

# Core Strategy

## Report on Consultation on Issues and Options

October 2009

### Your views so far

Rochdale Borough  
Local Development Framework



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# 1. Introduction

## Purpose of Document

Last year we consulted the local community, landowners, development interests, agencies and infrastructure providers on different options for how the borough should develop over the next 15 years. Those options (contained in our 'Issues and Options report') explored, for example, how much housing and employment growth we should plan for and where development should be located. The options also looked at what facilities and services we need to go with that development and how we should protect our environment and improve the look of the borough.

There were a total of 534 comments received from 97 respondents to the Issues and Options Report. In general, we feel your views on the Issues and Options provided us with a good steer and despite some gaps in information, we feel we are now at a stage where we can present our Preferred Options.

The purpose of this document is to:

- summarise the comments received on our Issues and Options Report;
- give our initial response to the comments and any issues raised;
- if appropriate, briefly explain how the comments made have been taken account of within the Preferred Options document;
- set out any further issues of relevance that have come to light since consultation on the Issues and Options Report e.g. evidence gaps;
- explain how the comments received have informed the structure and content of the Preferred Options; and
- publish the full list of comments received on the Issues and Options report (Appendix 1)

## Structure of the document

This document has been set out to follow the structure of the Issues and Options report and therefore reflects the sections within that document. We have included a section which deals with the more general comments received regarding the Issues and Options report and the process itself. We have also an overall conclusion section which explains how comments and other sources of evidence have shaped the Preferred Options document.



## 2. General Comments on Issues and Options Report

### What you said

Thirteen organisations or individuals submitted general responses at the issues and Options stage. Other recorded comments (written and verbal) were made at the four Township public workshops held during the issues and options consultation period. Since then a key stakeholder workshop was held to test out our approach to Preferred Options and a meeting of the Local Strategic Partnership. Taken together, these responses can be categorised as follows and are discussed in more detail below.

#### A) Priorities or omissions:

- The Core Strategy should accord with the regional Spatial Strategy
- Robust design policies should be incorporated in the Core Strategy and should provide support for subsequent guidance.
- New retail developments in Rochdale town centre are not needed to regenerate it
- No further development should be permitted on Greenfield sites.
- A clear policy direction on climate change and health and well-being
- Policies to align with Local and Multiple Area Agreements (indicators and targets)

#### B) and C) Further work, collaboration:

- The Core Strategy will need to be supported by evidence of what physical, social, and green infrastructure is needed to support those levels of development proposed. The LDF should maintain a clear policy on telecommunications
- Key areas of evidence required are:
  - impact of development on the strategic road network
  - consideration of potential funding and prioritisation of transport schemes
  - strategic flood risk assessment
  - green infrastructure study
  - employment land supply
  - strategic housing market assessment
  - information about health infrastructure priorities, proposals
  - utilities support for development
- A delivery and infrastructure strategy should be prepared to support proposals including site-specific proposals
- Consultation should include reviewing the scope of development management policies needed, bearing in mind the need to not reproduce national policy
- the issue of the mining legacy should be considered
- the LDF should maintain a clear policy on telecommunications

#### D) Approach to public engagement:

- A small number of residents said that publicity leaflets and information about the Core Strategy and public meetings should have been more widely available to residents and businesses.

### What our response is

We note the comments under A) above we would mostly agree with them. However, we would disagree with the view that redeveloping Town Centre East incorporating a new retail development is not necessary to help regenerate the wider centre.

We agree with comments advising on the need to ensure evidence is gathered to support the Spatial Strategy and specific policies. Whilst there is some evidence to support the policy approaches set out in the Preferred Options, further data and evidence is needed in some areas and work is ongoing. Work is also ongoing to collaborate with implementing and funding agencies ensure proposals are deliverable.

We agree that information about the Preferred Options and how to make views should be made more widely available.

### **What we propose to do**

The policies in the Preferred Options address most of these general comments. We will continue to explore other issues and if necessary carry out targeted consultation. With regard to public consultation arrangements, the consultation measures have been reviewed and improvements are planned, particularly the use of the Council's magazine 'Local Matters', to ensure households and businesses receive basic information. With regard to issues concerning the evidence base, work has been completed on some major studies and is reaching a conclusion on others. We have been working with other Districts within Greater Manchester and consultants to supplement our evidence base and will continue to do so to ensure that a pre-submission draft is supported by a robust evidence base.

Responses seeking strong policy approaches on health and climate change have been noted and this has been addressed thoroughly through further consultation and explored through the sustainability appraisal process.

### **Other Issues**

Other issues are addressed in response to specific policy areas.

### 3. Spatial Portrait

A total of fifteen individuals and organisations submitted comments on the spatial portrait element of the Issues and Options document.

#### **What you said**

This comprehensive spatial portrait covers the issues within it well. The emphasis placed on the distinctiveness between townships is important and should continue through to the rest of the document.

Heywood Distribution Park is a key employment destination alongside Kingsway Business Park, but the spatial portrait needs reference to the Simplified Planning Zone. There is a need to acknowledge new retail development potential at regenerated sites on the edge of Middleton.

The spatial portrait should identify local housing markets' needs, variations within them and the polarisation of character and quality of properties in the borough. The borough does not have enough housing of the right size, type, tenure and quality for current and anticipated demand.

As recognised, greenspace corridors play an important part in maintaining and enhancing biodiversity. Retaining and improving them is a priority. Some areas have poor access to green spaces and this needs significant improvement. The spatial portrait fails to capture the wider character and landscape assets of the borough. There should be recognition of the canal as an ecological asset and regeneration catalyst and how to improve it, with greater recognition within the Core Strategy.

Background information should be included on archaeological resources, geology and geomorphology. There should also be reference to sport and active recreation and the role they play on the borough's quality of life.

#### **What our response is**

We take onboard the comments received on the spatial portrait, its contents and areas for possible improvement.

#### **What we propose to do**

We will look at the areas of the Spatial Portrait that have been suggested for improvement and expansion. We aim to keep the Spatial Portrait succinct and to the point and therefore some areas that have been suggested for inclusion may be better suited in the Background Paper to the Preferred Options report.





## 4. Key Evidence

### What you said

- Reference is made to the Greater Manchester Biodiversity Plan in this section but it is not clear how this is being or will be monitored in the future. Also the Biodiversity Duty guidance document should be referenced.
- Comments were received regarding the lack of reference to transport documents including GMPTE's guidance document 'Land Use Planning and Public Transport' (section 4). There were also other documents and studies mentioned that should be taken account of including work undertaken for Corridor Partnerships and the Greater Manchester wide transport modelling being undertaken.
- This section should make reference to Oldham Rochdale HMR Pathfinder Heritage Assessment Final Report for Rochdale September 2006; to conservation area appraisals; and information from the forthcoming Greater Manchester Urban Historic Landscape Characterisation Project.
- The Rochdale Sport and Recreation Strategy is mentioned but not on website. Also queried if strategy was based on PPG17 compliant assessment.
- Reference to Strategic Flood Risk Assessment (SFRA) is required.

### What our response is

The Core Strategy is such a wide ranging documents that it relates to wide number of topics. Within each of these there are often a number of policy, strategy and guidance documents that provide important evidence in relation to the Core Strategy at the national, regional and local level. In producing the Core Strategy it is important to show how the key documents have been taken account of and how they inform and support each other. Given the number of documents it is not appropriate or desirable to go into a lot of detail within the Core Strategy or make reference to all of them within the document.

### What we propose to do

In developing the Preferred Options it will be important to show how relevant related documents have informed or evidenced our approach. Key documents will be reference in the text of the Preferred Options report. Along with the Preferred Options report we will also be publishing an updated version of the Background Paper. This document will provide further details regarding those documents that have been taken account in developing the Preferred Options along with where they can be accessed in full.

In relation to the documents mentioned in the comments above, all of these will be referenced within the Background Paper and in the Preferred Options report itself where appropriate. In terms of monitoring, it is intended to include a delivery table within the Preferred Options report and this will set out key targets and indicators.



## 5. Strategic Issues

### Economy

#### What you said

Respondents agreed with the need to focus on economic growth in accordance with RSS and local strategies. The issues did not, however, refer to economic opportunities outside the borough and related transport links e.g. connecting with Manchester Airport. Issues that would also need to be addressed are the value of the natural economy and the need to consider the re-use of old commercial properties and their contribution to local character. One respondent suggested an issue was the number of vacant and underused employment sites.

#### What our response is

We note support for the issues identified and the need to address the borough's underperforming economy etc. We agree that the Preferred Options will need to explicitly refer to the borough's place within the sub region in economic terms, accessibility to jobs outside the borough and the need to improve accessibility to jobs elsewhere for the borough's residents. We agree that the natural economy is a key part of the rural economy and should be reflected in policy. The importance of re-using buildings from a sustainability point of view is recognised elsewhere and the issue of how we ensure the heritage value of buildings are taken into account in assessing their future economic role or promoting the economy is an important one. With regard to under-used employment sites and premises, this has been taken into account in assessing the need for employment land.

#### What we propose to do

We therefore propose to:

- Ensure the Spatial Strategy makes clear the Council's position in relation to the economy of the sub region and economic links;
- Ensure policies acknowledge the heritage value of older commercial buildings and that buildings of heritage value are retained where practicable and where they support local character and distinctiveness.

### Housing

#### What you said

Representations concurred with the strategic issues on housing. One respondent thought there should be a stronger emphasis on new development meeting the code for sustainable homes (level 3 or 4). Terraced housing may have heritage value and housing regeneration can deliver benefits for the natural environment

#### What our response is

The points raised are noted. In relation to the first point, energy and climate change issues are covered in part 4 of the chapter although it is noted that the comment is expressed as a policy preference rather than an issue. It is accepted terraced housing can have important heritage value but this is not considered a strategic issue to include here. Similarly housing regeneration can contribute to improvements to the natural environment through open space and landscape improvements, but this is a detailed issue which will need to be picked up in Housing and other policies.

### **What we propose to do**

We will ensure that the representations are reflected in our Preferred Options / policies.

## **Quality of Place**

### **What you said**

There is a concern that the issues contain a sweeping statement that older buildings are not suited to modern needs and that a key issue is how to secure new uses for older buildings which give the borough its distinctive character. The issues should be expanded to cover the value of green infrastructure in promoting local character. The opportunity to improve and utilise the Roch valley is supported.

### **What our response is**

It is accepted that the statement that old buildings are not always suited to the needs of modern businesses is rather sweeping although the borough does have a high proportion of buildings in older employment areas that businesses do not find attractive. It is agreed that green infrastructure is important to protect character and improve image.

### **What we propose to do**

We will ensure that policies take a balanced view on older industrial buildings and the importance of green infrastructure in promoting local character (particularly the Roch valley) will be strongly featured in appropriate policies.

## **Climate Change, Pollution and Natural Resources**

### **What you said**

The issues should require that new properties achieve the Code of Sustainable Homes and BREEM standards including water saving. Wind farms may disturb peat resulting in the loss of carbon dioxide into the atmosphere and this should be included as an issue. Biomass production has the potential to reduce biodiversity. There is no reference to the contribution made by transport to CO2 emissions and pollution. Rural diversification need not harm the natural landscape and biodiversity if rural buildings were recycled and used appropriately. A further issue should be the need to make provision for the migration of species (flora and fauna) in response to the impacts of climate change.

### **What our response is**

All these points are noted and the Council does not disagree with them. However, they are not all 'strategic' and represent a level of detail that would not be appropriate in this list of objectives.

### **What we propose to do**

We will address all these points in the appropriate policies.

## **Accessibility and Sustainable Transport**

### **What you said**

More should be said about the role of public transport in meeting strategic objectives. The issues do not fully recognise the importance of strategic transport in providing access to jobs. Support was expressed for developing the potential of Mills Hill station to serve Middleton residents better.

**What our response is**

We agree with the responses and note the support for promoting the use of Mills Hill station.

**What we propose to do**

We will reflect these points in changes to the strategic objectives and the policies.

**Green Infrastructure**

**What you said**

Respondents agree with the issues covering flood risk assessment but the multi-functional role of green infrastructure and the need to explore the potential of green areas in this regard is not explained.

The potential for development to conserve and manage green infrastructure should be mentioned. There is no mention of historic parks and gardens. The need for an assessment of policies under the Habitats Regulations is emphasised.

**What our response is.**

Agree that an area of greenspace can fulfil multiple roles and this will need to be explicit in the relevant objectives and policies. The point about the contribution development can make to protecting and improving green infrastructure is recognised elsewhere and will be clear in the policies. Historic parks and gardens will be referred to in a green infrastructure policy along with all other types of GI. We are aware of the requirement for assessment under the Habitat Regulations.

**What we propose to do**

We will address all these points in the appropriate policies.

**People and Community**

**What you said**

Two respondents said the role of recreational facilities in encouraging exercise and improving health should be referred to as an important issue

**What our response is**

We agree this is very important issue for the borough.

**What we propose to do.**

We will ensure that our policy approaches covering health local recreational open space and green infrastructure are cross referenced to emphasise this. We will also explore the relationship between areas of poor health and current recreational provision in developing policies.



## 6. Spatial Vision and Strategic Objectives

### Spatial Vision

#### What you said

The Vision could be improved by a stronger reference to the protection of the historic and natural environment and the approach on promoting the built heritage. Accessibility by public transport should be mentioned. The Vision is not spatial and not locally distinctive. The Vision should include reference to the borough having a wide range of housing choice, including higher value homes. The Vision should contain references to the respective roles of the borough's towns and the borough's place within the Manchester city-region, major development opportunities and Housing Market Renewal. It should also reflect the priorities of the Community Strategy. The mention of 21<sup>st</sup> century accessible employment sites is supported.

#### What our response is

We agree that a stronger reference to the role of our built and natural heritage is needed. We agree the vision should emphasise the accessibility of the borough but in general terms. We agree the Vision could be more spatial and locally distinctive and that the vision should be extended to cover the townships and its place within the city region. It is compatible with the Community Strategy in so far that that document is spatial and the Borough Renaissance Masterplan.

#### What we propose to do

We will make the Vision more spatial and locally relevant as stated above and we will include separate visions for each of the Townships.

### Strategic Objectives

#### What you said

The objectives are too generic and could be improved to reflect specific issues in the borough, particularly on housing. Others supported these as an admirable set of objectives and sub-objectives. However, many of the sub-objectives are overly detailed.

#### What our response is

We note the general support and agree that the sub-objectives are overly detailed and do not set a clear direction.

#### What we propose to do

We will review and simplify the sub objectives to show how the strategic objectives will be achieved.

### Strategic Objective 1- Economy

#### What you said

Whilst this strategic objective was generally supported, a number of respondents submitted differing views about the sub-objectives; some wanted more detail or clarification and others sought new sub-objectives. Some of these points have also been made in respect of the policy options in the Economy section. One more fundamental point was that demand for housing and employment development is exaggerated.



**What our response is**

Some of the points are accepted and we wish to review the sub objectives accordingly and the level of detail.

**What we propose to do**

We will clarify the sub objectives.

**Strategic Objective 2 - Housing**

**What you said**

The objective and sub objectives are generally supported. The objective should acknowledge that the housing figure of 450 per year quoted is a minimum. More emphasis should be placed on making the best use of the existing housing stock. Housing objectives should have regard to the heritage assessment. Reference should be made to the need for housing to have good access to facilities by public transport. The strategic objective should include reference to the need for higher value homes.

**What our response is**

We note the points raised and do not disagree with them. However, they would include unnecessary detail which may be more appropriately included within the policies themselves. Accessibility is covered in such policies and in the Accessibility Strategic Objective. Higher value homes should be mentioned in housing policies but the strategic objective is to get the right mix and quality overall.

**What we propose to do**

We will reflect these points in the policies.

**Strategic Objective 3 – Quality of Place**

**What you said**

The strategic objectives and sub-objectives are supported.

**What our response is**

The support is noted.

**What we propose to do**

We will review the sub-objectives and make them more spatial and locally relevant.

**Strategic Objective 4 - Climate Change, Pollution and Natural Resources**

**What you said**

United Utilities, Environment Agency and others generally support the objectives. More liaison on flood risk policy and evidence base will be required. Peatlands should be protected. Detailed wording changes have been suggested for a number of the sub-objectives. The target of being carbon neutral by 2020 is questioned as this may affect the viability of new development.

**What our response is**

We agree the need for further work on flood risk assessment and will liaise with EA. Peatlands will be referred to in our biodiversity and green infrastructure policies. We will review the target on reducing carbon emissions and policy will spell out what measures will be used.

### **What we propose to do**

The sub-objectives will be simplified. We will consider a change to the strategic objective to include green infrastructure and green belt.

## **Strategic Objective 5 – Accessibility**

### **What you said**

There should be a stronger emphasis on promoting sustainable transport such as cycle lanes as the emphasis seems to be on vehicular transport. Highways Authority point out that there is no commitment for any large scale transportation assessments. The proposed accessibility hierarchy is supported. The objectives are in line with RSS

### **What our response is**

Detail about different measures to promote sustainable travel is not appropriate in the strategic objectives. The Council has completed transport mapping and is awaiting the results of a Greater Manchester transport modelling exercise being carried out which will assess the implications of the level and location of growth and development proposed. This is referred to in the Background Paper which is part of our evidence base.

### **What we propose to do**

The GM transport modelling work will continue and the results assessed in consultation with the Highways Authority and others. Further transport assessments and feasibility studies may be necessary. The Council is preparing a Transport Strategy in parallel with the Preferred Options and this will identify a range of transport schemes setting out links with the Core Strategy proposals, and delivery mechanisms.

## **Strategic Objective 6 – Green Infrastructure**

### **What you said**

There should be an additional objective regarding the contribution of green infrastructure to the protection of conservation and management of heritage assets. There is support for the benefits of a multifunctional green infrastructure network.

### **What our response is**

Agree.

### **What we propose to do**

The objectives will be amended to make a clearer link between GI and heritage and the policies on design, heritage and green infrastructure will reflect this relationship.



## 7. Economy – Issues and Options

### Issue EC1 – Employment land supply

#### The question was

Question EC1: Which of the Spatial Options in chapter 13 do you think would provide the most appropriate supply of new employment land and premises?

Should the release of greenfield / Green Belt sites for employment development be phased, with the release of land only being allowed when the total land and premises supply reaches a set minimum level?

#### What you said

There was concern about how the RSS employment land requirement would be agreed across Greater Manchester. Some thought that the illustration of dividing the RSS employment land requirement for Greater Manchester equally between the 10 districts was the way that we would arrive at our employment land requirement.

Some thought it unclear whether 35 ha of additional land will be sufficient in the plan period.

Rochdale should provide a supply that is consistent with, and reflects the requirements of, the RSS strategy which seeks to direct economic regeneration and growth to the conurbation core.

The release of additional sites / Green Belt land should be phased.

Development of Kingsway should be prioritised and maximised before additional sites are released. Small businesses should be encouraged to locate on Kingsway.

There should not be an over dependence on Kingsway.

Support for Spatial Option 4, because it makes the best use of access to the motorways.

#### What our response is

We agree that the employment land supply needs to be appropriately distributed across GM, and that Rochdale's economic role should be in line with RSS guidance.

The Greater Manchester authorities commissioned a study to examine how the GM authorities can and should meet the RSS employment land requirements.

The economic recession has had the following impacts on Rochdale:

- A considerably reduced take up of employment land from an average annual take up of about 9 ha, with 14 Ha developed in 2007/08, down to 1.4 ha in 2008/09;
- An increase in vacant employment sites, primarily within designated employment areas, that are available and suitable for continued employment use;
- Reduced forecast growth for the local economy.

The GM study concluded, taking into account the above points, that Rochdale should aim to provide around 210 ha in total up to 2026.

Comments range between concerns about an undersupply to concern about an oversupply. We agree with most of the points made about the supply of land and conclude that that an appropriately balanced supply needs to be provided. We wish to ensure development on Kingsway is delivered, but we also don't want to be overly dependent on Kingsway. We wish to promote physical regeneration but don't want to restrict economic regeneration.

### **What we propose to do**

We propose to:

- Provide an employment land supply of around 210 ha primarily on land in accessible locations in the south of the borough.
- This will be based on Spatial Option 5, which offers opportunities for land release along the motorway corridors. However we propose a smaller amount of land release than shown under option 5.
- Provide the opportunity for more employment development land in the plan period, but only seek to release it when it is required.

## **Issue EC2 – Location of Employment Land and Premises**

### **The question was**

Question EC2: Which of the Spatial Options in chapter 13 do you think offers the most appropriate locations for new employment development?

Are there parts of the borough that need more, or less, land identified for employment development?

### **What you said**

The following points were made:

- There is a need to use existing premises better;
- Concern from Littleborough residents that Kingsway should not be promoted at the expense of places like Littleborough that, although not ideal business could be attractive to some not requiring large vehicles;
- There was support for Spatial Option 2;
- Owners of Heywood Distribution Park supported further development on the site;
- There was support for a strategy that focuses employment development in the south with supporting housing and transport infrastructure development and utilises Rochdale's opportunities on M62. There was recognition of the need to retain employment in the north and that there should not be an over dependence on Kingsway.

### **What our response is**

We agree with all the above points, including support for Spatial Option 2 because our preferred option 5 includes the urban regeneration focus of option 2.

### **What we propose to do**

We will draft policies that seek to address all the points raised by respondents.

## **Issue EC3 – Change of Use of Employment Land and Premises**

### **The options and question were**

Option EC3A: Maintain the current policy approach in the Unitary Development Plan (UDP) of strongly protecting the best employment areas for B1, B2 and B8 uses (in

Primary Employment Zones) and in other employment areas allow most other employment uses (in Mixed Employment Zones). Review their suitability and boundaries and delete the least appropriate zones. Protect existing employment sites outside these areas (Spatial Option1).

