



Transport for
Greater Manchester

Transport for
Greater Manchester

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20th July 2025

Draft Response for consultation

Location: Land Bound To The North By Brightley Brook, Pilsworth Fisheries, Pilsworth Road & Heywood Distribution Park; The West By Whittle Brook; The East By Birch Industrial Park & Agricultural Fields; And The South By The M62 Corridor

Development: Application for outline planning permission (all matters reserved) for a national scale employment development, comprising Storage & Distribution (Use Class B8) and Industrial (Use Classes B2, E(g)(ii) and E (g)(iii)) uses (including, but not limited to, Logistics, Manufacturing Processes and Data Centres), with supporting ancillary uses including Hotel (Use Class C1), Commercial, Business & Service (Uses Class E (a-g)), Education (Use Class F1(a)), Local Community (Use Class F2(a-c) uses, Sui Generis uses (in accordance with the Uses Schedule), and associated demolition works, landscaping, drainage, ecological enhancements, highway works, cycleway and footpath linkages and other ancillary infrastructure

Dear Helen Leach

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.



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

The application seeks Outline Approval for up to 600,000sqm of employment floorspace with up to 5,000sqm of supporting uses (as defined by the Uses Schedule).

The 600,000sqm employment floorspace comprises:

- B2, E(g)ii and E(g)(iii) 180,000sqm
- B8 (including Data Centres) 420,000sqm

The potential supporting uses, (up to 5,000sqm), are set out in the Uses Schedule submitted with the Application (summarised in **Table 6.1 of the TA**).

The application site is bounded by Brightley Brook and Pilsworth Road to the north, by Birch Industrial Estate and the committed South Heywood Masterplan Area (SHMA) to the east, by the M62 to the south and by Whittle Brook to the west.

The JPA1.1 Allocation Site extends further to the west of the Application Site crossing Whittle Brook and is bounded by the M66 in the west. It also extends further to the northeast of the application site as the land to the northeast is the location of the committed SHMA.

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

In accordance with Places for Everyone (PfE) Policy JP Allocation 1.1: Heywood / Pilsworth (Northern Gateway), development in this allocation will be required to:

- 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.



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- 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.
- 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.
- 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.
- 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.
- 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

In accordance with JP-D1, a comprehensive Infrastructure Phasing and Delivery Strategy should be submitted, setting out what infrastructure is required, when it will be delivered, and how it will be funded.

To ensure the effective development and implementation of the infrastructure needed to deliver the vision and objectives of the Plan, we will 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.



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Vision-Led Planning

Paragraphs 115 to 118 of the December 2024 NPPF require that significant impacts on the transport network and highway safety are mitigated through a vision-led approach. This reinforces the need for early integration of transport planning into development proposals, ensuring alignment with sustainable transport objectives. A vision-led planning approach should start with a vision of what the development is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision.

Transport Framework Document

TfGM has led the development of the Northern Gateway Transport Framework Document (TFD) in collaboration with Bury and Rochdale Councils, National Highways and the Northern Gateway Joint Venture (JV). The TFD (v1.1) outlines the transport vision for the development (including both JPA1.1 and JPA1.2), that all relevant stakeholders have agreed could be achieved by the end of the development build-out. The TFD adopts a vision-led planning approach to determine interventions that will ensure the development comes forward sustainably, and will be acceptable for planning purposes, ensuring it aligns with PfE, NPPF and DfT Circular 01/2022 requirements.

The Transport Framework Document sets out the transport vision requirements and these have been referenced in Section 2 of the Transport Assessment.

Development Trip Derivation

Vision-led principles should underpin the development of all transport strategies in support of new development, such that the design of highway infrastructure needed to mitigate significant development impacts is based on residual car use (once the uptake of sustainable transport in accordance with the vision has been accounted for) and ensuring safety and permeability for sustainable modes, following the application of the vision-led approach. The following sections therefore focus on sustainable transport accessibility first, with highway impacts covered following this.

