

Creams Mill and Hall Lane, Bolton

Environmental Statement: Appendices

On behalf of

Watson Construction (Holdings) Limited

November 2020

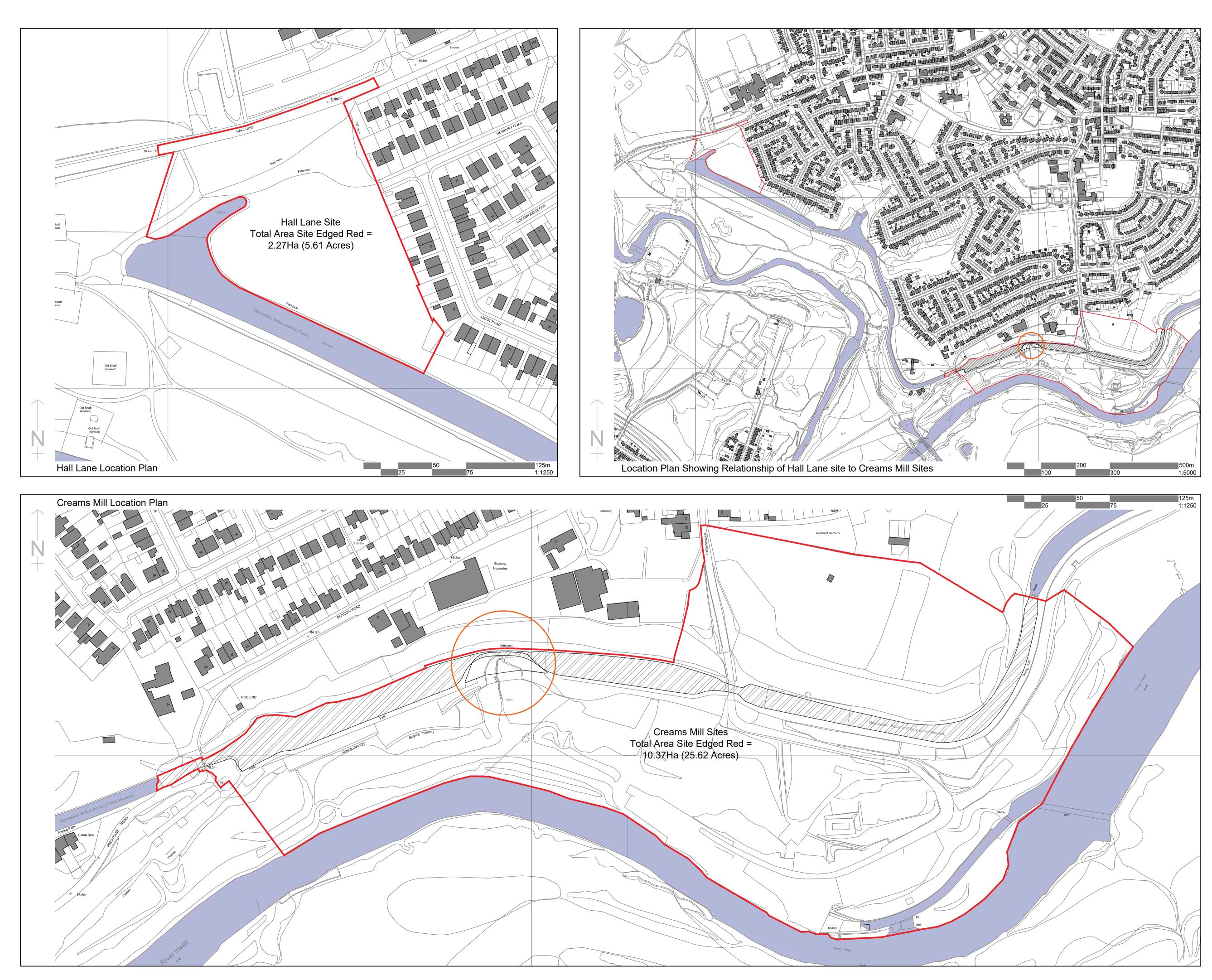


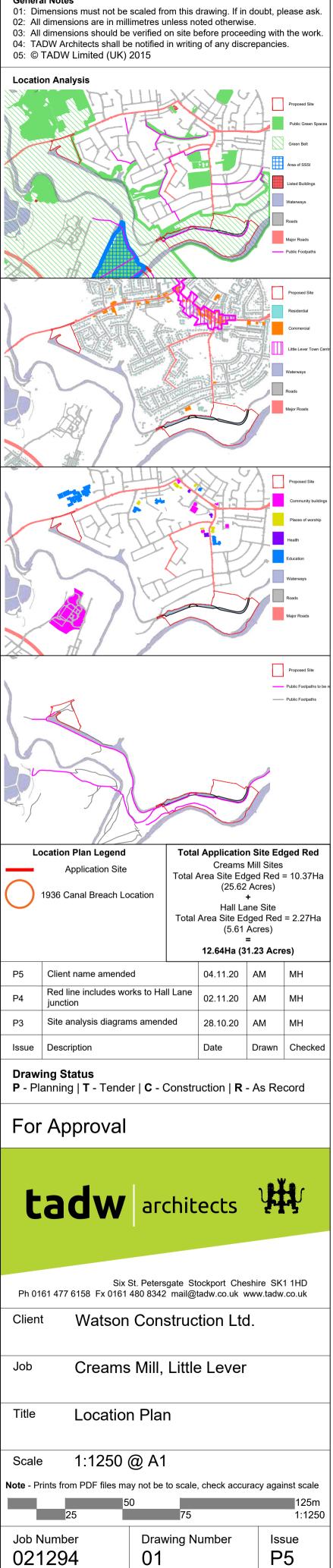
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Creams Mill and Hall Lane, Bolton

ES Scoping Report

On behalf of

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September 2020

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1. Introduction

- 1.1. This Environmental Impact Assessment (EIA) Scoping Report has been prepared on behalf of Watson Construction (Holdings) Limited in respect of 2 parcels of land off Mytham Road at the former Creams Mill and also Hall Lane, both in Little Lever, Bolton.
- 1.2. The term 'Proposed Development' used within this report refers to all stages of construction and operation of the residential led development.
- 1.3. The Application sites extend to approximately 13.45 Ha in total. Creams Mill comprises of 2 main parcels of land, with a total site area of 11.55Ha. Hall Lane extends to 1.9Ha. Both sites are located within the Green Belt. A site location plan for both sites is provided at Appendix 1.
- 1.4. This Scoping Report is submitted to Bolton Metropolitan Borough Council as a request for a Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 1.5. In accordance with Regulation 15, paragraph 2, this report contains:
 - a plan identifying the land
 - a brief description of the nature and purpose of the development, including its location and technical capacity
 - an explanation of the likely significant effects of the development on the environment
 - other information or representations as the person making the request may wish to provide or make.

Requirements of the Environmental Impact Assessment Process

- 1.6. The EIA process is the mechanism by which development proposals are appraised in terms of environmental and socio-economic criteria, in addition to the engineering and technical considerations. The EIA process defines the context of the Proposed Development and its construction, and examines the issues considered pertinent.
- 1.7. The purpose of the EIA is to establish the nature of the existing Application Site(s) and its surroundings (i.e. baseline) and the nature of the Proposed Development and compare the baseline with the situation once the proposals are in place, so to identify the likely significant effects that may arise as a result. This requires consideration of effects during construction, including any demolition of enabling works, and effects once operational. The document produced as a result of the EIA process is known as the Environmental Statement (ES).

- 1.8. The EIA Regulations (2017) require that any Proposed Development falling within the description of Schedule 2 Development within the meaning of the Regulations, may be subject to an EIA where such development is likely to have 'significant' effects on the environment by virtue of the factors such as its nature, size or location (Regulation 4 (2)).
- 1.9. The Proposed Development falls under the category of 'Infrastructure Projects (Schedule 2, 10 b) where it is identified that the applicable threshold above which EIA may be required is:
 - i. The development includes more than 1 hectare of urban development which is not dwelling house development; or
 - ii. The development includes more than 150 dwellings; or
 - iii. the overall area of the development exceeds 5 hectares.
- 1.10. The total development area is circa 13.45Ha and a total of 279 dwellings are proposed. The proposed development also includes a substantial repair to a breach on the Manchester, Bolton and Bury Canal.
- 1.11. Having regard to the size of the Application site, the nature of the Proposed Development and considering the surrounding future development, in the context of the above, it is considered that the proposals may lead to likely significant effects on the environment. The applicant therefore intends to submit an ES in support of a future planning application, the content of which is set out and discussed throughout this document.
- 1.12. The EIA Scoping Report provides a detailed description of the development site and the proposed development. Secondly, it provides an overview of the planning policy context applicable to the site and the proposal. Thirdly, it considers the relevant statutory bodies that will be consulted as part of the application process. Fourthly, it provides details of how the Environmental Statement will be structured and who it will be prepared by and finally, the topics to be scoped in and out of the ES.



2. Site Description and Proposed Development

2.1. It is proposed that a full planning application for both sites are submitted for residential development for a total of 279 dwellings, associated access and infrastructure, repairs to the breach on the Manchester, Bolton and Bury Canal between the two sites and a new two way bridge at Cream Mill. To assist in understanding the proposal in more detail, each site is described below, including its location, site context and planning history as well as the proposed development.

Creams Mill

- 2.2. The former Creams Mill is located off Mytham Road in Little Lever. The development site occupies two large areas of land, divided in two by the Manchester, Bolton and Bury Canal. The total site area is approximately 11.45Ha. All the site is located within the Green Belt.
- 2.3. The 'top site' comprises a large area of open undeveloped land, bounded by residential development on Cedar Avenue to the north, dense trees to the east, further trees to the south with the canal beyond and Mytham Road to the west. The top site is largely flat, with the land falling away steeply through the trees to the canal. Mytham Road is a narrow, single track road which falls away steeply as you enter into the site.
- 2.4. The 'lower site' is via an existing one way bridge over the disused canal. The lower site is densely populated with trees and has a steep gradient down to the area of land along the water front, previously occupied by Creams Mill. The mill has not been in use since 2004 and mill was demolished in 2011 following a fire and vandalism, with large areas of hardstanding remaining. Historic maps and photographs of the former mill can be found at **Appendix 2**.
- 2.5. The Manchester, Bolton and Bury Canal has not been in use since the 1936 following a breach to the west of the application site. This part of the canal is no longer in water and has been left to overgrow. Photographs of the breach can be found at **Appendix 3**.
- 2.6. The area previously occupied by Creams Mill is formally allocated (Policy SC1). The area occupied by Creams Mill benefits from planning permission for 95 open market dwellings and the construction of a new bridge over the canal which lapses in April 2021 (application reference 97139/16). It has never been implemented and has proved unviable.
- 2.7. Both Creams Mill and Hall Lane are identified on the Bolton Council Core Strategy Proposals Map as being within the Green Belt and the Little Lever and Kearsley Core Strategy Sub Area; within a Mineral Safeguarding Area (for coal/brick and clay); sites of biological importance due to the proximity to the canal; and within a designated landscape area. Neither site is within a conservation area, but there is a listed mile marker for the canal within the red line boundary of the Hall Lane site. There are no Tree Preservation Orders on site.

2.8. The top site is located within Flood Zone 1, and is at low risk of flooding, as well as the area immediately south of the canal. Part of the former Mill is located in Flood Zone 3 on the Environment Agency's flood risk map and is therefore at high risk of flooding. The middle section of the former Mill site is located within Flood Zone 2 and at medium risk of flooding.

Hall Lane

- 2.9. The Hall Lane site is located approximately 1.4km as the crow flies to the west of Creams Mill. It comprises a roughly triangular piece of undeveloped land. The site is bounded by residential development to the north/north-east, the Manchester, Bolton and Bury Canal to the south, Hall Lane to the north and a woodland to the west.
- 2.10. The site is currently accessed via Newbury Road and Hall Lane. There are existing established informal footpaths across the north of the site leading to the woodland and the footpath network to the south of the canal, which will be retained as part of the development.
- 2.11. The site slopes from Newbury Road down to the canal, with a large crater in the middle of the site. The site was previously mined and the crater is the remnants of the mining shaft access. This is reflected in the site being identified as within a Mineral Safeguarding Area for coal, brick and clay).

Proposed Development

- 2.12. Draft plans have been prepared for residential development for 279 dwellings across both sites. All of the properties will be developed with two housing associations for a mix of tenures.
- 2.13. At Creams Mill, the top site will accommodate 182 dwellings, accessed from Mytham Road. The development will include a mix of 2, 3 and 4 bed semi detached and mews houses on the top site, with semi detached, mews houses and apartments on the site of the former Mill along with associated car parking and landscaping.
- 2.14. A new two way bridge will be installed across the existing canal to provide vehicular access to the lower site. The existing bridge will be retained for pedestrian use.
- 2.15. Improvements will also be made to the existing footpaths along the canal connecting the two sites.
- 2.16. At Hall Lane, the existing access off Hall Lane will be utilised for vehicles, with the Newbury Road access retained for pedestrian and cycle access to the existing footpath network and the canal.
- 2.17. The development will comprise 97 dwellings, of 2 and 3 bed houses, along with 1 and 2 bedroom apartments, utilising the attractive canalside frontage. Car parking will be provided for the housing, with shared parking facilities for the apartments.

2.18. The works at both sites will enable the repairs required to the 1936 breach to the canal. This will allow for the canal to be brought back into water and utilised as a leisure destination for the local area, fulfilling a long held ambition by the Canal and River Trust and the Manchester Bolton and Bury Canal Society.