Option EC3B: Same as option EC3A plus adopt a more flexible criteria based approach on the majority of employment areas (Mixed Employment Zones) and existing employment sites outside employment areas, dependent on their location, their potential for regeneration and suitability for different types of development (Spatial Options 2 &3).

Option EC3C: Same as option EC3B but restrict change of use in the north of the borough and be less protective in the high growth zones identified under Spatial Options 3, 4 or 5.

Option EC3D: Do not identify employment zones through the Core Strategy.

Additional Question EC3: Should a charge be put on any development that results in the loss of employment land, in order to provide funding to improve employment areas and deliver new employment sites and economic infrastructure?

### **What you said**

All respondents appeared to support some level of protection of employment zones. No one supported option EC3D of not identifying employment zones in the strategy.

2 respondents supported option EC3A, to retain the existing approach to employment zones. Key sites, based on findings of employment land review, should be protected. New sites should be allocated for specific employment uses. One respondent thought the LDF should not be overly prescriptive when development is difficult, therefore they supported option EC3B. 3 respondents preferred EC3C because it recognises the need to protect the best sites but allows others to be regenerated for other uses.

There is need to be more flexible on the re use of redundant industrial buildings, in particular in the Green Belt. Suggested uses could be for community or church use.

3 respondents questioned or opposed the application of a charge on development as it would be contrary to guidance and it could make redevelopment financially unviable.

There is a need to ensure there is a sufficient supply of employment land available to allow the redevelopment of land obsolete for employment uses.

### **What our response is**

We generally agree with the points made by respondents, in terms of the need to achieve a satisfactory balance between protecting the best employment sites and allowing change of uses of sites that are not suitable for high quality employment use. We think that the approach to employment zones needs to be generally more flexible than that in the UDP, but that the best employment areas still need to be strongly protected. We agree that a charge on change of use of previous employment sites, particularly at the moment, would be inappropriate.

### **What we propose to do**

We propose to continue to protect existing employment areas and sites but to be more flexible on the range of employment uses allowed, and to allow change of use to non employment uses if it will better deliver our plan objectives.

## Issue EC4 - Type of Land and Premises

### The options were

Identify a range of employment sites and areas, using the ORESA classification, and within these:

EC4A: Identify sites restricted to specific business sectors or use classes dependent on their location (e.g. town centre sites for office development for Financial and Professional Services)

EC4B: Identify broad areas or locations suitable for specific business sectors or use classes but not restrict other uses.

EC4C: Allow only B1, B2 and B8 uses on employment allocations on the best employment sites and allow a wider range of uses, apart from retail, in most employment areas (see Option EC3B)

EC4D: Allow a wide range of employment generating uses, apart from retail, in all employment allocations and employment areas.

Additional questions were

Do you agree with the ORESA classification being used to designate sites?  
Should some sites be identified only for freehold development?

What other policy approaches could assist the diversification of the economy?

Should higher density employment uses be sought to reduce the amount of land needed for employment development and to increase the number of jobs created?

Which of the following options, or combination of options, could best assist in the growth and diversification of the economy?

### What you said

It was recognised that this issue is interrelated with issue EC3. All 4 options were supported with 1 respondent supporting EC3A, 3 supporting EC4B, 1 supporting EC4C and EC4D.

It was considered that LDF should not be overly prescriptive and that allocations should follow the flexibility encouraged by draft PPS4.

There is a need to provide opportunities for creative industries and to develop and manage cultural quarters.

### What our response is

There is a general recognition among respondents of the need to be flexible and provide for a wide range of employment uses.

### What we propose to do

We propose to provide a range of employment sites, through the allocation of sufficient land (see issues EC1 and EC2 above), and to have flexible policies in employment zones (see issue EC3 above), to try to meet the needs of all employment sectors.

## Issue EC5 - Visitor Economy

### The options were

EC5A: Identify specific locations (e.g. the canal basin) to focus and encourage tourism investment and development.

EC5B: Identify broad areas and corridors (e.g. the canal corridor) to promote investment and development in tourism.

EC5C: Do not specify specific sites or areas for promoting tourist development, but support a general approach to improving town centres, heritage attractions and recreational and countryside facilities throughout the borough to attract visitors.

### What you said

There was general support for promoting the visitor economy. 1 respondent supported option EC5A, 3 supported EC5B.

The need to support culture and theatres was raised.

British Waterways were pleased to note that Rochdale canal is recognised as a catalyst for visitor development. The Core Strategy needs to clarify that canal side development will be required to make a positive contribution to the canalside environment and to contribute to towpath and access improvements.

### What our response is

We generally agree with the points made.

### What we propose to do

We propose to include a policy to support the visitor economy, identifying visitor opportunity areas / features such as the Rochdale Canal. The town centre Masterplan also supports opportunities for a cultural area in Rochdale town centre.

## Issue EC6 – Town Centres, Retail

### The options were

EC6A Review and then identify the boundaries of Rochdale, Middleton, Heywood and Littleborough town centres through the Core Strategy. Rely entirely on PPS6 Planning for Town Centres to provide planning policy for determining planning applications for retail and leisure development inside town centres and in the rest of the borough.

EC6B Option EC6A plus policy guidance for town centres which emphasises the general actions and initiatives required to regenerate the town centres and in edge of centre locations. No policy for retail and leisure development in the rest of the borough.

EC6C Option EC6B plus identification of specific regeneration opportunities and sites within and adjoining town centres, such as the Rochdale Town Centre East Area and parts of Heywood town centre. No policy for retail and leisure development in the rest of the borough.

EC6D Option EC6C plus policy for retail and leisure development in the rest of the borough.



### **What you said**

Support for the above options was mixed. Most of the respondents supported the need to review the town centre boundaries identified in the UDP to ensure shopping opportunities existed and that consumer choice was encouraged. Edge of centre sites provide some high profile sites which have the potential to bring about regenerative benefits as well as improving the retail offer in the borough. Another view was that established retail destinations should be given some weight in the Core Strategy especially given their contribution in terms of retail provision and retail expenditure.

Whilst there was general support for having a policy on town centres and edge of centres, some wanted to see a borough wide policy on retail and leisure which went beyond PPS 6.

Overall, therefore, the responses did not clearly support any one of the options, but suggested elements of EC6B, C and D.

### **What our response is**

The borough's town centres are fundamental to the success of the borough as the primary focus for shopping, civic, leisure, commercial and cultural life. There is strong support to improve and regenerate these centres and bring it in line with its competitors in neighbouring towns. Given the comments received it is likely that a combination of the options above will help fulfil its potential and provide the quality of retailing required in each of the centres.

### **What we propose to do**

Taking into account the comments above and the aspirations of the borough masterplan it is considered appropriate at this stage to select EC6C as the preferred option.

## 8. Housing – Issues and Options

### Issue H1 – Amount of new housing

#### The options were

Option H1A: Seek to plan for additional homes in line with the requirement in RSS. This will mean providing on average 450 additional homes per year between 2008 and 2026.

Option H1B: Seek to go beyond the existing draft RSS requirements in RSS to support additional growth e.g. up to a maximum of 20% above draft RSS which would equate to 550 per annum.

#### What you said

The responses in relation to this issue were roughly split in their support of each option. Most of the respondents who supported the higher growth option cited the objectives of PPS3 and the Housing Green Paper to deliver higher levels of new housing. They also considered that going for a higher figure would help to uplift the borough and support economic growth although they acknowledged that it would require the release of greenfield sites. Those that supported H1A pointed out that given recent performance against the RSS requirement it would not be appropriate at this stage to set out to go beyond this. They made reference to the fact that the figure in RSS is no longer presented as a maximum (or minimum) figure and may be exceeded where justified.

#### What our response is

It has been recognised that the Council has not been meeting the requirement set out in RSS in recent years. Whilst this has mainly been due to high levels of clearance it has still had the effect of increasing the requirement over the remainder of the plan period. Given the comments received and an assessment of delivery, it is likely that even this option will require the release of some greenfield sites within regeneration areas in the urban area and possibly phased greenfield sites outside the urban area. Going beyond the RSS figure at this stage would be difficult to justify given current performance, would result in significant greenbelt and greenfield release and may also reduce the ability to deliver urban regeneration.

#### What we propose to do

Taking account of this and the current economic slow down it is considered appropriate at this stage to **select H1A as the preferred option**. This still represents a significant uplift in terms of numbers from the previous UDP target and given how the figures are presented in RSS there is still an opportunity to exceed this if justified.

#### Other Issues

- Maintain up to date Strategic Housing Land Availability Assessment

### Issue H2 – Location of New Housing

#### The question was

Question H2: Which of the Spatial Options in Chapter 13 do you think is most appropriate in terms of focusing the location of new housing?

### **What you said**

There was a general view that in regional terms the borough was a good location for new residential development. It was acknowledged that there still needed to be a focus on regeneration to improve the borough and to reflect its status as a Housing Market Renewal (HMR) Pathfinder Area. Some respondents did support the release of sustainable greenfield sites outside the urban area and suggested that this approach need not undermine regeneration and the delivery of previously developed land. In terms of the Spatial Options and the location of new housing, most support was given to Spatial Option 5.

### **What our response is**

It is acknowledged that whilst the borough as a whole is in a relatively accessible location there are clearly areas of the borough that are more sustainable in terms of transport links and access to jobs and services both within and outside the borough. Taking on board these issues and the comments received the proposed spatial strategy identified the south of the borough as the most suitable location for a majority of the new development, including housing, to be located. This approach will still allow development in the north of the borough but this would be limited to those sites where redevelopment provides clear benefits in terms of regeneration and local amenity.

### **What we propose to do**

This approach broadly reflects spatial option 5 of the issues and options report but with a likely reduction in the number of sites outside the urban area to reflect ongoing regeneration priorities. This spatial strategy will be worked up in detail within the Preferred Options Report. More detail on the comments received in relation to the Spatial Options and the responses to them is given in section 14.

## **Issue H3 – Priority Areas for Housing Regeneration**

### **The question was**

Question H3: Do you agree that the Core Strategy should identify broad regeneration areas and give clear policy guidance on the priorities for regeneration and redevelopment? If not what should the alternative approach be?

Are there other areas of the borough which you think should be identified for regeneration? Where are they and what do you think the priorities for regeneration and redevelopment should be?

### **What you said**

There was general agreement that the Core Strategy should identify regeneration areas and set out the approach to be adopted. Such an approach is supported in the Regional Spatial Strategy. It was noted that policies for such areas should be realistic in terms of delivery and this could be achieved by avoiding placing obstacles to regeneration. There was a view that central and southern Rochdale along with Middleton and Heywood should be considered as priority areas.

### **What our response is**

Given the importance of regeneration and the status of the borough as a Housing Market Renewal (HMR) Pathfinder area it will be necessary to identify areas within the Core Strategy. Many of the areas where regeneration is focussed are located within central and southern Rochdale, Heywood and Middleton. It is important that the Core Strategy continues with this focus in order to deliver the necessary regeneration and help create mixed and balanced communities

### **What we propose to do**

The Core strategy will identify broad locations for housing led regeneration. These will reflect priority areas for regeneration, including that related to existing and planned programmes for intervention.

## **Issue H4 – Types of New Housing**

### **The options were**

Option H4A: Seek to prescribe a mix of housing that should be achieved across the borough or within specific areas within the borough.

Option H4B: Continue to allow the types of new houses to be led by the market but still ensuring that larger developments incorporate a mix of property types.

### **What you said**

Respondents cited the role of the Housing Market Assessment in informing this aspect of the Core Strategy. Most supported option H4B saying that it was important to have some flexibility in the current climate and also that the provision of new housing should be influenced to some extent by market need. There was a view that option H4A could lead to a policy approach that was too prescriptive although it was thought that clear guidance on mix may provide more certainty for developers. Most respondents agreed that it was important to have a good mix of housing and that it was also important to consider aspirational housing to broaden the appeal of housing in the borough. Reference was also made to making better use of the existing housing stock.

### **What our response is**

In order to support a robust housing market it is considered important that the borough offers a good range of housing. It is acknowledged that being too prescriptive is a problem both in terms of implementing a policy on a site by site basis and in terms of viability for some sites. However, it is important for the Core Strategy to give an indication of the types of housing which should be developed in certain parts of the borough in order to provide a better balance of house types e.g. development of larger family housing in areas dominated by two bedroomed terraced properties.

### **What we propose to do**

The intention is to adopt a hybrid approach which allows flexibility but which does encourage the development of certain types of housing in specific areas e.g. housing led regeneration areas. The policy will make it clear that on all developments, applicants will be expected to demonstrate that they have taken account of local needs and existing housing in order to deliver an appropriate mix within their scheme.

### **Other Issues**

Need to take account of up to date Strategic Housing Market Assessments at the sub regional and local level.

## **Issue H5 – Affordable Housing**

### **The proposed approach was**

Approach H5: The current approach, which is set out in a Supplementary Planning Document, seeks the provision of affordable housing on all sites of 15 dwellings or more. The proportion of affordable housing and level of discount required is also set

out and ensures the cost to the developer is the same whether the provision is on-site or, in exceptional circumstances, through an off-site contribution. The targets set are boroughwide, as advised within the Housing Needs Study, since the scale of affordable housing need means that only a boroughwide approach is appropriate. It is intended to continue this approach, but enable the proportions and discounts be varied to reflect the most up to date evidence.

#### **What you said**

Several of the comments highlighted the need to consider viability within any affordable housing policies in light of the Blyth Valley judgement. Providing the economic viability was appropriately tested most respondents acknowledged the need for affordable housing, although the possibility of varying targets across the borough could be justified if supported by evidence. Another issue raised was the need to consider the split between social rented and intermediate housing. Finally the needs for smaller affordable units in Littleborough was mentioned but that this should not be delivered through the development of apartments as these are not a solution in the longer term.

#### **What our response is**

The issue of economic viability is acknowledged and it is important to consider this issue within any subsequent policy. Evidence from the 2006 Housing Needs Study Update and the Greater Manchester Strategic Housing market suggests that a boroughwide approach is more appropriate in terms of affordable housing delivery. In terms of the type, size and tenure of affordable housing this is something that is better dealt with on a site by site basis linked to the overall appropriate mix of housing within an area and the most up to date evidence. However, current evidence does suggest that the greatest need is for two and three bedroomed properties.

#### **What we propose to do**

The intention is to develop a policy linked to the Councils recently adopted SPD. However, in light of national guidance and comments received, this will be underpinned by a study of economic viability. The Council does have a relatively recent assessment of housing need in the borough (2006 Housing Needs Study Update) and the need for affordable housing has also been supported through the Greater Manchester Strategic Housing Market Assessment. The intention will be to update this information at appropriate intervals in the Core Strategy period.

#### **Other Issues**

Need to take account of up to date Strategic Housing Market Assessments at the sub regional and local level. Need to produce study of economic viability.

### **Issue H6: - Density of New Housing**

#### **The options were**

H6A: Set a borough wide range for density with potential for higher densities in sustainable locations e.g. in and around town centres and on good public transport corridors.

H6B: Set a range of densities across the borough. These could be based around different locations e.g. town centres or the nature / character of Townships.

### **What you said**

Most respondents commented that any policy on housing density should not be too prescriptive and instead it should be considered on a site by site basis taking account of factors such as location, character and market conditions. This implied most support for option H6A. Given the recent drop in the apartment market, it was stated that the encouragement of higher densities should be avoided although another respondent claimed that setting maximum limits could stifle creativity and innovation in design. One respondent did support option H6B on the basis that it enables greater consideration of the characteristics of an area in setting density requirements.

### **What our response is**

It is important that in all residential schemes consideration is given to the design and housing mix as well as the overall density. Whilst it is important to make efficient use of land, these two factors are potentially more important than just trying to achieve a specific density. In considering density it is important that it takes account of local character and accessibility. Generally it is considered that the minimum density should be 30 dwellings to the hectare.

### **What we propose to do**

It is intended to develop a policy approach which considers density alongside the type of housing since the two are so inextricably linked. This will also cross reference to the general design policies. It is hoped that this will encourage those developing proposals to consider these factors together.

## **Issue H7 – Gypsies, Travellers and Showmen**

### **The question was**

Question H7: Should the Core Strategy identify a broad location(s) for a Gypsies and Travellers site and/or travelling showmen's site?

Should the Core Strategy only list the factors that will be used to identify location(s) for a Gypsies and Travellers and/or travelling showmen's site?

If so, what factors should be included in a policy?

### **What you said**

There was support for a criteria based policy to be included within the Core Strategy to guide the allocation of specific sites within a subsequent Allocations Development Plan Document (DPD). Other issues raised included the need to consider availability, affordability and achievability; the importance of not being too narrow in terms of the broad locations considered; and the need to involve the Gypsy and Traveller community fully within the process.

### **What our response is**

The partial review of Regional Spatial Strategy (RSS) will set out requirements for Gypsies, Travellers and Travelling Showpeople within each district in the NW. It is therefore important that the Core Strategy sets out these requirements and how it will select sites to meet this requirement over the period.

### **What we propose to do**

The Preferred Options document will include a criteria based policy to assist with the identification of sites for Gypsies and Travellers.

## **Issue H8 – Older People and Other Vulnerable Groups**

### **The question was**

Question H8: Should the Core Strategy identify a broad location(s) for sites / accommodation to meet the needs of older people and other vulnerable groups? Should the Core Strategy only list the factors that will be used to identify location(s) for sites / accommodation to meet the needs of older people and other vulnerable groups? If so, what factors should be included in a policy?

### **What you said**

Reference was made to the Regional Supported Housing Strategy which will provide important context for any policy on meeting the needs of vulnerable groups. As part of this process a needs model is being developed which will provide a picture of need to 2020.

### **What our response is**

The issue of meeting the needs of vulnerable groups is important in order to meet the needs of all sectors of the community. A particular issue is the increase in the number of older people and the demands this will place on housing needs. However, this is clearly linked to the general issue about delivering the right kind of housing and therefore it is appropriate to consider these particular housing needs with those of the community as a whole.

### **What we propose to do**

We propose to deal with this through a more general policy which deals with the delivery of the right type of housing.

## 9. Quality of Place – Issues and Options

### Issue QP1 – Protection of the Borough’s heritage

#### The options were

Option QP1A: Increase the number of Conservation Areas in the Borough.

Option QP1B: Introduce a system of local listing.

Option QP1C: Place more emphasis on protecting those buildings and areas covered by existing designations and not attempt to protect those which fall outside the designations.

Option QP1D: Use and protect our built heritage more as an aid to regeneration and renewal.

#### What you said

There was disagreement in respect of the issue of local listing. On the one hand it was felt that this would have no basis in planning legislation and would give rise to subjective views being taken about the quality of buildings, resulting in an overprotective approach stifling modern design. On the other hand it was felt that the special character of Rochdale’s historic environment comprises many elements both statutorily designated and locally important.

Another view was that if we ignore buildings or spaces which contribute to an area’s character then we lose our background and heritage. Also, the character of townscapes and countryside must be maintained to ensure local distinctiveness is properly addressed. These views support option QP1D. It was also pointed out that the re-use of existing buildings is important in sustainability terms. Another view suggested there needs to be regular reviews of the Borough’s heritage resources including new Conservation Area designations if they are needed but not simply for the sake of it, and the protection and enhancement of designated heritage assets in accordance with PPG15 and RSS. There should be utilisation of the benefits of the historic environment to lead regeneration projects providing a focus and identity for new development, with the sensitive introduction of sustainable construction techniques including the provision of renewable energy in historic structures.

Overall, therefore, the responses did not clearly support any one of the options, but suggested elements of QP1A, C and D. There was, however, clear division in respect of QP1B.

#### What our response is

The issue of local listing is clearly contentious and on balance it is considered that it is best addressed separately from the Core Strategy. It is agreed that the protection and strengthening of local distinctiveness is important, and that the built heritage can be an aid to regeneration and renewal. The re-use of buildings is an important consideration which has a cross-over with policies in the Climate Change and Natural Resources section. It is agreed that increasing the number of Conservation Areas may be necessary depending on the need to protect heritage resources. It is also agreed that new construction techniques are not necessarily incompatible with heritage aims.



### **What we propose to do**

Taking account of the mix of consultation responses it is felt that a combination of QP1A, C and D should form the preferred option. This will be expanded into more of a 'protection of local character and distinctiveness' policy, reflecting a priority which is clearly popular with respondents.

### **Other Issues**

- The issue of a system of local listing to be looked at separately.
- Issues of re-use of buildings and construction techniques to be incorporated into a climate change policy.

## **Issue QP2 – Design Quality of New Development**

### **The options were**

Option QP2A: Identify those areas of the Borough which have a strong local distinctiveness and require new developments to significantly conform to the local style. Allow much more innovative and forward-looking design in all other areas.

Option QP2B: Identify locations in the Borough, such as town centres, key gateways / corridors or renewal areas, where design would be required to be contemporary and innovative or have to satisfy specific design guidance.

Option QP2C: Identify a network of key public spaces which could be prioritised for improvement, including possible pedestrianisation / traffic restrictions.

### **What you said**

There was general consensus that maintaining local distinctiveness is very important, and whilst it was pointed out that modern design can comfortably fit in with old and can enhance the characters of both, there was a feeling that the options were suggesting that there was a conflict between the two, which is not necessarily the case. The starting point is a clear understanding of what makes a place special in order to inform how development can be achieved without losing its significance.

There was felt to be an important link between design and sustainability. High standards of sustainable design and sustainable materials are required.

### **What our response is**

We accept that the Issues and Options report may have been interpreted as suggesting that heritage protection and modern design were incompatible, and that this is not the case. It is also agreed that, as well as taking account of context, it is vital that new developments are as sustainable as possible and design has an important role to play in this.