1. Trip Generation, Distribution and Modal Share

TfGM, Bury Council and Rochdale Council (alongside National Highways) have been working alongside Tetrattech for a number of months via the Highways Technical



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Working Group to work towards agreement of the underlying assumptions related to trip generation, trip distribution and modal share.

I. Trip generation

The underlying trip rates for each land use from the TRICS database are considered acceptable.

II. Mode share

In section 7.6.4 – 7.6.9 Tetra Tech include a rationale as to why the car driver mode share of 60% tested for a 'Policy On' scenario for development trips (rather than 65% quoted within the TFD v1.1) is considered acceptable.

In a meeting on 29/04/2025, TetraTech confirmed that the mode shares adopted in the TA in all scenarios include HGVs and LGVs. This is not an acceptable way to make comparisons with the GM Right Mix targets as goods vehicle movements cannot be influenced by the public and active travel access strategy (which is intended for commuter trips to the site). Therefore, TfGM has manually disaggregated the HGV and LGV trip rates from the previously identified vehicular trip rates. The change is shown in Table 1 with reference to 'Right Mix' (car (including car sharing) vs public transport and active travel) percentages. A comparison with the Census 2011 data for the Middle Super Output Area (MSOA) covering Heywood Distribution Park is also shown.



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Table 1: Baseline Mode Share Comparison

Scenario	Car driver	Car passenger	Walk	PT	Cycle	Sustainable (Right Mix)	Car (Right Mix)
Original JV (AM) used as reference in TFD v1.1	78%	13%	5%	3%	1%	9%	91%
JV HGV/LGV removed (AM)	70%	18%	7%	4%	1%	12%	88%
JV HGV/LGV removed (PM)	70%	15%	9%	4%	2%	15%	85%
Census 2011 Heywood Distribution Park	74%	8%	8%	8%	2%	18%	82%

It is notable that the TRICS data shows a high percentage of car sharing relative to the more geographically specific Census data, as well as a relatively low percentage to public transport. It may also be difficult to achieve a walking mode share of 7%+ given the distance of the site from surrounding residential areas. To inform a robust baseline assessment, it is considered that the car driver mode share should represent 74% of person trips (aligned with the nearby Census data), with associated reductions in the car passenger percentage. The walk mode share should also be adjusted down with an associated increase in the public transport mode share to account for the location of the site and the basic opportunities of the Bee Network e.g. integrated ticketing and a basic level of service to the site.

A suggested location specific baseline mode share is set out in Table 2.



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Table 2: Suggested Baseline Mode Share

Scenario	Car driver	Car passenger	Walk	PT	Cycle	Sustainable (Right Mix)	Car (Right Mix)
Suggested baseline (AM)	74%	14%	5%	6%	1%	12%	88%
Suggested baseline (PM)	74%	11%	5%	8%	2%	15%	85%

Whilst this suggests an increase in the car driver mode share, it is understood from the TA methodology that vehicular trips are fixed (from vehicular trip rates in TRICS) and this adjustment will simply affect how vehicular trips are adjusted in the vision-led scenario(s).

With reference to acceptability of a 60% car driver mode share for the site 'Policy On' full build out (application/allocation) scenario, the table below compares the suggested baseline mode share from Table 2 with 'Scenario 2' from the Transport Framework Document v1.1 (which has been accepted by stakeholders as a reasonable, vision-led future scenario) and the JV's suggested approach (which substantially increases the mode share to car passenger).

Table 3: Full Application/Allocation Build Out Mode Share Comparison

Scenario	Car driver	Car passenger	Walk	PT	Cycle	Sustainable (Right Mix)	Car (Right Mix)
Suggested baseline (AM)	74%	14%	4%	7%	1%	12%	88%
Suggested baseline (PM)	74%	11%	4%	9%	2%	15%	85%
TFD v1.1 'Scenario 2'	65%	5%	4%	20%	6%	30%	70%
TetraTech suggested mode share	60%	10%	4%	20%	6%	30%	70%

It is considered that a car driver reduction in commuter mode share from 74% to 60% is likely to be too ambitious for the site, but the car passenger mode share previously assumed in the TFD was possibly not ambitious enough given high levels of car sharing at similar TRICS sites and a car passenger mode share of 8% at the MSOA covering Heywood Distribution Park in 2011.