3. Planning Policy Context

- 3.1. A summary of the relevant planning policy will be presented, against which the various environmental topics addressed in the ES will be considered. Policy will be identified at a national, regional and local level as appropriate.
- 3.2. The Bolton Development Plan currently comprises of the Bolton Core Strategy (adopted 2011) and the Bolton Site Allocations Plan (adopted 2014).
- 3.3. The relevant Bolton Development Plan policies to be considered in the ES will include:
 - Policy CG1 (Cleaner and greener)
 - Policy CG2 (Sustainable design and construction)
 - Policy CG3 (The built environment)
 - Policy CG4 (Compatible uses)
 - Policy CG7AP (Green Belt)
 - Policy IPC1 (Infrastructure and planning contributions)
 - Policy LO1 (Links to Other Areas)
 - Policy OA6 (Little Lever and Kearsley)
 - Policy P4 (Minerals)
 - Policy P5 (Accessibility)
 - Policy P8AP (Public Rights of Way)
 - Policy S1 (Safe)
 - Policy SC1 (Housing)
- 3.4. The National Planning Policy Framework (NPPF) (adopted February 2019) sets out the three overarching and interdependent objectives (economic, social and environmental) that need to be considered for sustainable development. The relevant paragraphs in relation to this proposal are detailed below.
- 3.5. Paragraph 43 of this document notes that when preparing for formal assessments (such as an ES), applicants should discuss what information is required with local planning authorities and expert bodies as early as possible to avoid delays.
- 3.6. Section 5 of the NPPF places great weight on the delivery of a sufficient supply of homes, in which to support this objective, a sufficient amount and variety of land can come forward where it is needed, the needs of groups with specific housing requirements are addressed and that land is developed without unnecessary delay (Paragraph 59). Paragraph 71 places



emphasis of local planning authorities to support the development entry-level exception sites (suitable for first time buyers or renting their first home).

- 3.7. Section 6 of the NPPF emphasises the government's commitment to building a strong, competitive economy, in which significant weight should be place on the need to support economic growth and productivity; taking into account local needs and wider opportunities for development (Paragraph 80).
- 3.8. Section 8 of the NPPF shows the government's commitments in promoting healthy and safe communities. Paragraph 96 emphasises the importance for access to a network or high-quality open space with physical activity being important for the health and well-being of communities. Paragraph 98 notes that planning decisions should protect and enhance public rights of way and access, including taking opportunities to better provide facilities.
- 3.9. 1.10 Section 9 of the NPPF relates to promoting sustainable transport. Paragraph 108 advises developers to consider sustainable transport modes, safe and suitable access for all and any significant highways impacts can be mitigated. Paragraph 109 of the NPPF notes that development only be refused on highways grounds where the unacceptable impact on highway safety, or the residual cumulative effects would be severe. Paragraph 110 notes that development should consider the hierarchy of road users, those with reduced mobility, a safe and inclusive environment for all highway users, emergency and service access and consider provision of infrastructure for electric/other low emission vehicles. A travel plan should be prepared for development that would create a significant amount of movement (Paragraph 111).
- 3.10. Section 11 of the NPPF places weight on making effective use of land. Paragraph 116 notes that planning decisions should encourage multiple benefits of both developing urban and rural land, taking opportunities to achieve net environmental gains (through habitat creation) and improving access to countryside and that support should be given to opportunities to remediate degraded, derelict, contaminated and unstable land.
- 3.11. Section 12 of the NPPF places weight on achieving well-designed places, with Paragraph 128 emphasising the need for design quality to be considered throughout the evolution and assessment of the individual proposals, with discussions taking place with the local planning authority and local community about the design and style of emerging schemes. Paragraph 130 advises that planning permission could be refused for development of poor design that fails to consider opportunities to improve the character and quality of the area and the way it functions.
- 3.12. Section 13 of the NPPF places weight on protecting Green Belt land from inappropriate development. Paragraph 143 defines inappropriate development as being harmful to the Green Belt and should not be approved except in very special circumstances, in which very



special circumstances will not exist unless the potential harm to the Green Belt or other harm relating to the proposal is clearly outweigh by other considerations.

- 3.13. Section 14 of the NPPF notes that development should meet the challenge of climate change, flooding and coastal change. New development should play its part in reducing greenhouse gas emissions (Paragraph 150) and development is directed away from areas at highest risk of flooding (Paragraph 155).
- 3.14. Section 15 of the NPPF places weight on conserving and enhancing the natural environment. Development should protect and enhance valued landscapes, the beauty of the countryside and minimising on and providing net gains for biodiversity (Paragraph 17). Ground conditions should be factored into the development of the sites (Paragraphs 178 and 179) with new development considering the effects of pollution on the health, living conditions and the wider natural environment (Paragraph 180). Planning decisions should consider the presence of Air Quality Management Areas, with opportunities to improve air quality and mitigate impacts should be identified (Paragraph 181).
- 3.15. Section 16 of the NPPF places weight on conserving and enhancing the historic environment. Local planning authorities should require the applicant to describe the significance of any heritage assets, in which schemes that have (or potential to include) archaeological interests should include a desk based assessment and, where necessary, a field evaluation (Paragraph 189). Paragraph 195 states that development leading to substantial harm or total loss of significance to a designated heritage asset should be refused consent. Where development leads to a less than substantial harm, this harm should be weighed against the public benefits of these proposals (Paragraph 196). The effect of an application on the significance of a non-designated heritage asset should be considered when determining the application proposals (Paragraph 197). Footnote 63 notes that non-designated heritage assets of archaeological interests, which the NPPF considers are of equivalent significance to scheduled monuments, should be subject to policies for designated heritage assets.

4. Consultation

- 4.1. A process of consultation has already commenced with regard to the Proposed Development with officers at Bolton Council as well as some statutory consultees. Members of the project team have met with senior officers at Bolton Council to discuss the draft proposals and the applicant is currently engaging formally with the Canal and River Trust to review the proposal.
- 4.2. It is proposed that prior to submitting the application and during the determination, the project team will engage with;
 - Design Review Panel
 - Bolton Metropolitan Borough Council
 - Transport for Greater Manchester (TfGM)
 - Canal and River Trust
 - Environment Agency
 - Highways England
 - Historic England
 - Natural England
 - Greater Manchester Ecology Unit
 - Greater Manchester Archaeological Advisory Service
 - United Utilities
 - Local politicians
- 4.3. The applicant proposes to undertake public consultation ahead of the submission of the planning application. This will be done in the form of a letter drop to local residents and notices in the local press with a dedicated website offering further plans detailing the proposed layouts with the opportunity to provide feedback. It is anticipated that the consultation will run for 3 weeks.



5. Legislative Requirements and the EIA Process

- 5.1. The EIA process will be undertaken in accordance with the requirements of the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2017. Schedule 4 (Regulation 18 (3)) sets out the information for inclusion in an ES, which is summarised below;
 - a. A description of the proposed development;
 - b. A description of the likely significant effects of the proposed development on the environment;
 - c. A description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce, and, if possible, offset likely significant adverse effects on the environment
 - d. A description of reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment
 - e. A non technical summary of the information referred to in sub paragraphs a) to d) and
 - f. Any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.
- 5.2. The applicant has appointed a team of specialist consultants to consider planning and environmental matters in relation to the proposed development and it provide input into the production of this Scoping report. Details of the consultant team can be found below.

Topic	Consultant
Planning	P4 Planning
Socio Economic	P4 Planning/TBC
Landscape and Visual Impact	Enzygo
Ecology and Nature Conservation	Arbtech
Archaeology	Archaeological Research Services
Ground Conditions	LK Consult
Air Quality	Ensafe
Noise	Ensafe
Transport and Access	SCP Transport
Drainage and Flood Risk	Elluc

5.3. In accordance with the Regulations, the ES will be prepared by 'competent experts' as listed above. A statement outlining the relevant experience of the experts who have undertaken the assessment and drafted the technical chapters within the ES will be provided. It is also



noted that the Regulations now require decision makers to ensure they have the 'necessary skills in house' to assess the Environmental Statement once submitted.



6. Proposed ES Structure and Chapters

6.1. The following section sets out our proposed structure for the ES and the chapters to be contained within it and the steps which will have been taken in order to prepare them.

ES Structure

- 6.2. The introductory chapters within the Environmental Statement will be set out as follows;
 - Introduction
 - EIA Scope and Methodology
 - Application Site
 - Proposed Development and Alternatives
 - Planning Policy

ES Chapters

6.3. Each of the topic areas 'scoped' into the ES will undergo the following main steps;

Baseline studies

6.4. Many of the relevant disciplines relating to the proposal have already undertaken baseline studies. Baseline conditions will be established within each of the environmental assessment through the use of a number of sources, including desktop reviews of existing available data, site specific survey work and consultation with relevant statutory bodies.

Assessment of Environmental Effects and Evaluation of Significance

- 6.5. The EIA regulations require that the ES identifies 'likely significant effects of the Proposed Development on the environment'. It is recognised in the EIA Regulations however that not all environmental effects are significant.
- 6.6. The evaluation and determination of significant effects will be carried out using specific criteria defined within each of the technical chapters of the ES. Where available, published standards and guidelines will be used as a basis for the significance criteria.
- 6.7. The following approach is utilised for the topics relevant to this ES;

- The sensitivity of the receiving environmental receptor is evaluated using defined criteria;
- The nature of the impact is established in terms of its duration, extent, frequency, likelihood of occurrence, reversibility, and compliance with recognised standards;
- The magnitude of the impact is determined. The magnitude of change is a consideration of how much the impact alters the baseline condition; and
- The significance of the effect is determined by cross referencing the sensitivity of the receptor with the magnitude of change on the receptor.
- 6.8. It should be noted that environmental effects may be direct or indirect, secondary, cumulative, transboundary, short, medium, long-term, permanent and temporary, positive and negative effects of the development and this will be noted in the ES. Effects will be considered both during the construction phase, when the development is being built (often temporary effects) and following completion of the development (often permanent effects). Given the nature and intended longevity of the Proposed Development's operational life, decommissioning is not appropriate to consider. Accordingly, the ES will focus on the potential likely significant effects during the construction and operational phases only. Consideration will however be given to effects from major accidents and disasters where relevant.

Mitigation Measures and Residual Effects

6.9. Following the assessment of effects, mitigation measures to reduce and avoid these effects will be identified and detailed. Mitigation measure considered may include modification of the proposals, integral mitigation or secondary measures. Any residual effects following the implementation of mitigation measures will be determined accordingly. The residual effects represent the overall likely significant effect of the proposed development on the environment having taken account of practicable/available mitigation measures.

Cumulative and In-combination Effects

- 6.10. The ES will respond to the requirements in the Regulations to assess the cumulative effects of the Proposed Development which will specifically consider two types of effect;
 - Intra-project cumulative effects the combined effect of individual effects on a single receptor where deemed potentially significant; and
 - Inter-project cumulative effects the combined effects of development schemes which may, on an individual basis be insignificant but, cumulatively, have significant effect.
- 6.11. For inter-project cumulative effects, the Regulations state that consideration should be given to 'other existing and/or approved projects' (Schedule 4, 5e). This is further supported by the National Planning Policy Guidance (NPPG) which states 'there are occasions, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development'.

- 6.12. The Environmental Statement will therefore take into consideration existing and/or approved projects which alongside the development of the proposals, could potentially result in cumulative significant effects. Relevant planning applications in the vicinity of the Proposed Development site;
 - Lever Gardens, Little Lever, Bolton (Application reference 08816/20) Erection of Extra Care units comprising 62 Apartments and 6 bungalows with Bistro, Staff Facilities, Communal Areas, Ancillary Accomodation, Parking and Landscaping. Pending determination.
 - Land at Victory Road, Little Lever, Bolton (04748/18)
 22 dwellings with associated parking, landscaping and re-routing of existing public right of way. Approved 29 March 2019.
- 6.13. Whilst the Scoping Report seeks to identify relevant schemes to be considered, the extent to which each scheme needs to be considered within each environmental discipline with inevitably vary.
- 6.14. The applicant's team are not aware of any other projects within the vicinity of the site which would be required to be considered as part of the cumulative assessment, however we would be grateful if the Council could provide confirmation of this in their Scoping response.

Consultant Chapters

6.15. The table below lists the environmental topics specified within the EIA Regulations with potential for consideration within the EIA process. It also provides details as to whether these topics have been scoped in or out of the ES, with further reasoning provided.

EIA Topic	Scoped In/Out	Where addressed within ES
Population	In	Socio Economic Chapter
Human Health	In	Socio Economic, Landscape and Visual,
		Ground Conditions, Transport
Biodiversity	In	Ecology and Nature Conservation Chapter
Land	In	Ground Conditions, Landscape and Visual
		Impact, Ecology chapter
Soil	In	Ground Conditions Chapter
Water	In	Drainage and Flood Risk Chaper
Air/Climate	Out	N/A
Noise	Out	N/A
Cultural Heritage	Out	N/A
Landscape	In	Landscape and Visual Impact Chapter

6.16. In the context of the above, we propose to include the following chapters within the ES;



- Drainage and Flood Risk
- Ground Conditions and Contamination
- Ecology and Nature Conservation
- Landscape and Visual Impact
- Traffic and Transport
- Socio Economic
- 6.17. Following a review of the baseline position and discussions with relevant statutory bodies where required, the topics will not be included within the ES but a supporting report submitted as part of the planning application;
 - Air Quality
 - Noise
 - Archaeology
- 6.18. Details of the specific discipline chapters are set out below, including an introduction to the discipline, the relevant policy and guidance, a preliminary assessment of baseline conditions, potential impacts/effects, their proposed scope and methodology, preliminary potential mitigation and enhancement measures and who they are proposing to consult with.

Drainage and Flood Risk

- 6.19. The Flood Risk and Drainage chapter will be prepared by ELLUC Projects and will identify the potential impacts that the proposed development might have on the site.
- 6.20. This scoping section has been prepared to set out the methodology for the assessment of the Proposed Development on Flood Risk and Drainage.
- 6.21. The assessment will deal with the separate but interlinked issues of:
 - **Flood Risk:** The potential effects of the development upon the existing hydrological regime including for the potential impacts of the site on the surrounding area.
 - **Surface Water Drainage**: The potential effects of the development on drainage downstream of the site.
 - Water Quality: The potential effects of the development on water quality in the wider catchment.
 - Foul Water Drainage: The potential effects of the development on the existing foul water network.