### **What we propose to do**

The response would suggest that QP2A is too simplistic an approach and that it is more a case of taking account of context in all situations, and therefore QP2A will not be pursued. In respect of QP2B and QP2C, these are not rejected but relate to the improvement of image, therefore it has been decided to address these within Issue QP3 below. It has been pointed out, in respect of QP3, that quality design must relate to all areas, not just those in key locations; in respect of this, it has been decided that QP2 should take the direction of outlining design principles to be adhered to by all new developments, emphasising the importance of both context and sustainability.

## **Issue QP3 – Image**

### **The options were**

Option QP3A: Prioritise improvements to transport and corridors / gateways (including public transport gateways) into the Borough.

Option QP3B: Prioritise improvements to town centres.

Option QP3C: Prioritise improvements to housing and mixed use areas.

### **What you said**

It was felt that all of these areas would need to be improved in order to have a significant impact upon the Borough's image for both residents and visitors.

### **What our response is**

It is agreed that improvements need to relate to all areas. However, in line with option QP2B, there could be particular locations where particular innovation is required. There are also other particular measures which could be taken at certain locations which could have a significant return in terms of image improvement.

### **What we propose to do**

It is proposed that the design policy (i.e. the policy which will relate to Issue QP2) will outline the design principles required in order to achieve high standards of design which is appropriate to its context and which embodies sustainability. The image policy will look at particular measures which can take place at strategic and prominent locations, and this will include those locations outlined in QP3A and QP3B.



## 10. Climate Change, Pollution and Natural Resources – Issues and Options

### Issue C1 – New Development and Climate Change

#### The options were

Option C1A: Require a high standard of energy efficiency and low CO<sub>2</sub> emissions through the use of renewable energy technologies for all new development in the Borough.

Option C1B: Go beyond existing commitments by requiring even higher standards of energy efficiency and renewable energy production in key parts of the Borough e.g. regeneration areas and areas of growth.

Option C1C: Introduce strict design standards to ensure that new development takes full advantage of natural systems for reducing energy consumption (e.g. controlling orientation and siting) and incorporates full measures for climate change adaptation (e.g. green roofs).

#### What you said

There was a lot of support for option C1A. It was also felt that C1B could be applicable in some locations. However, the view was also expressed that the focus should be more on energy efficiency, i.e. reducing the demand for energy in the first instance. There was also a view that more flexibility should be incorporated into policy to allow for the circumstances of particular sites. The issue of the viability of developments was raised, and the relationship with wider strategic objectives of economic growth and household provision, and it was suggested that the Authority should work towards national and regional requirements.

Other points raised:

- No mention of the contribution to CO<sub>2</sub> emissions made by transport and the contribution of sustainable transport such as Metrolink to reducing CO<sub>2</sub> emissions.
- There is a need to ensure that new development integrates sustainable design such as SUDs and the use of Green Infrastructure to help tackle and adapt to climate change effects.
- Where possible new development should be located in areas where flood risk is low.
- It is important to mention water conservation in respect of reducing carbon emissions.

#### What our response is

It is agreed that reducing the demand for energy is vital. It is also understood that energy efficiency and renewable energy requirements can have cost implications for developments, although it should be pointed out that they can also have cost benefits in the longer term. It is not necessarily agreed that designing to maximise the use of passive systems is necessarily more expensive than not. It is agreed that local policy should align with national and regional objectives, but this must take the form of local requirements as appropriate.

It is agreed that reducing transport emissions is a vital element of tackling climate change, as is water conservation and flood risk prevention.

### **What we propose to do**

All of the proposed options will be taken forward. There will be a particular emphasis on energy efficiency and the use of passive systems, although renewables requirements will also be a part of policy in order to comply with national and regional guidance and strategy. There will be particular requirements in particular locations in line with the guidance in Planning Policy Statement: Planning and Climate Change Supplement to PPS1.

### **Other Issues**

- The issue of transport emissions will be addressed in the transport policies.
- The issues of water conservation and flood risk will be addressed in a separate 'water management' policy and also in a climate change adaptation SPD.

## **Issue C2 – Renewable Energy**

### **The proposed approach was**

Approach C2: The Borough is committed to maximising its potential for the sustainable development of renewable energy technologies of various scales and types in order to help deliver its contribution to meeting regional renewable energy targets. Larger scale renewable energy developments including wind farms will be supported in the Borough's rural uplands where they can be satisfactorily accommodated in the landscape without significant harm to acknowledged qualities or features of the landscape or its ecology. Within urban areas and the urban fringes of settlements, renewable energy installations including biomass and other appropriate technologies for domestic, industrial and community development will be strongly encouraged and supported where they do not cause significant harm to townscape, historic character and local amenity.

### **What you said**

There was disagreement in respect of support for large scale rural renewable energy developments. In particular, wind turbine developments were criticised for their impact on the landscape and doubt raised over their benefit. Another issue raised was the requirements of the PPS1 Climate Change Supplement and the need for a sound evidence base for any policy directions.

### **What our response is**

PPS1 Climate Change Supplement sets out the requirements for the development of local planning policies in respect of renewable and low carbon developments, and we can confirm that the required evidence base is being developed and is at an advanced stage. PPS1 Climate Change Supplement also makes it clear that local planning authority policies should be designed to promote and not restrict renewable and low-carbon energy and supporting infrastructure. Nonetheless, we agree that it is important to ensure impact of large scale renewable developments on such things as the landscape and ecology is minimised.

### **What we propose to do**

Proceed with the proposed approach, ensuring that criteria to minimise the impact of large scale developments is part of any policy relating to them.

### **Issue C3 – Development and Flood Risk**

#### **The proposed approach was**

Approach C3: Ensure that development is located and designed to minimise flood risk both on site and through increasing flood risk in other areas. Development will be informed by appropriate flood risk assessments and concentrated as much as possible in areas of the lowest flood risk potential (i.e. Flood Zone 1) and avoiding development of functional flood plain and greenfield land. Where development must be exceptionally located within higher flood risk areas (i.e. Flood Zones 2 and 3) such as urban regeneration areas and town centres with established residential, commercial and industrial development, it must be on previously developed land and include suitable measures to control and mitigate flood risk which do not result in increased risk elsewhere and where possible help to reduce wider flood risk potential. All development wherever it is located will be required to include climate change adaptation standards to ensure that they minimise any flood risk and achieve effective and sustainable use, storage and disposal of water.

#### **What you said**

Whilst there was general support for the approach, it was felt by one respondent that the approach would just repeat national policy as set out in Planning Policy Statement 25, which is unnecessary.

Additionally, the point was made that, with an emphasis on redeveloping along core river valley corridors there is a significant opportunity to rehabilitate and enhance these river corridors with integrated development that can have a multitude of benefits in respect to landscape amenity, biodiversity and flood risk.

#### **What our response is**

It is agreed that it is unnecessary for local planning policy to repeat national planning policy. It is agreed that opportunities should be taken to enhance river valleys in respect of those matters referred to by the respondent.

#### **What we propose to do**

It is proposed that there will be a 'water management' policy, which will incorporate policy in respect of specific issues raised as a result of local Strategic Flood Risk Assessments as well as promoting water quality and conservation issues.

### **Issue C4 – New Development and Pollution**

#### **The proposed approach was**

Approach C4: Ensure that development does not result in unacceptable levels of pollution (including air, water, ground and noise) through its location, design, construction, operation and traffic generation. Any potential pollution should be mitigated and minimised through good design and environmental management practices. Where development would have an unacceptable impact on natural resources, residential amenity or other factors which cannot be satisfactorily mitigated, it will not be permitted.

#### **What you said**

It was pointed out that if development is truly sustainable it should not cause pollution, and it was also pointed out that development can sometimes have potential to ameliorate pollution.

**What our response is**

It is agreed that policy should expect development not to cause pollution, and also that if there are situations where development can help to ameliorate pollution this should be taken into consideration.

**What we propose to do**

It is proposed that the policy will require new developments not to increase pollution, and to ameliorate existing pollution wherever possible.

# 11. Accessibility and Sustainable Transport – Issues and Options

## Issue A1 - Accessibility

### The question was

Question A1: Which of the 6 Spatial Options in the Core Strategy Issues and Options Paper do you think provides the most accessible and sustainable pattern of development ?

### What you said

The responses were varied with options 2 and 4 most favoured and options 1 and 6 least favoured. Support for option 2 as well as options 1 and 3 came mainly from community and environmental group responses. The high number of responses from individuals and groups with interests in Middleton and Heywood meant option 4 was most favoured. Along with options 5 and 6, it was also the most favoured by business and developer interests.

The Highways Agency gave a detailed response, but did not indicate its preference. They are awaiting the outcome of modelling work assessing the traffic impact of Rochdale Borough's development allocations on the motorway network. GMPTE expressed opposition to Options 1 and 6 as they are the most difficult and expensive to serve by public transport.

### What our response is

The Core Strategy will provide a policy framework allowing the whole of the borough to regenerate and prosper.

### What we propose to do

The Councils preferred spatial option is similar to Spatial Option 5, a combination of Spatial Options 3 and 4. These views and the Issues and Options consultation comments, and transport and accessibility policies will influence the associated Accessibility and Delivering Sustainable Transport section of the Preferred Options Report. The section will include stronger development control policies and the Council is collating information on the proposed "preferred option", land use allocations so the Highways Agency can update its work to model the impact on the motorway network.

## Issue A2 – Strategic Transport Improvements

### The options were

Option A2A: New Interchange facilities at Rochdale Town Centre and Park and Ride facilities at Rochdale Railway Station.

Option A2B: East Lancashire Railway link to Castleton and Manchester Victoria to Rawtenstall (via Heywood) Rail Commuter Services.

Option A2C: Guided Busway, Rochdale to Manchester

Option A2D: Enhanced Rail Services

Option A2E: Heywood Southern Relief Road to M62 Junction 19.



### **What you said**

There was strong support for the sustainable transport options A2A to A2D from local communities, businesses and developers, particularly in developing rail links between Heywood and Manchester City Centre. GMPTE sought some amendments to the scheme descriptions.

A2E Heywood Southern Relief Road generated strong opposition from the local community based on the:

- impact of attracting further HGV traffic on local residents,
- high scheme costs, when lower impact solutions should be considered,
- additional impact on the already congested M60 and M62,
- relief road not addressing HGV's generated from Green Lane on A6046 Middleton Road,
- imposition of further development and relief road in to the green belt,
- access via Pilsworth Road to the M66 being sufficient, and
- proposal contradicting of the other more sustainable strategic transport options.

Although they have not expressed a firm position to date, the Highways Agency will take an active interest in the impact that additional development to the south of Heywood and the relief road proposal will have on the motorway network.

Developers and business representatives with interests to the south of Heywood strongly supported of the principle of a Heywood Relief Road as well as the other options presented.

### **What our response is**

Since the LDF Core Strategy Issues and Options consultation, the package of transport proposals for Heywood and Middleton have developed and some of the proposals have earmarked funding from the Greater Manchester Transport Fund subject to them demonstrating a suitable business case.

### **What we propose to do**

Heywood Southern Relief Road is not included in the Rochdale West package as the predominant beneficiaries are developers and business end users. The relief road including supporting traffic management and sustainable transport measures to mitigate local community impacts will require developer financing. A new route to the distribution park will allow better bus penetration of the distribution parks south of Heywood, with bus gates maintaining restricted HGV access in to the town from the south as at present. The East Lancashire Railway proposals, and the potential to provide a new station at Broadfield, will offer an additional sustainable transport option to commercial areas south of Heywood.

## **Issue A3 – Movement Within and Across the Borough**

### **The options were**

Option A3A: Establish and improve cycle links

Option A3B: Stronger Requirement for Travel Plans

Option A3C: Quality Bus Corridors

Option A3D: Improving access to Kingsway Business Park

Option A3E: Private Contributions to Transport Improvements

Option A3F: A58 Peak Time Congestion Relief

- (i) Improve Road Capacity
- (ii) Rail and Bus Improvements,
- (iii) A58 Bypass

### **What You Said**

All the comments on this option came from statutory or professional bodies and offered general support. GMPTE indicated that the Kingsway Metrolink stop proposal was not part of Phase 3A although the line design will accommodate it as an additional part of Phase 3B subject to developer funding coming forward. Government Office for the North West sought the inclusion of cycle parking and facilities in A3A. The Environment Agency opposed the bypass option to address peak time congestion on A58, citing its environmental impact in the Roch Valley. The Highways Agency sought assurance that Travel Plans would be conditioned on developments with potential traffic impact on the motorway network and monitoring to review and assess performance. A developer supported all the options as a package.

### **What our response is**

The Preferred Option will incorporate the comments made and notes the concern regarding the A58 bypass.

### **What we propose to do**

There will be flexibility in considering A58 congestion relief measures proposed to allow assessment of a range of options.

## **Issue A4 – Accessibility to Town Centres, Transport Hubs and Local Services**

### **The options were**

Option A4A: Improve Pedestrian Links and Safety

Option A4B: Rail Station Improvements and Park and Ride

Option A4C: Northern Relief Road – Heywood Town Centre

### **What You Said**

Support for A4A and A4B but opposition to A4C (Heywood Northern Relief Road). The local community give land subsidence, the conflict between diverted traffic and vulnerable road users (elderly residents and people accessing the new Leisure Village) as reasons. A developer opposed the option because of the impact of the reduction in passing traffic on town centre businesses. The lack of short stay and visitor parking in the town centre was of concern and issues regarding meeting standards and improving street furniture location and design to assist people with impaired vision / mobility and wheel chair users.

### **What our response is**

The access issues raised will be addressed in the future through design and the Disability Discrimination Act requirement placed on the Council and are technical issues that are addressed in highway design and maintenance proposals rather than through Core Strategy policies. These have been referred to the Impact Partnership.

**What we propose to do**

It is unlikely that the Heywood Northern Relief Road will be included in the Core Strategy Preferred options with other measures included to promote the vitality of Heywood Town Centre. These include rationalising bus services by providing and interchange facilities and opportunities to enhance the boroughs urban centres will include measures to improve shopper and visitor parking. The potential for a Southern Relief Road from M62 Junction 19 will assist in relieving some unwanted traffic from Heywood town centre.

## 12. Green Infrastructure (Open Spaces and Countryside) – Issues and Options

### Issues and Options (General)

The borough contains an extensive and diverse network of open spaces and countryside. Together, the borough's open spaces provide a multifunctional green infrastructure network supporting quality of life and quality of place which contributes to sustainable development and growth in Rochdale and Greater Manchester.

The functional integrity of the Green Infrastructure network is of variable quality and is under pressure from the impacts of urban communities, economic and housing growth, regeneration, and helping to tackle the effects of climate change locally and in the region.

#### **What you said:**

There was support for the Green Infrastructure approach to Open Spaces and Countryside. A number of respondents referred to the important role of open space in contributing to quality of life, recreation and healthy lifestyles. There was support for protecting open spaces from development and improving the quality, accessibility and recreational facilities of green spaces and enhancing their biodiversity and, where appropriate, their historic interest. It was felt, however, that geodiversity issues were not sufficiently reflected within the text.

There were a number of comments concerning specific sites within the borough for play areas and open space provision particularly around Alkington and Castleton. It is not appropriate to consider specific sites in the preferred options, but these concerns have been noted.

#### **What our response is:**

The borough is committed to developing a green infrastructure approach for its open spaces and green corridors. Key green infrastructure assets include the South Pennine Moors, river valleys, Rochdale Canal, parks and open spaces. This recognises the importance of green infrastructure in contributing to both quality of place and quality of life, respecting the differences between the townships and their locally distinctive townscapes, historic features and patterns of development.

#### **What we propose to do:**

Taking into account these comments, it is proposed to include a green infrastructure policy within preferred options. Geodiversity issues will be addressed and specifically included within a biodiversity and geodiversity policy.

#### **Other issues**

A Green Infrastructure strategy for the borough is being produced which will provide detailed guidance on this approach within the borough and outline the key infrastructure assets and their connections to the wider Greater Manchester and regional Green Infrastructure work. In addition, work has commenced on producing Green Infrastructure Plans for each townships, which include detailed mapping of existing assets, and proposals for the creation of new assets and enhancements to the functionality and quality of existing assets.

## Issue G1- Biodiversity

### **The options were**

Option G1A: identify specific sites and corridors within which development will not be permitted where it causes loss or damage to acknowledged biodiversity interests.

Option G1B: identify specific sites and corridors of acknowledged biodiversity importance and ensure that all development proposals identify measures to protect and enhance biodiversity.

Option G1C: do not identify specific sites and corridors of biodiversity importance and use a criteria based approach to encourage the protection and enhancement of biodiversity in all developments where appropriate.

### **What you said**

There was universal support for Option G1B as this reflects the strategic approach to conservation and enhancement as outlined in PPS9 and supports the requirements of the Natural Environment and Rural Communities Act. Comments stressed the importance of wider biodiversity outside key sites and corridors, such as brownfield sites, gardens and green routes and the contribution that these locations can make to the borough's biodiversity resources.

### **What our response is**

Strategic corridors and key sites are identified through the statutory and non-statutory designation processes. The Greater Manchester Ecological Framework and the Green Infrastructure Strategy will form the basis for biodiversity and geodiversity enhancement. The Township Green Infrastructure Plans and the emerging Rochdale Biodiversity Action Plan stress the importance of biodiversity within the wider landscape and gardens, and provides guidance on how development can contribute to and enhance biodiversity. The NERC Act also grants the biodiversity duty to local authorities. The Oldham and Rochdale Design Guide and the Biodiversity and Development SPD provide guidance on ensuring that biodiversity is included within any development proposals.

### **What we propose to do**

Based upon the comments received, option it is the intention to select G1B as the preferred option. This identifies specific sites and corridors of core biodiversity interest, but also looks to protect and promote biodiversity interest on all sites and within all development. This policy will take a comprehensive approach to development and biodiversity opportunities and will contribute to establishing a core ecological framework for the borough.

### **Other issues:**

The policy will work with the Biodiversity and Development SPD which details the planning approach to biodiversity in the borough and includes guidance on how to include biodiversity interest in development. The emerging Rochdale Biodiversity Action Plan identifies priority species and habitats for the borough and sets out targets for enhancement.

## Issue G2 - River Valleys

### **The options were**

Options G2A; identify all principal river valley corridors incorporating key sites for recreation, biodiversity, countryside gateways, principal recreational routes and land

with high flood risk. There would be strict controls over new development within such areas and adjacent areas where development could compromise the quality or function of a river valley and key opportunities for enhancement would be identified. This would include the Roch, Beal, Spodden, Irk and other main river valleys.

Options G2B; Focus on the Roch valley as the principal river valley where strict controls and criteria for development are used. For other river valleys more general criteria for new development would be used to ensure that new development does not harm their function or integrity.

Option G2C; do not identify river valleys and use general policies for environmental protection and enhancement to control development.

### **What you said**

There was universal support for Option G2A as the more comprehensive and strategic approach. Comments stressed the multi-functional benefits of this approach which includes biodiversity, recreation, flood risk reduction and enhances the image of the area as a part of the borough's green infrastructure.

Comments concerning the Rochdale Canal are too specific for this document, as they relate to a particular concern. They have been noted.

### **What our response is**

River valleys form a key part of the functional green infrastructure network for the borough. Collectively, they perform a number of functions including recreation, flood risk management and biodiversity. The quality and functionality of the river valleys within the borough does vary according to historic use, modification to the river course, settlement patterns, development and accessibility.

### **What we propose to do**

It is proposed that as river valleys form a key part of the GI approach, that option G2A is included within the proposed Green Infrastructure policy, as one of the key issues. The current proposed wording is:

“Protecting and enhancing the Roch valley and other principal river valleys in the borough as the core of a Green Infrastructure network supporting countryside recreation, ecological corridors and flood risk management for adjacent developments and urban areas, the borough and the city region”

## **Issue G3 Open Spaces:**

### **The options were**

Option G3A: Protect all open spaces from loss, even when they are poorly located and managed. Provide additional open spaces in new development and investment in existing open spaces through developer contributions.

Option G3B: Protect all open spaces where they have a clear function and value to the community in meeting local need for formal and informal recreation and “natural” open spaces. Where open space has substantial problems which cannot be solved through investment and improved design and management (e.g. sites with poor location and persistent misuse) allow development which will secure new open space and investment in existing open space or improved access to space that would more appropriately meet local need.

**What you said:**

The responses to this option were generally supportive of the approach within G3B. However, there were also some concerns that this policy allows for the potential loss of open space even where poorly used and located. The concept of no net loss of open spaces was endorsed, with problem sites being considered within their wider multi-functionality including contribution to biodiversity, flood risk management etc.

**What our response is:**

Open spaces form a key part of the multi-functional approach of Green Infrastructure for the borough. Both formal and informal open spaces are important for the development of play, sport and recreation. The quality of open spaces is important, and there are neighbourhoods within the borough where there are acknowledged deficiencies in both quantity and quality of open space. The quantity of open space in the borough will be protected through no net loss, acknowledging that there may be a few very specific sites within the borough where development may be appropriate, subject to investment in new and improved open spaces of benefit to the community.

**What we propose to do**

An open spaces policy will be included within GI policy for the borough. The policy will stress both the importance of multi-functionality, and also the need to ensure both quality and quantity of open space for play, sport and informal recreation. This policy will take an approach of no net loss of open space within the borough.

<b>Issue G4 Countryside</b>
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**The issues were**

Option G4A: Target opportunities for improvements on identified routes and gateways from urban areas where access is currently poor and set out a clear and sustainable approach to creating and enhancing countryside gateways, recreational management areas, river valleys and facilities to serve each township and support local tourism opportunities.

Option G4B: Focus on the Rochdale Canal and Hollingworth Lake Country Park as the primary recreation facilities for the borough.

Option G4C: Do not focus on specific sites or areas but support a general approach of improving access to the countryside from urban areas.

**What you said**

There was universal support for option G4A of a targeted approach. Within this, approach comments included the need to ensure that good access is maintained where it already exists, decrease pressure on existing 'honey pot' sites and co-ordinate with multi-user commuter routes.

