



# Draft Allocations Plan Consultation Statement

September 2018



# Statement of Consultation

## Introduction

### Purpose of the Statement

This Consultation Statement describes how Rochdale Council has undertaken consultation in the production of its draft Allocations Plan. This statement has been prepared in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is an interim statement for the purposes of consultation on the draft Allocations Plan.

The Statement will identify the methods of consultation used; who has been involved in the process and when; and how consultation has shaped the Allocations Plan. The statement also summarises the main issues raised through representations made at the Regulation 18 consultation stage.

### Background and context

The Allocations Plan will propose detailed planning policies, areas designations and site allocations for specific types of development to meet the needs of the Rochdale borough up to 2028, as set out in the adopted Core Strategy. This will include identifying sites to deliver the new homes and employment land required over the plan period. It provides the details needed to demonstrate how the spatial vision, strategic objectives and scale of growth outlined in the Core Strategy will be delivered.

Throughout production, the Allocations Plan will evolve through several iterations and this Statement will be updated at each stage to outline the consultation that has taken place. Consultation has been carried out in accordance with the adopted Statement of Community Involvement and requirements set out in the relevant Regulations.

### Legal Context

This Statement of Consultation has been prepared in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Regulations require that the documents submitted for examination of the Local Plan should include a statement setting out:

- i. Which bodies and persons the local planning authority invited to make representations under Regulation 18;
- ii. How these bodies and persons were invited to make representations under Regulation 18;
- iii. A summary of the main issues raised by representations made pursuant to Regulation 18;
- iv. How any representations made pursuant to Regulation 18 have been taken into account;
- v. If representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- vi. If no representations were made in Regulation 20, that no such representations were made.

The Regulations prescribe a series of bodies that should be consulted during the development of the plan. Some of these 'Specific Consultation Bodies' are prescribed other 'General Consultation Bodies' are at the discretion of the Local Planning Authority.



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### Statement of Community Involvement

The Council's Statement of Community Involvement (SCI) sets out how Rochdale Council will engage with the community, businesses and other organisations in the development of the Local Plan. It provides details of who, how and when the Council will consult during preparation of the Allocations Plan and other planning policy documents.

### Duty to Cooperate

In addition to the requirement to consult in accordance with the Local Planning Regulations and the Council's adopted SCI, there is a 'Duty to Cooperate' contained within the Localism Act 2011. This places a legal duty on Local Planning Authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. Meeting the 'Duty to Cooperate' is one of the 'legal' tests that must be satisfied as part of the Local Plan examination.

As part of the plan production for the draft Allocations Plan, and to satisfy our Duty to Co-operate obligations, a Duty to Co-operate meeting was held with the following neighbouring authorities: Oldham Council; Rossendale Borough Council; Calderdale Council; Bury Council and Manchester City Council. The purpose of the meeting was to discuss the progress of the plan to date, the proposed sites and designations, any key cross-boundary issues and updates on the next steps and timetable.

### Key Stages of Consultation

#### Initial Regulation 18 consultation

##### What and when

A Regulation 18 consultation took place for 6 weeks between 3<sup>rd</sup> July 2017 to 14<sup>th</sup> August 2017 to seek views on the scope of and inform production of the emerging draft Allocations Plan.

The consultation was carried out in the context of the Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation sought to notify Specific and General Consultation bodies of the Council's intention to prepare a local plan draft Allocations Plan and to invite representations about what the draft Allocations Plan should contain.

A call for sites exercise also took place for 6 weeks between 3<sup>rd</sup> July 2017 to 14<sup>th</sup> August 2017 which sought to identify potential allocations that could meet the housing and employment requirements over the plan period.

A Duty to Cooperate meeting was held on 1<sup>st</sup> February 2018. Further details on this meeting can be found in the Duty to Cooperate section above.

##### Who was consulted and how

Consultation was in the form of:

- Strategic Planning mailing list: a letter or email to members of the public held on the Strategic Planning mailing list.
- Specific Consultation Bodies: an email was sent to all specific consultation bodies as specified in the adopted Statement of Community Involvement.
- General Consultation Bodies: an email was sent to all general consultation bodies as specified in the adopted Statement of Community Involvement.
- Public Notice: a public notice advertising the consultation was posted on the Council's website and made available at the four township libraries.

