



M60/M62/M66 Simister Island – TR010064

Section 51 advice regarding draft application documents submitted by National Highways

On Friday 13 November National Highways submitted the following draft documents for review by the Planning Inspectorate as part of its Pre-application Service¹:

1. Location Plan
2. General Arrangement plan
3. Land plan
4. Works plan
5. Draft Development Consent Order (dDCO)
6. Explanatory Memorandum
7. Book of Reference
8. Environmental Statement Chapter 1 Introduction
9. Environmental Statement Chapter 2 The Scheme
10. Environmental Statement Figure 1.1 Location plan

¹ See <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>



11. Environmental Statement Figure 2.1 Environmental constraints

12. Environmental Statement Figure 2.2 Scheme design

13. Environmental Statement Figure 2.3 Environmental masterplan

14. Environmental Statement Figure 2.4 Temporary works

The advice recorded in the table below relates solely to matters raised upon the Planning Inspectorate's review of the draft application documents listed above. The advice is limited by the maturity of the documentation provided by the Applicant and the time available for consideration and is raised without prejudice to the acceptance decision or the final decision about whether development consent should be granted.

Book of Reference		
Ref No.	Paragraph/Section	Comment/Question
1.	Page 97	'1/08b' should be '1/8b'
2.	Page 100	Plot 1/14a doesn't seem to be located at '15 Barnard Avenue', seems to be 1/10, 1/14b and 1/14c
3.	Page 120	Plot 1/33a – remove highlighted comma 'Thatch, Leach Lane'
4.	Page 135	Plot 2/1ai – 'shrubbery' spelling needs correcting



Development Consent Order		
Ref No.	Paragraph/Section	Comment/Question
5.	Schedule 1	All Work Nos - 'shown on sheet X of the works plans and being the construction' - should say 'as being'
6.	Schedule 1	Works 1-9 in dDCO are formatted differently on work plans: Works 01-09
7.	Schedule 1: Page 33	Work No.15 - 'construction of new a new maintenance' – remove the first 'new'
8.	Schedule 1	Work No. 30 – Shown on sheets 2, 4 and 5 – need to add 'sheet 5' in description
9.	Schedule 1: Page 36	Work No. 43 – 'M66 Southbound and is accessed via' – add 'and'
10.	Schedule 1: Page 38	No description of Work No. 54 – looks like an Environmental Mitigation Area on Works Plan
11.	Schedule 1: Page 38	Work No. 58 – 'between the M60 northbound and M60 westbound ' – not eastbound
12.	Article 36 Page 27	Cutting back trees and hedgerows – There is a mention of compensation, but nothing to say how this is mitigated.



Explanatory Memorandum		
Ref No.	Paragraph/Section	Comment/Question
13.		<p>The work “substantially” is used quite often in the EM and DCO. It is preferable to use the wording “in accordance with” unless there is a definition of substantially.</p> <p>Design Quality/Approach – Makes reference to documents, but doesn’t explain the design approach. Not a lot of information on how this had been demonstrated.</p>

Environmental Statement chapter 1 Introduction		
Ref No.	Paragraph/Section	Comment/Question
14.	Para 1.2.3	<p>This paragraph notes that the Proposed Development comprises of more than one motorway and the M60 J18 and M66 J4 are mentioned, but the M62 is omitted. To aid the reader, the Applicant should explain the relationship of the M62 with this interchange within this paragraph.</p>
15.	Para 1.3.1	<p>The area of the Proposed Development is missing, this should be identified.</p>



Environmental Statement Chapter 2 The Scheme		
Ref No.	Paragraph/ Section	Comment/Question
16.	2.3.5	This para states that the Scheme predominantly lies on low-lying Grade 3/4 agricultural land to the east. If not stated elsewhere in the ES, it should state whether the grade 3 land is category 3a or 3b and whether this is classified as 'Best and Most Versatile'.
17.	2.5.74	Typo - [name of figure] text needs to be removed and updated with the correct Figure title.
18.	2.5.76	Missing reference to the relevant section of the DCO.
19.	Section 2.5	The Applicant should provide a table of parameters for the relevant Works within ES Chapter 2 to allow for ease of reading. The Applicant should ensure this is consistent with the parameters provided in the Draft Development Consent Order and Works Plans.
20.	Para 2.5.32 and Table 2.4	This paragraph explains that five ponds will form part of the Proposed Development and the numbering of these features aligns with their connections to outfalls, which are presented in Table 2.4. The pond numbering system however uses numbers one to seven. For the avoidance of doubt, the Applicant should confirm here that the scheme does not include ponds 3 and 6.
21.	2.5.82 and ES Figure 2.4	ES Figure 2.4 depicts several stockpile areas. These have not been described within ES Chapter 2. The Applicant should ensure that all elements of the Proposed Development are captured within ES Chapter 2 and ensure consistency between documents.



