Mountain seam. It is expected that this would be conditioned as part of any application and undertaken prior-to the commencement of any works on site.

A Preliminary Mineral Resource Assessment (MRA) has been instructed by the client which will collate baseline information and consider the potential impact on mineral reserves within the development site boundary. This report will also where appropriate make recommendations for further work and will be in consultation with Greater Manchester Combined Authority Minerals Planning Officer. The Preliminary MRA will also set out compliance with Policy 8 of the Greater Manchester Joint Minerals Development Plan 2, and relevant national planning policy.

Further details will be provided as part of the planning application and planning conditions will be secured to ensure further assessment are undertaken (where necessary) during determination of the application.

Considering the above, the proposed development, its users and the environment will not be at risk from, nor will it lead to the generation of any adverse impacts in terms of ground contamination and conditions.

Socio-Economic

The proposed development will generate economic and social benefits in the area, including creation of a significant number of temporary jobs in the construction phase.

The proposal will also deliver substantial socio-economic benefits to the locality including additional GVA to the local economy within Littleborough.

Based on the above, development on the site will have a positive impact on socio-economic issues and therefore does not constitute EIA development.

CONCLUSION

The proposed development comprises residential development at Rook Nook Mill, Littleborough.

This EIA screening report considers the likelihood of significant environmental effects arising from the proposed development, including in cumulation with existing and approved developments. It accords with the Regulations and has regard to PPG.

No significant environmental impacts are expected in relation to the local highway and transport networks, noise, flooding and drainage, arboriculture, biodiversity or landscape during the operational phase and mitigation measures can be implemented during the construction phase. The development would not result in significant effects that would require assessment in accordance with the EIA Regulations. The planning application will be accompanied by a prior agreed suite of technical reports and assessments, which will enable a full understanding of the scheme's potential impacts without the need for an EIA. Therefore, the preparation of an Environmental Statement is not required in support of this proposal.

We trust the above is acceptable, but should you have any queries or require any further information please do not hesitate to contact me.

Yours faithfully



Nick Fillingham
Director (Planning Consultancy)