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21 September 2026

Subject: Corrosion Resistant Products Ltd, Todmorden Road, Littleborough (Ref: 25/00200/FUL)

Dear Nick,

Further to your previous correspondence with the applicant on the 3rd August, I am happy to provide you with the following documentation:

- Badger Camera Survey Report
- Biodiversity Metric
- Biodiversity Net Gain Report
- Ecological Enhancement Map
- Invasive Non-Native Species Protocol
- Landscape Plan
- Otter Report
- River Condition Assessments
- River Data
- Water Vole Report

I note that the previous case officer via GMEU requested additional information on 21st May 2025. The applicant has instructed Elite Ecology to carry this work out. This confirms that no evidence of otters or water voles have been recorded during survey visits. There is also a negligible impact on badgers. A River Condition Assessment has been carried out which confirms that the River Roch and Town House Brook are in a 'fairly poor condition'. Invasive non-native species are addressed by a robust removal plan, which can be secured by way of planning condition.

As a result of the above, the applicant has instructed a revised Landscape Plan and BNG Report with an Enhancement Plan. The planting proposals include wildflower meadow within neutral grassland as well as tree planting and native hedgerow. It concludes that the existing baseline for BNG is 1.6 area habitat units, with 1.41 units lost during development (58% loss). In terms of linear habitats, this is currently 0.39 units for the baseline, with 0.27 units lost during development (69% loss). Water course habitats are unchanged. The report recommends the creation of 0.77ha area habitats on-site, which will generate 1.35 new area habitat units. A total of 92m of linear habitats in the form of new hedgerow will also produce 0.43 new linear units, providing a 11% BNG. This will somewhat mitigate the losses, however off-site credits totalling 0.22 area habitat units and 0.15 watercourse units are required to meet the requisite 10% uplift.

Additionally, the revised Landscape Plan now allows for 34 new tree specimens to be planted, including a mix of birch, holly, hornbeam, rowan and cherry trees. The proposed development requires the removal of 42 existing trees, with 21 trees retained. It is acknowledged that this does not meet the 2:1 replacement ratio set out in Policy G6 (h) when considered solely against the number of trees proposed for removal. However, the proposal balances many competing factors including BNG, drainage attenuation, parking and the optimal use of space of an existing employment site. As such, the proposed tree planting is acceptable when held in the planning balance.

The design and layout of the redevelopment have been reviewed and amended to ensure that the proposals compliment the wider area and do not have an overbearing impact on neighbouring properties on Todmorden Road. This has resulted in amendments to the storage unit extension with a reduced building height by 1m and horizontal cladding on building corners. The applicant has worked proactively with the LPA to ensure that the proposals are sympathetic to the wider area. However, it must be borne in mind that the proposal site is located within a designated area of employment in the development plan where such uses should be supported in principle.

The proposal is also supported by the NPPF (2026), in particular Policy S4(1) of NPPF which confirms that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, and Policy L2(1) and E2 which confirm that substantial weight should be given to making better use of vacant and underutilised land and building as well as the economic benefits of commercial developments which allows businesses to expand.

In terms of flood risk and drainage, a revised FRA is underway that will be able to satisfy the LLFA response dated 15th July 2025 and the Environment Agency's response dated 22nd December 2025, providing revised modelling data within the updated Assessment.

On the basis that the revised FRA will address the comments of consultees, we confirm proposals are entirely appropriate and comply with relevant planning policy and guidance. There is therefore a compelling case for the granting of permission without delay.

Yours sincerely,

Leon Armstrong MRTPI
Director