Relevant Policy and Guidance

6.22. The assessment will be carried out with due regard to the following guidance:



- National Planning Policy Framework (NPPF)
- Bolton Council- Strategic Flood Risk Assessment
- The Bolton Core Strategy

Preliminary Assessment of Baseline Conditions

- 6.23. The majority of the 3 sites lie within Flood Zone 1. This area is defined as being at little or no flood risk at all, with a 1 in 1000 annual probability (0.1% chance) or less of flooding from rivers or the sea in any one year.
- 6.24. There is a small area of the Creams mill site (southern area) which does lie within flood zones 2 and 3 (Flood Zone 2 is an area at risk of flooding between 1 in 100 year event and 1 in 1000 year event. Flood Zone 3 is an area of high risk of flooding with a risk of flooding higher than 1 in 100-year event)
- 6.25. No proposed development is proposed within the Flood zone 3 area
- 6.26. Assessment of other potential flooding mechanisms shows the land to have a low probability of flooding from overland flow, ground water and sewer flooding.
- 6.27. The key receptors at the site will be defined through the completion of the detailed assessment work within the Flood Risk Assessment.

Potential Impacts/Effects

- 6.28. This Chapter will identify the drainage characteristics of the existing site and any potential issues and risks associated with the former use of the site. It will consider impacts on groundwater, nearby watercourses, and water resources.
- 6.29. Recommendations for any mitigation measures required to minimise the potential environmental impacts of the proposed development will be considered.

Construction

- As a result of the Proposed Development, two potential construction phase environmental effects have been identified relating to hydrology and hydrogeology. These mechanisms are as follows:
- Direct and indirect contamination of surface water due to mobilisation of soils, existing contamination and spillage of oils and the like from construction plant.
- Direct and indirect flooding and changes to baseline drainage hydrology due to disturbance of the ground during construction works.

Operation

6.30. As a result of the Proposed Development, four potential operational environmental effects are identified relating to water. These mechanisms are as follows:



- Direct and indirect flooding of surrounding watercourses, the wider catchment area, adjacent land and property due to increases in surface water runoff from positively drained hard areas.
- Direct flooding of the Proposed Development due to inadequate flooding resilience and management of residual flood risk.
- Direct contamination or deterioration of surface water quality due to leakages of fuel oils, general spillages and other contaminants from within the development and the associated collection of surface water drainage from hardstanding areas.
- Direct and indirect contamination of surface water, soil and potential groundwater contamination due to surcharging of the foul water network or the discharge of untreated foul flows.
- 6.31. A number of flood risk and drainage impacts could occur as a result of the development proposals as described above. However, with mitigation some of these could potentially offer beneficial effects such as a reduction in flood risk to the immediate area surrounding the development site.
- 6.32. All potential impacts can be reduced by suitable mitigation and management and will be considered within the assessment and presented within the Flood Risk and Drainage ES Chapter.

Scope and Methodology of Assessment

- 6.33. A Flood Risk Assessment and surface water drainage strategy will be undertaken to establish flood risk to and from the proposed development and recommend mitigation measures where necessary. This will form the Appendix to the ES chapter.
- 6.34. Impacts in relation to flood risk and drainage will be assessed against the methodology which will first identify potential receptors and impacts. These impacts will then be described as beneficial to adverse, short to long term, direct and indirect, permanent, or temporary. Cumulative impacts will also be considered within the assessment. Assessed against each other, the sensitivity of the receptors compared to the nature of the impact will indicate the significance of the environmental effect.
- 6.35. It is anticipated that regulatory control will ensure that development will be required to implement sustainable drainage measures and controls on drainage discharge rates that at least meet current standards. In such circumstances, the environmental effects resulting from cumulative development will be negligible.
- 6.36. Ground contamination testing and infiltration tests will be undertaken to identify the most suitable locations for the proposed sustainable drainage systems.



Preliminary discussions of mitigation and enhancement measures

- 6.37. Based upon the initial considerations of the drainage and flood risk features that could possibly be affected by the EIA development proposal, it is considered that the following mitigation measures may be appropriate. The precise measures to prevent, reduce and offset any adverse effect will be fully determined through the EIA process
 - Implementation of a construction management plan to include a range of best practice measures to minimise pollution of the River Irwell
 - Use of sustainable drainage systems
 - Management of the surface water site run off
 - Management of surface water quality and control of pollution

Consultation

6.38. Consultation with the Environment Agency, Bolton Council as Local Lead Flood Authority (LLFA), and United Utilities will be required to understand the relevant flood risk and drainage hydrology issues relating to the site and the potential wider catchment area

Ground Conditions and Contamination

6.39. The purpose of this assessment is to identify the existing soil and geological conditions and development constraints, evaluate the potential for ground instability associated with the natural geology and geomorphological make-up of the site, evaluate the potential for contamination associated with past land use activity and the natural underlying geology and assess the potential effects on ground conditions during both the construction and operational phase. This ES chapter will be prepared by LK Consult Ltd (LKC).

Relevant Policy and Guidance

- 6.40. The legislative framework, policies and guidance relevant to the Proposed Development are set out below;
 - Part IIA Environmental Protection Act, 1990; and,
 - Environment Agency (2004) Contaminated Land Report 11 (CLR11), Model Procedures for the Management of Land Contamination;
 - The National Planning Policy Framework (NPPF), in particular, Paragraphs 178, 179 and Paragraphs 203-206.
 - Relevant policies within the Bolton Local Plan including policies CG4 'Pollution Control and Policy P4 'Minerals'



Preliminary Assessment of Baseline Conditions

- 6.41. A Phase 1 Preliminary Risk Assessment and a Desk-Based Coal Mining Risk Assessment has been undertaken by LKC for the Creams Mill and Hall Lane development sites. The assessments will accompany the planning submission.
- 6.42. British Geological Survey (BGS) maps indicate the underlying bedrock to comprise Pennine Middle Coal Measures Formation 'Mudstone, Siltstone and Sandstone'. The superficial deposits on site comprise Devensian Till although these are indicated to be absent over the centre and south of Creams Mill. Coal seams (Ashton Great Coal and Brassey Coal) run through Hall Lane, while the Ince New Coal and an unnamed seam run though Creams Mill.
- 6.43. According to a Coal Authority search Hall Lane has 2no. shafts on or adjacent to the site boundary and Creams Mill has an adit, spine roadways and 6no. shafts marked on site. The majority of Hall Lane and the northern half of Creams Mill are within a 'Development High Risk Area' as defined by the Coal Authority. In these areas the Coal Authority note there are probable shallow coal mine workings. These features have the potential for instability or a degree of risk to the surface from the legacy of coal mining operations.
- 6.44. The history of Hall Lane is of generally undeveloped land with an access point and low spot from the adjacent canal basin leading to Hall Lane and a mine shaft and pond shown on historical mapping. The northern part of Creams Mill has remained open space and undeveloped. Where the mill and production areas area located these have been in use as a paper works from 1677 to c. 2004. Associated uses include coal shafts, former reservoirs, gasometer, numerous structures associated with the paper mill, a remediated sludge canal sludge bed and a notified landfill. These features and activities may have resulted in contamination of soils and groundwater within the site boundary.
- 6.45. An exploratory Phase 2 Ground Investigation was undertaken on Creams Mill and the wider area in 2006. This identified localised hot spots of heavy metal, PAH and hydrocarbons across the former production areas of the site.
- 6.46. The sites are located within a Minerals Safeguarding Area for Brick Clay and Surface Coal, with Sand and Gravel in the northern part of the Hall Lane site.

Potential Impacts/Effects

6.47. The EIA will provide an initial assessment of the likely significant effects of the proposed development in relation to site preparations and construction activities, and post development activities. The environmental effects will be predicted with reference to definitive standards and legislation where available, including an assessment of value, significance and sensitivity of receptors and whether the effects are adverse or beneficial or major-negligible significance. This will consider impacts on the following:



- Geology and Soil
- Hydrology and Hydrogeology
- Contaminated Land
- Hazardous and Ground Gas
- Mining Instability
- 6.48. Where it will not be possible to quantify effects, qualitative assessment will be carried out based on available knowledge and professional judgement.

Cumulative impacts

6.49. It is considered that the development and the proposed remediation will have a major beneficial effect on the contamination risk to future site users and adjacent and neighbouring hydrology and hydrogeology receptors. Any potential adverse effects during the demolition and construction phase neighbouring receptors such as residents would be mitigated by the inclusion of the control measures proposed.

Scope and Methodology of Assessment

- 6.50. The Environment Agency / Department of Environment Model Procedures for the Management of Land Contamination (CLR 11) document recommends a phased or tiered approach to risk assessment. The first phase (Tier 1) comprises a preliminary qualitative assessment comprising four stages as follows:
 - Hazard Identification identifying potential contaminant sources on and off the site.
 - Hazard Assessment assessing the potential for unacceptable risks by identifying what pathways and receptors could be present, and what pollutant linkages could result (forming the Conceptual Site Model).
 - Risk Estimation estimating the magnitude and probability of the possible consequences (what degree of harm might result to a defined receptor and how likely).
 - Risk Evaluation evaluating whether the risk needs to be, and can be, managed.
- 6.51. The Tier 1 assessment will be informed by a Phase 1 Preliminary Risk Assessment following guidelines set out in CLR11. The information to be obtained and considered in the desk study will include historical Ordnance Survey maps, geological maps and memoirs, hydrological and hydrogeological records, environmental databases, coal mining and mineral extraction records and the results of site investigations carried out previously in the vicinity of the site. The purpose of the Preliminary Risk Assessment has been to:

- To establish the environmental setting of the site, particularly with regard to ground conditions including local geology, hydrology and hydrogeology;
- To identify historic use or current potential sources of contamination and how these may affect the proposed scheme or indeed the wider environment;
- To develop a Preliminary Contamination Conceptual Model (PCCM) of the site. This would be carried out in line with requirements of the Environmental Protection Act Part IIA source-pathway-receptor 'pollutant linkage' methodology;
- To undertake a geotechnical appraisal of the site and identify any site constraints and potential risks;
- To identify the potential mineral resources within the site; and
- To characterise, where possible, constraints and development considerations, including recommendations for further investigations, assessments and mitigation.
- 6.52. Based on the findings of the Phase 1 Preliminary Risk Assessment the potential effects during the construction stage and the operational development will be evaluated and appropriate mitigation measures identified. This will include an assessment of the effects of any proposed remediation works and the potential effects of the development activities on sensitive receptors such as groundwater, site workers and residential end-users. Significance criteria in accordance with the overall EIA approach will be applied and the residual impacts once mitigation has been applied will be presented
- 6.53. The desk based coal mining risk assessment has been undertaken in accordance with Coal Authority documentation and guidance 'Risk Based Approach to Development Management: Guidance for Developers' and with recourse to the model template provided in this guidance. The purpose of the Desk Based Coal Mining Risk assessment has been to:
 - Present a desk-based review of all available information on the coal mining issues which are relevant to the application site;
 - Use that information to identify and assess the risks to the proposed development from coal mining legacy, including the cumulative impact of issues;
 - Set out appropriate mitigation measures to address the coal mining legacy issues affecting the site, including any necessary investigation and remedial works and/or demonstrate how coal mining issues have influenced the proposed development;
 - Demonstrate to the Local Planning Authority that the application site is, or can be made, safe and stable to meet the requirements of national planning policy with regard to development on unstable land; and,
 - Demonstrate a clear strategy for addressing the coal mining legacy and how the requirements of national planning policy with regard to development on unstable land have been addressed.

Preliminary discussions of mitigation and enhancement measures

- 6.54. The EIA will detail the measures that are required and will be put in place to mitigate any significant identified impacts with the aim of reducing residual impacts to an acceptable level.
- 6.55. The mitigation summarised below and the general remediation approach will comprise typical 'urban renewal' type remediation measures which have been implemented successfully on a number of site with similar contamination and mining histories. The wording of a suitable planning condition would be agreed with the Council to secure further site investigations for refinement of the detailed Remediation Strategy.
- 6.56. It is considered that the assessment works completed to date have identified the main risks and highlighted the likely mitigation measures required for the development. To further refine the Remediation Strategy, further site investigation will be required. The Conceptual Site Model is still considered appropriate. Further investigation of the soil, gas and groundwater will be required.
- 6.57. All works would be undertaken following current UK regulations, guidance and industry best practice. A detailed Remediation Strategy will be submitted prior to commencement of works on site and secured by way of a suitably worded planning condition based on results of the survey and assessment works to be submitted. It will include appropriate protocols for the identification and management of unforeseen contamination. All contractors appointed will be appropriately licensed and experienced, working within the requirements of the Construction (Design and Management) Regulations 2015.
- 6.58. Potential receptors, impacts, potential mitigation and residual impact following application of the mitigation measures in the construction and post development stage are summarised below.