**What our response is**

The approach outlined within G4A will be maintained. The borough has an emerging recreational and commuting multi-user network of cycleways, and linking routes which will enhance accessibility to the countryside.

**What we propose to do**

Option G4A will be taken forward as the preferred option. It will be included within the Green Infrastructure Policy, targeting resources and opportunities at identified routes

and gateways and utilising existing opportunities within the Green Infrastructure framework for the borough.





## 13. People and Community – Issues and Options

### Issue PC1 – Health

#### The options were

Option PC1A: The Council works with the PAHT and local PCT to ensure the provision of health facilities that meet the needs of the local population and reduce health inequalities through:

- directing health provision and resources to the areas of greatest need;
- locating services in highly accessible locations by all means of transport;
- co-ordinating health provision with major new development; and
- linking with other public services to ensure the most cost effective, efficient and accessible delivery of facilities.

The Council will consider the possibility of requiring developers to contribute towards improving health facilities through the Core Strategy and the Community Infrastructure Levy.

Option PC1B: The potential health impacts of all Core Strategy policies will be considered with the assistance of all the health agencies.

#### What you said

Responses to the Issues and Options Report sought a direct policy reference to sport and active recreation both facility-based and through informal opportunities to promote more active and healthier lifestyles. Better quality schools and learning facilities, a safer community, all of which is accessible to all by walking, cycling and public transport.

The responses supported both of the options, and suggested elements of PC1A and PC1B should be incorporated.

#### What our response is

Sports and recreational facilities can underpin the quality of people's lives through facilitating social inclusion, supporting healthier lifestyles and personal well-being, and providing educational opportunities. It therefore has a central role to play in addressing many of our current concerns; including climate change, social cohesion, healthy lifestyles and regeneration. The broad nature and amount of open space provision and recreational facilities to be secured through new developments would be considered through the preparation of the infrastructure delivery plan (see Strategic Objective on Infrastructure).

#### What we propose to do

A combination of PC1A and PC1B should form the preferred option.

#### Other Issues

- The issue of undertaking a separate HIA for each of the policies.

## **Issue PC2 – Education**

### **The approaches were**

#### **PC2A Schools**

The Council works in partnership with the Rochdale Borough Children's Trust and the LSP to ensure that the educational needs of children and young people are met through:

- ensuring land is available to accommodate improved facilities where needed;
- ensuring where appropriate, development contributes financially to new or extended facilities;
- ensuring safe and convenient pedestrian routes to school;
- considering alternative uses for redundant school land.

The government's Primary Capital programme (for primary schools) and Building Schools for the Future (for secondary schools) will provide opportunities to improve school buildings.

#### **PC2B Higher and Further Education**

The Council will work in partnership with Hopwood Hall College and local stakeholders in the creation of a learning quarter and a new Sixth Form Centre, at Saint Mary's Gate site, adjoining Rochdale town centre.

The Council will consider the potential for requiring developers to contribute to improving education facilities through the Core Strategy and the Community Infrastructure Levy.

### **What you said**

There was disagreement with the approach the Council had on education (11-18 years old). It was considered that the policy was towards larger schools and fewer schools which were not in the interest of the young people or the people living in that area. For example, school children have to leave the town to go to school which means they have to travel further to access schools. Too much emphasis is on pupil numbers and not enough is being placed on what the community needs.

They also considered that education plays an important role in community cohesion and providing extended educational and community facilities along with play and recreational spaces would have a positive effect in the community and reduce anti social behaviour and nuisance and make young people more socially interactive.

### **What our response is**

Rationalisation and closure of schools provides an opportunity to remove surplus capacity from the system, modernise and refurbish existing schools, and save money. The issue and options paper did not make clear however that where there are pressures on existing schools that are at full capacity or an area with significant housing development and changes to population, there could potentially be a need for a new school. However, as things are now, projections indicate that there is sufficient capacity for the next couple of years.

Going beyond traditional school services and providing a wider role is critical therefore extending school services to provide opportunities to children and families to take part in educational activities will promote community cohesion.

### **What we propose to do**

PC2A needs to be strengthened and it needs to reflect that the areas of greatest need and demand will require additional support and accommodation outside the governments Primary Capital Programme for primary schools and Building for Schools Future for Secondary schools. In respect of PC2B no responses were given and this will remain.

### **Issue PC3 – Access to Community Facilities**

#### **The options were**

PC3A: Strengthen existing local centres with a range of better quality shops, services and community facilities.

PC3B: De-allocate poorly performing local centres and identify new local centres in areas which are poorly served or located.

PC3C: Allow new retail and service provision outside local centres in areas of poor provision to meet local needs.

#### **What you said**

There was support for PC3A and PC3B. It was felt the term 'community facility' did not go far enough and requires an explicit reference to the term to include facilities such as theatres and prisons.

#### **What our response is**

It is important to consider and balance the different needs and requirements of communities and it is perhaps more feasible to have a hybrid which addresses the different needs of each centre. With regards to meeting local needs in terms of what kind of facilities should be provided then this will be met by development as and when the needs arises. This could mean the development of a new shop or community facility or an improvement to existing facilities.

#### **What we propose to do**

It is considered appropriate to select option PC3A and PC3B as the preferred options.

#### **Other Issues**

Significant or major local centres need to be mapped out (we need to gather evidence on the level of importance of each of the local centres to identify which centres need to be strengthened, downgraded or where new centres should be created).

### **Issue PC3 – Community Safety**

#### **The approaches were**

PC4A Policies will seek to reduce crime and fear of crime through positive community safety principles (e.g. 'Secured by Design') being applied to the design and layout of development to achieve, for example, mixed use developments, well-used streets and public spaces that are pedestrian friendly with social interaction and low vehicle speeds.

PC4B Spatial Options 2 to 6 focus on improvement and development in regeneration priority areas which are frequently the areas which have highest crime levels.

**What you said**

There was support for PC4A and PC4B.

**What our response is**

These options will help deal with community safety however, as a strategic document and it is not its role to set out detailed policies. Community safety is an important contributor to people's quality of life and a key element of community cohesion. Addressing crime and antisocial behaviour can also reduce social inequalities and support economic regeneration of areas. The Council, its partners, and the local community will work together to reduce the potential for crime and antisocial behaviour through high quality design and controlling the nature and the location of development in problem areas will undertake more detailed work.

**What we propose to do**

It is considered appropriate to select option PC4A and PC4B as the preferred options.

## 14. Spatial Options

Six spatial options were identified to deliver the Strategic Objectives and an increasing level of housing and employment development ranging from:

Current Growth - Based on achieving the Regional Spatial Strategy (RSS) housing requirement (450 additional homes in the borough per annum) with no additional employment sites on top of the existing supply of 180 hectares; to

High Growth - Based on achieving the RSS housing requirement plus 20% (550 additional dwellings per annum) plus the RSS employment land requirement of potentially up to around 89 hectares of additional employment land on top of the current supply.

The Spatial Options were (with option1 delivering the lowest and 6 the highest growth):

### **Spatial Option 1 - Dispersed development in the built up area**

This option had no spatial focus or priorities in terms of where development, growth or regeneration should take place. It is likely that this option would continue existing levels of housing and employment development. (i.e. Current Growth)

### **Spatial Option 2 - Focus on regeneration areas in the built up area**

This option put a greater focus on regeneration within the following priority areas:

- existing and proposed housing led regeneration areas;
- along strategic corridors, including important transport corridors, the canal and enhancement of river valleys, on gateways and around transport interchanges; and
- town centres.

It's likely that this option could deliver slightly more house building than Option 1 (i.e. above current growth) but a slightly lower level of employment development (i.e. below current growth).

### **Spatial Option 3 - Focus on Rochdale (as the sub regional centre) (Zone B)**

Under this option (and options 4 & 5) the borough was split into three zones (A, B & C) based on their accessibility.

This Option still had the same focus on regeneration as Spatial Option 2. It also directed more new development to south Rochdale and south Pennines (Zone B).

In Heywood and Middleton (Zone A) there would still be the focus on existing regeneration priorities (identified under Option 2) but no additional regeneration priorities or development outside the urban area.

In north Rochdale and north Pennines (Zone C) there would still be the focus on existing regeneration priorities (identified under Option 2) and specific sites but restrictions on development elsewhere in the zone.

This option could deliver medium levels of housing and employment development (i.e. slightly above current growth).

#### **Spatial Option 4 - Focus on Heywood and Middleton (Zone A)**

- This Option still had the same focus on regeneration as Spatial Option 2.
- It directed more new development to Heywood and Middleton (Zone A) where there would be an additional focus on existing and proposed regeneration priorities and Heywood and Middleton town centres. Phased development would be possible outside the urban area on protected open land and green belt sites for primarily employment and mixed use. Transport improvements would be promoted to support the growth in this part of the borough.
- In south Rochdale and south Pennines (Zone B), whilst there would still be a focus on regeneration, there would be no development permitted outside the urban area.
- In north Rochdale and north Pennines (Zone C) there would be restrictions on development (as under Spatial option 3).

Overall this option could achieve a medium level of housing and a high level of employment.

#### **Spatial Option 5 - Focus in the south of the borough (Zones A & B)**

- This Option still had the same focus on regeneration as Spatial Option 2.
- It directed development to Heywood and Middleton (Zone A) where there will be an additional focus on existing and proposed regeneration priorities and Heywood and Middleton town centres. Phased development would be possible outside the urban area on protected open land and green belt sites for primarily employment and mixed use. Transport improvements would be promoted to support this growth.
- In south Rochdale and south Pennines (Zone B) whilst there would still be a focus on regeneration, there would be no development permitted outside the urban area.
- In north Rochdale and north Pennines (Zone C) there would be restrictions on development (as under Spatial option 3).

Overall this option could achieve a medium level of housing and a high level of employment development (i.e. medium to high growth).

#### **Spatial Option 6 - High growth and dispersed development across the borough**

- This Option had the same focus on regeneration as Spatial Option 2.
- It promoted high growth across the borough. It had no spatial focus other than the regeneration priorities identified under Option 2.
- There would be no spatial restrictions on development. Opportunities for development outside the urban area would be considered across the borough, including in the north. This is the only option which would allow significant development in the north of borough.

This achieves very high levels of development across the borough and provides a variety of locations for both housing and employment (i.e. very high growth).

## What you said

The points made on the options were:

Agencies and developers were generally opposed **spatial Option 1** because it has no focus and it would be difficult to plan the interrelationship between development and transport infrastructure / public transport. It would lack certainty and GONW considered that it was not a spatial option. It was supported by some members of the public it because it did not propose any development in the Green Belt.

Most respondents supported **spatial Option 2** because it focuses development in the most accessible locations, makes the best use of existing infrastructure, regenerates priority areas and doesn't propose any development in the Green Belt. However, there was some concern that it wouldn't meet the longer term needs of the borough in terms of housing and employment.

Some respondents supported **spatial Option 3** because the focus on Rochdale would make best use of the public transport infrastructure and focus on the sub regional centre. There was some support for restricting growth in north Rochdale and Pennines. GMPTE and the HA were concerned that it could encourage more trips by car. There was also opposition because of the possibility of further development at Trub Farm, Castleton.

There was support for **Spatial Option 4** because of its focus on Middleton and Heywood and the benefits it could bring to those towns in terms of increased housing and employment and the fact that it could take development pressure of Rochdale. Those who don't want further development in Heywood and Middleton, especially in the Green Belt south of Heywood, strongly opposed it. There was concern about the impact on traffic generation on the motorway network and from the Heywood southern relief road. Some considered that options 4 and 5 were presented as the preferred options.

There was support for **Spatial Option 5** by those who considered it the most comprehensive option in meeting the strategic objectives of economic and housing growth, whilst also protecting the environment and defending the open spaces and hills in the north of the borough. It was opposed because it would deliver more development than required and could undermine regeneration in the inner areas. There was concern that it could increase congestion and that there could be problems in delivering the supporting public transport network.

Developers supported **Spatial Option 6** because they saw it as likely to deliver the greatest level of growth and investment in the borough. It was opposed because of its impact on green field land, increased traffic on the A58, difficulty in planning infrastructure investment and the view that the scale of development would exceed need.

## What our response is

The concerns about **Spatial Option 1** are accepted. Whilst recognising the support given because there is no green belt development, this option is not included in the preferred option.

**Spatial Option 2** received a lot of support because of its focus on regeneration and on locations that are well served by existing infrastructure. It's proposed to include all these elements in the preferred option. However, the option does not focus or restrict development in any particular parts of the borough. Therefore, on its own, it will not



provide a sufficiently clear or robust spatial strategy for delivering all the plan objectives.

The common elements of **Spatial Options 3 and 4**, which includes the approach in Option 2 and restrictions on development in the north, were generally supported and are therefore proposed for inclusion in the preferred option. There was support for a focus on both Rochdale and Middleton and Heywood.

As **Spatial Option 5** is a combination of options 2, 3 and 4, all the above conclusions on those options apply. The most concern about this option was because of the scale of potential growth and the impact this could have on infrastructure and the environment. However the scale of development indicated was to show what was possible, rather than what is required, through this option. This option offers the potential to focus development in the urban area of the borough that is most accessible by both public and private transport. It is potentially the most sustainable of all the options. However, the sustainability of the option is dependent on which elements of the option are taken forward and the measures taken to mitigate the impact of any development.

The concerns about **Spatial Option 6** are accepted. Whilst recognising the support given because of the potential for higher levels of inward investment, this option is not included in the preferred option.

### **What we propose to do**

Based on the responses on the spatial options, and on the other representations, the preferred Spatial Option is 5 but with a scale of growth closer to that proposed in Spatial Option 2. In developing this preferred option we will have to take account of the need to:

- Refine the boundary between the north and south of the borough;
- Restrict the scale and location of any greenfield / Green Belt land release to that which essential to meet the plan's objectives;
- Deliver the necessary transport and other infrastructure to support this option;
- Select the most sustainable site and land release options within this option;
- Ensure the spatial strategy policies mitigate any possible negative impacts and deliver the option satisfactorily;
- Ensure that this option integrates into the Spatial Strategy for Greater Manchester and has a good fit with the emerging core strategies in adjoining authorities.

## 15. Site Options

Chapter 14 of the Issues and Options Report set out a number of possible site options for consultation and further and further investigation. Their identification in the report did not assume any acceptance of suitability or need. Some of these sites had been put forward by landowners and developers previously as candidates for UDP allocations.

Alongside consultation on the Issues and Options, the Council ran a ‘call for sites’ exercise, the aim of which was to invite owners of land and development interests to propose large sites for development and to comment on their suitability and availability. This was done to help the Council to assess what land is available and to assess the relative merits of sites before proposing them in the Core Strategy or other Development Plan Documents.

**Question 1:** What do you think about the suitability of the sites (listed below) for possible development?

The table below sets out the site options put forward in the Issues and Options Report. The table summarises the comments received along with what our response is and what we propose to do.

Site Option	What you said	What our response is	What we propose to do
General comments on sites in the Issues and Options Report	<ul style="list-style-type: none"> <li>- Need to consider phasing of any sites</li> <li>- Several of the sites have utility apparatus crossing and there are some sewer flooding issues</li> <li>- Appears that most designated wildlife sites will not be affected</li> <li>- Some of the sites contain or are close to listed buildings. The heritage and archeological value of some of these sites may require further investigation</li> <li>- Sites may be at risk from surface water , have potential to increase run-off and could be difficult to drain</li> <li>- Almost all sites put forward are greenfield and some are Green Belt. Given the strategic priorities set out in RSS the need for such sites would have to be fully</li> </ul>	<p>It is acknowledged that the identification of any large sites through the Core Strategy or subsequent Allocations DPD would need to be subject to phasing. The issues regarding utilities and flooding are acknowledged and covered under the separate site responses below. Many of the site are greenfield and it is accepted that the identification and allocation of any major sites would have to be fully justified in terms of need. The comment regarding advice in PPS12 regarding allocations within in Core Strategies is noted.</p>	<p>Any sites put forward for actual allocation in the Core Strategy will be fully investigated (e.g. to assess impact on nature conservation, heritage etc) and justified (i.e. are required to meet development requirements). It is more likely that most of the sites will be allocated through a separate Allocations DPD and will therefore be subject to further analysis and consultation. Only sites vital to the delivery of the Core Strategy will be allocated through the document</p>

Site Option	What you said	What our response is	What we propose to do
	<p>justified. Also changes to the Green Belt would have to be considered as to whether they represent a 'substantial strategic change'</p> <ul style="list-style-type: none"> <li>- Council should have regard to guidance that states that Core Strategies should avoid site specific detail and only allocate strategic sites that are central to the achievement of the strategy.</li> </ul>		<p>with other sites allocated through the Allocations DPD.</p>
<p>Trub Farm (west of canal), Manchester Road, Castleton, Rochdale</p>	<ul style="list-style-type: none"> <li>- Problem of public sewers passing through site and issue sewer flooding risk</li> <li>- Danger of damage to wildlife given designation of canal as SSSI &amp; SBI</li> <li>- Site is well served by public transport</li> <li>- Already been loss of open space in Castleton</li> <li>- Need for housing not employment</li> </ul>	<p>We accept there are problems with the public sewer and issues regarding wildlife and biodiversity. Public opposition to the loss of further open space for employment developments is also noted. The land to east of the canal is already allocated in the UDP and is likely to come forward for a housing led development.</p>	<p>It is not the intention to identify it as a key strategic site in our Preferred options. Given that the site is within the urban area any development proposed would be considered against the relevant Core Strategy / 'saved' UDP policies</p>
<p>Land south of Cripple Gate Lane, Castleton, Rochdale</p>	<ul style="list-style-type: none"> <li>- The site is inaccessible by public transport</li> <li>- Already been loss of open space in Castleton</li> <li>- Already enough industrial units in Castleton</li> <li>- Site is large enough to accommodate a mixture off uses, is in a good location and there is developer interest.</li> </ul>	<p>The site is difficult to access for development. Most of the site is greenspace corridor and whilst the topography adds to the landscape quality of the area it is also a constraint on development.</p>	<p>We do not intend to identify this site as a key strategic site in our Preferred options</p>
<p>Broad Lane, Rochdale</p>	<ul style="list-style-type: none"> <li>- A trunk water main passes through the site</li> <li>- Developer support for the allocation of the site for housing given location and proximity to Kingsway Business Park</li> <li>- Site (particularly</li> </ul>	<p>This site has been safeguarded in the past for development but never came forward due to availability of other more suitable sites. The site may offers</p>	<p>At the Preferred Options stage we intend to consult further on the possibility of this land being reserved for future</p>

Site Option	What you said	What our response is	What we propose to do
	western end) is well served by buses but is inaccessible by rail	some potential for housing, if required, in the longer term	development (likely to be housing) if required to meet development needs over the Core Strategy period
Middleton West, Heywood Old Road, Middleton	<ul style="list-style-type: none"> <li>- A trunk water main passes through the site and there are also sewer flooding risks in the vicinity</li> <li>- Most of the site is inaccessible by public transport although some of the site is within 400m of services on Langley</li> <li>- Objections to development of site based on traffic, loss of green space (particularly between Heywood &amp; Middleton), and attractive views and the need to develop brownfield sites.</li> </ul>	This site was put forward for employment development to support the regeneration of Middleton in the draft UDP but was rejected by the Inspector. The main reasons were lack of demonstrable need and the quality of the landscape.	At the Preferred Options stage we intend to consult further on the possibility of this land being added to the Green Belt.
Land north of Langley Lane (east), Middleton	<ul style="list-style-type: none"> <li>- There is no need to use green belt or protected open land for more development</li> <li>- Two trunk water mains pass through the north of the site</li> <li>- New bus stops would be required to improve accessibility</li> <li>- Objections to development of site based on traffic, loss of green space (particularly between Heywood &amp; Middleton) and need to develop brownfield sites</li> <li>- Represent good locations for employment and mixed use due to location</li> </ul>	This land which is designated as Protected Open Land in the UDP surrounds the recently refurbished school site. The issues regarding traffic and loss of greenspace are acknowledged and this particular site does act as an important buffer between Middleton, the motorway and Heywood beyond	At the Preferred Options stage we intend to consult further on the possibility of this land being added to the Green Belt.
Land north of Langley Lane (west), Middleton	There is no need to use green belt or protected open land for more development	This land is currently designated as Protected Open Land in the UDP However,	At the Preferred Options stage we intend to consult further on the

Site Option	What you said	What our response is	What we propose to do
	<ul style="list-style-type: none"> <li>- Site is currently accessible but new bus stops would improve accessibility</li> <li>- Objections to development of site based on traffic, loss of green space (particularly between Heywood &amp; Middleton) and need to develop brownfield sites</li> <li>- Represent good locations for employment and mixed use due to location</li> </ul>	<p>given the sites accessibility it may offer some potential to meet the future development needs of the borough.</p>	<p>possibility of this land being reserved for future development (likely to be mixed use) if required to meet development needs over the Core Strategy period</p>
<p>Land south of Hareshill Road, Heywood</p>	<ul style="list-style-type: none"> <li>- Objection to loss of green belt land for development</li> <li>- Area suffers from air and noise pollution</li> <li>- The Council has opposed development (land filling prior to equestrian centre) on this site in the past</li> <li>- Trunk water main passes through the south west of the site</li> <li>- Site is considered inaccessible by public transport</li> </ul>	<p>We acknowledge the points main regarding loss of greenspace and green belt. However in terms of meeting long term employment needs this site does offer opportunities given its location close to the motorway, proximity to existing employment development and the potential to improve the local transport infrastructure.</p>	<p>At the Preferred Options stage we intend to consult further on the possibility of this land being released for employment development if required to meet development needs over the Core Strategy period</p>
<p>Land north of Hareshill Road, Heywood</p>	<ul style="list-style-type: none"> <li>- Objection to loss of green belt land for development</li> <li>- Area suffers from air and noise pollution</li> <li>- There are sewer flooding risks in the vicinity</li> <li>- Site is considered inaccessible and it falls outside the 400m buffer zone on the Rochdale accessibility map.</li> </ul>	<p>We acknowledge the points main regarding loss of greenspace and green belt. However in terms of meeting long term employment needs this site does offer opportunities given its location close to the motorway, proximity to existing employment development and the potential to improve the local transport infrastructure.</p>	<p>At the Preferred Options stage we intend to consult further on the possibility of this land being released for employment development if required to meet development needs over the Core Strategy period</p>
<p>Land south of Manchester</p>	<ul style="list-style-type: none"> <li>-Objection to loss of green belt land for</li> </ul>	<p>We acknowledge the points main regarding</p>	<p>At the Preferred Options stage we</p>