In addition to the consultation, Council Officers were available throughout the preparation of the draft Allocations DPD on an ongoing basis to respond to general queries raised by interested parties and key stakeholders. Dialogue will be kept open with partners through the plan preparation process, which can take the form of emails, telephone calls and meetings.

##### Responses

A total of 63 representations were received during the consultation, of which 51 related to the call for sites exercise. Comments were received from a range of statutory bodies and organisations as well as one individual member of the public.

A summary of all the representations received can be found in appendix 1.

## Appendix 1: Consultation Responses

The Council considered all representations made through the consultation. A summary of all the responses received can be found in the following table.

<b>Respondent Name</b>	<b>Summary of Response</b>	<b>Rochdale Council's Response</b>
Historic England	<p>Historic England has no sites to put forward for consideration, but emphasise the need to consider the historic environment in the Rochdale Local Plan- this is expected to include a description, identification and assessment of the historic environment accompanied by an evidence base including heritage information. The evidence base needs to be up-to-date, identifying the contributions of the historic environment to the area along with their issues, challenges and opportunities.</p> <p>In line with the Town and Country planning Act 1990, 'special regard' should be had to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess. Before allocating any site, there needs to be an evaluation of the impact development might have upon the heritage asset – through a heritage impact assessment. The Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Historic England strongly advises cooperation with conservation, archaeology and urban design colleagues at the council to ensure awareness and consideration of the historic environment.</p>	<p>Comment noted. Greater Manchester Archaeological Unit has carried out an Archaeological and Heritage Impact Assessment of allocations in the plan. Please see Appendix 2 of the Integrated Assessment for further details of the assessment.</p>
Chorlton Planning	<p>Concerns relating to the fact that the Allocations DPD is being undertaken as a separate exercise to the GMSF. The land needs of both plans, and any phasing requirements, must be set out for both urban and Green Belt land allocation. A Green Belt review should be done at both a strategic and local level.</p> <p>Need for a range of sites, in wide spread locations, to provide different types of housing as appropriate.</p>	<p>Comment noted. The Allocations Plan sets out planning policies, areas designations and site allocations to meet the needs for new homes and jobs as set out in the adopted Core Strategy. It provides the details needed to deliver the spatial vision, strategic objectives and scale of growth outlined in the adopted Core Strategy.</p> <p>The GMSF is planning for more significant levels of growth across Greater Manchester and that scale of growth may require the identification of strategic</p>

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		sites outside the urban areas. Any review of the Green Belt will be carried out as part of this process.
The Coal Authority	General response in respect of mining activities within the borough. Request to include a criterion which assesses coal mining data in respect of land stability issues and surface coal resource. However, would not wish to suggest that any potential sites should be excluded from the assessment on the grounds of former mining legacy issues.	Dealt within the adopted Core Strategy.
Campaign for Rural England	General response from CPRE which welcomes the production of a Local Plan but stresses the importance of Rochdale's countryside as an asset. Hope that the value of previously developed land to the delivery of new jobs and homes will be effectively realised in the document to save preventable countryside and green space loss, especially Green Belt designated land, so that it will be protected and enhanced in the future.	Comment noted. A large proportion of the sites identified for new development in the Allocations Plan are brownfield sites within the urban area  The sites identified within the Allocations Plan for development outside the urban area are those which either have planning permission or there is a resolution to grant planning permission.
Manchester Airport	General point regarding the role of the airport and the two-way relationship between the economic prosperity of both the airport and the borough. Recommend that consideration be given to the allocation of sites that have good connectivity and that improved accessibility and transport infrastructure are also considered alongside the allocations.  Also make reference to the need for an Aerodrome Safeguarding policy within the plan, particularly with regard to wind turbines. - suggested wording <i>'Aerodrome Safeguarding – Development which would adversely affect the operational integrity or safety of Manchester Airport or Manchester Radar will not be permitted.'</i>	Comment noted. The accessibility and connectivity form part of the assessment process applied during the site selection.
Natural England	General response from Natural England ensuring appropriate consideration is given to all aspects of the natural environment within the Allocations Plan. Land allocations should avoid areas of high environmental value.  Proposals map should include designated biodiversity and geological sites and these should be protected and where possible, enhanced. The provision of green infrastructure should be	Comment noted.