	Description of Impact	Potential Impact	Potential Mitigation	Residual Impact
	Geology and Soil	Minor to Moderate Adverse	Stockpiles to be sealed. Use of best practice management and working practices.	Negligible
	Hydrology and Hydrogeology	Minor to Major Adverse	Further investigation and assessment to develop Remediation Strategy. Remediation of soil and groundwater where required to remove or treat mobile contamination sources. Foundation risk assessment to ensure appropriate quality of structures and effects of groundwater conditions. Follow regulations for storage of oils and fuels. Use of best practice management and working practices.	Negligible
	Contaminated Land	Moderate to Major Adverse	Further investigation and assessment to develop Remediation Strategy. Remediation of soil and groundwater where required to remove source of contamination. Human health controls and protection to be used such as vapour monitoring and prevention in contact with contaminated soil through use of PPE. Use of best practice management and working practices.	Negligible to Major Beneficial
Demolition and Construction Stage	Hazardous and Ground Gas	Major Adverse	Further investigation and assessment to develop Remediation Strategy. Remediation of soil and groundwater where required to remove or mitigate sources of ground gas and vapour. Site wide monitoring programme. Human health controls and protection to be used such as vapour monitoring and prevention in contact with contaminated soil through use of PPE. CEMP to be prepared Installation of gas and vapour protection measures to new buildings. Use of best practice management and working practices.	Major Beneficial



Mining	Major	Investigation and risk assessment.	Major
Instability	Adverse	Stabilisation and treatment works during the demolition and construction phase. Stabilisation and treatment works to be fully validated. Watching brief for unrecorded mining features.	Beneficial

	Description of	Potential	Potential Mitigation	Residual
	Impact	Impact		Impact
	Geology and	Negligible	Mitigation proposed at the remediation	Negligible
	Soil		and construction phase. As such, no	
			further mitigation is proposed.	
	Hydrology	Negligible to	Long term maintenance of site drainage	Minor
	and	Major Adverse	infrastructure.	adverse
	Hydrogeology			
	Contaminated	Negligible to	Mitigation proposed at the remediation	Minor
	Land	Major Adverse	and construction phase. As such, no	adverse to
age			further mitigation is proposed.	Major
: St				Beneficial
ent	Hazardous	Minor to	No maintenance measures necessary.	Negligible
bm	and Ground	Major Adverse		
elo	Gas			
Post Development Stage	Mining	Major Adverse	Mitigation proposed at the remediation	Major
st D	Instability		and construction phase. As such, no	Beneficial
Ро			further mitigation is proposed.	

- 6.59. The sites represent a risk to human health for the intended residential end use and a risk to controlled waters. The planned redevelopment, including remediation of the soil, gas and groundwater as set out in the mitigation measures, presents an enhancement of the current situation. The remediation seeks to remove or reduce the source of the contamination and breaking contaminant exposure pathways towards identified receptors. The implementation of the remediation and adherence to the mitigation measures will bring major beneficial impacts to both the site and the local environment.
- 6.60. An instability risk exists across the site from mineshafts, surface workings and shallow underground working, plus any unrecorded mining features that may be present. The planned redevelopment, including the proposed treatment and stabilisation of mining features presents an enhancement of the current situation and seeks to reduce the risk of instability. The implementation of the stabilisation and treatment works and adherence to the mitigation measures will bring major beneficial impacts to both the site and the adjacent site.

Ecology and Nature Conservation

- 6.61. The ecological chapter (in the form of an Ecological Impact Assessment [EcIA]) will be prepared by Arbtech and will consider the potential impacts arising from the construction of new affordable hosing and associated infrastructure on the site of the former Creams paper mill and the greenfield site off Hall Lane.
- 6.62. The impacts will be considered against a range of ecological receptors including any specially protected sites within the zone of influence of the works, habitat, fauna and flora. Particular attention will be given to legally protected species and problematic species.

Relevant Policy and Guidance

- 6.63. The primary policy, legislative and guidance documents considered relevant in regard to ecological matters as part of the Environmental Impact Statement are;
 - National Planning Policy Framework;
 - Chartered Institute of Ecology and Environmental Management 'Guidelines for Preliminary Ecological Appraisal Second Edition, December 2017';
 - Chartered Institute of Ecology and Environmental Management 'Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine, September 2018'; and
 - British Standard 42020 'Biodiversity Code of Practice for Planning and Development' 2013

Preliminary Assessment of Baseline Conditions

- 6.64. The baseline condition of the mill site was evaluated thoroughly by Appletons in 2016 for Creams Mill Development Ltd. Whilst this work would now be regarded as historical evaluation in 2020 suggests that the bulk of that assessment is still relevant and useful to this EIA. It is believed that the Hall lane site has not previously been assessed for its ecological baseline.
- 6.65. The Appletons report summarised "Based in initial draft proposals, key potential ecological concerns in relation to the proposed development are the proximity of the site to the Ashclough SSSI, the presence of notable habitats and the potential presence of protected species. In order to ensure compliance with wildlife legislation and relevant planning policy, the following recommendations are made:



- Ashclough SSSI: Natural England should be consulted prior to any works commencing to discuss the likelihood of any impacts on this SSSI.
- Woodland and semi-mature / mature trees: These habitats should be retained and protected where feasible. Habitat losses should be compensated for within landscaping proposals.
- River Irwell: The river should be protected from site run-off and pollution throughout development works and post-development.
- Habitat Loss and Enhancement: Biodiversity enhancement measures should be incorporated into landscape proposals.
- Roosting bats: A daytime bat survey should be undertaken on trees, walls and structures to be impacted upon. This survey should also assess potential impacts upon foraging and commuting bats.
- Nesting birds: Any vegetation clearance should be undertaken outside of the nesting bird season.
- Water vole: If proposed works within the south-west of the site cannot avoid impacting upon land within 5 m of the earth riverbank, a water vole survey should be undertaken.
- Otter: An otter survey should be undertaken on the River Irwell adjacent to the site, and the site should be subject to a detailed search for potential holts and layup sites.
- Reptiles: A reptile survey should be undertaken of suitable habitats within the site area.
- Badger: A badger survey should be undertaken to determine whether any setts are located within 30 m of the proposed development.
- Invasive species: Reference should be made to Appletons Report 2069: Creams Mill Invasive Species Survey.
- Terrestrial Mammals: Any excavations or open pipework should be covered / blanked off overnight.

Potential Impacts/Effects

- 6.66. The potential impacts on ecological receptors come from
 - i. Site establishment the formation of transport routes in and the construction of the necessary profiles and working areas
 - ii. Site construction the impacts come from the clearance and excavation of land to be built-upon, the operation of transport, hydrological requirements during operation and the production of disturbance and dusts.
 - iii. Site restoration these impacts under guidance facilitate positive impacts resulting from careful restoration.



Scope and Methodology of Assessment

- 6.67. The scoping of ecological evaluation has been discussed with the LPA's advisory ecology service and this has included a site visit by interested parties.
- 6.68. It is recommended that the sites have conducted a full Preliminary Ecological Appraisal (a refresher in the case of Creams Mill and a new survey at Hall Lane) including a new desk study and Enhanced Phase 1 Habitat Survey. This up-to-date evaluation, drawing upon the earlier Appletons evaluation will determine any further (Phase II) ecological evaluation that might be required to understand the impacts in an EcIA.
- 6.69. On the basis of what is already know a number of Phase II evaluations are predicted to be required and will be conducted in 2020 to allow evaluation at optimal timing widows. These include:
 - Bird counts
 - Bat activity surveys
 - Reptile presence/likely absence surveys
 - Otter and water vole surveys
 - Badger surveys
 - Remote monitoring
 - Problematic species management planning.
 - The desk study area and field survey area (generally 50m from the site boundary/proposed footprint and including the 'zone of influence' of the scheme) is identified
 - A desk study is carried out.
 - Baseline information on the site and surrounding area has been recorded through an 'Extended Phase 1 Habitat Survey', including a Phase 1 Habitat Survey (JNCC 2010) and recording further details in relation to notable or protected habitats and species. Consideration could be given to also presenting this information in the new UK Habitat Classification format.
 - The ecological features present within the survey area are evaluated where possible (CIEEM, December 2017).
 - Invasive plant and animal species (such as those listed on Schedule 9 of the Wildlife & Countryside Act) are identified.
 - Likely impacts on features of value, as a result of the development proposals, are identified.
 - Recommendations for further survey and assessment are made.



• Recommendations for mitigation and opportunities for enhancement are provided based on current information.

Preliminary discussions of mitigation and enhancement measures

6.70. Mitigation measures routinely employed in this type of operation include timing restrictions and the translocation of threatened habitats, flora and fauna as well as obtaining a licence for the appropriate statutory body.

Landscape and Visual Impact

- 6.71. The Landscape and Visual Impact chapter will comprise a Landscape and Visual Impact Assessment (LVIA) that will assess the likely effects of the Proposed Development on the landscape character and visual amenity.
- 6.72. Relevant Policy and Guidance
- 6.73. The approach and methodology used for the LVIA has been developed using best practice guidance, as set out in the following documents;
 - *Guidelines for Landscape and Visual Impact Assessment*, 3rd Edition [2013] Landscape Institute and the Institute for Environmental Management and Assessment;
 - Landscape Character Assessment Guidance for England and Scotland [2002] The Countryside Agency and Scottish Natural Heritage; and
 - *Guidelines for Environmental Impact Assessment* [2004] Institute for Environmental Management and Assessment
 - Landscape Institutes Technical Guidance Note 06/19 date September 2019
 - National Planning Policy Framework (February 2018)
 - Bolton Core Strategy (2011)

Preliminary Assessment of Baseline Conditions

- 6.74. A key element of the LVIA process involves establishing the sensitivity of the baseline landscape and visual receptors. Criteria thresholds would be established to determine the landscape and visual sensitivity. These are for general guidance only and the assessment will also rely on professional judgement, which will be clearly explained, as necessary, in the report.
- 6.75. Baseline information regarding landscape features and sensitive visual receptors, and the likely change in the landscape character and visual amenity of the site and its surroundings, would be used to identify potential impacts and inform the final scheme as appropriate.

Landscape Character

6.76. In terms of Landscape Character the site lies within the 'Manchester Pennine Fringe' National Character Area 54 which is described as:



"......the transitional zone between the open moorlands of the Dark Peak and South Pennines, which lie to the east and north respectively, and the densely populated areas of the Manchester Conurbation NCA and the Lancashire Coal Measures NCA, which lie to the south and south-west.

There are prominent views from urban settlements looking up the Pennine slopes towards the adjacent South Pennine Moors and the Dark Peak. Equally, looking down from the foothills of the moors provides extensive views across to the adjacent Manchester Conurbation NCA and Lancashire Coal Measures NCA. The high rise of Manchester city centre is a visual landmark.

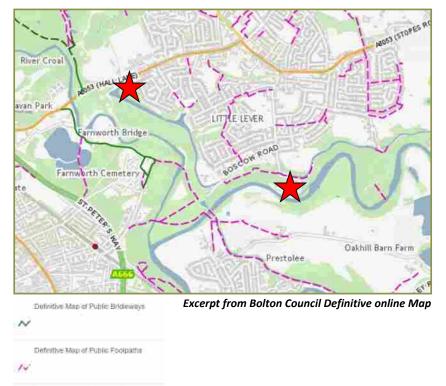
Numerous rivers flow through the area, including the Irwell, Roch, Goyt, Tame and Etherow, which drain down through this area from the adjacent uplands of the Dark Peak and Southern Pennines towards the lowland Manchester Conurbation and Mersey Valley NCAs, ultimately flowing into the Mersey Estuary and the Irish Sea. These rivers are important links between the uplands and lowlands, in terms of ecological connectivity as well as water management.

The demand for recreation – both within the Manchester Pennine Fringe NCA and from neighbouring NCAs – is high, due to the closeness of the Manchester Conurbation. The Pennine Bridleway National Trail provides an opportunity for multi-user access to the eastern extent of the area, providing links to other NCAs along the edge of the Pennines. There is evidence of the diversification of farming into a range of urban-related uses.

Historic trans-Pennine communication routes, especially railways and canals, connect with surrounding NCAs. A large number of A-roads and motorways [including the M60, M62 and M67] cut through this NCA, connecting the towns of Bolton, Bury, Glossop, Rochdale, Oldham and Dukinfield, and bypassing the city of Manchester. The closeness of the adjacent Manchester Conurbation NCA is reflected in the fact that many of the settlements act as 'satellite towns'. The modern tram and busy public transport networks link the Manchester Pennine Fringe NCA with Manchester city centre."

Visual Amenity

- 6.77. Based on the brief and a desk-based review of available documentation and data there are a number of potentially sensitive receptors in proximity to both sites, including but not limited to:
 - Farnworth Grade II Registered Park and Garden which lies approximately 1.2 and 1.5km south and west of the sites;
 - Three local Country Park at Blackleach, Clifton and Moses Gate all of which are also Local Nature Reserves [LNR] the closest of which is located immediately adjacent to Halls Lane;
 - Mytham local park and play area north of the site;
 - Nob End SSI and LNR which lies immediately adjacent to the Cream Mill site and Ashclough SSSI which lies opposite across the River Irwell;



• The principal Public Rights of Way [PRoW] network including those shown:

• Residential properties on the southern edges of Little Lever and Nob End and the northern edges of Prestolee;

- Isolated properties, farmsteads and properties including but not limited to Oak Hill Farm, Oak Hill Barn, and Ash Clough;
- There are a number of listed buildings [15no.] within 500m of the two sites site, all of which are Grade II; and
- The is also a single Scheduled Ancient Monuments [SAM] at Rigley Old Bridge; however, it is unlikely that this will be affected.

Potential Impacts/Effects

Definitive Map of Restricted Byways

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6.78. Criteria thresholds for assessing the degree of change as a result of the scheme will be established, in line with best practice, and the final layout of the scheme will be reviewed to ascertain the magnitude of change in the landscape and in views. Visual impact on historic features of interest will also be assessed which will in turn inform the cultural heritage assessment of impact on setting of such features. Where appropriate the assessment will consider cumulative landscape and visual impacts including those arising from adjacent and nearby proposals, which have planning consent or, which are under construction or operation.

6.79. The number and location of the representative viewpoints will be assessed by desk-based and site surveys and agreed in principal with the LPA landscape officer. A plan showing the proposed viewpoints is included at **Appendix 4.** Unless otherwise directed by the LPA the number of representative viewpoints will not exceed ten in number.