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A suggested location specific full application/allocation build out mode share is set out in Table 4 below, with the mode share from 'Scenario 2' from the TFD v1.1 remaining applicable for public and active transport as part of a vision-led scenario.

Table 4: Suggested Full Application/Allocation Build Out Mode Share

Scenario	Car driver	Car passenger	Walk	PT	Cycle	Sustainable (Right Mix)	Car (Right Mix)
Suggested full build out	62%	8%	4%	20%	6%	30%	70%

In the current TA, in the 2032 (opening year) assessments, baseline mode share is applied. However, a vision-led mode share is needed for site opening.

To manage residual impacts on the highway network from site opening (where the uptake of alternatives to car use are uncertain), but also to tap into the opportunities of the Bee Network and a vision-led public transport network to be provided from site opening, an opening year mode share alongside the suggested baseline and full application/allocation build out mode share are presented in Table 5 below.

Table 5: Suggested Mode Shares for Future Scenarios

Scenario	Car driver	Car passenger	Walk	PT	Cycle	Sustainable (Right Mix)	Car (Right Mix)
Suggested baseline (AM)	74%	14%	4%	7%	1%	12%	88%
Suggested baseline (PM)	74%	11%	4%	9%	2%	15%	85%
Vision-led opening year	72%	11%	4%	10%	3%	17%	83%
Vision-led application/allocation complete	62%	8%	4%	20%	6%	30%	70%

Table 5 aims to illustrate early take up of the vision-led approach leading towards the full build out 'Scenario 2' mode share from the TFD v1.1.



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In all cases, these modes shares should be applied to person trips EXCLUDING HGV and LGV trips as it is assumed that all of these would be freight related and not impacted by the measures to influence commuter trips.

These assumptions will need agreeing across all stakeholders before the tests utilising these assumptions should be undertaken. This is to avoid abortive work from all parties.

III. Trip distribution

The distribution and assignment of commuter trips has been requested from Tetra Tech via the Highways Technical Working Group to cross reference whether the distribution utilised in the TA is in alignment with the NG TFD v1.1. Section 11.2.1 states that “WSP Strategic Modelling Team (Leeds), have undertaken Select Link Analysis of the development Site Access Roads to determine the routing of development trips on the network. The resultant trip distribution diagrams are presented in Appendix N”. However the routing provided only shows one percentage which it is assumed is for cars, LGVs and HGVs. A disaggregation between car drivers (which are considered as part of the TFD) and LGVs and HGVs (which are not considered via TFD) is required. Given the delay and evident misunderstanding as to what is required in terms of the car driver distribution, access to the NGTM is requested so that the car driver matrix can be compared with the distribution set out in the TFD and the distribution for HGV and LGV trips (assumed to be derived from donor zones) can also be understood.

Sustainable Transport Accessibility

1. Public Transport

I. Bus Services

The places to be served by bus services in accordance with the Scenario 2 vision are set out in the TFD v1.1.

Section 7.4.1 sub point iv states that “the Public Transport and Active Travel Strategy elements identified by TfGM within the TFD sufficient to Support Scenario 2, will be funded proportional to the development impacts, as the Proposed Scheme progresses. There should be recognition of the fare revenues from bus services and the wider roles that the mitigations play in delivering wider GM Transport Strategy needs”.



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TfGM has been working on how the current network around the site may be adjusted to serve Northern Gateway, as well as phasing for the bus strategy, though further details of site phasing will be needed. The required services will need to be funded by the developer in order to make the site acceptable in planning terms.

