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**Date:** 4<sup>th</sup> February 2026

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**To:** Manchester City Council

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**From:** Renaker Build Limited

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**Subject** **Technical Note: Holcroft Moss SPD**

Crown Street Phase 3 and Plot D, Great Jackson Street

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## Introduction

This Technical Note has been prepared by Deloitte (Planning), with technical input from Curtins (Transport) and Enzygo (Air Quality) to jointly consider the current proposals for Crown Street Phase 3 (Ref. 137226/FO/2023) and Plot D, Great Jackson Street (Ref. 137227/FO/2023) (herewith referred to as ‘the Proposed Developments’) in respect of the ‘Holcroft Moss Planning Obligations Supplementary Planning Document -May 2025 (herewith referred to as ‘the SPD’).

The SPD was prepared in respect of PfE Policy JP-C8 and is a material consideration in determining planning applications in Manchester City Council.

The note provides a sensitivity test and has considered the combined effects of Crown Street Phase 3 (CSPH3) and Plot D, which is consistent with the approach taken for the planning application and specifically the Transport Assessment (TA), and the Traffic and Transport chapter of the Environmental Statement (ES).<sup>1</sup>

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<sup>1</sup> The TA considered a ‘Base’ scenario (2022 Surveys + Committed Development), and a ‘Base + Development’ scenario (where the Development comprised CSPH3 and Plot D traffic flows). The Traffic and Transport chapter of the ES considered ‘Scenario 1: Baseline’ (including all Committed and Cumulative Development traffic flows), and ‘Scenario 7: Base + Development’ (all phases of the Proposed Development – Phases 1 to 6).

The Technical Note demonstrates that the impacts of the Proposed Developments falls below the defined significance threshold and it does not constitute further environmental information or any other information for the purposes of Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

## Significance

The SPD supports the requirement set out in PfE Policy JP-C8, specifically Clause 17, which seeks to ensure new development does not have an adverse impact on the protected habitats and species of Holcroft Moss.

As set out in Policy JP-C8 of the PfE Plan, where planning applications are required to be accompanied by a Transport Assessment, they will need to consider air quality impacts on Holcroft Moss, within the Manchester Mosses Special Area of Conservation (SAC). Any proposals that would result in increased traffic flows on the M62 past Holcroft Moss of more than 100 vehicles per day or 20 Heavy Goods Vehicles (HGVs) per day must devise a scheme specific range of measures to reduce reliance on cars, reduce trip generation, promote ultra-low emission vehicles, and provide a contribution towards restoration measures at Holcroft Moss.

Importantly, the Air Quality Habitats Regulations Assessment (AQHRA) prepared to support the preparation of PfE<sup>2</sup>, states:

*If the change in flows on a the M62 past Manchester Mosses SAC due to a given scheme is likely to exceed **200 Heavy Duty Vehicles per day or 1,000 Average Annual Daily Traffic (AADT)** then this would be the trigger for project-level air quality modelling and, depending on the outcome of that modelling, the need for scheme-specific mitigation.*

Within the above context, the relevant thresholds are:

- SPD Assessment Threshold: 100 vehicles or 20 HGVs per day
- Significance Threshold: 1,000 AADT or 200 HDVs per day

## Transport

Curtins have undertaken a Holcroft Moss assessment, taking a consistent approach to the assessment methodology undertaken as part of the Transport Assessment submitted with the applications.

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<sup>2</sup> Air Quality Habitat Regulations Assessment (HRA) study for the Greater Manchester “Places for Everyone” Plan (report prepared by Ricardo Energy & Environment for Systra Ltd on behalf of the Greater Manchester Combined Authority, dated 12/07/2021)

A robust and worst-case trip generation methodology was employed, following pre-application scoping discussions with Highways Officers at Manchester City Council (MCC) and Transport for Greater Manchester (TfGM). The agreed methodology for trip generation, distribution, and assignment, was appropriate for the planning submissions and was based upon TRICS trip rates, 2019 GMTRADS data, 2011 Census data, gravity models, online journey planners, and 2022 traffic survey data. Further details of the methodology employed can be found in the TA and ES chapter.<sup>3</sup>

The resulting daily traffic flow forecasts along the M62 (passing Holcroft Moss) are 4 HGVs<sup>4</sup> and 508 AADT for the Proposed Development.

As the traffic forecasts exceed the 100 vehicles per day SPD thresholds, mitigation measures and a financial contribution are required in line with the SPD. However, as the traffic forecasts do not pass the EIA significance threshold in the AQHRA, the impacts of the Proposed Development are not significant in EIA terms; this would therefore not trigger the need for project-level air quality modelling and scheme-specific mitigation, as noted in the AQHRA.