Scope and Methodology of Assessment

- 6.80. The LVIA technical report and ES Chapter will be written in such a way that it is accessible to all, but in any event will include as a minimum the following tasks and outputs:
 - i. Baseline data assessment, include producing a site-specific methodology in line with current guidance, preparing detailed, site specific and study area, landscape character and planning policy sections of the technical report. In addition, the local authority's landscape officer would be contacted to agree the location of the representative viewpoints and a photographic survey undertaken from these locations.
 - ii. Prepare of supporting illustrative material including the following figures and plates [utilising the information prepared as part of the master planning exercise above]:
 - Figure 1 Zone of Theoretical Visibility [ZTV]
 - Figure 2 Topographical and Drainage plan;
 - Figure 3 A Visual Context and Viewpoint Location Plan;
 - Figure 4 A Landscape Constraints [and Policy] plan;
 - Figure 5 A Landscape Character plan;
 - Figure 6 Strategic Landscape Master/Mitigation Plan; and
 - Plates 1-20 Key Viewpoint plates [Max 20].
 - iii. Produce landscape and visual impact tables and assessment report by assessing the magnitude of change in the landscape and visual amenity as a consequence of the proposals for each potential receptor [including any new representative viewpoints] and describe the potential landscape and visual impacts arising from the proposals during construction and before mitigation [nominally Year 1 Opening Year], including temporary and permanent effects, direct and indirect effects, short term and long term effects;
 - iv. Develop mitigation proposals which will avoid or reduce adverse landscape and visual effects or provide compensation where unavoidable, and where possible enhance and safeguard beneficial effects;
 - v. Identify residual impacts on the landscape and visual resource [nominally Year 15];
 - vi. Identify the cumulative impacts on the landscape visual resources for identified projects; and
 - vii. Evaluation of the significance of landscape and visual impacts arising from the proposals during operation and in years 1 and 15 after completion of the scheme.

Preliminary discussions of mitigation and enhancement measures

6.81. Mitigation measures will be developed in tandem with the proposals to minimise adverse impacts as part of the iterative design process. Options for screening various components of the scheme will be investigated and adopted as mitigation measures where appropriate.

Traffic and Transport

- 6.82. An assessment of the likely environmental effects of the Proposed Development on the local transport network will be undertaken by SCP Transport.
- 6.83. The Transport chapter of the ES will report and build upon the findings of the Transport Assessment, which will be submitted as part of the planning application alongside a Travel Plan. It will provide a detailed description of the baseline transport environment and include an assessment of the likely effects of the development on the operation of the local highway network and driver delay, pedestrian delay and amenity, fear and intimidation, severance and road safety. Effects will be assessed for the construction and operational phases of the Proposed Development, as is described in Section 2.

Relevant Policy and Guidance

- 6.84. The Transport Assessment shall examine the transport implications and transport strategy requirements of the development in relation to relevant guidance, which will include:
 - National Planning Policy Framework (the framework) (February 2019);
 - Planning Practice Guidance (PGG) Travel Plans, transport assessments and statements in decision-taking (March 2014);
 - Design Manual for Roads and Bridges (DMRB);
 - Manual for Streets (MfS) (2007);
 - Manual for Streets 2 (MfS2) (2010);
 - Transport for Sustainable Communities: A Guide For Developers (2013);
 - The third Greater Manchester Local Transport Plan (GMLTP3)
 - Bolton Council Accessibility, Transport and Road Safety Supplementary Planning Document (October 2013)
 - Bolton Council Adopted Core Strategy Development Plan Document (March 2011)
 - IEMA Guidelines for the Environmental Assessment of Road Traffic (1993).

Preliminary Assessment of Baseline Conditions

6.85. Baseline traffic flows will be obtained from existing data where available and from new traffic counts where appropriate.



- 6.86. The baseline flows will be adjusted to future assessment year levels using NTEM / NTM growth factors calculated using the TEMPRO software. The preliminary study area is as follows, subject to the views of the local highway authority.
 - A6053 Market Street / Redcar Road
 - A6053 High Street / Mytham Road

Potential Impacts/Effects

- 6.87. A trip generation exercise will be undertaken using the TRICS Database to establish the likely traffic generation associated with all uses of the proposed development. The subsequent traffic flows generated by the proposed development during the AM and PM peak hours will be distributed onto the local highway network based on origin / destination Journey to Work Census data. These flows will be used to establish the peak hour traffic impact of the development scheme.
- 6.88. The Institute of Environmental Assessment, now the Institute of Environmental Management and Assessment (IEMA), Guidance lists seven transport related environmental impacts which have been presented in the Table below:

IEMA Transport Related Environmental Impacts
Driver Delay
Impacts on Public Transport Users
Pedestrian Delay and Amenity
Impacts on Fear and Intimidation
Severance
 Accidents and Safety

6.89. The effects of the construction and operational phases will be considered and the greater effect assessed.

Scope and Methodology of Assessment

6.90. A scoping process is to be undertaken for the Transport Assessment with the local highway authority, in order to formally agree the content of the assessment and the study area.

Preliminary discussions of mitigation and enhancement measures

6.91. This section of the ES Chapter will set out the means by which any likely significant environmental impacts identified in the preceding assessment of construction and operation phase impacts is to be mitigated. The purpose of the mitigation measure will be to prevent, reduce or offset any likely significant environmental effects.



6.92. The ES will identify any residual environmental effects and their significance taking account of the application of the mitigation measures. Appropriate mitigation measures will be identified through the TA process.

Socio Economic

6.93. This chapter of the ES will provide an assessment of the likely socio and economic effects generated by the Proposed Development. This will include the identification and assessment of likely direct, indirect and induced effects in relation to employment, leisure, tourism and contributions to economic output. The assessment will consider effects generated during construction and operation, including cumulative effects.

Relevant Policy and Guidance

- 6.94. The assessment will take account of adopted and emerging policies of relevance to socioeconomics. This will include
 - The National Planning Policy Framework (February 2018)
 - The Bolton Core Strategy (adopted March 2011)
 - Green Infrastructure Framework for Greater Manchester (2008)
 - Bolton Retail and Leisure Study (2008)
 - Strategic Housing Market Assessment (2008)

Preliminary Assessment of Baseline Conditions

- 6.95. The assessment will establish baseline socio-economic conditions within those areas likely to be affected by the Proposed Development. Study areas are defined based on an understanding of relevant local and wider economic geographies, and the extent to which socio-economic effects are likely to be contained within these established statistical geographies.
- 6.96. Baseline socio-economic conditions will be established using the most up-to-date available secondary data, establishing the extent to which the following key indicators have changed over time:
 - Jobs;
 - Business base;
 - Population past trends and future projections;
 - Economic output;
 - Unemployment;
 - Deprivation;
 - Qualifications and skills; and



• Economic activity.

Potential Impacts/Effects

- 6.97. During construction, it is anticipated that the Proposed Development will generate the following socio-economic effects:
 - Direct, indirect and induced jobs based in the local and wider impact areas;
- 6.98. Once completed and fully operational, it is anticipated that the Proposed Development will generate the following socio-economic effects:
 - Increasing the local population;
 - Provision of new housing in the local area;
 - Impacts on the wider economy in terms of annual household expenditure and Council Tax receipts associated with the Proposed Development;
 - Demand for health provision;
 - Demand for education provision;
 - Access to local space/public amenity.

Scope and Methodology of Assessment

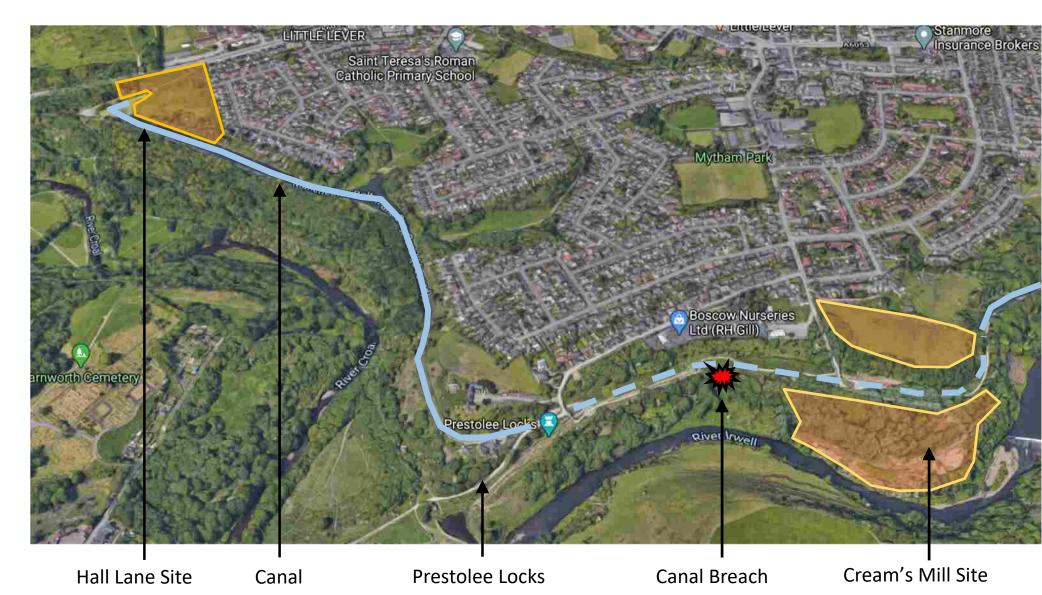
- 6.99. There is no overarching Government guidance that sets out the preferred methodology for assessing the likely socio-economic effects of development proposals. Accordingly, the approach adopted for the assessment will be based on professional experience and best practice, and in consideration of the policy requirements/tests set out within the NPPF and the adopted Local Plan.
- 6.100. The first step in the assessment will be to identify the sensitivity of the receptors. In socioeconomic assessments, receptors are not sensitive to changing environmental conditions in the same way as many environmental receptors are. To address this, the assessment will draw on a combination of measurable indicators (jobs, population, etc.) and a consideration of the importance of the receptor in policy terms to gauge the receptor's sensitivity.
- 6.101. The magnitude of change upon each receptor will then be determined by considering the predicted deviation from baseline conditions, both before and, if required, after mitigation.

Preliminary discussions of mitigation and enhancement measures

6.102. Following the assessment of effects, mitigation measures to reduce and avoid any negative effects will be identified and detailed if required. Any residual effects of significance will then be evaluated. Given the analysis underpinning the socio-economic chapter has not started, it is not possible to say whether any mitigation or enhancement measures are required. Given the nature of the Proposed Development, however, it is considered unlikely that it will have any negative impacts from a socio-economic perspective. When considered with other developments in the area, this may change, and the chapter will analyse this accordingly.

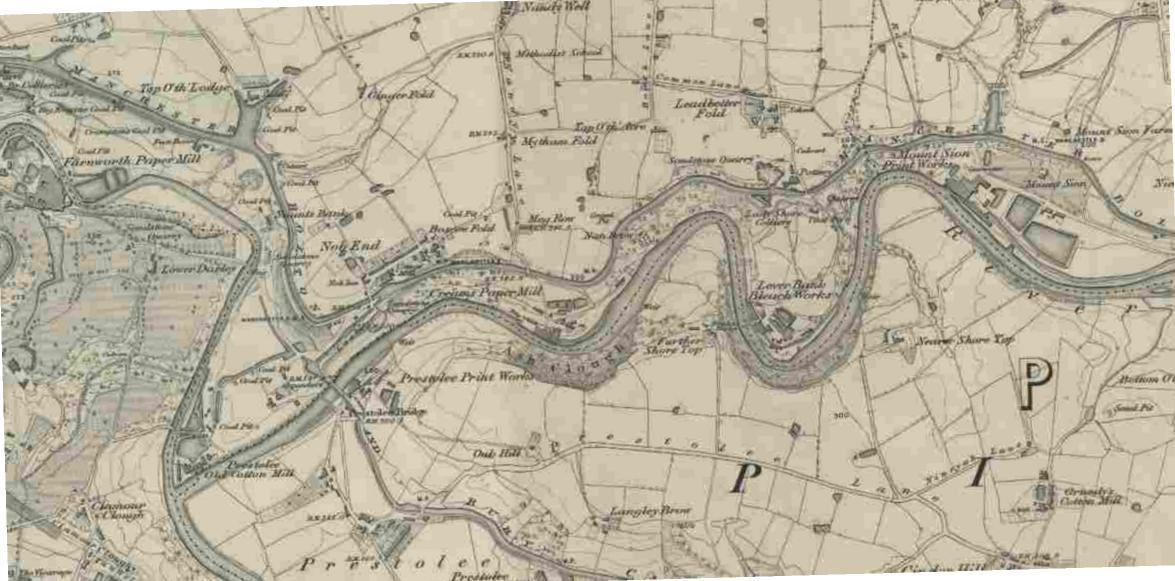
Appendix 1: Site Location Plan

Proposed Hall Lane / Cream's Mill Sites in Context





Appendix 2: Historic map and photographs from Creams Mill



Creams Mill



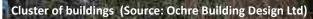
Creams Mill – Previous Development





Building Design Ltd)