Section 6.6.5 makes reference to an on-site shuttle bus and this being addressed via Section 106 contributions. Whilst the site is large (and internal connections may be necessary), the initial preference would be for Section 106 contributions towards bus services connecting with surrounding areas, as this will mitigate trips on the highway network and ensure access to employment for those without a car, which is a key focus for the site.

II. Bus Infrastructure

Section 15.3.3 states that the public transport interchange will be delivered by TfGM. The Design and Access Statement states that “a transport interchange is proposed in the southern mixed-use hub”. TfGM would suggest that an interchange in the southern location would not be preferable as it is understood that this will be one of the final areas of the site to be developed, and infrastructure to support sustainable travel to the site should be in place as early as possible as part of site delivery to ensure it supports and encourages sustainable travel from site opening. In addition, TfGM does not have funding for an interchange on the site and, due to the fact that the requirement for the facility is wholly due to the development, this should be fully funded by the developer.

The Transport Assessment suggests that the site will be built in stages. As the site is built out, suitable turnaround facilities will be required if buses are unable to pass through the site. Reversing of buses will not be acceptable.

Design Code S7-1 should make reference to the consideration of bus priority on primary and secondary streets as well as bus corridors, should highway modelling indicate that significant delays to bus services are likely, due to predicted traffic levels.

III. Rapid Transit

TfGM is assessing the strategic benefits and the likely delivery costs, which may include the provision of developer contributions, of providing faster, more frequent and higher-capacity journeys (‘rapid transit’) to and from Middleton and between Bury and Rochdale. Whilst these are long term proposals, active travel integration to these potential future proposals should be considered which would also support active travel connections to the existing surrounding urban areas on these rapid transit routes.



2. Active Travel

I. Active Travel Routes

In order to maximise the benefits of the site's location and to encourage walking and cycling, it should be ensured that the pedestrian and cycling environment, within and around the site, is designed to be as safe, attractive and convenient as possible, including natural surveillance where possible. This should provide high quality walking and cycling links which connect to existing and future walking and cycling infrastructure.

Section 5.5.9 acknowledges the need for active travel facilities to be upgraded to serve Northern Gateway. The details of which routes will be upgraded to serve the planning application should be made clear. As with public transport, the TFD identified the active travel routes in need of upgrade to support sustainable access to the site. Further work is now needed on the active travel infrastructure phasing and contributions towards upgrades will be required to support the TFD Scenario 2 vision and make the site acceptable in planning terms.

Section 6.5.6 states that "It is assumed that to allow development of the plots, all existing PRoW across the Application Boundary will be extinguished. A network of replacement PRoW will maintain and improve permeability through the Application Site and throughout the JPA1.1 Allocation Site". Is there a commitment to retain and improve all current PRoWs through the site? This should be clarified.

With reference to Design Code S1-5 Street design and active travel routes, TfGM support the design quality ambitions for active travel routes across the site, including commitment to attain Streets for All and LTN 1/20 standards for walking/wheeling and cycling across the site.

Access barriers should be avoided on planned traffic free routes. If there are locations where access barriers are judged to be necessary, inclusive design guidance should be followed to ensure access for all walking/wheeling and cycle users. Please refer to guidance in Key Issue 6 of the GM Interim Active Travel Design Guidance.

With reference to Design Code S4, S5, S7, the application of DMRB standards, which are primarily intended for trunk roads and motorways rather than local streets, can undermine the creation of well-designed, people-focused employment areas. Both Primary and Secondary streets should be designed as local streets (max. 6.5m width with widening on bends if required by tracking at reserved matters) ensuring they



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provide safe access for buses, HGVs and motor vehicles, but emphasise placemaking and prioritise user experience for people walking/wheeling and cycling. This can be achieved through tighter road geometry and turning radii to achieve a safer, more inclusive environment for all users. Taking a more balanced approach can deliver better outcomes for movement and safety of all users and support both economic activity and the creation of attractive, functional employment sites.

With reference to Figures 9 and 10 and Design Code S9, where soft landscaping is located adjacent to plot parking or service and delivery areas, careful consideration should be given to the type and location of street trees and planting - owing to the absence of natural surveillance from overlooking buildings, in accordance with Design Code 010-1.