Site Option	What you said	What our response is	What we propose to do
Road, Heywood	<p>development</p> <ul style="list-style-type: none"> <li>- Area suffers from air and noise pollution and there are existing problems of congestion because of a lack of necessary infrastructure</li> <li>- There are sewer flooding risks in the vicinity</li> <li>- Half of this site could be considered accessible by public transport whilst the other half lies outside the 400m buffer zone on the Rochdale accessibility map</li> </ul>	<p>loss of greenspace and green belt. However in terms of meeting long term employment needs this site does offer opportunities given its location close to the motorway, proximity to existing employment development and the potential to improve the local transport infrastructure. Given the existing housing to the north of this site some of this land may be suitable for new housing as part of a mixed use development.</p>	<p>intend to consult further on the possibility of this land being released for mixed use development if required to meet development needs over the Core Strategy period</p>
Stakehill, Bentley Avenue, Rochdale	<ul style="list-style-type: none"> <li>- There are sewer flooding risks in the vicinity</li> <li>- Site includes several small reservoirs which may provide a source of residual risk from flooding</li> <li>- Apart from a small section in the west, this site is considered inaccessible and it falls outside the 400m buffer zone on the Rochdale accessibility map</li> <li>- Better to focus existing empty units in the industrial estate than allocate more land</li> <li>- Health risks due to air pollution</li> </ul>	<p>This site is reasonably located in terms of access to the motorway network. However, access to the site put forward, the shape of the site and the existing properties in the area are significant constraints in this site coming forward as a key employment site.</p>	<p>We do not intend to identify this site as a key strategic site in our Preferred options</p>
Roch Valley, Halifax Road, Pennines	<ul style="list-style-type: none"> <li>- Two public sewers pass through the middle of the site and there are sewer flooding risks in the vicinity</li> <li>- Risk of fluvial flooding</li> <li>- Half of site is within 800m of Smithy Bridge railway station and much</li> </ul>	<p>This site has limited potential for sustainable developments given problems of location, access and the risk of flooding. This area also provides a high quality landscape</p>	<p>We do not intend to identify this site as a key strategic site in our Preferred options</p>

Site Option	What you said	What our response is	What we propose to do
	of the site is with 400m of bus stops on Halifax Road. However pedestrian access would need to be improved and this may be constrained by River Roch.	and there is significant biodiversity value associated with the River Roch.	
Dye House Lane, Smallbridge, Pennines	- There are sewer flooding risks within the vicinity - Risk of fluvial flooding - Much of the site is with 400m of bus stops on Halifax Road. However pedestrian access would need to be improved and this may be constrained by Ash Brook.	This site is currently designated as a mixed employment zone. However, the recent Employment Land Study (2008), Dye House Lane scored the lowest in terms of potential to meet future employment needs.	At the Preferred Options stage we intend to consult further on the possibility of this site being redeveloped for residential or mixed use development.

All of the above sites will be assessed against the Sustainability Objectives within the Sustainability Appraisal.

**Question 2:** Can you suggest any other sites for possible development? Please tell us how they may relate to the Strategic Objectives and Spatial Options etc.

#### What you said

As part of the 'call for sites' exercise, 27 sites were put forward for possible development. Most of these were for housing or employment use with two for possible retail. A majority were greenfield sites, some of which were in the Green Belt. The comments argued that the sites put forward for development were appropriate given their location and the opportunities they gave to meet development needs over the Core Strategy period. Some of the sites put forward were those that had been identified as Site Options within the Issues and Options Report.

#### What our response is

These sites will be considered and their suitability assessed through the Core Strategy process. Some of the sites put forward had been suggested through previous consultations on the Unitary Development Plan and therefore we were aware of their benefits and constraints.

#### What we propose to do

The sites put forward by respondents, along with all those suggested at issues at options stage and sites promoted through the Core Strategy, will all be assessed against the Sustainability Objectives within the Sustainability Appraisal to the Core Strategy. The results of this assessment will be presented in the Sustainability Appraisal and be taken account of in putting sites forward for further consultation within the Core Strategy Preferred Options document. In addition, those sites put forward for residential development will be considered against the Strategic Housing Land Availability Assessment (SHLAA)

## 16. Conclusion

This report focuses on the written comments submitted on the Questions set out in the Issues and Options Report. It should be noted that public meetings carried out within the four Townships provided a good sounding board on the whether we had identified the issues correctly and on the policy options (See Appendix 1). Those who attended were invited to write their comments but only a small proportion of responses were completed at the meetings. These comments along with tear off comments forms available on the publicity leaflet have been considered in developing the preferred options. In terms of the responses to the 6 spatial options there was no clear preference although there was broad agreement to the following spatial policy approaches:

- Existing regeneration areas should be a priority for development and housing growth;
- Growth and development should be shared across central and south Rochdale, Heywood and Middleton;
- Economic development should be focussed on quality sites with good access;
- A better range and choice of housing is needed;
- New employment development should be focussed in the main existing employment areas and town centres, but better, more accessible sites are needed to increase the range and quality of jobs, especially in the west of the Borough;
- Opportunities in the north of Rochdale and Pennines for development are limited by land, access, topography and green belt; high housing densities may harm local character;
- Further land release for employment development should not be allowed if it could undermine Kingsway;
- Improved accessibility to Manchester, Bury and Oldham is vital for access to jobs, leisure and shopping for adjoining parts of the borough;
- The green belt should be protected; and
- Transport and service/community infrastructure is vital to any spatial strategy.

Consultation on Issues and Options has also been useful in considering the level of detail, the need to identify specific sites at this stage, the presentation of the Core Strategy and the need to demonstrate a clear Vision, clear Strategic Objectives, a Spatial Strategy and policies to deliver the strategy. There was considerable local support for a vision for each of the Townships and policies or projects that show how the spatial strategy and policies will be delivered within the Townships. We have resisted including the level of detail suggested by some as the Core Strategy is about setting a clear direction and the priorities for other LDF documents to come.

The structure of the Core Strategy Preferred Options may be slightly different to the structure of the Issues and Options. This is because we will refine our objectives and instead of presenting options we will identify our preferred policy approaches. We will present draft policies although these will not be fixed. We will be asking for views on the detailed wording of the policies and we will asking specific questions on some so you can help us decide if the approach is right and whether we need to address other things. Finally, the comments concerning evidence about delivery will be



addressed through further refinement of the evidence base and by the inclusion of a delivery schedule and infrastructure plan.

A statement of Consultation will be prepared which will detail how we approached consultation and publicity, the specific measures we undertook and when. This will demonstrate that the Council has met the Regulations on consultation and the requirements of the Council's agreed procedures for consultation on the LDF – its 'Statement of Community Involvement'.

## Appendix 1 - Notes from Township Workshops

### Summary of comments from Heywood Township Workshop – 29<sup>th</sup> September 2008 - Heywood Township Office

#### General Issues

##### What you said

- How do the spatial options tie in with Bury's Core Strategy options?
- The Core Strategy must support Heywood SUN and provide a long term framework for regeneration.
- There should be more of a focus on Heywood in terms of regeneration.
- There is some additional capacity for additional housing and jobs.
- It is a general view that a strong Green Belt is needed to separate Heywood from Middleton and Rochdale to preserve the character of the town and to protect areas of countryside.
- The comments made by people at the workshop are based on a limited level of detail / knowledge on the issues and options. Views may not be final therefore and some residents will wish to provide a more considered/detailed view by way of a personal representation on-line or on paper.

##### What our response is

These general issues are noted. A key issue to address will be linkages with adjoining districts and the need to support ongoing regeneration. The importance of the green belt is noted but this needs to be balanced against development needs, as was pointed out in the comment relating to the need for more jobs and homes. It was recognised that people attending the meeting may not have had chance to look in detail at the document but could submit final view up until the end of the consultation

##### What we propose to do

These views will be taken account of in the preferred options and a number of the issues raised have been covered within the relevant sections within this document.

#### Economy

##### What you said

- Borough has poor quality jobs. There is too much reliance on distribution and warehousing.
- People will need to commute outside Heywood and there is a need to ensure good transport to access higher paid/skilled jobs in Manchester and elsewhere.
- Can we require specific employment types?
- Need to make better use of land for employment and provide more jobs per hectare.
- It will be difficult to resist more distribution and warehousing on greenfield sites if such sites were allocated.
- Some more local jobs are needed though. We should consider employment opportunities in the centre.
- Some people are supportive of greenfield development (even green belt) for employment development provided the green belt could still function effectively.
- Others are opposed to greenfield development especially those residents living near site options south of Heywood and those whose homes would be affected.

- How do we encourage more people working from home and being able to operate from smaller premises because of new technology and how will this affect the employment land requirement?
- Part of zones 7, 8 and 9 shown for potential new development has recently been approved as a tip.

### **What our response is**

The comments are noted. Detailed responses to these and other points are given within the Economy – Issues and Options section of this document. Some of the specific points made regarding home working are difficult to address within a Core Strategy.

### **What we propose to do**

These views will be taken account of in the preferred options and a number of the issues raised have been covered within the relevant sections within this document.

## **Housing**

### **What you said**

- There is a need more social housing in Heywood, and there is a demand for bungalows to meet needs of elderly (Heywood has a high proportion of elderly residents compared with other parts of the Borough).
- There is a need for a better range of housing.
- There is no point building houses that are £250,000 or more when nobody can afford them.
- Why build more houses in Heywood when statistics show that the population is going down and people are leaving the town?
- What has happened to the land at Gort Sand Pit given that it has not been developed?
- Housing in Heywood is relatively cheap but in terms of new housing there is still a need for affordable homes.
- More control is needed over the types of housing being built. It is not a good idea to keep building lots of flats / apartments and not supportive on the market leading on house type and design - strong guidance required on these without being prescriptive.

### **What our response is**

The need for a wider choice of housing in terms of type, size and tenure is recognised and will be a focus of the Core Strategy. One of the objectives of Masterplanning work undertaken in Heywood is to reverse the population decline and one way to do this is to provide more, good quality housing of a type which retains and attracts residents. Whilst affordability is an issue there is also a need for some higher value homes to widen the appeal of the town. The aim to ensure developments provide an appropriate mix of dwellings on sites should address the concerns regarding apartments

### **What we propose to do**

It is intended that the policies within the Preferred Options document will focus on delivering the right types of housing as well as ensuring the provision of affordable housing.

## Town Centre

### What you said

- Regeneration should be focussed on the town centre and areas around it.
- Good pedestrian routes and quality open spaces are important.
- More pedestrianised areas should be created.
- Suggestion for a new market

### What our response is

These comments are noted

### What we propose to do

It is intended that these policies will be picked up in policies relating to Heywood town centre and any associated masterplans / regeneration schemes.

## Transport

- Heywood and the Borough need better rail links to Manchester
- Metrolink should be extended to Heywood
- There is a need to improve bus reliability and journey time (e.g. it takes too long to get to Manchester. The Transport Innovation Fund (TIF) bid will only offer additional buses; not more routes
- A new highway link to Junction 19 would divert HGVs from residential areas and town roads.
- ELR should be extended and developed as a commuter link. The area around the station should be regenerated. A big issue is how to link a 'destination' at the station with other parts of the town.
- Heywood could have been on a good rail link, but losing the old line between Bolton and Bury means that the opportunity was lost.
- The Caldervale train line is poor compared to other train routes and changes may mean that some stops are missed out to provide a quicker service.
- Is there potential to use access to and from Birch Services for HGV's so that heavy traffic to and from Heywood Distribution Park avoids the town centre. This would require the upgrading of existing roads and the services junction with M62. A similar route from the M6 services near Lancaster was cited as an example.
- Some bus services are good but need for a better 'hub' in Heywood. Also some direct services seem to have been lost e.g. Darnhill to Rochdale,
- Any accident on the M62 gridlocks Heywood – is there any opportunity to prevent this?

### What our response is

These points are noted. The importance of improvements to transport within Heywood are recognised, particularly the need for better bus services / facilities, the role of ELR and the need for better traffic management.

### What we propose to do

The points raised here will be taken account of within the relevant transport policies of the preferred options document. Where appropriate, these issues will also be picked up in the relevant town centre, economy and regeneration based policies.

## Environment

### What you said

- Taking Green Belt land around Heywood for development means the loss of food producing land which subsequently increases food miles.
- Following incidents of flooding / high water, the land adjacent to the River Roch is covered with rubbish and litter – need for United Utilities to improve filters around storm drains, sewers etc.

### What our response is

The agricultural land around Heywood is fairly low grade and although the point regarding sustainable food sources is a valid one, it is not a key issue in this case. The importance of taking account of fluvial and surface water flooding is noted.

### What we propose to do

The issue of managing water resources and flood risk will be addressed through policies in the preferred options document.

## Summary of comments from Middleton Township Workshop – 25<sup>th</sup> September 2008 - Middleton Civic Centre

## Economy

### What you said

- Middleton has highest population working outside the Borough (e.g., Manchester) and therefore needs improved access to employment in Manchester (both high and low paid)
- Employment opportunities exist in Heywood but few Middletonians work in Heywood. Is this due to transport difficulties?
- Middleton itself has limited employment opportunities, especially skilled jobs
- Stakehill and Kingsway are not easily accessible to many people in Middleton
- The town centre could accommodate more jobs
- The town centre needs further regeneration.
- If Greenfield land needs to be released to meet housing/employment needs, land at Langley Lane is preferable to land east of Heywood Old Road (south of Bowlee).
- The release of land at Hareshill Road, Heywood could assist Middleton's need for future employment.

### What our response is

Access to jobs from Middleton is a key issue to address. As the comments note this is as much to do with better links to existing / proposed developments in Manchester, Heywood and Kingsway than it is to new provision within Middleton. However, the possibility of more jobs in Middleton, particularly in the town centre, is noted.

### What we propose to do

As well as possible new provision of employment, policies within the preferred options will address better access / links to jobs across the borough and in adjoining districts.

## Housing

### What you said

- Housing regeneration priorities are Middleton and Hollins. Longer term, areas north of the town centre and parts of East Middleton should be regenerated.

### What our response is

Comments noted.

### What we propose to do

Policies will focus on regeneration particularly that which is housing led.

## Transport

### What you said

- Buses to Manchester are too slow
- Metrolink should be extended to Middleton
- If congestion charging is introduced, demand for car parking in Middleton will need to be carefully managed.
- Mills Hill station needs improved parking, but land is within Oldham MBC. There is massive potential demand to use Mills Hill station.
- A park and ride station at Stakehill would avoid extensive parking at Mills Hill or elsewhere in Middleton if congestion charging is introduced.
- Transport gateways, corridors need to be improved, i.e.
  - between Langley and the town centre
  - through conservation area
  - Oldham Road corridor

### What our response is

These comments are noted. It is important to improve the quality of, and access to, public transport across the borough. The issue regarding Mills Hill and bus services to Manchester is particularly important in order to reduce car journeys. The main issue with many of the points made is resources.

### What we propose to do

Many of the points made are covered within the transport section of this document and will be considered in developing the transport policies within the preferred options documents

## Conservation

### What you said

- More should be made of Middleton's heritage and buildings in terms of improving image, tourism, historic associations and maintaining character of area.
- Open spaces should be improved using developer contributions where possible.
- Hopwood Hall needs a scheme to improve/safeguard the future of the listed hall.

### What our response is

The importance of heritage and open space is noted and is covered in more details in the relevant sections of this document

### **What we propose to do**

Focussing on the heritage assets of Middleton and the need to improve the boroughs open space will be key priorities within the relevant policies of the preferred options document.

## **Community Facilities**

### **What you said**

- Developments in the town centre will help to improve the shopping 'offer' but Middleton Gardens needs to be improved to create an attractive town centre environment and to link Tescos with the shopping centre.
- A new health facility in the centre will be welcomed.

### **What our response is**

The issues raised are points of detail that should be properly addressed through the planning application for the Tesco store. The importance of supporting new health provision where there is demand is noted.

### **What we propose to do**

The relevant town centre and health policies within the preferred options take account of these comments.

## **Summary of comments from Pennines Township Workshop – 2<sup>nd</sup> October 2008 – Littleborough Coach House**

## **Economy**

### **What you said**

- A number of employment sites have been lost in Littleborough – predominately to housing.
- Not much development has taken place on Kingsway. Doubts that it will deliver the number of jobs promised.
- Need for light industry and not warehousing which generally provides fewer jobs for the amount of land developed.
- Need for lower cost business units as currently rents are too high.
- Is there potential to encourage 'home-working' to reduce development and congestion.

### **What our response is**

Whilst much of Pennines is not an appropriate location for new large scale employment development, it is important to retain and enhance quality sites and premises.

### **What we propose to do**

It is intended to focus the Spatial Strategy on retaining good quality employment sites in the north of Pennines. There may be more opportunities for new development in the south of the township. The importance of links to jobs elsewhere and the type / mix of employment development will be addressed through the relevant policies

## Housing

### What you said

- Too many houses have been built in the area and the supporting infrastructure cannot support it.
- Don't want further housing growth.
- There has been very little affordable housing.
- The accommodation does not meet the needs of elderly people. For example none of the new development contains bungalows and there is a large demand for these in the area.
- Why is the authority still allowing residential development when it appears obvious that local infrastructure (particularly in terms of roads and local facilities) cannot support it.
- Need a more integrated approach to development and facilities.
- Why is the Council still pursuing residential development on the TBA site given the levels of contamination on the site?

### What our response is

A number of large sites have recently come forward in this area and there are some significant brownfield sites that have planning permission (e.g. Birch Hill Hospital and Akzo). However, the issues regarding congestion and infrastructure are noted and these have been taken account of in devising the Spatial Strategy options. The importance of mix and meeting the needs of specific groups has been raised elsewhere in this report.

### What we propose to do

The preferred Spatial Strategy is likely to take account of the issues regarding the ability of parts of the borough to accommodate significant development. In addition, an important aspect of the Core Strategy will be to ensure that new development has the appropriate infrastructure to serve it.

## Transport

### What you said

- The A58 is congested at peak times and cannot cope with existing traffic let alone the new developments at Akzo, Birch Hill etc.
- The A58 has been narrowed at some points which has added to the problem, especially when buses stop at bus stops that do not have a lay-by.
- A new senior school in Littleborough would help to reduce congestion.
- Calderbrook Road which could help to alleviate some of the congestion through Littleborough has not been re-opened (see related comment under renewable energy).

### What our response is

These points are noted and have been considered in the transport section of this report and in developing the preferred spatial strategy.

### What we propose to do

The preferred Spatial Strategy has been informed by issues of accessibility in the north of the borough and will be addressed in the relevant policies of the preferred options document.



## Renewable Energy

### What you said

- Concern over access to the proposed windfarm. Particular issue is transporting any turbines up Calderdale Road which is currently closed.

### What our response is

Comment is noted.

### What we propose to do

This is a specific issue that will have been considered as part of the Public Inquiry into the wind farm proposal.

## Community facilities

### What you said

- Always the last in line when it comes to local facilities.
- There is a need for a new secondary school in Littleborough, particularly given the amount of new homes that have been built.
- Need for a theatre in the area.
- No swimming pool in the area. Whilst there is a facility at Wardle High School this is only open to the public for short, specific times.
- Need to improve the centre of Littleborough if the area is to become more of a tourist destination.

### What our response is

These comments are noted. The issue of community facilities is linked to the need for appropriate levels of infrastructure and demonstrated need.

### What we propose to do

Issues regarding the provision of community facilities and enhancing the role of the town centre as a tourist destination will be addressed through relevant policies within the preferred options document. However it should be noted that the provision of some facilities e.g. theatres, does rely on commercial viability.

## Summary of comments from Rochdale Township Workshop – 22<sup>nd</sup> September 2008 – Rochdale Town Hall

## Spatial Options

### What you said

- There will need to be a focus on regeneration in Rochdale township for many years to come. Examples include areas around Rochdale town centre, Sparth, South Rochdale, Deeplish & Milkstone, East Central Rochdale and public housing estates.
- Greenfield sites are required to provide land for quality (upper market housing)
- Greenfield sites in the west of the Borough are needed to provide good quality employment sites to balance with Kingsway Business Park.

### What our response is

The importance of focusing on existing and proposed regeneration areas is recognised. Whilst greenfield sites can provide high value housing it is important that

they do not come forward in a way which undermines regeneration. Any greenfield sites considered for housing or employment will need to take account of need and may need to be phased to ensure they do not effect the delivery of regeneration.

#### **What we propose to do**

Policies within the preferred options document will place an emphasis on regeneration, including a focus on specific areas within the borough. Any proposals for greenfield development will be considered against the delivery of regeneration priorities.

### **Environment**

#### **What you said**

- Green Infrastructure is critical to support growth in terms of access to greenspace and for protection of resources, flood management etc. Roch Valley is an asset which should be made more accessible.
- The quality of some green open spaces is very poor. Some should be developed. Others need major investment. New development should help fund improvements.

#### **What our response is**

The importance of green infrastructure is noted. This and the quality of open spaces in the borough is covered elsewhere in this report.