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	<p>included in a specific policy in the Local Plan, or alternatively integrated into other relevant policies e.g. biodiversity.</p> <p>The plan needs to address the traffic impacts associated with new developments and include suggestions of appropriate avoidance or mitigation measures.</p>	
Oldham Council	As a neighbouring authority, Oldham Council welcome the opportunity to discuss sites which may have a cross boundary impact. Look forward to continuing to work together on Local Plans and the Greater Manchester Spatial Framework.	Comment noted. Rochdale Council will continue to work with Oldham Council as part of Duty to Cooperate as the plan progresses.
Turley (on behalf of Peel)	Refer to the site at Jowkin Lane, Bamford which is being pursued as proposed Green Belt release and residential development allocation in the draft GMSF. Turley question Rochdales approach of pursuing a separate Local Plan to the GMSF, rather than progressing a Local Plan in alignment with the GMSF as done by other local authorities. They suggest it would be advantageous for the Local Plan to be aligned with the GMSF. Given this, they have not submitted detailed representations of the Bamford site due to it being outside the scope of the Allocations Plan, as it is a matter for the GMSF and a Local Plan Review. They point out that Rochdale Council has previous representations of the Bamford site, in the event that Rochdale changes its approach to the Allocations Plan.	<p>Comment noted. The Allocations Plan sets out planning policies, areas designations and site allocations to meet the needs for new homes and jobs as set out in the adopted Core Strategy. It provides the details needed to deliver the spatial vision, strategic objectives and scale of growth outlined in the adopted Core Strategy.</p> <p>The GMSF is planning for more significant levels of growth across Greater Manchester and that scale of growth may require the identification of strategic sites outside the urban areas. Any review of the Green Belt will be carried out as part of this process.</p>
Sport England	<p>Sport England welcome the inclusion of playing pitches as a protective designation on the Proposals Map. They note that the Rochdale Playing Pitch Strategy may identify disused playing field sites that may be considered as allocations for future playing fields.</p> <p>They set out the issues of what Sport England should be consulted on.</p> <p>Also they advise that the Allocations Plan should consider the advice within Sport England's 'Active Design' guidance document – in particular, 10 principles to help create the right environment to help people become more active.</p>	Comment noted. The policies in the Allocations Plan are supported by an up to date Playing Pitch Strategy for the borough.
Resident	There should be no release of green belt land as	Comment noted. No Green Belt

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	<p>part of this process. As stated in the Core Strategy, "The Green Belt is expected to endure to the end of the Core Strategy period as there is no evidence currently that development needs will require the release of Green Belt land".</p>	<p>land is being released as part of the proposed draft Allocations Plan.</p> <p>The Allocations Plan does identify the proposed development within the Green Belt at South Heywood given that there is now a resolution to grant planning permission for development on this land.</p>
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**Appendix 2: List of Call for Sites Received**

<b>Respondent</b>	<b>Site Name</b>	<b>Proposed Use</b>	<b>Rochdale Council's Response</b>
Rochdale Online	Land rear of Lancashire Wallpaper	Not specified	Site not large enough for allocation for residential uses
Indigo Planning	Central Retail Park	Residential and/or retail	Site allocated
Indigo Planning	Trows Farm	Residential	Site is Protected Open Land
Turley	Smithy Bridge Road	Residential	Site is Protected Open Land
Turley	Rhodes Green	Residential	Site is Protected Open Land
Steven Abbott Associates LLP	Crimble Mill	Residential	Site is Green Belt
Resident	Land off Rosemary Drive	Residential	Site is Green belt
Chorlton Planning	Land at Bury & Rochdale Old Road, Birtle	Residential	Site is Green belt
Chorlton Planning	Land off Greenbooth Road, Norden	Residential	Part of site allocated. Land in the Green belt is not proposed for allocation
Chorlton Planning	Land off Wardle Road, Rochdale	Residential	Site is Green belt
Chorlton Planning	Cockclod	Residential	Site is Green Belt
GL Hearn Limited	Whittle Lane	Mixed use	Site is Green Belt
GL Hearn Limited	Buckley Road	Employment	Site appears to be below threshold for employment allocations of 0.2 ha.
GL Hearn Limited	Green Lane	Residential / Employment	Site in Green Belt
GL Hearn Limited	Rydings Lane	Residential / Employment	Site in Green Belt
GL Hearn Limited	Smallbridge Business Park	Employment	Site allocated
HCA	Hollingworth Road	Residential	Site in Green Belt
Resident	Burnedge Mill	Residential	Site in Green Belt. Any proposal in relation to existing buildings could come forward in line with national policy
Lichfields	Crimble Mill	Residential	Site in Green Belt
Lambert Smith Hampton	Land off Kemp Street	Retail - seeking a change to the Town centre boundary to include this site	Not considered appropriate due to physical separation from the existing centre
Lambert Smith Hampton	Land off Syke Road	Residential	Protected Open Land
Lambert Smith Hampton	Land off Red Lane	Residential	Site has value as green infrastructure and for flood risk management
NJL Consulting	Former TBA Site	Residential -	Uncertainty over developability of