Site specific mitigation for the Proposed Development is provided in the form of the Framework Travel Plan (FTP) that was submitted with the planning applications. The detailed implementation of the FTP will be secured by conditions on the permissions for the applications. This mechanism will secure the measures and initiatives within the FTP that seek to minimise the number of car trips generated by the development and encourage residents, staff and visitors of the Proposed Development to use sustainable modes of transport. A Construction Environmental Management Plan (CEMP) is also identified as mitigation, which will also be conditioned.

It is highlighted that the traffic forecasts for Holcroft Moss are higher than they would be in practice, due to the conservative nature of the methodologies that were employed for the TA and ES chapter. Alternative Holcroft Moss specific methodologies<sup>5</sup> would produce more realistic (and lower) traffic flow forecasts.

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<sup>3</sup> TA document reference: 081453-CUR-XX-XX-T-TP-00001-P02

ES document reference: Environmental Statement: Crown Street Phase 3 and Plot D (Vol1-3), Deloitte, June 2023

<sup>4</sup> The proposed development flows, whilst presented as HGVs, are comparable with HDV flows as the development won't generate any bus/coach movements.

<sup>5</sup> These methodologies include: an assessment of trips by journey purpose, applying modal splits and distributing trips by purpose, calculating bespoke expansion factors for the Proposed Development traffic, applying the latest datasets available, applying vision-led transport planning in accordance with the National Planning Policy Framework (NPPF), and estimating the likely traffic composition to account for ultra-low and zero emission vehicles.

## Air Quality

Enzygo have undertaken a sensitivity test in the context of the Air Quality Assessment Chapter as part of the ES was submitted in support of each planning application, based on data provided by Curtins.

The Development AADT is well below the Natural England (NE) guidance<sup>6</sup> precautionary screening threshold of 1000 AADT past the Holcroft Moss SSSI and, as such, impacts can be considered as being well below the 1% contribution for critical loads and levels.

Impacts are therefore deemed ‘imperceptible’ in line with the NE guidance and there is no requirement for an HRA appropriate assessment or detailed dispersion modelling to determine the magnitude of impacts or significance.

An assessment of the air quality impacts from the PfE has been carried out by Ricardo Energy & Environment for GMCA<sup>7</sup>. To provide further context, we can make a comparison between the modelling traffic increases used in that assessment and those predicted for the Proposed Developments.

The Riccardo report used dispersion modelling to assess a potential future increase of c. 45,000 AADT past Holcroft Moss SSSI due to the Local Plan. The maximum impact on the sensitive features was for nitrogen deposition which was predicted to be 4.6% of the lowest critical load (5 kgN/ha-year). As such it is clear that the generated traffic arising from the Proposed Developments is a very small proportion of this assessed number and the impacts are likely to be a similarly negligible proportion of the critical load.

As the Development traffic impacts at the Holcroft Moss SSSI are imperceptible in accordance with NE guidance, impacts on the ecological designation are deemed not significant.

To consider potential in-combination impacts of the Proposed Developments, NE guidance<sup>8</sup> states that:

*“it is Natural England’s view that care should be taken to avoid unnecessarily combining the insignificant effects of the subject plan or project with the effects of other plans or projects which can be considered significant in their own right. The latter should always be*

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<sup>6</sup> Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations Natural England, June 2018

<sup>7</sup> Air Quality Habitat Regulations Assessment (HRA) study for the Greater Manchester “Places for Everyone” Plan, Ricardo Energy & Environment, July 2021

<sup>8</sup> Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations Natural England, June 2018

*dealt with by its own individual HRA alone. In other words, it is only the appreciable effects of those other plans and projects that are not themselves significant alone which are added into an in-combination assessment with the subject proposal”*

As the Development impacts are ‘imperceptible’ the in-combination impacts should also be deemed as not significant.

### **Financial Contribution**

In accordance with the terms of the SPD, it is anticipated that each proposed development will be subject to a planning obligation within the Section 106 agreement to secure Holcroft Moss financial contributions (payable on a phased pre commencement basis), consistent with the charge rates set out within the ‘Holcroft Moss Planning Obligations joint Supplementary Planning Document 2025<sup>9</sup>.

### **Conclusion:**

The provisions and guidance contained within PfE Policy JP-C8 and the Holcroft Moss SPD have been considered by the appointed technical team, ensuring that the Proposed Developments have fully addressed adopted policy and relevant material considerations.

In accordance with relevant thresholds, the technical note assesses the combined impacts of both planning applications and demonstrates that the trips arising from the Proposed Developments fall below the defined significance threshold.

Scheme specific mitigation will be detailed within the future Travel Plan and CEMP, which will be secured by planning condition. A financial contribution (payable on a phased pre commencement basis) is also proposed to be secured via legal agreement in line with charge rates set out within the Holcroft Moss Joint Supplementary Planning Document.

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<sup>9</sup> [https://www.greatermanchester-ca.gov.uk/media/ituizwj/holcroft-moss-spd\\_project-costs\\_adoption2025.pdf](https://www.greatermanchester-ca.gov.uk/media/ituizwj/holcroft-moss-spd_project-costs_adoption2025.pdf)