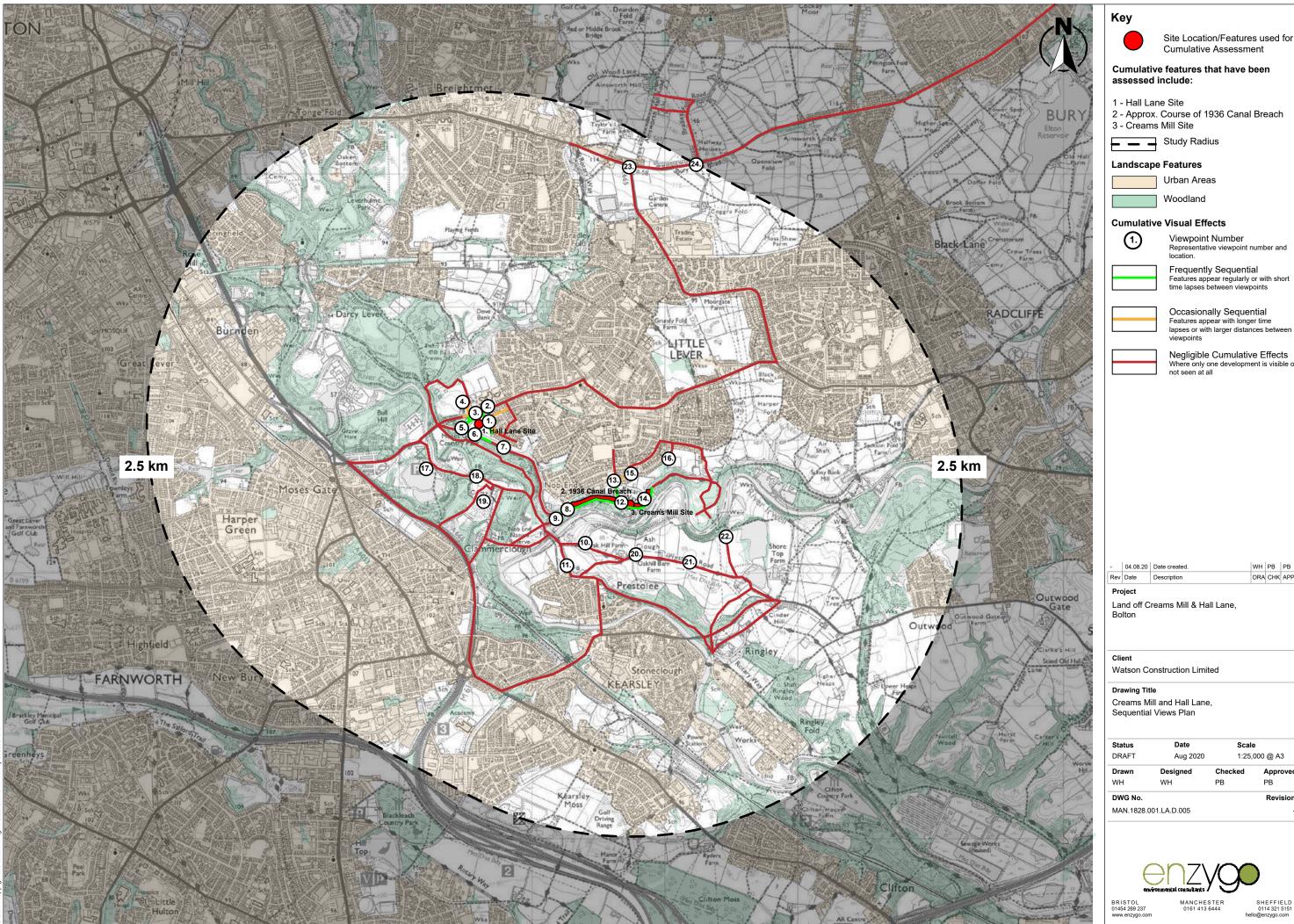




Appendix 3: Photograph of breach



Appendix 4: LVIA viewpoints



Negligible Cumulative Effects Where only one development is visible or not seen at all

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Appendix 3: EIA Scoping Response

Date: 13th October 2020

Ms Gillian Worden P4 Planning Limited 111 Piccadilly Manchester M1 2HY **Development Management**

Department of Place Bolton Town Hall Bolton BL1 1US

Tel: 01204 336000 www.bolton.gov.uk

Dear Ms Worden,

Creams Paper Mill and Hall Lane, Little Lever, Bolton

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 – Request for Scoping Opinion

Further to the receipt of your Scoping Request and the consultation undertaken by the local planning authority, we are pleased to provide a response on behalf of Bolton Council.

The overall scope for the Environmental Statement appears to be satisfactory.

We would however be grateful if the following additional issues/comments could be addressed in any future planning submission:

Floodrisk

The Environment Agency, the Council's Floodrisk team and the Canal and River Trust have responded to the EIA Scoping in relation to floodrisk.

The EA welcomes the proposed development avoiding flood zone 3 and states that the application submission FRA must consider the impacts of climate change - increases in fluvial flows of 35% and 70% must be considered in the FRA.

The EA confirm that any changes in ground levels adjoining the River Irwell must not lead to a loss of flood plain storage volumes. The minimum design event to consider for flood plain storage is the 1% AEP event including at least 35% increase in flows to allow for climate change impacts.

The EA have confirmed that in terms of layouts, they have discretionary powers to carry out maintenance or improvement works on the River Irwell which is "Main River" and will use the Environmental Permitting (England and Wales) Regulations 2016 to control development within 8m from the bank where it could affect access and any proposed layouts for the site will need to take account of this.

This development may require a permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency for any proposed works or structures, in, under, over or within 8m of the bank of the River Irwell which, is designated a 'main river'. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted.

The Canal and River Trust advise that the EIA and FRA should consider the potential impacts/effects of the proposed drainage from the Hall Lane site and should include an assessment of the impact on the adjacent canal. The canal is currently hydrologically isolated from the remainder of the canal network, with limited water flow to and from the existing watercourse. Additional water flows to the canal in this location could therefore result in changes to the water levels, which could increase the risk of localised flooding or a canal breach.

Works to the Canal

Both the Environment Agency and the Council's Floodrisk team have addressed the proposed work to the canal breach.

Floodrisk have raised some concerns about any future breach of the canal, especially given the position of the canal at a much higher level and sitting above the proposed residential scheme. The EA have stated that the FRA should also consider any potential for future flood risk to the site from the canal overtopping. Similarly, Floodrisk have requested that details should be submitted as to how the canal water levels are to be managed to ensure that there is no escape of water.

The EA also state that based on proximity and evident environmental risk to watercourse, we would seek the active protection of River Irwell and main ecological receptor of development site, and this be an integral element in designing any scheme to the repair canal.

Public Rights of Way

Responses have been received from the Council's Public Right of Way Officer, Bolton Ramblers and Peak and Northern Footpaths.

Your attention is drawn to the relevant policy:

- Allocations Plan Policy P8AP states that the Council will permit development proposal affecting Public Rights of Way provided that the integrity of the right of way is retained.
- Developments must have full regard for NPPF 2019 paragraphs 91, 98 & 102.
- DEFRA Circular 1/09 (Version 2). In particular, Section 7.8 regarding the alternative alignment of PRoW.

The proposed development involves two PRoW (LIL040 and LIL038). Consideration should be given to the affect this development will have on the amenity of Public Rights of Way and other recognised trails due to its visual impact and any potential physical impact. It is also extremely important that all existing and any potential Public Rights of Way on or adjacent to the development are identified and considered at an early stage in the development process. It is possible that a path across an area of land may have become public by usage although not indicated on the Definitive Map.

It has been highlighted that it is likely that the rights of way will have to be closed for a considerable time while works to create a new bridge and to repair the canal breach are

undertaken. These are very popular public rights of way, it would therefore be beneficial for, at the planning stage, an alternative route could be found to avoid the bridge work/breach work.

With regard to the Hall Lane plot of land, the Ramblers welcome the fact that the two footpaths (which are not public rights of way) linking the estate of houses to the east of the plot of land through to the canal tow path and Moses Gate Country Park are to be retained.

Concerns are raised that the amenity value and usability of both definitive and informal footpaths and other ways are maintained and if possible enhanced. This is believed to be relevant to the environmental impact of the development, notably the woodland environment of the riverside walks. Relevant issues to be considered are the realignment of any public rights of way, the boundary treatment between any way and the development – should not reduce the amenity value of the PRoW/footpath.

Consideration should be given to any new footpaths created to be dedicated as public rights of way. If this is not possible, permissive rights should be protected by binding long-term agreements.

Biodiversity

The Environment Agency, the Council's Greenspace Officer and The Manchester, Bolton and Bury Canal Society have provided comments with regard to biodiversity. The guidance from Natural England is also relevant in this respect.

The EA welcome the inclusion of drainage and flood risk chapter in forthcoming EIA, based on the proximity to River Irwell WFD waterbody (Ref: Irwell (Roch to Croal) (GB112069060840), and Manchester Bolton & Bury Canal (GB71210501)), with these being key environmental receptors; and based on these waterbodies currently failing their ecological objectives as outlined in the statutory North West River Basin Management Plan. It will be essential, based on future riparian schemes proximity to these waterbodies, that potential water quality impacts associated with redeveloping the old paper mill site and construction of new site wide drainage strategy are actively be addressed through design, construction and operation. We would also recommend that existing WFD environmental data is referred to in EIA to establish a baseline in the drainage chapter. Both the physiochemical and hydro-morphology elements should be referred to, as construction and operation of the site could impact on both of these receptors.

Where feasible based on the sites industrial legacy, we recommend the use of multifunctional sustainable urban drainage be considered as part of the new residential scheme design, providing wider environmental opportunities including water quality and biodiversity in conjunction to flood risk benefits, particularly based on current WFD waterbody failing its existing biological target, and with River Irwell being a key ecological receptor.

The Council's Greenspace Officer has commented that, the submitted scoping report provides a comprehensive level of investigation and assessment in respect of biodiversity. They make the following observations (numbering refers to the submitted scoping report paras):

6.65 The Appleton's report of 2016 may now be outdated with respect to the spread of invasive non-native species. Surveying and mapping may require to be updated and potential impacts evaluated at the Hall Lane site.

6.66 Consideration needs to be given to the reduction in connectivity along the river valley corridor and the impact this will have for both plant and animal wildlife. This may then inform the design, mitigation and enhancement planning.

6.69 Evaluations to be conducted in 2020 should hopefully have been undertaken already. If not this will need to be done in the next available optimal survey window. Sub-optimal or inappropriate timing of surveys will not be considered acceptable.

6.70 Translocation of habitats and species is rarely successful. Protection of existing species and habitats and habitat creation are likely to be more successful and cost effective.

The Manchester, Bolton and Bury Canal Society, identify opportunities on both sites, along the restored canal and off-site on adjoining land to establish increased bio-diversity, net gain and contribute to GM Nature Recovery Network pilot scheme (in line with NPPF 170 a,b,d). They also believe the EIA should identify where habitat enhancements will take place especially as this would be a good way to reasonably extend the benefits beyond the immediate development sites, which shouldn't be limited to the Ashclough SSSI. The proposed completion of a habitat survey would be welcomed and a phase 2 Ecological Evaluation is encouraged.

Ecology and Trees

Responses have been received from Bolton Council Tree and Woodland Officer, Natural England and the Environment Agency.

It is noted that Natural England have provided a detailed response to the EIA Scoping Report. They refer to the requirements of Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 which sets out the necessary information which needs to be included within an Environmental Statement including the cumulative impact of proposals. Specific guidance is provided within the Natural England response in respect of ecology, regionally and local important wildlife sites, protected species and habitats and species of principal importance. This includes the use of local records as appropriate.

The Council's Tree and Woodland Officer has confirmed that a full tree survey would be necessary for all sites as well as an arboricultural impact assessment including tree constraints plans. The Hall Lane site is adjacent to woodland near the entrance and protected trees on the eastern boundary, any potential impacts should be assessed as part of the submission.

The EA welcome the inclusion of ecology and nature conservation chapter within EIA. Based on the schemes proximity to two WFD, but failing waterbodies and key ecological networks.

In regard to relevant policy and guidance the Sustainable Design and Construction SPD (2016) is a key document to refer to based on proximity to River Irwell, and this being identified as a key green infrastructure asset.

It is also recommended any new ecological assessment (section 6.68) also encompass the proposed canal breach site and surrounds that may be impacted as part of these works, if this is to be submitted as part of planning application.

Based on wider Creams Mill site encompasses the now redundant Creams Mill weir; to which such artificial in-channel impact on natural hydro-morphological and ecological processes of river; and is one a key reasons why currently the River Irwell WFD waterbody is failing to achieve its ecological objectives. There now may be an opportunity to enhance the ecological potential of waterbody as part of riparian development, by looking to modify or remove the old industrial infrastructure. Removal of the structure would take a big step towards meeting the objectives of the Water Framework Directive, whilst also potentially offsetting and wider development impacts to the water and riparian environment. Such a project would also provide the ability to continue progressive river restoration works already undertaken in the Irwell catchment, and helping achieve net gain for biodiversity as sought by NPPF and draft GM Spatial Framework , whilst also potentially work to deliver part of nature recovery strategy in Greater Manchester which has been highlighted as a pilot area.

At this stage, it would be advantageous if any future Flood Risk Assessment of site could also consider the option to remove the weir, which may provide flood risk benefits and would be required should this opportunity be progressed.

The Environment Agency and Groundwork Greater Manchester (Catchment Host for River Irwell) would welcome further discussion and opportunity for partnership working to potentially help achieve this.

Land Stability

The Coal Authority has responded to the scoping request. They have confirmed that their records indicate the development sites are in areas of past coal mining activity. They are pleased to see that the ES Scoping Report, dated September 2020, includes a section on ground conditions, including coal mining legacy. This report notes that investigation and risk assessment is required in order to establish the risks posed by past coal mining activity. The authors of the report then note that stabilisation and treatment works may be necessary. The Coal Authority concurs with this view.

The Coal Authority would expect the formal planning application to be supported by a Coal Mining Risk Assessment, or equivalent report. Where mine entries are present on a site then this report should be informed by the findings of intrusive site investigations to locate these features and assess their condition.

The location of the mine entries once established, and their zones of influence, should be used to inform the development layout in order to ensure that buildings are not located over, or in close proximity to, these features.

Highways

The Council's Highway Engineers have assessed the scoping submission and confirmed that content of the EIA scope from a transport/highway's perspective is acceptable.

Land Contamination

The Canal and River Trust welcome that a Preliminary Risk Assessment has been undertaken for all sites. They advise that the canal should be identified as a receptor so that any risk to the water environment can be fully assessed and mitigated against, this should include drainage details considering surface water discharge which could introduce pollution pathways to the canal unless appropriate mitigation measures are incorporated.

They also advise that during development, canal protection measures should be incorporated to avoid any contamination of the water environment. On this basis, the Canal and River Trust recommends that the scope of the EIA is expanded to include the consideration of appropriate mitigation measures to protect the water environment during construction.

Landscape and Visual Impact

The Canal and River Trust have requested that the canal is included within the list of sensitive receptors (para 6.77). They also highlight that due to its historic links to the history of the site, the canal should be considered a heritage asset. They therefore advise that the EIA should specify whether the canal will be included in the cultural heritage assessment (para 6.78).

The Manchester, Bolton and Bury Canal Society, using the LVIA map consider that between points 10 and 20 there would be occasionally sequential (visual) impact, which should be considered in the LVIA.