Environmental Statement Figure 1.1 Location plan		
Ref No.	Paragraph/Section	Comment/Question
22.	ES Figure 1.1	The choice of purple to depict the Local Planning Authority boundaries is not considered to be clear for a wide range of readers and may not be suited to readers with colour blindness. The Applicant should consider the use of a colour choice which is more suited to a wide range of readers.

Environmental Statement Figure 2.1 Environmental constraints		
Ref No.	Paragraph/Section	Comment/Question
23.	ES Figure 2.1 and ES Chapter 2 Paragraph 2.4.2	ES Figure 2.1 does not depict all the constraints listed in ES Chapter 2, Paragraph 2.4.2 such as Mineral Safeguarding Areas, Rochdale Canal Special Area of Conservation (SAC) and Rochdale Canal Site of Special Scientific Interest (SSSI). The Applicant should ensure that all relevant constraints are clearly depicted on ES Figure 2.1. In addition to this, the applicant should provide clearer labelling of the relevant constraints, such as clarifying that it is the Greater Manchester Air Quality Management Area (AQMA) depicted on the figure.

Environmental Statement Figure 2.2 Scheme design		
Ref No.	Paragraph/Section	Comment/Question
24.	ES Chapter 2, Table 2.1	ES Figure 2.2 does not depict the highway element/section 'M62 westbound to M60 southbound.' The Applicant should ensure that highway elements/sections match those described in ES Chapter 2 and ensure consistent referencing between documents.



Environmental Statement Figure 2.2 Scheme design		
Ref No.	Paragraph/Section	Comment/Question
25.	Figure 2.2	The Applicant should ensure that the arrows linking the label and the relevant element on the map align. The arrowheads for ponds 1, 2 and 5, as a basic example, do not correspond with the pond features.

Environmental Statement Figure 2.3 Environmental masterplan		
Ref No.	Paragraph/Section	Comment/Question
26.	Figure 2.3	The legend shows a typography for a 'Public Right of Way' (PRoW), a 'Restricted byway' (sheet 1) and 'Bridleway/bridlepath' (sheet 5). Restricted byways and bridleways are both types of PRoW but it is not clear why these two categories are differentiated. It is suggested that the Applicant distinguishes between all types of PRoW.

Environmental Statement Figure 2.4 Temporary works		
Ref No.	Paragraph/Section	Comment/Question
27.		See reference 21 regarding ES Figure 2.4 above.



Land Plan		
Ref No.	Plan ref	Comment/Question
28.	All	'Land to be acquired' in key is permanent acquisition, This could be changed to state 'land to be permanently acquired' to help distinguish.
29.	P01 – Sheet 1	Plot 1/1k – coloured as 'land to be acquired' on plan but labelled in BoR as 'temporary possession'.
30.	P01 – Sheet 1	1/34 label is covering 'Sandy Gate Road' label.
31.	P01 – Sheet 1	Plot 1/7 is missing from the plan.
32.	P07 – Sheet 1	Plot 1/8a, 'Kensington Street' needs labelling on plan.
33.	P07 – Sheet 1	Plot 1/21 is labelled as 'permanent acquisition' in BoR but coloured as 'temporary possession'
34.	P07 – Sheet 1	'Conisborough Place' is labelled 'Place Conisborough' on the plan
35.	P07 – Sheet 2	Plot 2/5b is labelled as 'permanent acquisition' in BoR but coloured as 'temporary possession'. Please amend.

Works Plan		
Ref No.	Plan ref	Comment/Question
36.	P01.7 – Key Plan	No scale bar on Key Work Plan (is present on Key Land Plan).



Works Plan		
Ref No.	Plan ref	Comment/Question
37.	P01.7 – Sheet 1	dDCO states that Work No. 55 is located ‘south of Prestfield Court’ but Prestfield Court is not labelled on the plan. There is the same issue with Work No. 56 and ‘north of Warwick Avenue’ but Warwick Avenue is not labelled.
38.	2.4 Works Plans	The Applicant should label the relevant parameters on the Works Plans to aid readers.

General

1. Where references are provided to other draft application documents it would be beneficial to provide the full title thereof inclusive of document reference number. Should further draft documents be provided for review, the Applicant may wish to consider providing a full list of known application documents (for purpose of signposting) as well as their respective reference number.
2. [\[MHCLG\] Application form guidance](#), paragraph 3, states: “*The application must be of a standard which the Secretary of State considers satisfactory: Section 37(3) of the Planning Act requires the application to specify the development to which it relates, be made in the prescribed form, be accompanied by the consultation report, and be accompanied by documents and information of a prescribed description. The Applications Regulations set out the prescribed form at Schedule 2, and prescribed documents and information at regulations 5 and 6.*” The applicant’s attention is drawn to Regulation 5 (2)(o) in respect of provision within the application of any other plans, drawings and sections necessary to describe the proposals for which development consent is sought, showing details of design, external appearance, and the preferred layout of buildings or structures, drainage, surface water management, means of vehicular and pedestrian access, any car parking to be provided, and means of landscaping.