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		with possible limited local retail depending on demand	site and ability to deliver dwellings within the period covered by the Allocation Plan
Persimmon Homes (North West) Ltd	Land at Langley Lane / Hollins Lane	Residential	Site in Green Belt
Rapleys LLP	Fieldhouse Industrial Estate	Residential	Site does currently provide employment floorspace for a number of businesses
Russell Homes (UK) Ltd	Land off New Road	Residential	Site currently considered to come forward beyond plan period
Russell Homes (UK) Ltd	Land at New Road (greenfield)	Residential	Site allocated
Russell Homes (UK) Ltd	South Heywood	Mixed use - housing, employment, retail and new school	Site allocated
Williams Gallagher Town Planning Solutions Ltd	Middleton Shopping Centre	Wider range of uses to maximise vacant units / upper floors of the shopping centre	Would be inconsistent with how other centres are treated. However, PSA now include flexibility to accommodate a wider range of uses.
Resident	Lawflat	Residential	Site in Green Belt
Bamford Green Belt Action Group	Former TBA site, off Rooley Moor Road	Residential	Uncertainty over developability of site and ability to deliver dwellings within the period covered by the Allocation Plan
Bamford Green Belt Action Group	Meadowcroft Mill, off Bury Road	Residential	Site is currently in employment use and access is limited
Bamford Green Belt Action Group	Former Shepherds Mill, Edenfield Road	Residential	Site allocated
Bamford Green Belt Action Group	Land at junction of Mellor Street and College Road	Residential	Recent applications have been for more commercial uses
Bamford Green Belt Action Group	Former 'Carcraft' site, Nixon Street	Residential	Site allocated
Bamford Green Belt Action Group	Former domestic garage site, Edenfield Road	Residential	Site allocated
Bamford Green Belt Action Group	Former Salvation Army hostel, High Street	Residential	Site allocated
Bamford Green Belt Action Group	Former Dunlop Mill, Royle Road	Residential	Site allocated
Bamford Green Belt Action Group	Former Waggon and Horses public house, Manchester Old Road	Residential	Site not large enough for allocation for residential uses
Bamford Green Belt Action Group	Former Windmill Inn public house, Manchester Old Road	Residential	Site not large enough for allocation for residential uses

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Bamford Green Belt Action Group	Former Castle Hotel public house, car park and St Albans Hotel, Manchester Old Road	Residential	Site not large enough for allocation for residential uses
Bamford Green Belt Action Group	Former Park House Nursing Home, Falinge Road	Residential	Site not large enough for allocation for residential uses
Bamford Green Belt Action Group	Land to the south of Shawclough Road	Residential	Site allocated
Bamford Green Belt Action Group	Land to the rear of 71 – 91 Norden Road	Residential	Site allocated
Bamford Green Belt Action Group	Crimble Mill, Crimble Lane	Residential	Site in Green Belt. Issue of deliverability in terms of mill conversion
Bamford Green Belt Action Group	Former Bamford Squash, Bamford Road	Residential	Site allocated
Bamford Green Belt Action Group	Hooley Bridge Mill, Bamford Road	Residential	Site in Green Belt. Currently occupied by a number of businesses.
Bamford Green Belt Action Group	Former Household Waste Recycling Centre, off Peel Lane	Residential	Site not large enough for allocation for residential uses
Bamford Green Belt Action Group	Land at junction of Bamford Road and Starkey Street West	Residential	Site likely to come forward for non-residential use
Bamford Green Belt Action Group	Land between Fox Street, Hill Street and Bridge Street	Residential	Site allocated
Bamford Green Belt Action Group	Greenvale Mill, off Todmorden Road	Residential	Site currently in employment use