Archaeology

Greater Manchester Archaeology Unit are satisfied with the details contained in the Scoping Report, in that archaeology will be scoped out and dealt with separately. GMAAS consider the provision of an archaeological desk-based assessment and evaluation to be submitted in support of the application will be satisfactory. These will inform an appropriate archaeological mitigation which can be secured through a condition of consent

<u>Heritage</u>

The Canal and River Trust highlight that Mount Sion Steam Crane is Grade II listed, however it is the Council's understanding that this structure is no longer in existence.

Other Issues

The Manchester, Bolton and Bury Canal Society encourage the application submission to include a health impact assessment, to recognise the connection between environment and health benefits. At 6.15 we are not convinced that the proposed approach to covering human health will sufficiently cover the issue of health impact. Paragraph 3.8 allows for a more holistic evaluation to be taken. The health benefits of restoring the canal are significant but won't be given proper emphasis if the EIA sticks to a narrow definition of health impacts.

The full responses from the consultations we have received are attached to this letter.

Should you require any further information, please feel free to contact me.

Yours sincerely

Jodie Turton Principal Development Officer Direct Line: 07920 500990 E-mail: Jodie.turton@bolton.gov.uk



Appendix 4: Creams Mill Site Layout Plan



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		Site 4 6no. 2B3P apartment 6no. 1B2P apartment <u>Total - 12 units</u>) 57m) 45m	
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	P2	Revised to suit Highways & GMFR comments. Bins shown	30.10.20	АМ	МН
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PLEASE NOTE: Landscaping design and layout shown here are indicative, please refer to relevant drawings by Enzygo.

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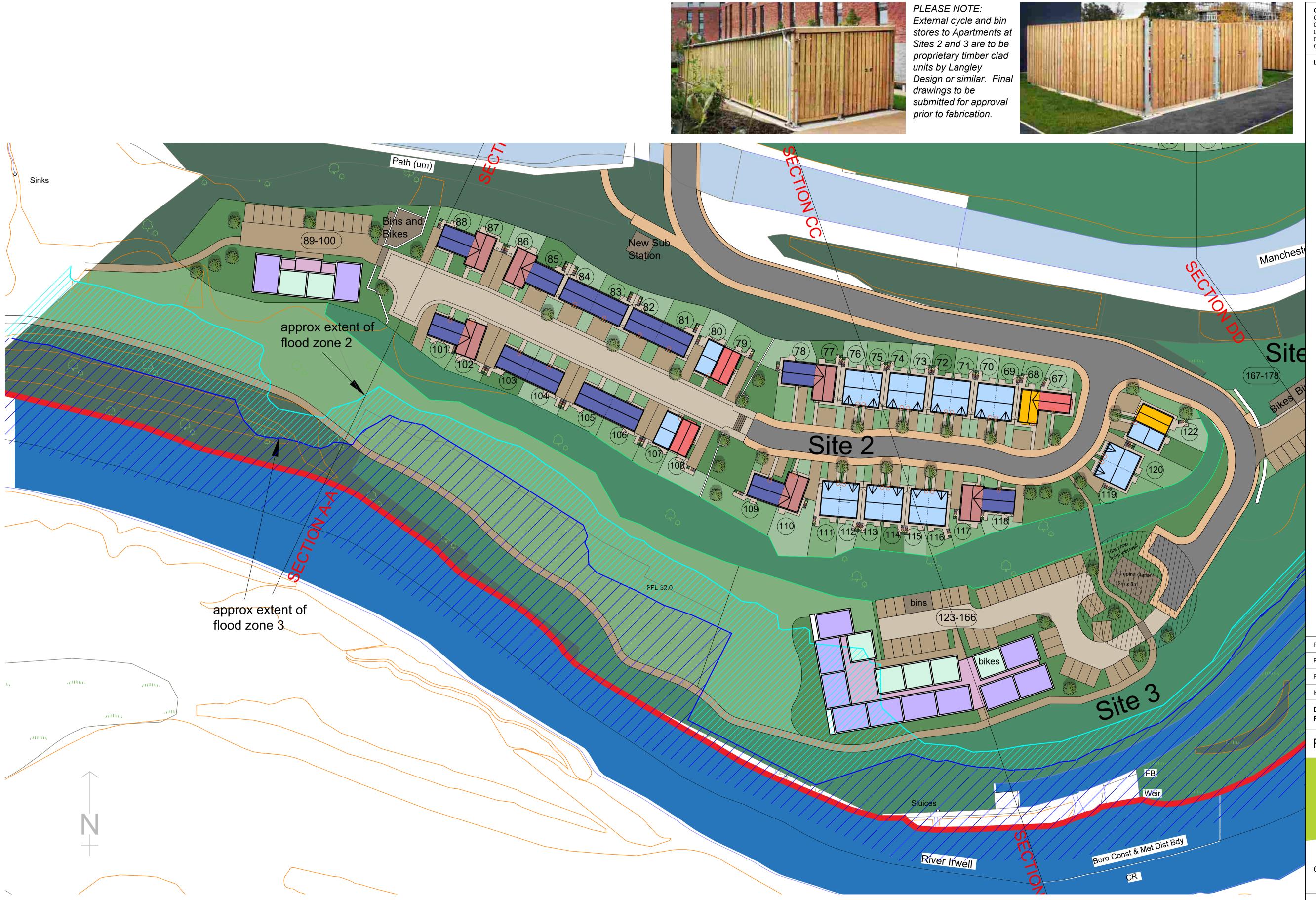
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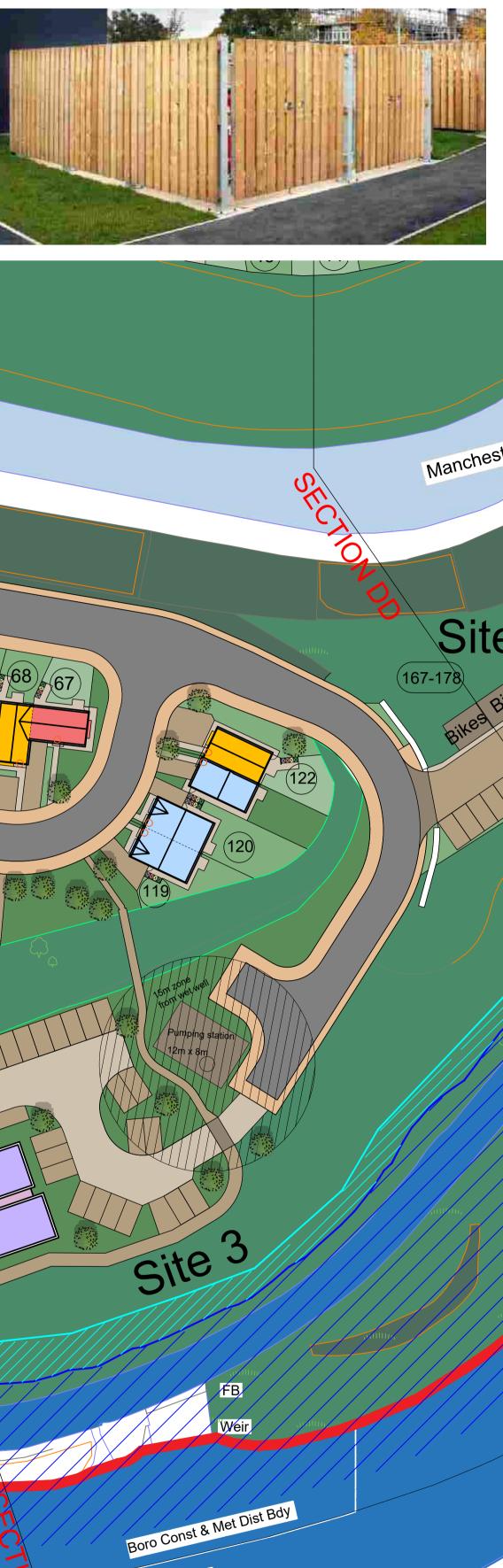
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PLEASE NOTE: Landscaping design and layout shown here are indicative, please refer to relevant drawings by Enzygo.

General Notes 01: Dimensions must not be scaled from this drawing. If in doubt, please ask. 02: All dimensions are in millimetres unless noted otherwise. 03: All dimensions should be verified on site before proceeding with the work.04: TADW Architects shall be notified in writing of any discrepancies. 05: © TADW Limited (UK) 2015 Legend Schedule of Accommodation Site 1 21no. 3B5P houses @ 85.5m² * 3no. 3B5P houses @ 88.6m² 7no. 3B5P houses @ 88.4m² 31no. 2B4P houses @ 73.6m² 4no. 4B6P houses @ 101.4m² Total - 66 units Site 2 2no. 4B6P houses @ 101.4m² 💻 3no. 4B6P houses @ 107m² @ 88.4m² 14no. 3B5P houses 6no. 3B5P houses @ 85.5m² 19no. 2B4P houses @ 73.6m² * 6no. 2B3P apartments @ 57m² 6no. 1B2P apartments @ 45m² Total - 56 units Site 3 30no. 2B3P apartments @ 57m² 14no. 1B2P apartments @ 45m² Total - 44 units Site 4 6no. 2B3P apartments @ 57m² 6no. 1B2P apartments @ 45m² Total - 12 units **Overall Total 178 units** *Note, some plots feature bay windows which add to floor area.

Note, cycle storage to be provided at a rate of 1 cycle space per dwelling for all houses and apartments. To houses, these are to be by secure bracket fixed to rear wall within private gardens

P3	Landscaping clarified to be by Enzygo, indicative layout shown here	04.11.20	АМ	МН
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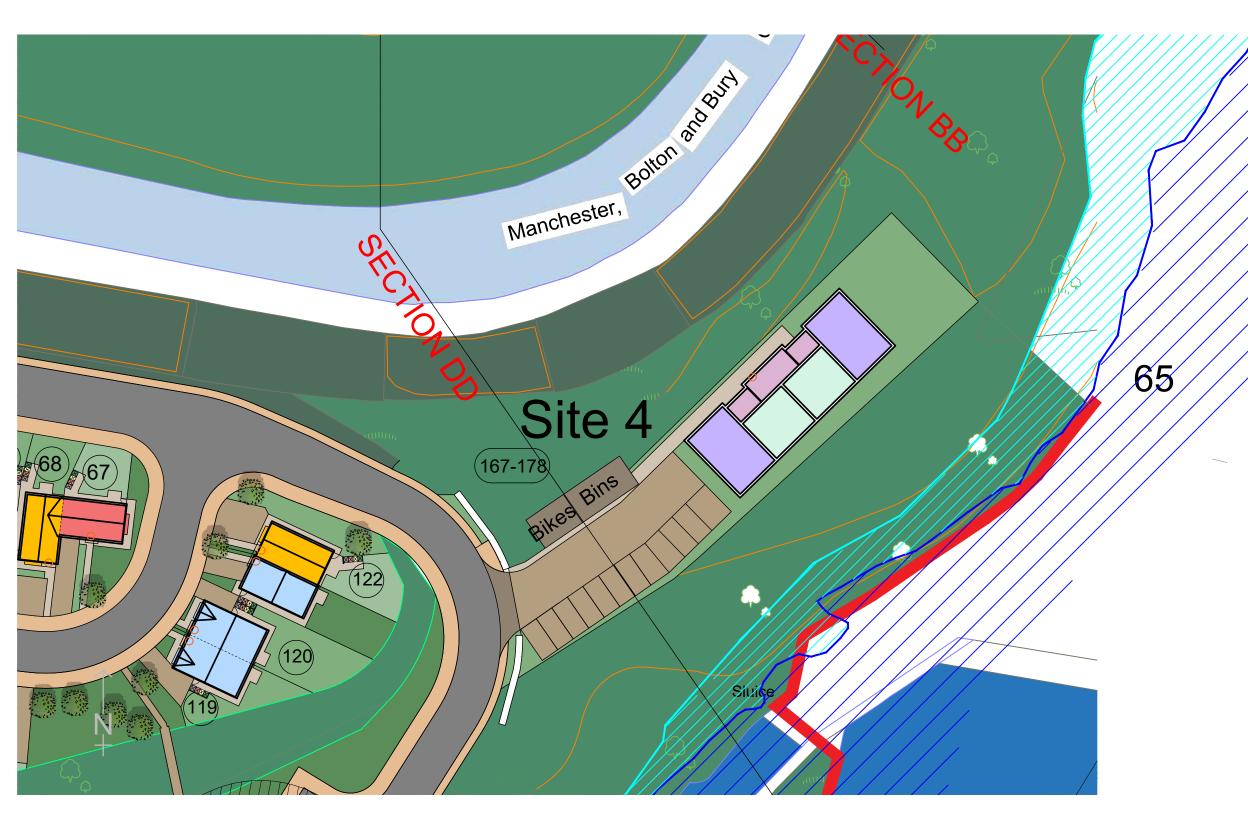
For Approval

tadw architects

Six St. Petersgate Stockport Cheshire SK1 1HD Ph 0161 477 6158 Fx 0161 480 8342 mail@tadw.co.uk www.tadw.co.uk Watson Construction Ltd. Client Creams Mill, Little Lever Job Proposed Site Plan - Sites 2&3 Title 1:500 @ A1 Scale

Note - Prints from PDF files may not be to scale, check accuracy against scale

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PLEASE NOTE: Landscaping design and layout shown here are indicative, please refer to relevant drawings by Enzygo.