#### **What we propose to do**

These comments will be addressed within the relevant policies of the preferred options document.

### **Transport**

#### **What you said**

- Priorities for transport improvements are:
  - Rochdale Station (major interchange) and Castleton station
  - Castleton station and extension of East Lancs Railway to link with main commuter lines.

#### **What our response is**

These comments are noted and are recognised as important priorities in terms of transport and access within the borough and beyond.

#### **What we propose to do**

These comments will be addressed within the relevant policies of the preferred options document. In terms of implementation, the availability of resources will be a key issue

### **Image**

#### **What you said**

- Why aren't there signs on M62 to point to Rochdale/Greater Manchester?
- Gateways and corridors should be the focus for regeneration/improvement. Priorities are Oldham Road, Rochdale, parts of A58 (Rochdale/Littleborough), Heap Bridge, approaches to town centres, Sudden roundabout area.

### **What our response is**

The issue of motorway signs is the responsibility of the Highways Agency. The need to enhance gateways and corridors is recognised in order to improve the overall image of the borough, both to residents and visitors

### **What we propose to do**

We intend to include a focus of gateways and corridors within our policy dealing with image.

## **Consultation**

### **What you said**

- A leaflet should have been distributed to every household in the Borough. Press publicity has been poor.

### **What our response is**

This criticism is noted and attempts will be made to rectify this for future consultation stages.

### **What we propose to do**

For the preferred Options consultation we intend to use the Council's magazine 'Local Matters' to publicise the consultation and workshop events. This magazine is delivered to every household in the borough.

### **Additional Boroughwide Workshop – 22<sup>nd</sup> October 2008 – Touchstones, Rochdale**

In addition to these Township workshops an additional workshop for all residents in the borough was arranged. This workshop was well attended and included residents from across the borough, particularly south Heywood. The comments raised at this workshop generally reiterated the comments raised at the individual Township workshops and through the on-line consultation. Therefore these have been addressed through our responses elsewhere in this report.

## **Appendix 2 – Comments from Limehouse consultation**

Comment ID	Consultee Full Name	Consultee Organisation Details	Agent Name	Agent Organisation Details	Comments
<b>Core Strategy Issues and Options – General</b>					
183	Sarah Burgess	Senior Planning Advisor CABE			Thank you for consulting the Commission for Architecture and the Built Environment (CABE). Unfortunately due to limited resources we are unable to comment on this document. However we would like to make some general comments which you should consider. 1. Design is now well established in planning policy at national and regional levels and LDFs offer an opportunity to secure high-quality development of the right type in the right place at the right time. 2. Robust design policies should be included within all LDF documents and the Community Strategy embedding design as a priority from strategic frameworks to site-specific scales. 3. To take aspiration to implementation local planning authorities' officers and members should champion good design. 4. Treat design as a cross-cutting issue – consider how other policy areas relate to urban design open space management architectural quality roads and highways social infrastructure and the public realm. 5. Design should reflect understanding of local context character and aspirations. 6. You should include adequate wording or 'hooks' within your policies that enable you to develop and use other design tools and mechanisms such as design guides site briefs and design codes. We have attached some key questions to consider throughout the development of your Core Strategy document. You might also find the following CABE Guidance helpful. · "Making design policy work: How to deliver good design through your local development framework" · "Protecting Design Quality in Planning" · "Design at a glance: A quick reference wall chart guide to national design policy" These and other publications are available from our website <a href="http://www.cabe.org.uk">www.cabe.org.uk</a>
149	Unknown	Miller Homes (Strategic) North West	Mr Leon Armstrong	Planner Mosaic Town Planning	PPS3: Housing - Where need and demand are high it will be necessary to "identify and explore a range of options for distributing housing including the managed growth of settlements in urban areas where necessary." (Parag.37) - The Government's objective is to "ensure that the planning system delivers a flexible responsive supply of land. Reflecting the principles of 'Plan Monitor Manage' Local Planning Authorities and Regional Planning Bodies should develop policies and implementation strategies to ensure that sufficient suitable land is available to achieve their housing and previously-developed land delivery objectives." (Parag.62) - With regard to supply guidance states that "Allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. In these circumstances an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment historic windfall delivery rates and expected future trends." (Parag. 59) - Local Planning Authorities are also encouraged to identify "a further supply of specific developable sites for years 6-10 and where possible for years 11-15. Where it is not possible to identify specific sites for years 11-15 broad locations for future growth should be indicated." (Parag.55) North West Regional Spatial Strategy -

					<p>Policy RDF1 – Main Development Locations states that “Plans and strategies will support the concentration of most new development in the region within the urban areas of the Regional Centres Regional Towns and Cities identified in Table 7.1 in particular to maximise the growth opportunities presented by the...city region...of Manchester... and to support development in the regional towns and cities in City Regions to secure urban regeneration and economic growth that is complementary to the Regional Centres.” Settlement Hierarchy – Regional Towns and Cities...Rochdale. (Table 7.1) - Policy L4 – Regional Housing Provision advises that “Local Authorities should monitor and manage the availability of land released in plans and strategies and through development control decisions on proposals and schemes to achieve as a maximum the housing provision (net of clearance replacement) set out in Table 9.1...(b) Pennine Manchester...support for potential economic growth and regeneration particularly in Housing Market Renewal Pathfinder areas; including replacement and renewal of housing stock and where appropriate the development of a wider range of housing types (including high quality market housing). This should be achieved while ensuring that local and affordable housing needs can be met elsewhere. (table provided) - Policy MCR4 – Northern part of the Manchester City Region refers to “Plans and strategies within the northern parts of the city region will secure improvements that enable the area to compete more effectively for economic investment now and in the future helping to achieve significant improvements in its productivity and to support its long-term regeneration. This will involve...focusing economic development at locations accessible by public transport...Improving public transport links between the northern towns and Regional Centre...The expansion of the quality and choice of housing in line with the approach set out in policy L4.</p>
392	Les Morris	Town Planner National Grid			<p>The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK’s energy infrastructure during this period. There will be a requirement for;</p> <ul style="list-style-type: none"> <li>- An expansion of national infrastructure (e.g. overhead power lines underground cables extending substations new gas pipelines and associated installations).</li> <li>- New forms of infrastructure (e.g. smaller scale distributed generation gas storage sites).</li> </ul> <p>Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes. We therefore wish to be involved in the preparation alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues;</p> <ul style="list-style-type: none"> <li>- Any policies relating to overhead transmission lines underground cables or gas pipeline installations</li> <li>- Site specific allocations/land use policies affecting sites crossed by overhead lines underground cables or gas transmission pipelines</li> <li>- Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations</li> <li>- Any policies relating to the diverting or undergrounding of overhead transmission lines</li> <li>- Other policies relating to infrastructure or utility provision</li> <li>- Policies relating to development in the countryside</li> </ul>

					- Landscape policies - Waste and mineral plans In addition we also want to be consulted by developers and local authorities on planning applications which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.
549	Mr John Pilgrim	Senior Planning Executive Yorkshire Forward			Thank you for seeking Yorkshire Forward's comments on the above document. We welcome the opportunity to participate in the development of local planning policy within Yorkshire and the Humber's neighbouring authorities as part of our statutory consultee role. In this instance however we do not have any comments to make on the Core Strategy Issues and Options consultation. We look forward to future opportunities for involvement in the ongoing LDF preparation process.
266	Mr Dave Arstall	Spatial Development Manager Government Office North West			General In accordance with PPS12 (paragraph 4.1) the emerging document will need to incorporate a delivery strategy for the achievement of its objectives setting out how much development is intended to happen where when and by what means it will be delivered. Paragraph 4.8 advises further that the core strategy should be supported by evidence of what physical social and green infrastructure is needed to enable the amount of development proposed for the area taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations. Your attention is drawn to PPS12 paragraph 4.11 which says that infrastructure planning for the Core Strategy should include the specific infrastructure requirements of any strategic sites which are allocated in it. In accordance with PPS3 the Core Strategy should illustrate the expected rate of housing delivery through a housing trajectory for the plan period and should also include a previously-developed land trajectory (paragraphs 55 and 43 of PPS3 respectively). As the Plan progresses you will also need to consult on the scope of any development management policies which are to be included bearing in mind that these need to be genuinely required and add a specific local dimension rather than simply repeating national policy. We would also strongly encourage you to make use of the LDF self assessment guidance available for the Planning Advisory Service at <a href="http://www.pas.gov.uk/pas/core/page.do?pageId=14614">http://www.pas.gov.uk/pas/core/page.do?pageId=14614</a>
267	Ms Joanne Macholc	Deputy Strategic Planning Manager Lancashire County Council			General Observations I note that some of the spatial options include high levels of development. In relation to housing this could mean a housing requirement of 20% above the RSS requirements (housing option H1B). I note also that there is reference to a review of greenbelt boundaries in relation to some of the spatial options. Finally I note that the report recognises the pressures for renewable energy (particularly wind energy) on the South Pennine Moors but that it also recognises that such development could affect the natural carbon sink function of peatlands as well as landscape character. I do not wish to make any further observations at this stage. I look forward to being consulted at further stages in the Core Strategy process.
435	Ms Debra	Regional			In terms of conformity with RSS the Core Strategy should be inline with the spatial principles

	Holroyd	Planning Officer 4NW			and framework within RSS particularly policies as follows: DP 1 – 9 and Policy RDF1 2 and 4 these polices set out the broad locations of development and the main development principles for the region.
268	Miss Rachael Bust	The Coal Authority			As you will be aware Rochdale is an area where former coal mining activities have taken place. This will have led to an environmental legacy which includes shallow mine workings which have the potential to collapse if disturbed by other ground movements and development activities; there is also rising minewater which is normally controlled. There will also be mine entries which may be located under Local Authority owned property existing developments or under potential new allocations in due course. For example mine entries and shallow mine workings can often be present yet undetected until the surface is disturbed and then there is a collapse leaving an open shaft or area which will contain asphyxiative mine gases which can cause a public safety hazard. In these instances the 24hr/365day call out service provided by The Coal Authority should be called. The Coal Authority would strongly recommend that the issue of mining legacy is considered during the preparation of the Core Strategy and any site specific documents which may be produced in due course. Should you require any further information or wish to discuss the matter please do not hesitate to contact us either by email or telephone. In the meantime I hope that these comments although brief raise your awareness of the need to consider mining legacy and other land stability issues as advised by PPG14.
430	E Tierney				An innovative & creative response to urban blight in Yorkshire street and Drake street is needed urgently. Building a 3rd shopping centre is a waste of public money at a time when careful husbandry is required. As much of the housing developments wit in the Borough in the last 25 years have been on green field sites which have only limited public transport options – this has meant almost ‘gridlock’ in parts of the locality at key times during the working day. Planners have allowed development unchecked in parts of the Borough restricting public access to open spaces and destroying a sense of community.Few public facilities are incorporated into developments Kingsway Business Park is an exception. Rochdale Town Centre is an unmitigated disaster with retail consisting of charity or phone shops.
383	L Walsh				With reference to your publications ‘Have Your Say’. It does seem that very little time has been given to the majority of people who may want to register their feelings. The copy to which I have access was only put through the door of a neighbour two days ago and you want all representations in by the 7th. No forms were available at libraries two days ago.
371	J Grimshaw				All people and businesses in areas should be informed of all meetings. Leaflets should be hand delivered to ensure everyone knows.
364	Mr F Greaves				‘Have your say’ what a laugh. As usual we get very fine brochures telling us nothing and when we try to see and digest the real information and reports we are told we have to pay for them. All at very short notice all cut & dried as usual.
559	Ms Nicola	Council Liaison	Ms Carolyn	Senior	We do not have any specific issues or options for inclusion in the Council's Core Strategy



	Davies	Manager Mobile Operators Association	Wilson	Planner Mono Consultants Ltd	however we would take this opportunity to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Development Framework. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through PPG8 which provides clear guidance as to the main issues surrounding telecommunications development. These include the legislative framework siting and design issues levels of consultation and issues surrounding electromagnetic fields (EMFs). Clear guidance is also given regarding what should be included within local plan (now LDD) policy.
<b>Introduction</b>					
21	Mrs Pat Donald				I do not think you should include addresses on the web-site because telephone numbers can be found with names and addresses. Just the district should be enough.
<b>Spatial Portrait - General</b>					
186	Ms Judith Nelson	Regional Planner English Heritage - North West Region			The spatial portrait for the Borough emphasises that each of the four townships has its own distinctive character and identity and whilst the section on Quality of Place gives some feel for the character and appearance of the Borough this is not fully expanded upon in the later sections on the townships in terms of their historic environment. In relation to the fact box up to date information can be gained from the 2008 editions of Heritage Counts and the Heritage at Risk Register.
165	Mr Brian Green	Regional Planning Manager Sport England North West			Sport England considers that the spatial portrait whilst possessing a significant amount of detail across a number of topics fails to acknowledge the contribution made by sport and active recreation to a good quality of life in Rochdale. More direct reference to sport and active recreation both facility-based and through informal opportunities (notwithstanding the current references) would help to give a more rounded perspective to the qualities of the Borough and provide an introduction to what should be a wider aspiration to promote more active and hence healthier lifestyles.
<b>Spatial Portrait – Location and Setting</b>					
164	Mr Brian Green	Regional Planning Manager Sport England North West			Sport England considers that the spatial portrait whilst possessing a significant amount of detail across a number of topics fails to acknowledge the contribution made by sport and active recreation to a good quality of life in Rochdale. More direct reference to sport and active recreation both facility-based and through informal opportunities (notwithstanding the current references) would help to give a more rounded perspective to the qualities of the Borough and provide an introduction to what should be a wider aspiration to promote more active and hence healthier lifestyles.
395	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands &			Map 3 page 11 - The title given to this map is a little uncharitable. At the very least it might more properly be headed up "Floodzone/Air Quality Constraints and Environmental Assets". Even then it would be sensible to add a note to the box containing the legend that not all environmental assets are shown as some such as Listed Buildings are too small to be

		NW) The National Trust			identified individually.
286	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	We support the identification of Heywood as one of the Borough's main urban settlements. We support the identification of Heywood Distribution park as a major business location for Heywood Township and confirm that there is a large amount of land within the Park that is available for employment development. We would also suggest that reference to the proposed SPZ at HDP should be made here in order to highlight the benefits of the scheme.
287	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	We support the identification of Heywood Distribution Park on Map 2 as a Major Industrial Location
<b>Spatial Portrait - Economy</b>					
485	Ms Debra Holroyd	Regional Planning Officer 4NW			The use of maps clearly highlights the spatial distribution of the Local Authorities key employment sites. 4NW welcomes the identification of Kingsway Business Park as a key employment destination. 4NW also welcomes the identification of a range of relevant economic studies as part of the evidence base.
<b>Spatial Portrait - Housing</b>					
440	Ms Debra Holroyd	Regional Planning Officer 4NW			The work carried out by 4NW on Housing Market Areas recognises Rochdale as part of the Greater Manchester North East HMA (along with Oldham Tameside and a small part of Manchester City Centre). The regional work recognises this housing market as an area where GVA per head has been historically low reflected in current relatively low levels of earning and skills levels and occupational structure of the residents. This history of the area has had a direct impact on the local tenure pattern with a disproportionately large social rented sector compared with the regional average. The demand for social housing papers to have been increasing in tandem with the price of terraced housing which has become increasingly unaffordable for lower income groups. The ethnic composition of the housing market area is projected to change significantly over time driven both by net out-migration and natural growth within local communities. The process is predicted to continue in the future and is likely to result in a changing pattern of demand for property by type and location. Significant growth in future income levels would impact on the tenure structure of the locality in the long term. (Regional Strategic Housing Market Assessment August 2008) While these trends have been identified for the wider housing market area there will be variations within the area and we welcome the identification of local housing market areas within the issues and options document.
486	Mr Daniel Kershaw	Russell Homes			HOUSING 3.1 It is acknowledged that the Borough is made up of distinct housing market areas with different housing issues. The inner urban areas of Heywood Middleton and Rochdale vary considerably from the outer suburban areas of Norden Bamford and Alkington and the existence of these distinct housing areas means that there is polarisation in the character and quality of residential areas within the Borough. 3.2 The inner urban areas reflect

					the characteristics of a weak housing market and high levels of deprivation which include low house prices poor quality housing a dominance of terrace properties overcrowding neighbourhood problems such as high levels of crime a lack of children's play and amenity spaces and proximity of bad neighbour industrial uses that are a legacy of the historic manufacturing base within the Borough. 3.3 The character of the outer suburban areas is very different with higher house prices and an improved environmental quality. 3.4 It is agreed that the Borough does not have enough housing of the right size type tenure and quality to meet the current demand for the anticipated population increase to 217 000 people at the end of the Framework period. 3.5 Housing stock in the Borough is made up predominately of terrace properties (39%) with nearly a quarter of all houses dated before 1919 and 29% of terraced houses considered unfit for human habitation. Of all the townships within the Borough Heywood has the highest proportion of terraced properties with up to 46%. It also has a considerably reduced percentage of suburban better quality houses where there is considered to be a lack of supply.
<b>Spatial Portrait – Quality of Place</b>					
396	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			The items drawn out here relating to the built heritage of the Borough and tourism are useful and agreed; however it fails to capture any essence of the wider character of the Borough in particular its landscape assets. These are a key component and it is requested that a suitable addition is made. (Alternatively some additional information could be added in to the section on Green Infrastructure – page 22.) In addition this section should include background information about the archaeological resource of the Borough – specifically any individual Scheduled Monuments and the general extent and nature of entries in the Sites and Monuments Record.
<b>Spatial Portrait – Climate Change, Pollution and Natural Resources</b>					
56	Mr David Hardman	Asset Protection United Utilities			Flooding danger will increase with inappropriate development. When considering development design surface water should be separated and run-off rates reduced by attenuated by sustainable measures to mimic natural processes. The Planning Authority should work with the various agencies to manage surface water disposal to prevent flooding locally and further downstream in the Irwell and Mersey catchments.
281	Ms Alison Truman	Planner (North-West) British Waterways			British Waterways is pleased to note that Map 2 (Setting the Scene) clearly indicates the line of the Rochdale Canal. British Waterways is also supportive of the general recognition in this section of the role of the restored canal as a leisure and recreation resource a catalyst for regeneration and ecological asset and of the need to improve and encourage access to it. British Waterways is also pleased to note that Map 3 (Constraints) illustrates the Rochdale Canal Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) designations. However it should be noted that these designations only extend as far as Littleborough although the remainder of the canal to the north is locally protected as a Site of Biological Importance. The designations recognise the presence of a diverse assemblage of aquatic flora notably floating water-plantain (luronium natans) - a UK and European protected species - and 9 pondweeds. The significance of these designations should be given greater

					prominence in the Core Strategy reflecting the requirements of the Habitats Regulations in terms of assessing the impact of any development proposals on the integrity of the SAC/SSSI. It should be clarified at this early stage that the allocation of any development sites in the vicinity of the canal will require the competent authority to carry out an appropriate assessment of the likely effects on the designated site both individually and “in combination” with other identified plans and projects.
<b>Spatial Portrait – Accessibility and Sustainable Transport</b>					
106	Ms Rosemary Olle	Senior Land Use Planner GMPTE			The comments above relating to the Background Paper also apply here including (page 21) reference made to Kingsway Business Park Metrolink stop which is subject to developer funding.
<b>Spatial Portrait – Green Infrastructure</b>					
83	Mr David Finch	Volunteer Project Officer Lancashire Wildlife Trust			As recognised in the document Rochdale is an important area for wildlife and biodiversity with many water bodies river valleys woodland and large areas of moorland and other open spaces. Fact Box – Green Infrastructure in the Spatial Portrait outlines this. Reference is also made to the importance of this in Fact Box – Climate Change Pollution and Natural Resources and conservation of the moorland peat bogs is a key factor in the amount of carbon dioxide produced in the borough. This has already come under pressure with the development of wind-farms and could well come under increased pressure in the future.
85	Mr David Finch	Volunteer Project Officer Lancashire Wildlife Trust			In Rochdale Greenspace Corridors which facilitate the movement of wildlife from one wildlife habitat to another play an important part in maintaining and enhancing biodiversity in the borough and in the conservation of wildlife. This is recognised on page 29 in reference to the Pennines but it is also particularly important in relation to the townships where wildlife habitats tend to become fragmented. For these reasons every effort should be made to retain or even enhance Greenspace Corridors
177	Mrs Janet Belfield	Planning Specialist Natural England			We welcome such a comprehensive portrait and in particular are pleased to see references to environmental assets including designated sites; national trails and land designated for open access; and nature reserves. We welcome recognition that whilst much of the borough had good access to green spaces and the natural environment there are some parts where access is poor and requires significant improvement. We note that the report does not thoroughly cover geology/geomorphology or Regionally Important Geological and Geomorphological Sites (RIGS) and we would welcome this being included. We would also welcome references to Biodiversity and in particular protected species along with reference to the Greater Manchester Biodiversity Action Plan. We would also welcome greater reference to landscape character and the particular character areas that the borough falls within i.e. the Southern Pennines and the Manchester Pennine Fringe.
225	Ms Helen Little	Policy Adviser, Environment			this landscape is delivered by the land managers and farmers whose businesses and assets. It is important that appropriate development in rural areas of the Borough is not stifled in an

