

Rochdale MBC
Number One Riverside
Smith Street
Rochdale
OL16 1XU

Your Ref OTH/2026/0588

Our Ref CRTR-PLAN-2026-47163

Thursday 6 August 2026

Dear Tom Hiles,

Proposal: Request for screening opinion in respect of the proposed erection of new apartment building and dwellings

Location: Rook Nook Mill, Lightowlers Lane, Littleborough

Waterway: Rochdale Canal

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

Based on the information available our substantive response (in accordance with the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)) is the following general advice:

The consultation relates a screening opinion request for an Environment Impact Assessment (EIA) for residential development comprising up to 94 residential units (flats and dwellings), on a site area of 5.32 ha split into 4no. development parcels together with open space, landscaping and access off Lightowlers Lane.

The consultation is supported by an EIA Screening Letter (WSP UK Ref. 70105820) and accompanying Site Plan as Proposed – Identification of Areas (Drawing no. 59 C).

The Trust notes that the EIA Screening Letter concludes that no significant environmental impacts are expected and that the proposed development would not constitute EIA development. The Trust has no comment to make with regard to whether an EIA is required for this development.

In the event of a future EIA or planning application being prepared in connection with the proposed development, the Trust would wish to see any potential environmental impacts on our waterway, and its users, fully assessed and mitigated against, to safeguard its environmental, ecological and water quality, structural integrity, navigational safety and safety of canal users during construction and operation of the above development.

Regarding potential environmental effects of the proposed development upon the Rochdale Canal and its users, we have the following comments to make (only where considered relevant to the Trusts interests).

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Pollution and ground conditions

There is potential for dust, vibration and contaminants from construction, which would be largely covered with the Construction Environmental Management Plan (CEMP). This is acknowledged in the Screening Letter, but it doesn't refer to the canal as a potential sensitive receptor in this regard.

Users of the waterway should be included as nearby sensitive human receptors with regard to any assessment of air quality, during construction and operational stage, although it is acknowledged that users would be transitory. The waterway should be identified as a sensitive receptor particularly with regards to dust emissions during the construction phase.

There should be measures to mitigate fugitive dust emissions during construction based on IAQM guidance, with details on protective measures for the canal to avoid impacts during construction and include the canal and its users as receptors with respect to dust management, as part of any robust and comprehensive CEMP.

Due to the historic industrial uses, there may need to be a Remediation Strategy too.

Landscape and Visual

The Trust would agree that the assessment should consider potential impacts upon landscape character and visual amenity for canal and towpath users and the corridor should be a key receptor. The proposed development has the potential to result in notable cumulative effects on the character, particularly as development is spread across multiple parcels within the Rock Nook Conservation Area. The Trust would like to see consideration of the cumulative landscape and visual effects arising from development across the multiple parcels; effects on the character and setting of the Rochdale Canal corridor, including the introduction of urbanising influences; visual effects on canal users, including towpath users & boaters, and the contribution of the canal corridor and surrounding open land to the significance and setting of the Conservation Area and nearby heritage assets.

Cultural Heritage

The information submitted suggests a profound and harmful impact on the character and appearance of Rook Nook Conservation Area and the setting of Lock 45 and Pike House Bridge (both are Listed Grade II). The rural setting, views into and out of the conservation area, spaces between buildings and relative tranquillity of the towpath all appear important to the designations. The 2006 conservation area has not been appraised (although presumably there will be some information/description that accompanied the Council's designation), which suggests that an in-depth understanding of significance is required before assessments can be undertaken and decisions made on the wholesale re-development of the area i.e. section 72 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require 'special attention' and 'special regard' to preservation in the planning balance.

Biodiversity

The canal should be fully considered in respect of its biodiversity value and any potential impacts of the development proposals in terms of habitat loss, impact on species that use the canal corridor, consideration of the Local Wildlife Site designations, Biodiversity Net Gain implications, as well as opportunities for enhancement.

Ecological habitat, and water quality, along the canal must be protected during and post construction works, with consideration being given to protection from, water pollution, air pollution and light pollution, during construction and during the operation of the development, and providing mitigation/enhancement where appropriate. The ecological value of the waterway should be recognised and assessed as a receptor in terms of being susceptible to pollution during construction and operation.

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The Trust notes the scope of the ecological assessments that will be undertaken and updated, as listed in the Screening Letter. Potential overshadowing on canal habitat which contains both marginal and aquatic plant species should also be taken into consideration

Transport and Access

The whole site would be accessed via Punchbowl Bridge (Bridge 43) and along with bridges 44 (Sladden) and 45 (Pike House), would need pre & post condition surveys, weight limits imposing & protection measures used. Delivery vehicles are highly likely to cause damage & there is a history of damage to Bridge 43. There is also an issue with the deck. Bridge 45 also has a 3T weight restriction, so is unsuitable for vehicular access.

The canal would also offer opportunities for active travel from the proposed development to Littleborough and for leisure activities. The Trust would expect this to be included in Transport Assessments.