Appendix 5: Hall Lane Site Layout Plan



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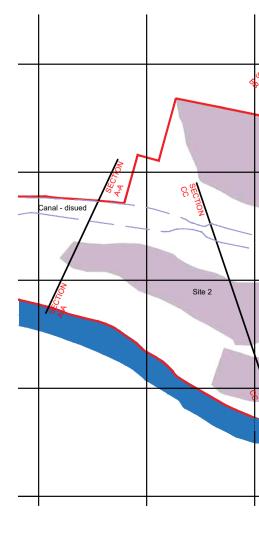


Appendix 6: Site Section Plan

Retaining wall	

Section CC

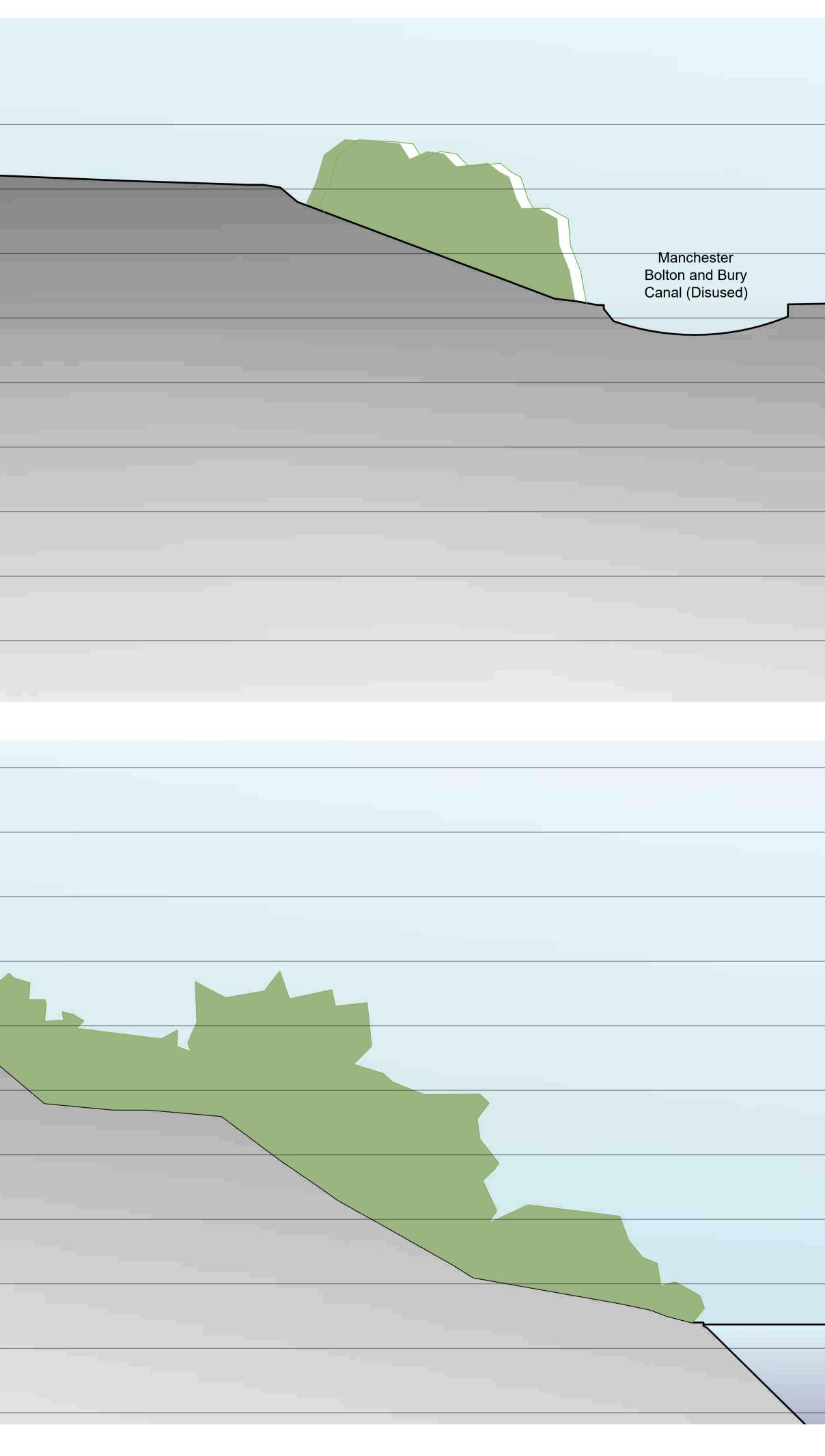


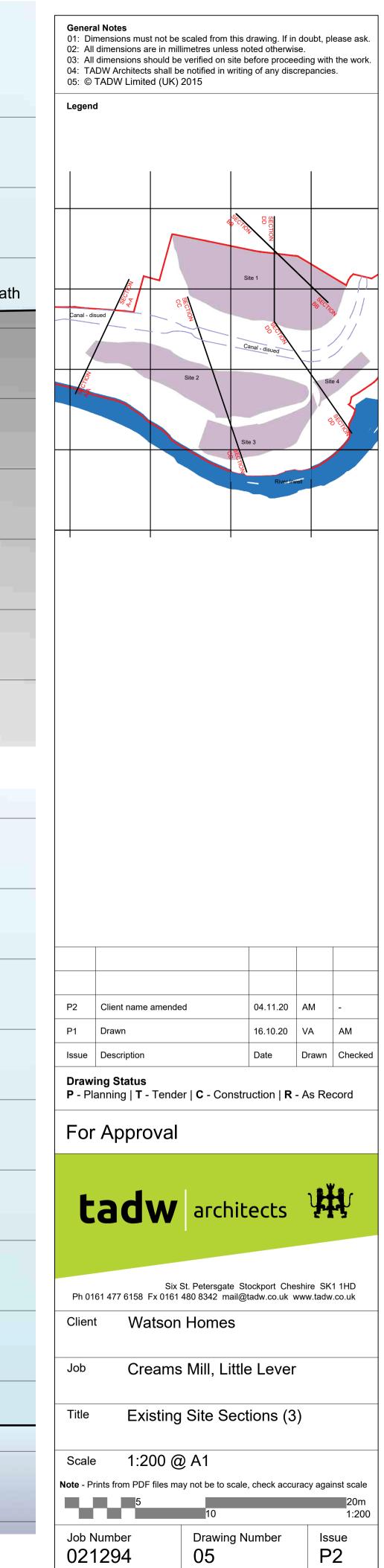


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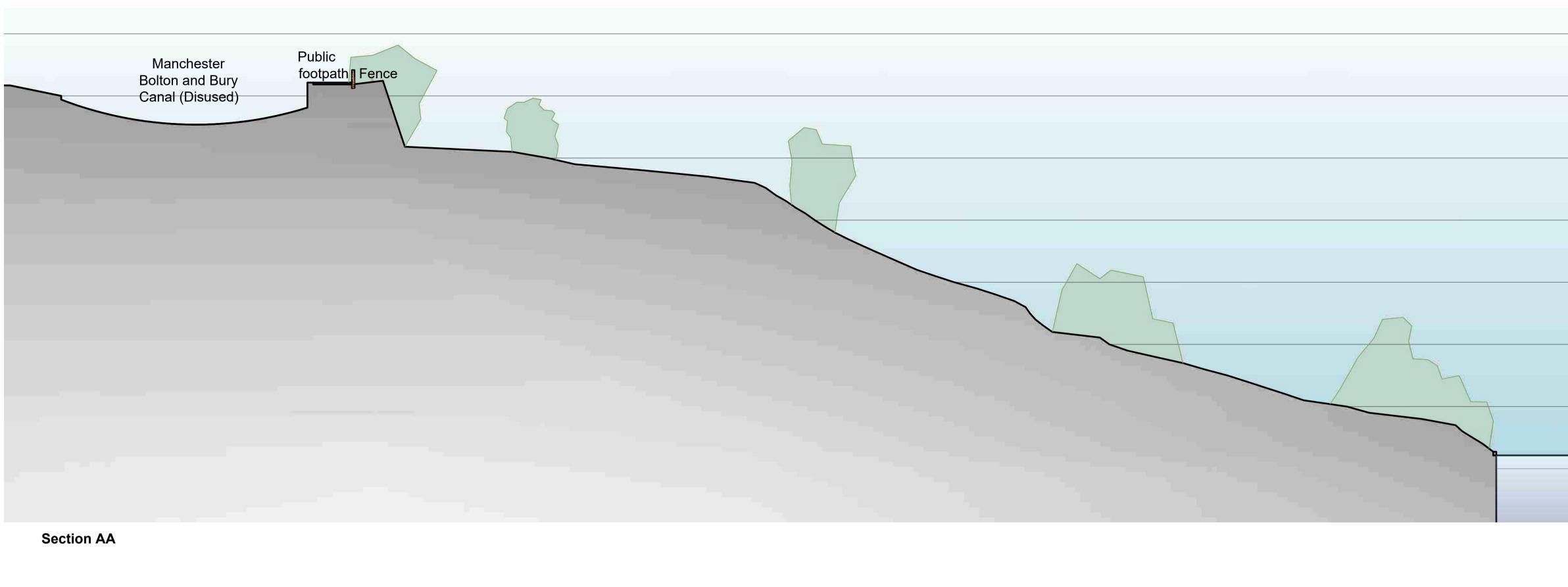
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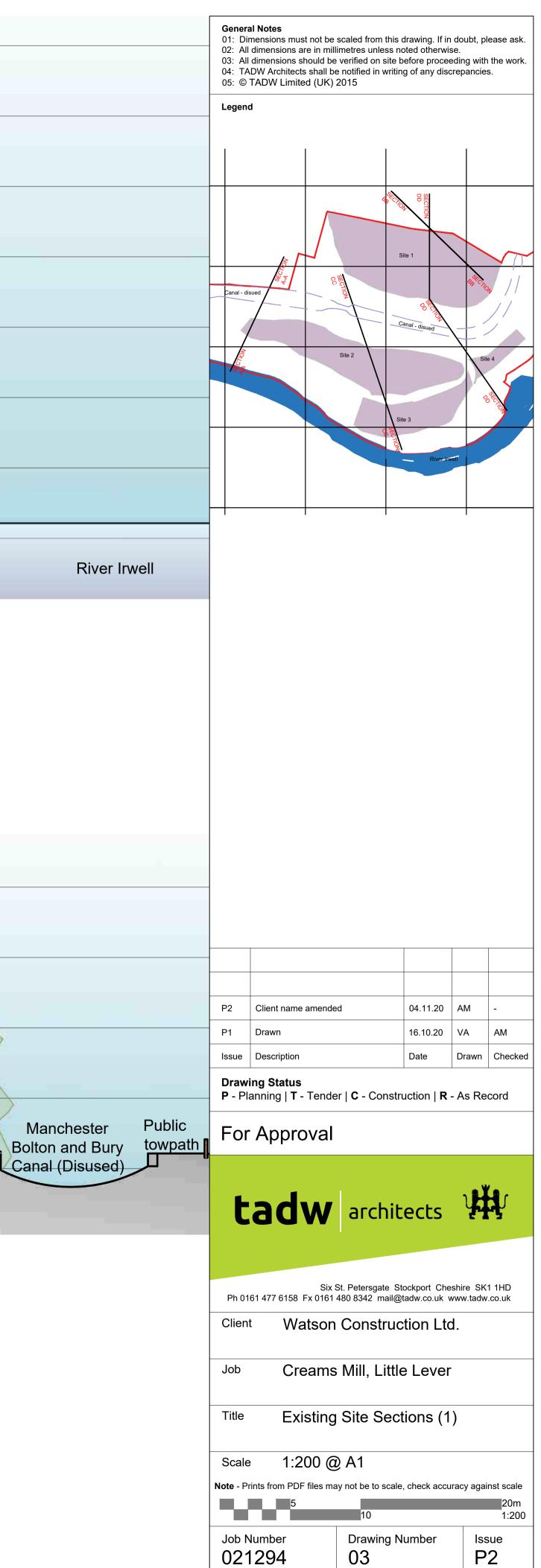


Public footpath

River Irwell









Section A



Section B



Section C

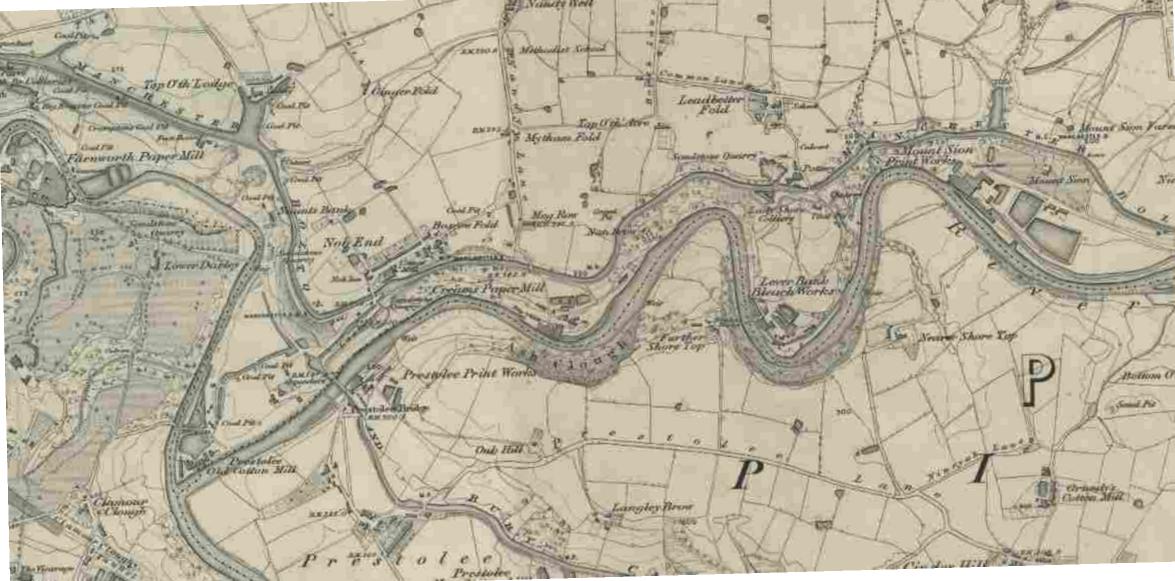
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Appendix 7: Historic Maps and Plan



Creams Mill



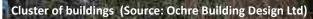
Creams Mill – Previous Development





Building Design Ltd)













Appendix 8: Photographs of site features

Creams Mill Today



Hall Lane Today





Appendix 9: Canal Breach





Appendix 10: AADT Flow