		NFU North West Region			attempt to preserve a landscape that has historically and will continue to evolve in the future. Indeed it is imperative that sympathetic development is permitted to assist rural businesses in diversification and expansion activities in order to contribute to the economy of the Borough.
<b>Spatial Portrait – People and Community</b>					
397	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			It would be helpful if the fact box or the text that followed included information on the current population of the Borough in order to put some of the other figures into context (although included in fact box on page 7 it would be helpful to re-state it here).
<b>Spatial Portrait – The Townships Fact Box</b>					
469	Mr Iain Gerrard	Secretary Littleborough Civic Trust			As a matter of fact we would question the land areas attributed to the four townships. The figure of 22% for the Pennines did not appear to us to be correct and this would seem to be borne out by looking at the adjacent map where the Pennines area is shown as close to that of the Rochdale Township while Heywood -- also described as having 22% of the total land area -- is clearly barely half the size. This may appear to be a niggle but if it is an incorrect set of figures for this fact then it opens up the possibility that less easily checked figures in the table may also be incorrect.
<b>Spatial Portrait – Middleton</b>					
2	Unknown	Kirkland Developments Ltd	Mr Richard Moffat	Director Lambert Smith Hampton	The fact that the document recognises the loss of retail trade from Middleton to other retail locations outside the Borough is welcomed. The Strategy does however need to acknowledge the potential for new retail development to bring about the regeneration of sites on the edge of Middleton provided they are in highly sustainable locations in close proximity to means of transport other than the private motorcar
22	Mrs Pat Donald				I am surprised that no mention has been made of the millions of pounds spent by Bowlee Park Housing Assoc in refurbishing their properties which has made an immense difference to the look and feel of the estate.
<b>Spatial Portrait – Pennines</b>					
470	Mr Iain Gerrard	Secretary Littleborough Civic Trust			Also as a matter of fact the reference to Hollingworth Lake being 'near' Littleborough needs clarification as it is in fact 'in' Littleborough. It is good to see that the need for small affordable housing in Littleborough is recognised because as stated earlier the supply of such housing has been conspicuous by its absence in the housing boom of the last ten or more years. We are in agreement that the shopping areas in Littleborough need help to regenerate into significantly useful centres of trade. The opinion that the majority of shoppers go to Rochdale to shop is thought unlikely unless the use of supermarkets is accepted as the bulk of this trend. The denigration of Rochdale's commercial centre is widespread; many people will travel further to Bury to shop if going out of town or into Yorkshire to the market in Todmorden.
<b>Key Evidence</b>					

87	Mr David Finch	Volunteer Project Officer Lancashire Wildlife Trust			<p>The first two objectives of Planning Policy Statement 9 – Biodiversity and Geological Conservation (PPS 9) are particularly important to biodiversity and the conservation of wildlife. These are: • “to promote sustainable development by ensuring that biological and geological diversity are conserved and enhanced as an integral part of social environmental and economic development so that policies and decisions about the development and use of land integrate biodiversity and geological diversity with other considerations.” • “to conserve enhance and restore the diversity of England’s wildlife and geology by sustaining and where possible improving the quality and extent of natural habitat and geological and geomorphological sites; the natural physical process on which they depend; and the populations of naturally occurring species which they support”. Important Key Principles set out in PPS 9 include: “ii) Plan policies and planning decisions should aim to maintain and enhance restore or add to biodiversity and geological conservation interests . In taking decisions local planning authorities should ensure that appropriate weight is attached to designated sites of international national and local importance; protected species; and to biodiversity and geological interests within the wider environment. iii) Plan policies on the form and location of development should take a strategic approach to conservation enhancement and restoration of biodiversity and geology and recognise the contributions that sites areas and features both individually and in combination make to conserving these resources. vi) The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests. Where planning permission would result in significant harm to those interests local planning authorities will need to be satisfied that the development cannot reasonably be located on any other alternative sites that would result in less or no harm. In the absence of any such alternatives local planning authorities should ensure that before planning permission is granted adequate mitigation measures are put in place. Where a planning decision would result in significant harm to biodiversity and geological interests which cannot be prevented or adequately mitigated against appropriate compensation measures should be sought. If that significant harm cannot be prevented adequately mitigated against or compensated for then planning permission should be refused.” Reference is also made to Greater Manchester Biodiversity Plan. It isn’t clear if or how this is being and will be monitored in the future but National Indicator 197 of the Natural Environment and Rural Communities Act 2006 is relevant to this.</p>
108	Ms Rosemary Olle	Senior Land Use Planner GMPTE			<p>GMPTE’s guidance document ‘Land Use Planning and Public Transport’ (section 4) sets out the type of policies we would like to see included in LDFs in order to increase the use of public transport. The document can be found at <a href="http://www.gmpete.com/landuse">www.gmpete.com/landuse</a>. There is also a need to ensure that the policies and proposals relating to Rochdale in the LTP are reflected in and linked to policies in the Core Strategy.</p>
105	Ms Rosemary Olle	Senior Land Use Planner GMPTE			<p>This refers to a number of local policies strategies and studies but there are no transport documents referred to. GMPTE can supply you with a list of relevant background documents should you require this. Work undertaken for the Corridor Partnerships identified the following areas with congestion issues. - A671 South of Rochdale boundary – Royal Oldham Hospital - A640 Rochdale Road Milnrow - Rochdale town centre - A671 Oldham Road (Balderstone –</p>

					Rochdale town centre) - A580 Edenfield Road / Spotland Road Rochdale There is currently Greater Manchester wide transport modelling being undertaken by GMTU to identify the cumulative effect of proposed development in the conurbation. The Core Strategy will need to take account of any issues raised by this transport modelling.
190	Ms Judith Nelson	Regional Planner English Heritage - North West Region			Chapter 3 sets out Key Evidence this could usefully refer to the Oldham Rochdale HMR Pathfinder Heritage Assessment Final Report for Rochdale September 2006; to the 10 conservation area appraisals; and forthcoming information from the Greater Manchester Urban Historic Landscape Characterisation project currently underway.
176	Mrs Janet Belfield	Planning Specialist Natural England			Biodiversity Duty Biodiversity is a core component of sustainable development underpinning economic development and prosperity and has an important role to play in developing locally distinctive and sustainable communities. From 1 October 2006 all local authorities and other public authorities in England and Wales have a Duty to have regard to the conservation of biodiversity in exercising their functions. The Duty aims to raise the profile and visibility of biodiversity to clarify existing commitments with regard to biodiversity and to make it a natural and integral part of policy and decision making. Guidance is available in Defra publication Guidance for Local Authorities in Implementing the Biodiversity Duty <a href="http://www.defra.gov.uk/wildlife-countryside/pdfs/biodiversity/la-guid-english.pdf">http://www.defra.gov.uk/wildlife-countryside/pdfs/biodiversity/la-guid-english.pdf</a> The Duty is set out in Section 40 of the Natural Environment and Communities Act (NERC) 2006 and states that: "Every public authority must in exercising its functions have regard so far as is consistent with the proper exercise of those functions to the purpose of conserving biodiversity". This is a new duty for Local Authorities and we would expect to see references to it in all relevant planning documents including the Core Strategy and its SA.
166	Mr Brian Green	Regional Planning Manager Sport England North West			The citing of the Rochdale Sport and Recreation Strategy is noted but there appears to be no further use made of this document or ready access to it as part the evidence base page on your website. Critically is this Strategy based on a PPG17-compliant assessment of open space and sports facilities? The preparation of a PPG17-compliant assessment of open space and sports facilities is a minimum requirement for underpinning policy and will form an important part of the evidence base when the Strategy is tested at Examination in Public.
230	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			It has been noted that the Strategic Flood Risk Assessment (SFRA) is not included within the 'key evidence' section of the Core Strategy. We would request that this section is amended to include the SFRA. The current Greater Manchester SFRA is only at its first sub regional stage and has yet to undertake a more detailed level two assessment which considers flooding from all sources (Canals Sewers Pluvial etc). Although we accept that work is ongoing to complete the SFRA we would expect that a completed SFRA is in place so that this can inform the sustainability appraisal of the DPD and spatial options. The LPA can then also apply the sequential and exceptions test where necessary. Without a completed SFRA or level 2 SFRA in place the DPD will not be able to adequately apply the sequential test to broad allocations of development/strategic sites or consider flood risk in its entirety. The risk associated with this is in allocating strategic sites which could ultimately be at risk from flooding elsewhere. In considering the broad spatial options we note that some of them include potential

					development sites that are in flood risk areas (Sites 11 and 12). Paragraph 3.39 of the Practice guide to PPS25 states that where land can not be accommodated outside of flood risk areas the scope of the SFRA needs to be widened in a level 2 SFRA. Therefore before the Core Strategy is submitted for examination we would suggest that the SFRA needs to be completed to a level 2 assessment and that the sequential test needs to be applied in order to justify the potential development sites/preferred option. Without the level 2 SFRA being completed at preferred options stage the Environment Agency would object to the DPD. Failure to have the appropriate evidence base may result in the DPD not being considered 'justified' during the test of soundness at the inspection stage. We are keen to continue to work closely with AGMA in respect of ensuring the completion of the final stage of the SFRA as early as possible.
231	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			The document makes no reference to the Water Framework Directive. The Water Framework Directive will have implications for spatial planning and development decisions. Development can contribute to an improved water environment but can also have an adverse impact. Spatial planning bodies can help deliver the Water Framework Directive objectives by adopting policies that contribute to or support measures that need to be put in place to achieve 'good status'. For example new developments (such as new housing) when proposed could be assessed against: - available water resources; - existing capacity for sewage treatment; - the potential environmental impacts discharges of treated effluent might have on receiving water bodies. The Water Framework Directive and the River Basin Management Plan process will be going out for public consultation in regards to the North West River Basin District at the end of 2008. The adoption of a River Basin Management Plan will set out how the whole water environment will be improved in the North West district which encompasses the whole of Rochdale MBC. Therefore we would recommend further information is sought in respect to the WFD and its implications on the LDF. For further information contact <a href="http://www.environment-agency.gov.uk/wfd">www.environment-agency.gov.uk/wfd</a> .
<b>Strategic Issues 1 – Economy</b>					
86	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			It is important to set out as you have the area's profile which must focus upon the need for new investment into the local economy and housing market. All policies within the eventual Core Strategy need to focus their support on economic growth in accordance with the Regional Economic Strategy RSS and your own local strategies. New homes form an important element to this.
192	Ms Judith Nelson	Regional Planner English Heritage - North West Region			The "legacy of old commercial properties" is identified as a strategic economic issue. The Rochdale Heritage Assessment recommended surviving mills as an area for further study and site No. 12 includes the grade II listed Dob Wheel Mill and also Smallbridge Mill. The heritage and townscape value of older commercial properties should be assessed and understood to enable fully informed decisions to be made about their future. The adaptive re-use of buildings which contribute to the distinctive character of the Borough should be promoted.
178	Mrs Janet Belfield	Planning Specialist Natural			Broadly we concur with the content but would want to see them expanded to cover the following issues: 1. value of the natural economy (issue 1);



		England			
453	Ms Sarah Lee	Planner Manchester Airport			The document currently touches on cross-boundary issues such as the Regional Centre and Manchester Airport and generally recognises the important role they play in the North West economy. However when the document considers the finer details in the strategic issues all these points seem to have been forgotten with little or no mention of major opportunities outside the borough. For example Manchester Airport is considered when describing the spatial portrait of the borough as a key economic transport hub accessed from the borough via the M60. However there is no mention of it when considering major opportunities under Strategic Issue 1 - Economy. Manchester Airport plays a key part in attracting investment into the region and is well placed for Rochdale businesses - linking them with overseas markets helping to transport both people and goods win business while also enabling them to grow their contribution to the regional economy. More regard should therefore be given as to how the borough interacts with crossboundary issues such as Manchester Airport and moe importantly how the policy framework can guide development within the borough to fully utilise these assets.
288	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	The issues that are identified in respect of the economy are accepted and we support the identification of Heywood Distribution Park as being a major and successful employment development which assists with providing a good supply of modern premises and associated economic benefits. Rochdale MBC have now confirmed their intention to create a SPZ at HDP recognising it will enhance this role and continue to help meet the economic needs of the Borough in the future.
429	Mr H Davenport				Industrial sites are not full and seem to be underused and there are so many empty houses that the redundant labour force could well be employed in the short term on flood defence work throughout the country.
476	Mr Daniel Kershaw	Russell Homes			THE ECONOMY ISSUES AND OPTIONS 2.1 Rochdale's local economy has been identified as underperforming in comparison to Greater Manchester and the rest of the North West. Unemployment is higher than the National and Greater Manchester rates with a further 3 000 people needing to enter employment in order to close the gap between the Borough and the National Employment rates. The Borough's local economy has an over concentration of manufacturing industries whose employers are typically low skilled and on low wages with an under representation of financial and business services within the Borough. 2.2 Economic forecasts show a likely decline in the manufacturing sector and as such the LDF and Borough Master Plan are looking to identify 21st Century employment sites to support local industry. 2.3 Kingsway is clearly significant in reducing the proportion of unemployment within the Borough as is the retention and protection of other large employment sites within the Borough specifically Heywood Distribution Park and Stakehill Industrial Estate. 2.4 With the shortfall in employment opportunities and the population expected to rise to 217 000 by 2021 it is necessary to allocate sufficient development opportunities to enable the growth of the economy which will facilitate an increase in jobs.

<b>Strategic Issues 2 – Housing</b>					
195	Ms Judith Nelson	Regional Planner English Heritage - North West Region			The housing strategic issue refers to terraced housing and again the heritage appraisal referred to above will be a key part of the evidence base.
179	Mrs Janet Belfield	Planning Specialist Natural England			Broadly we concur with the content but would want to see them expanded to cover the following issues: 1. Regeneration can also deliver benefits for the natural environment
232	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			We would recommend there be a stronger emphasis on ensuring all new development meet from the outset of the core strategy a minimum Code for Sustainable Homes ( <a href="http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf">http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf</a> ) level 3 while the council would look more favourably to developments that meet level 4 or above. This would set a stronger message to all prospective developers the council's desire to drive the sustainable development in the borough and make a major step in tackling the urgent need to address climate change.
<b>Strategic Issue 3 – Quality of Place</b>					
198	Ms Judith Nelson	Regional Planner English Heritage - North West Region			Strategic issue 3 lists a number of issues relating to the historic environment including the need to enhance conservation areas and secure high quality well maintained public spaces. A rather sweeping statement is made about old buildings not being suited to modern needs; here the key issue must be to secure sustainable new uses for buildings which are a key component of the Borough's distinctive character. The section goes on to recognise the untapped potential heritage assets.
180	Mrs Janet Belfield	Planning Specialist Natural England			Broadly we concur with the content but would want to see them expanded to cover the following issues: 1. value of green infrastructure promoting local character and distinctiveness and highlight opportunities for biodiversity and geodiversity (issue 3);
233	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			We would support the identified opportunity of identifying the Roch Valley playing a key role in enhancing the environment. We would encourage any planning applications that capitalise on these opportunities to improve the Roch Valley. The creation and enhancement of habitats adjacent to existing wildlife sites where new habitat can complement and provide a buffer for existing habitat should be promoted. Habitat creation and enhancement towards the achievement of targets in the Greater Manchester Biodiversity Action Plans should also be encouraged through the planning process.
<b>Strategic Issue 4 – Climate Change, Pollution and Natural Resources</b>					
57	Mr David Hardman	Asset Protection United Utilities			Drinking water is a natural resource and the water cycle of production distribution drainage treatment and disposal itself carries a significant carbon footprint. Hence drinking water saving in new and existing housing is important. For new properties achievement of the Code for Sustainable Homes and BREEAM standards should include drinking water saving.
90	Mr David	Volunteer			Strategic Issue 4 refers to the development of wild farms and the loss of carbon dioxide into

	Finch	Project Officer Lancashire Wildlife Trust			the atmosphere when peat is disturbed. This has already been an issue in Rochdale and with government emphasis on generating power from natural sources amongst others it must be expected that this pressure could increase in the future
116	Mr David Finch	Volunteer Project Officer Lancashire Wildlife Trust			Reference is made in this section to “biomass production”. Whilst the use of biomass in order to reduce the use of fossil fuels can be seen to be beneficial there are concerns from a biodiversity and wildlife conservation standpoint. In particular we would be concerned about the effect of monoculture crop production which would be likely to diminish biodiversity. There would also be issues about heavy uses of fertilizers and pesticides
103	Ms Rosemary Olle	Senior Land Use Planner GMPTE			There is no reference to the contribution made by transport to CO2 emissions and pollution. The appropriate location of new development can help reduce the need to travel by ensuring it is accessible by sustainable transport modes.
181	Mrs Janet Belfield	Planning Specialist Natural England			Broadly we concur with the content but would want to see them expanded to cover the following issues: 1. Avoid detriment to the natural environment aspirations for rural diversification and new buildings can also provide opportunities for enhancement of the built and natural environments (issue 4);
227	Ms Helen Little	Policy Adviser, Environment NFU North West Region			There appears to be a concern that diversification will require new buildings which in turn might be detrimental to the natural landscape and biodiversity. This could easily be avoided by employing policies to promote the return of redundant buildings in the countryside for a range of uses including perhaps the work/live type development. This has become increasingly popular for rural dwellers and their businesses as a result of the ‘communication revolution’. The provision of well thought out and designed tourist accommodation would also be compatible with the recycling of redundant buildings contributing to the strategy’s visitor economy aspirations. Thirdly in adopting such a policy young local people wishing to live in the countryside could be offered access to affordable housing allowing them to live as well as work in the Borough.
398	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			It is considered that in addition to the matters identified the following needs to be included (in particular in response to the advice in the PPS1 Supplement on Climate Change relating to adaptation): • Provision needs to be made for the migration of species (both flora and fauna) in response to those impacts of climate change that are now unavoidable.
<b>Strategic Issue 5 – Accessibility and Sustainable Transport</b>					
102	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Suggest rewrite to: “Enhance the quality and coverage of the public transport pedestrian and cycling networks to provide a seamless integrated safe and affordable multi-modal transport system which: - Supports the sustainable delivery of the other strategic land use objectives; - Strengthens and builds upon the borough’s geographical position; - Improves strategic transport links to and from key development and renewal areas; and -Provides good access to jobs shops and essential community services”

475	Ms Sarah Lee	Planner Manchester Airport			Cross-boundary issues shouldn't just be restricted to key economic drivers. Sustainable transport networks successful businesses I business sectors and other activities located within neighbouring boroughs also need to be considered within the core strategy demonstrating how they can be exploited to Rochdale's advantage. Improving accessibility and the need for sustainable transport is also recognised within the document with access to Manchester Airport via the Manchester Hub highlighted as a key issue for the borough within the spatial portrait of the Issues and Options document. However again there is no mention of this issue when considering the options for strategic transport improvements. Airports are a vital part of the national transport infrastructure and work best when well connected to road rail and other transport networks.
425	Mr M Hughes				Mills Hills whilst not in the centre of Middleton is close enough to town centre to become a more serviceable station for Middleton. It is noted that Middleton no longer has a railway station the nearest halt being Mills Hill. This is poorly served since Middleton Junction station is no longer available. I have noticed that on the Manchester Victoria – Leeds line that all the station halts between Bradford & Leeds are continuously in use that the stops between Rochdale and Victoria Manchester are not so. Mills Hill could be a more serviceable station for Middleton public.
<b>Strategic Issue 6 – Green Infrastructure</b>					
58	Mr David Hardman	Asset Protection United Utilities			United Utilities supports the wording of the 5th bullet point in relation to flood risk management needing to manage on site risks and also not increase risk downstream.
115	Mr David Finch	Volunteer Project Officer Lancashire Wildlife Trust			Strategic Issue 6 draws attention to other pressure e.g. economic and housing on the Green Infrastructure. We would expect these pressures to increase in the future and it will be in these circumstances that policies such as PPS 9 and the Greater Manchester Biodiversity Action (GMBAP) will be particularly relevant. It is important that GM BAP in incorporated into planning structures and policies.
200	Ms Judith Nelson	Regional Planner English Heritage - North West Region			Strategic Issue 6 covers green infrastructure and should address the Borough's Registered Parks and Gardens which include three public parks.
175	Mrs Janet Belfield	Planning Specialist Natural England			Amendments have been made to the Habitats Regulations to reflect recent clarification of the status of land-use plans as 'plans or projects' under Article 6(3) & 4 of the Habitats Directive. Natural England is awaiting further guidance on how Habitats Regulations assessment procedures will need to be applied specifically in the case of Local Development Frameworks. In general terms this means that if a land-use plan is likely to have a significant effect alone or in combination on one or more European sites (SACs SPAs) it must be subject to an 'appropriate assessment'. We recommend that consideration be given to Habitats Regulations Assessment (HRA) requirements at an early stage in the development of your Core Strategy and look forward to your consultation on the screening report in due course. We encourage work to be undertaken on this alongside any drafts or sustainability appraisal and used as another method to assist with screening out incompatible options. We consider that where

					assessment is deferred to the preferred options stage which whilst acceptable an opportunity is missed to use the HRA Screening as another tool to work up any preferred option. We always recommend starting this work at the earliest possible stages of plan production. We will be pleased to discuss this further if required. Paragraph 3.2 of the DCLG guidance recommends: We recommend that AA should be undertaken in conjunction with the SA. It would be best practice to maximise the relevant evidence gathered in the SA and to use it to inform the AA and vice versa. SA and AA outputs must be clearly distinguishable and reported on separately. This is practice that we too encourage.
182	Mrs Janet Belfield	Planning Specialist Natural England			Broadly we concur with the content but would want to see them expanded to cover the following issues: 1. Some new development will also prove opportunities to conserve enhance and manage existing green infrastructure (issue 6)
399	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			The issues identified here are agreed but it is considered that they fail to recognise the potential for green infrastructure assets to fulfil multiple roles i.e. not just for recreation or for wildlife or for flood control but by careful design and management to provide an increasingly wide range of such benefits – “improve the multi-functionality of green spaces”.
<b>Strategic Issue 7 – People and Community</b>					
256	Mr Dave Arstall	Spatial Development Manager Government Office North West			Consideration should also be given to the role that increasing recreation facilities and promoting walking and cycling can play in improving health. This issue should also be picked up in either strategic objective O/G/5 or O/PC/1
184	Mrs Janet Belfield	Planning Specialist Natural England			Broadly we concur with the content but would want to see them expanded to cover the following issues: 1. Recognise the value of well managed accessible natural environment and green infrastructure to the health and well-being of the boroughs residents (issue 7).
<b>Spatial Vision and Strategic Objectives – General</b>					
201	Ms Judith Nelson	Regional Planner English Heritage - North West Region			The Spatial Vision would be improved by specific reference to the historic environment; this might include the need to safeguard and enhance heritage assets as identified for example at Littleborough Town Centre Conservation Area and the need to find new uses for listed and locally important buildings including farm buildings to safeguard them for the future.
<b>Question V&amp;O1 – Spatial Vision</b>					
23	Mrs Pat Donald				Yes I think that the Borough as a whole should be looked at and I welcome this strategy.
104	Ms Rosemary Olle	Senior Land Use Planner GMPTE			This should include a statement about accessibility as follows: ‘It is important to ensure that new development is located in areas that can be easily accessed by public transport’.
257	Mr Dave	Spatial			The vision is not spatial and with the exception of the final paragraph it is not locally