Structures and canal stability

Canals are not water-tight and retain their water through a combination of waterway wall construction, clay lining and earth pressure. Vibrations, for example, from piling operations, ground compaction or plant/vehicle movement, in the vicinity of the canal can create land instability and lead to leaks or even, in extreme cases, breaches of the canal which in turn results in flooding of adjacent land.

As you will be aware, land stability is a material planning consideration and is referred to in paragraphs 187 and 196 of the NPPF and is the subject of more detailed discussion in the NPPG (see <https://www.gov.uk/guidance/land-stability>). We consider that this advice and guidance is clear in identifying that the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure and the public. We appreciate that the issue of land stability can be complex and often also involves other regimes such as Building Regulations and legislation such as the Party Wall Act 1996. However, the NPPF is clear that planning decisions should ensure that new development is appropriate for its location in the context of avoiding unacceptable risks from land instability.

Parcel 1 - Situated above two non-principal cuttings (RD-023-013-L & RD-024-018-L) with a maximum height of 2.8m. We would require the developer to demonstrate that the development would not detrimentally affect the condition of the cutting. Cross-sections illustrating the relationship of the development to the canal, foundation details, drainage details and slope stability analysis would be required. The proposed parking area in zone 1 is possibly too close to the canals edge and edge protection may need to be installed. There would be a need to consider loading from vehicles that close to a cutting.

Parcel 3 - Situated above a non-principal cutting (RD-024-018-L) with a maximum height of 2.8m. We would require the developer to demonstrate that the development would not detrimentally affect the condition the cutting. Cross-sections illustrating the relationship of the development to the canal, foundation details, drainage details and slope stability analysis required

Parcel 4 - Residential dwellings to be constructed within embankment that supports the canal. These works should not be taken lightly. The developer should demonstrate that the development would not detrimentally affect the stability of the embankment nor the canal that it supports. We would require slope stability analysis, cross-sections with foundation and retaining wall designs, foundation details, drainage details, and a full and comprehensive construction method statement that focuses on the safeguarding of the canal. Confirmation of the ownership and maintenance liabilities of the as-built structures to safeguard the right of support to the canal.

Flooding and drainage

The Trust notes the matters stated in the Screening Letter.

Parcel 3 – Culvert (Sewer - RD-024-028) is a 225mm diameter foul sewer which appears to be owned by United Utilities (UU). The Trust does not have any particular concerns on this and would expect relevant approvals from

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UU / LLFA if there is any proposed discharge to it or otherwise. In terms of protection, the Trust would also expect a competent contractor to follow standard good practice measures for any works in and around buried services, with this sewer being clearly shown on UU mapping.

Greenvale Feeder Culvert (RD-024-020) is a culverted section of a feeder, technically under Trust remit. However, it appears to be a stone box culvert under the road on the offside of the canal. Stone box culverts by their nature are prone to brittle failures and there are cracked and displaced soffit stones previously noted. The Trust's abnormal load checks on file, typically show a limit of 44T (subject to review and approval). The Trust may require mitigation to prevent collapse/ strengthen the box.

Socio-economic impacts

The Screening Letter notes that the proposed development will generate economic and social benefits in the area, but the canal is not referenced. It plays a multifunctional role as a corridor for recreational pursuits and leisure activity, contributing to local economy, tourism, and as a resource for health and well-being, which should be recognised in any assessment, which should include canal and towpath users and boaters.

The Trust as adjacent landowner

We encourage early engagement between the developer and the Trust in order to address any practical issues around development works on adjacent land. We run a free pre-application advice service and encourage developers to engage with us as early as possible on their proposed developments. Further information can be found at <https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/what-were-interested-in/pre-application-advice>

We note that parcel 4 does overlap Trust land under Land Registry Title No. MAN202880.

Any works to Trust owned land, or any use of land in our ownership, would require the prior consent of the Canal & River Trust. The agreement of the Trust is required for any works undertaken on land in its ownership. The contact details for the Trust's Estate Management Team is at enquiries.northwest@canalrivertrust.org.uk

Any works adjacent to, on or involving the use of Trust owned land, (including demolition, excavation, piling, scaffolding, craneage) will also need to comply with the 'Trust's Code of Practice for works affecting the Canal and River Trust'. The applicant should in the first instance contact the Trust's Infrastructure Services Team to discuss matters relating to the Code of Practice and to obtain any necessary consents. The contact details for the Third Party Works team is Enquiries.TPWNorth@canalrivertrust.org.uk.

Discharging surface water to the canal would require the prior consent of the Canal & River Trust. The Trust is not a land drainage authority and as such discharges are not granted as of right, where they are granted they will usually be subject to completion of a commercial agreement.

The applicant is advised contact our Utilities Team in the first instance at utilitiesenquiry@canalrivertrust.org.uk

The above general advice is on the basis of the information provided and does not prejudice any further comments to be provided in the event of a formal planning application being submitted or as the proposed design evolves and further detail is provided.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

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