The standards set out in Design Code S3-1 and S4-1 are not consistent with the footway design requirements specified in Chapter 3 of the GM Streets for All Design Guide (see Table 3.4). TfGM considers that the site must provide a betterment of 2m wide footways across the site.

With reference to Design Code 24-1, footways should be provided on both sides of the carriageway to create a permeable, legible, safe and attractive pedestrian environment.

With reference to Design Code S2-1, S4-1 and S5-2, pedestrian crossings should also reference the design of side road junction crossings that prioritise pedestrian and cycle movements across the junction e.g. raised table crossings, continuous footways etc. in areas of high pedestrian footfall.

II. Cycle Parking

Consideration should also be given to short stay cycle parking as well as longer stay secure cycle parking. Short stay cycle parking could include covered Sheffield stands and should be suitable for different types of bikes e.g. cargo bikes.

The volume of cycle parking should at least meet minimums in LTN 1/20 Chapter 11 Table 11-1.

With reference to Design Code P2-2 Cycle Parking, consideration should be given to storage within buildings, cycle compounds, areas with controlled access and cycle lockers, in order to help serve the need for long-stay cycle parking for staff with complementary facilities: showering and changing facilities with accessible features, storage (lockers) and equipment for basic maintenance, such as pumps.

3. Internal Access Arrangements



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With reference to Section 6.1, it is questionable whether the site can be considered 'highly permeable' given that there doesn't appear to be a firm commitment to provide an east-west vehicular route through the site. This would appear to contradict the PfE requirement to "ensure the design and layout allows for effective integration with surrounding communities".

Section 6.5.2 covers the proposed site access strategy and this refers to Moss Hall Road as the primary access and Whittle Lane being a secondary access with the "potential for traffic management in the form of shuttle working signals, which would limit the number of vehicles which can travel along it". There is a longstanding aspiration for Whittle Lane to be closed to all traffic except public and active transport which is set out in the SPD. Shuttle working signals would clearly also affect wait times for bus services and undermine the aspiration of the bus only link.

Alongside the aspiration for Whittle Lane to be closed to all traffic except public transport, this means that there is only one route in and out of the site via the Moss Hall Road. This is of particular concern given the size of the development site (acknowledged in the TA as of national scale), and is likely to limit bus routing options through the site and will undoubtedly place greater pressure on the Moss Hall Road / Pilsworth Road junction throughout the delivery of the site. As part of the SPD, there is an aspiration to provide a second vehicular access via a route east-west from the Moss Hall Road/Whittle lane spine road through the SHMA on to Queen Elizabeth II Way. It is understood there is a potential land issue with this option however, there may be the opportunity to resolve this via the forthcoming Mayoral Development Corporation for Northern Gateway. This is the preferred initial access strategy for the site to address some of the shortcomings highlighted above.

In terms of car parking provision, it is stated that this will be covered as part of a future reserved matters application. As set out in the TFD, current Bury and Rochdale car parking standards result in the need for nearly 12,000 spaces on the site which would represent a huge land take that could be better utilised via the provision of more employment space and/or green and blue infrastructure, whilst supporting the transport vision. A commitment to provide car parking at levels beneath the current Bury and Rochdale standards, aligned with a car parking demand assessment and supporting the vision for the site, would be welcomed at this stage, notwithstanding the fact that it is stated that these will be defined at detailed design stage. In addition, Design Code P2-1 d) states that "proposals should *consider* providing priority spaces for car sharing". In alignment with the high mode share for car sharing in the mode share recommendations outlined in the mode share section, the code



should be updated to ensure that proposals *must* include an allocation of priority spaces for car sharing rather than just considering it.

With reference to Design Code O3-2 and M2, the use of Sustainable Drainage Systems should be designed in accordance with Greater Manchester's Sustainable Drainage Design Guide to support delivering SuDS to adoptable standards by United Utilities or other approved authority [Greater Manchester's Sustainable Drainage Design Guide - GM Green City](#)

Servicing arrangements will be covered in detail as part of a future reserved matters application. All intended service and emergency vehicles i.e. refuse / fire tender / LGV / HGV should be able to enter and exit the site in forwards gear, carrying out turning manoeuvres on-site safely and appropriately.

At a more detailed level, the access points should be designed to ensure the provision of tactile paving and dropped kerbs, with appropriate white lining. Any redundant access points bordering the site should be reinstated accordingly. Visibility splays in line with standards contained within Manual for Streets should be achievable in both directions from all the site access points.

TfGM would refer to the Local Highway Authority (LHA) to determine whether the proposed access, car parking and servicing arrangements are acceptable.

4. Travel Plan

TfGM recommends that a full Travel Plan is produced for the development, with the objective of reducing reliance on the private car, particularly single occupancy use. The Travel Plan should be designed to raise awareness of opportunities for reducing travel by car and should feature a range of measures and initiatives promoting a choice of transport modes, and a clear monitoring regime with agreed targets.

In order to encourage sustainable journeys to mitigate the traffic impact of the development through the Travel Plan, incentives should be offered to encourage users of the site to use public transport and active travel modes through measures such as discounted bus tickets, discounted cycles, incentives to support car sharing such as a guaranteed ride home if let down by your car sharer, journey planning etc.

Collision Investigation



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Section 5.4.8 covers the collision analysis and the TA states that it covers the five year period from 2018 to 2023. This is a 6 year period so the years covered should be clarified.

As part of our Vision Zero strategy, all partners must work hard to deliver our vision of reducing deaths to close to zero by 2040. Within the analysis presented, there are a number serious incidents identified on Queen Elizabeth II Way, Moss Hall Road and Pilsworth Road (leading towards Heywood) and a death on the latter route. These are all key routes for those likely to access the site by active travel and we would therefore disagree with the assertion made in the TA that "the incidents recorded over a five-year period do not indicate any untypical accident patterns". On this basis, we consider the accident analysis in this section to be inadequate. More detail on these incidents should be provided from the STATS19 records to identify the cause of incidents, who was involved (i.e. whether any vulnerable road users such as pedestrians or cyclists were involved) and whether improvements to these routes may be required to ensure safe and suitable access to the site for all road users in accordance with NPPF paragraphs 115 and 117. Similar analysis should also be provided for any slight incidents involving pedestrians or cyclists.

Residual Highway Impacts

1. Scenarios

18 'Core Tests' are referred to in the TA which test several 2032 and 2039 assessment year scenarios, alongside various development and mitigation packages. The National Highways Simister Island scheme and the Western Access Scheme (the preferred option set out in the Pell Frischmann SOBC) known in the TA as the "common highways mitigation package" have been included in all scenarios. The Western Access Scheme includes small scale, slip road widening improvements at M66 junction 3. On the M62, a new junction 19 has been tested in some scenarios.

However, there are a number of deficiencies in the approach taken including:

- None test a scenario without external highway mitigation (to identify significant impacts in need of mitigation in accordance with NPPF).
- Very few scenarios consider the vision-led scenario (which is a clear NPPF requirement).
- Only one scenario (Run 25) tests the preferred access strategy set out in the Internal Access Arrangements section, but this only considers the full allocation (rather than just the application) and includes the new junction at M62 junction 19, which currently does not have a clear funding route.



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- Most tests reference a “2039 Do Minimum – Policy On (Run 0)” which appears to be equivalent to the 2022 Baseline Flows. This methodology was not previously agreed and is not appropriate.
- The number of scenarios and the interrelationships with the scale of development and the mitigation tested makes it very difficult to draw conclusions and understand the Infrastructure Phasing and Delivery Strategy which is a clear requirement of PfE Policy JP-D1.

With reference to section 7.3, further assessments are needed without the Western Access Works in place because it cannot be assumed that the preferred option from the Pell Frischman SOBC for Western Access will be delivered as the business case work has not yet been completed. Therefore, tests are needed to understand the minimum solution needed to make the site acceptable in planning terms alongside site phasing. This will support the dependent development case as part of the Western Access OBC, ensure a design that is aligned with the TFD (which has been completed since the Western Access SOBC) and minimise the risk of the assessments in the TA not being aligned with the eventual Western Access design (the TA assessments would identify the minimum capacity designs needed to release the site).

Concerns around the proposed access strategy (outlined in the internal access arrangements section) were shared with Tetrattech in the “The Northern Gateway Access Strategy Technical Note, April 2025” with recommendations for how these could be addressed through sensitivity testing. However, a suggested approach which supersedes this advice (in order to provide more focussed guidance on tests) is set out below:

- 2032 do minimum as reference case (2022 base with background growth to 2032 and agreed committed development)
- 2032 full application (600,000sqm), 74% car driver (no vision), Whittle Lane as now, South Heywood Link not open, no other external highway mitigation
- 2032 full application (600,000sqm), 62% car driver (TFD Scenario 2 vision), Whittle Lane closed to traffic except PT, South Heywood Link open, no other external highway mitigation
- 2032 full application (600,000sqm), 62% car driver (TFD Scenario 2 vision), Whittle Lane closed to traffic except PT, South Heywood Link not open, no other external highway mitigation
- 2032 full allocation (1,025,000sqm) + JPA 1.2, 62% car (TFD Scenario 2 plus appropriate blend of mode share for JPA 1.2), Whittle Lane closed to



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traffic except PT, South Heywood Link open, no other external highway mitigation

Following these initial model runs, results should be shared with stakeholders to inform the precise location of any significant impacts in need of mitigation (with reference to 2032 do minimum) as well as further sensitivity tests which may be needed.

Tetrattech should then identify the minimum residual highway mitigation needed to mitigate significant impacts on the local and strategic road network back to the reference case. These tests can inform the Western Access OBC and the National Highways PCF work on the strategic road network. Given the scale of the site and the lack of more detailed site phasing information in the TA, trigger point assessments will be needed to understand when, within the phasing of the development, schemes are needed on the surrounding local and strategic highway networks to inform the required Infrastructure Phasing and Delivery Strategy.

2. Modelling

I. Strategic Modelling

Development impacts have been tested taking flows from the Northern Gateway Transport Model (SATURN) and applying these directly to junction models. Local level junction analysis is required (a similar analysis to that presented in Evidence Point 5 of the "Technical Note – NH Comments" dated 21 February 2025 for the local road network junctions which are to be tested) to show that model flows from the SATURN model validate well for use in the individual junction models.

II. LINSIG modelling

Due to uncertainties around the acceptability of underlying development flows and confusion with the number of scenarios tested as well as their applicability due to the compared reference case, detailed review of the junction modelling has not been undertaken at this stage. However, the section below summarises initial comments on the models presented in the TA. Further comments will be provided once other matters have been addressed.

- Hareshill/Hill Top Road/Industrial Estate



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The cycle time used (120s) is too high.

- Bridge Street/Pilsworth Road/Bury Street

The cycle time used (120s) for several of the modelled scenarios is too high.

- Manchester Road/Coronation Avenue

The cycle time used (120s) for several of the modelled scenarios is too high.

- Heywood Old Road/Langley Lane

The signal staging used in the model is incorrect.

Other

A robust Construction Traffic Management Plan should be employed as part of the development.

Conclusion

There are a number of matters in relation to underlying assumptions underpinning the assessments and how the assessments themselves have been undertaken which require greater clarity in order to determine the application. TfGM will continue to work alongside Tetrattech, Bury and Rochdale Councils in working through these matters to ensure the site is delivered in accordance with a vision-led transport strategy. We reserve the right to make further comments on the scenarios tested and underlying modelling approach once the assumptions and approach move forward in accordance with the advice provided in this letter.

I hope you find these comments useful in the ongoing review of this planning application. 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

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