	Arstall	Development Manager Government Office North West			distinctive. As currently drafted most of the vision could relate to anywhere in the country. Include objectives relating to minerals and waste. The way in which minerals issues are tackled in the Core Strategy will be influenced by whether the GM authorities agree to prepare a joint minerals DPD or whether the issues will be dealt with by Districts individually. The plan objectives will need to be specific deliverable and measurable. As the document is developed you should consider incorporating targets and milestones to these against which progress can be monitored.
185	Mrs Janet Belfield	Planning Specialist Natural England			We would wish to see a vision that covers issues important to us including conservation and enhancement of landscape (and townscape) character and quality biodiversity and geodiversity and recreation and access to the countryside and green spaces. We consider that the vision does most of that but we would welcome mention of geodiversity. The strategic objectives should all be given equal importance as they are all necessary to achieve the overall vision for the borough.
254	Unknown	Crosby Lend Lease (North West) Ltd	Mr Mark Worcester	Associate Director Turley Associates Ltd	2.2 We agree with the specified spatial vision for the borough with some qualification. 2.3 The vision should include reference to the borough having a wide range of housing choice including higher value homes which will assist in attracting and retaining a skilled and professional workforce.
438	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			As drafted the spatial vision focuses on generic issues and with the exception of the final paragraph is not particularly specific to Rochdale. We suggest the vision should contain references to: • the respective roles of Rochdale Middleton Heywood and the Pennine towns over the plan period; • Rochdale's role within the wider Manchester city-region; • some of the major development opportunities identified on page 35 (especially Metrolink and Kingsway Business Park) in delivering growth and economic development; and • future prospects for the Borough's Housing Market Renewal areas. PPS 12 requires key spatial planning objectives to be aligned with priorities identified in the Sustainable Community Strategy (SCS). The consultation paper makes no reference to the SCS Vision. We are therefore unable to comment on the extent to which the spatial vision is aligned with the SCS.
400	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Not agreed. In most respects the Vision is considered to be suitable but notwithstanding the very general reference at the start to the Borough being 'attractive' there is no commitment to the protection and enhancement of its built heritage assets (compared for example to the commitments in respect of biodiversity that are apt and welcomed). It is suggested that at the end of the draft vision the following should be added: "The built heritage of the Borough will be protected and enhanced for its own unique value with new development careful to respect and complement its historic surroundings."
289	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	We support the spatial vision particularly the element that relates to providing employment sites that will be fit for the 21st century and which provide for a range of jobs which are accessible for businesses and people.

Question V&O2 – Strategic Objectives					
24	Mrs Pat Donald				I think priority should be given in equal measure to the Economy and Housing. When people are working and living in a place they like they are more inclined to make changes in their lifestyle which would assist the development of the other strategic objectives.
88	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			This is fairly generic stuff and perhaps fails to address the specific challenges and opportunities within Rochdale. A generic approach should be avoided where possible. We consider your objectives should specifically include: • Securing new investment in order to uplift the local economy and close the gap with the national average (eg. GDP per head); • The regeneration of run-down areas; • The diversification of the housing stock; • The delivery of new homes; • Improvements to the environment within the above context – we would not want additional costs to deter inward investment; • To conclude this Section is about your local priorities and need to be focussed in order to deliver. Parts of Rochdale might not be as well placed to achieve certain objectives (eg. environment/design) that more prosperous locations might achieve and this must be recognised. That is not to say that real benefits can be secured for the Borough just that policies need to be realistic and focussed in order to deliver this.
401	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Overall these are considered to be an admirable set of strategic objectives and sub-objectives which the National Trust is pleased to support. It is considered that the Strategic Objectives should be ordered or at least prominence given to one or two of them. More specifically in preparing and commenting upon Development Plans we all need to remind ourselves of the statutory duty to seek to achieve sustainable development; in this context the overarching Objectives that specifically relate to sustainable development should be appear first in particular that relating to “climate change pollution and natural resources” (especially having regard to the first objective’s reference back to the UK’s Sustainable Development Framework).
500	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			We support the strategic objectives for the economy and housing. However many of the sub-objectives for these and other topics appear overly detailed for an Issues and Options consultation.
Strategic Objective 1 - Economy					
1	Unknown	Kirkland Developments Ltd	Mr Richard Moffat	Director Lambert Smith Hampton	O/EC/7 Needs to recognise that development will take place outside the existing Primary Shopping Areas of Middleton which is capable of adding to the vitality and viability of the Town Centre as a whole. The Strategic Objective for Middleton should recognise the quantative and qualitative need to provide additional retail floorspace
202	Ms Judith Nelson	Regional Planner English Heritage - North			The strategic objectives for the economy might address the need to find new uses for redundant industrial/commercial buildings where these building contribute to the character if the area.

		West Region			
290	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	O/EC/1 We support this objective and agree that the Borough should provide a good range of employment sites to meet the needs of modern businesses and the wider city region. O/EC/2 We agree that existing employment sites such as HDP should have a suitable level of protection so that there is sufficient land and premises to meet the needs of business but to ensure that the opportunities for regeneration and redevelopment are not restricted in older parts of the Borough. O/EC/3 We support the objective of getting the right location of premises to meet business needs whilst being accessible to the workforce. We feel that there should .however be a degree of flexibility within this objective as demands of the market vary over time and landowners need to be able to respond to these changes in demand. O/EC/4 We support this objective as we do not see the benefit of buildings remaining empty whilst waiting for a new occupier. The ability to respond to demands for different types of accommodation and uses is a key driver of SEGRO's business and the ability to respond proactively is essential. O/EC/1 The objective to diversify the economy into a larger number of sectors is supported and we propose that Heywood Distribution Park through the proposed SPZ is a location which is suitable for such diversification in addition to the opportunities at Kingsway.
487	Ms Debra Holroyd	Regional Planning Officer 4NW			4NW acknowledges the strategic objectives listed under Strategic Objective 1 – Economy and considers that these provide a clear range of mechanisms by which the economic growth aspirations of the Manchester City Region will be achieved. 4NW would like to highlight the policies RDF1: Spatial Priorities; W1: Strengthening the Regional Economy; W2: Locations for Regionally Significant Economic Development; MCR1: Manchester City Region Priorities; and MCR5: Northern part of the Manchester City Region in the consideration of the Rochdale's Strategic Objectives and how they fit within the aspirations of the Manchester City Region.
534	Mr David Povey				Demand – as we enter a recession and employers down size or even go bust – there will be little demand for employment land. Houses are not selling at the moment and demand in the future is doubtful. The government recently announced intentions to control UK population through immigration controls etc – this will impact on the demand for houses / employment land.
550	Unknown	Crosby Lend Lease (North West) Ltd	Mr Mark Worcester	Associate Director Turley Associates Ltd	2.4 We consider that there is a need for an additional bullet point as follows: • Increasing the level of housing choice in the borough in particular the availability of higher value homes. 2.5 This addition is requested because a fundamental premise of the recently adopted RSS is that meeting the region's aspirations for economic growth will entail a significant increase in the amount and quality of housing to be built in the region. It is generally agreed that it will be necessary to accommodate not only new households which are expected to form but also to provide for what has been termed 'aspirational' need for accommodation for the senior managerial and professional level workers in the knowledge and growth sectors. Objective O/EC/10 2.6 We consider that this objective should be amended to include specific reference to the need to widen housing choice in the borough.
478	Mr Daniel	Russell Homes			2.6 Russells strongly supports the strategic objectives as are set out within the document. It is



	Kershaw				vitaly important for the Borough that a strong economy and access to employment underpins the foundations for growth within the Development Framework Period.
<b>Strategic Objective 2 - Housing</b>					
9	Miss Jean Barlow				The target of providing land for 450 additional dwellings is inconsistent with the background document and also the spatial portrait section of this document which both state the RSS target to be 400 dwellings rather than 450.
59	Mr David Hardman	Asset Protection United Utilities			O/H/3 United Utilities supports the wording that the Council will ensure that housing is delivered in appropriate locations which takes advantage of existing infrastructure or where infrastructure can be provided in a sustainable way. United Utilities is referring to utility infrastructure in this regard.
89	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			The RSS has now been adopted and is therefore relevant here. The figures quoted in RSS are MINIMUM figures (both 400 and 450 are referred to). Given the economic downturn with no indication of any improvements in the house building sector for the next 12-24 months policies need to be realistic and supportive in order to deliver new homes. We generally support the range of objectives listed under O/H but it is the balance of these on any particular site that will determine whether a scheme is delivered or not. Your policy focus needs to be upon the delivery of new homes to support wider strategic objectives. The viability of development will become a key consideration in deliverability over the next 2 years minimum and we seek to work with the planning authority so that policies do not prohibit much needed development.
76	Unknown	CEMEX	Ms Kathryn Thompson	Senior Planner Drivers Jonas LLP	CEMEX supports Strategic Objective 2 and considers that the housing target set within the Core Strategy should correspond with the minimum requirement of at least an additional 450 dwellings per year as set out in the emerging Regional Spatial Strategy In addition CEMEX supports the approach to ensure that housing is in a location that supports the sustainable growth and regeneration of the borough and that fits with the growth objectives of the North West and manchester City Region. In particular CEMEX welcomes the use of brownfield sites within the strategy for growth and considers tha Strategic Objective 2 should specifically make reference to brownfield/previously developed land in the text as CEMEX considers that the use of brownfield sites to accommodate growth is a robust approach which is supported by National Planning Policy. Both Planning Policy Statement 3 and Planning Policy Statement 1 encourage the efficient use of land and development of brownfield sites. In addition CEMEX considers that the Council should consider sites for residential use which are currently in industrial or employment use and situated within predominately residential locations. In particular CEMEX urges the Council to consider paragraph 43 of Planning Policy Statement 3 which states that when forming strategies for the development of brownfield land Councils should consider whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development.

204	Ms Judith Nelson	Regional Planner English Heritage - North West Region			The strategic objectives for housing should look to the Heritage Assessment and its recommendations.
402	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			O/H/3 would benefit from a specific reference to locations that either are or will be well served by public transport.
441	Ms Debra Holroyd	Regional Planning Officer 4NW			The objectives identified for housing within the document put a significant emphasis on new supply. We accept that this will be part of the solution; however a recognition of the need to make the best use of the existing stock is currently missing and needs to be recognised as a key objective in line with Policy L3 and supporting text for Policy L4 in paragraph 7.18b in adopted RSS. This is particularly important given that part of the area falls within the Oldham - Rochdale HMR area which could be given more recognition within the document.
502	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			Housing objective O/H/1 refers to the provision of at least an additional 450 dwellings per annum between 2007 and 2026. Page 63 explains that this figure exceeds the Draft RSS requirement of 400 per annum due to the high levels of clearance between 2003 and 2008. The housing requirements in RSS are of course net of any clearance replacement and additional provision will need to be made to take account of any future clearance from 2008 to 2026. The consultation paper points out that the housing figures in RSS are no longer expressed as ceilings.
551	Unknown	Crosby Lend Lease (North West) Ltd	Mr Mark Worcester	Associate Director Turley Associates Ltd	2.7 We suggest that this strategic objective be amended to include specific reference to the need to provide increased levels of higher value homes. Objective O/H/1 2.8 This objective identifies the need to provide as a minimum 450 dwellings per annum in the period 2007-2026. Whilst this represents a higher annualised figure than is quoted in adopted RSS this is because of the need to 'compensate' for the under provision of housing which has occurred in the borough over the period 2003-2007 and so ensure that the total RSS requirement (9 200 dwellings) is satisfied. 2.9 We support this approach on the basis that RSS figures are treated as minimum requirements rather than ceilings and that the 450 figure is clearly identified as being 'net of clearance'.
<b>Strategic Objective 3 - Quality of Place</b>					
205	Ms Judith Nelson	Regional Planner English Heritage - North West Region			The strategic objectives for Quality of Place are supported whilst recognising that O/QP/1 must also address latent heritage assets where the potential exists to make a strong and positive contribution in the future.
403	Mr Alan Hubbard	Land Use Planning Adviser (E			Strategic Objective 3 "...whilst protecting and enhancing in a sustainable manner..." – to accord with the UK Sustainable Development Strategy and advice in PPS1. O/QP/2 – "Ensure that new developments in the Borough respect and respond positively to their context..." – to

		Midlands & NW) The National Trust			ensure that the local distinctiveness angle is properly addressed.
<b>Strategic Objective 4 - Climate Change Pollution and Natural Resources</b>					
60	Mr David Hardman	Asset Protection United Utilities			O/C/1 United Utilities supports the reduction in demand for drinking water. However in relation to the wording water and waste recycling and management - United Utilities would clarify this. Whilst we would support harvesting and recycling of rainwater for garden watering and car cleaning etc we would not support the use of rainwater or 'grey water' for indoor uses. A lot of research studies have been undertaken which have demonstrated that the systems are currently expensive to install and to maintain often use significant amounts of energy (increasing carbon emissions) and have public health concerns.
61	Mr David Hardman	Asset Protection United Utilities			O/C/4 United Utilities support the words on flood risk.
117	Mr David Finch	Volunteer Project Officer Lancashire Wildlife Trust			We would broadly agree with Strategic Objectives 4 and 5 but would expect the preservation and enhancement of biodiversity and the conservation of wildlife to be an important consideration in any development.
234	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			Strategic Objective 4 makes reference to adapting to climate change (e.g. by guarding new and existing developments against flood risk); - Depending on the interpretation of the terms guarding new developments should not need defending and should ideally be built in the lowest risk areas.
235	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			We would recommend objective O/C/3 has a stronger emphasis (i.e. to protect and enhance the value of existing peatlands) as many of these peatlands have been impacted by issues such as poor land management pollution inappropriate access etc. Healthy peatlands not only provide important wildlife resources and important carbon sink but can also have water quality and flood risk benefits.
404	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Strategic Objective 4 : o It is also relevant and important to ensure that the energy efficiency of existing buildings is improved given that they will continue to provide the bulk of the borough's building stock throughout the life of the Core Strategy. It is of course quite possible to retro-fit existing buildings (residential or commercial) especially when significant refurbishment or extension proposals are being considered. Request that this is amended to read "increasing the energy efficiency of existing and new buildings". o The final bullet point should be amended to seek to conserve existing biodiversity at all times i.e. by re-wording it to read as follows: "ensuring all development conserves existing biodiversity and identifies opportunities to increase it." • O/C/2 – there is an important role for microgeneration especially in new housing developments that it would be useful to pick up here e.g. "Encourage the development of microgeneration and other renewable energy technologies such as biomass and wind power in appropriate locations." • O/C/4 – it is noted that new development can also provide the opportunity to reduce existing flood risk through its overall design for example the

					National Trust's development at Stamford Brook in Greater Manchester has achieved this through a combination of measures including river restoration and the installation of a SUDs scheme. The objective could be supplemented to include: "...and in appropriate locations designed to reduce existing flood risks." • O/C/6 – it is considered that this would benefit from a specific reference to light pollution e.g. "...against pollution (including light pollution) from surrounding..."
291	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	O/C/1 We do not object in principle to the objective of reducing carbon emissions from new development although we do question the target of being carbon neutral by 2020. We object to the overlap in control over the issue of carbon emissions as this is a matter that could adequately be dealt with by the system of Building Regulations. This blanket objective whilst laudable does not take account of those instances where the viability of a new development would be severely compromised by this requirement.
<b>Strategic Objective 5 - Accessibility and Sustainable Transport</b>					
118	Mr David Finch	Volunteer Project Officer Lancashire Wildlife Trust			We would broadly agree with Strategic Objectives 4 and 5 but would expect the preservation and enhancement of biodiversity and the conservation of wildlife to be an important consideration in any development.
236	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			We would recommend there is stronger emphasis in the core strategy in promoting other transport options such as cycle lanes and improved pedestrian links in order to reduce the reliance on the car. The objective would seem to be largely orientated at improving vehicular movement in the borough. Therefore we would recommend there is a strategic target aimed at expanding core pedestrian/cycle routes.

527	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			Revised PPS12 Guidance RMBC should also take note of the recently published revised Planning Policy Statement 12: Creating strong safe and prosperous communities through Local Spatial Planning (PPS12) which places greater emphasis on key sites who will provide development and importantly who will fund any associated infrastructure. The need for greater clarity in terms of deliverability should also detail how and when development will be delivered. The Agency would welcome the provision of this additional information whilst taking account of paragraph 4.56 of the revised PPS12; "Local authorities are urged to ensure that effective programme management techniques are employed in progressing the core strategy and orchestrating the production of the evidence base. Various studies (on for example housing market assessments housing land availability flooding and transport) are necessary for the proper preparation of core strategies. Local authorities should seek to align the timetables of these studies with the core strategy so that it is not unexpectedly held up. This will mean discussing the project timetabling with key stakeholders. It will also be helpful to reach agreement with key stakeholders on what the main components of the evidence base need to be." There is no commitment for any large scale strategic transport assessments and as such an absence of a transport evidence base. Consequently it is recommended that an independent topic paper is established to discuss transportation matters in relation to key sites/main areas for employment growth and the local and strategic network.
406	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			<ul style="list-style-type: none"> <li>• O/A/4 – the reference to the Council’s accessibility hierarchy is very apt and strongly supported – arguably this should also be referred to in the Strategic Objective for Accessibility and Sustainable Transport (indeed potentially in the Vision as well).</li> </ul>
456	Ms Debra Holroyd	Regional Planning Officer 4NW			The objectives are in line with spatial principles in the RSS which seek to promote sustainable communities and sustainable economic development (e.g. DP2 and DP3) make the best use of existing resources and infrastructure (e.g. DP4) increase accessibility (e.g. DP5) and also marry opportunity with need (e.g. DP6). Specific transport objectives which are addressed include those which seek to provide an integrated transport network (RT1).
<b>Strategic Objective 6 - Green Infrastructure</b>					
206	Ms Judith Nelson	Regional Planner English Heritage - North West Region			The objectives for Green Infrastructure should include an objective regarding the contribution of GI to the protection conservation and management of heritage assets. The Greater Manchester Urban Historic Landscape Characterisation will be of assistance in developing GI strategy and networks.
405	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands &			Strategic Objective 6 – Green Infrastructure: the Trust is pleased to see the reference here to the benefits of a “multi-functional green infrastructure network” – such an approach is strongly endorsed.

		NW) The National Trust			
<b>Economy - Issues and Options (General)</b>					
187	Mrs Janet Belfield	Planning Specialist Natural England			We have no specific comments to make concerning the economy section although we trust that policy will highlight the value of the natural economy to the economic prosperity of the borough. We are pleased to natural environment assets listed on page 58.
506	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			Pages 49 and 50 discuss issues to be taken into account in establishing the amount of land to be allocated for employment use. It concludes by saying that the Council's Employment Land Study suggests that an additional 35 hectares of land are required within the plan period. So far as we are aware this study has not yet been published. We are therefore unclear how this assessment relates to the employment land requirement in RSS the final version of which requires an additional 917 hectares of employment land across Greater Manchester between 2003 and 2021. The consultation paper suggests a possible need for an additional 89 hectares of employment land in Rochdale based on the Draft RSS figure (893 ha) being split equally between the ten GM districts. This simple pro-rata split across the ten districts seems a somewhat arbitrary basis on which to develop the Core Strategy. Whilst we appreciate that this is essentially a matter for AGMA rather than individual local authorities we would hope to see a more rigorous exercise to apportion the RSS requirement that takes account of Employment Land Reviews carried out by each of the ten GM authorities.
480	Mr Daniel Kershaw	Russell Homes			2.7 In order to achieve this sufficient employment land needs to be made available to meet the needs of businesses within and wishing to locate within the Borough. In addition to the existing employment land within the Borough the Regional Spatial Strategy published by the Government requires a net additional 917 hectares of employment land to be provided in Greater Manchester between 2005 to 2021. If this figure is split equally between the 10 Authorities within Greater Manchester there will be a requirement to provide find an additional 5.4 hectares per annum within Rochdale. This equates to 103 hectares between 2003 and 2021. This is higher than the figures set out within the Core Strategies and Issues Consultation which relies on a draft RSS figures. 2.8 In presuming that Rochdale will accommodate approximately one tenth of the employment and provision within the Greater Manchester area this makes the assumption that the capacity of other Authorities within the Greater Manchester region can accommodate their respective 10%. It is unlikely that Bury Oldham and Tameside could accommodate 10% of this annualised figure. 2.9 It is considered that Authorities which can accommodate additional employment land and which have access to key strategic highway routes will be required to accommodate more than the Borough's which are not able to do so. 2.10 It is considered that Rochdale will be required to accommodate a minimum of 10% however there is the real potential that this will be increased to compensate for the shortfall in provision in neighbouring Authorities. Further consideration to this matter will have to be given.

Questions EC1 - Employment Land Supply					
25	Mrs Pat Donald				The release of land for employment development should be phased but in a way that does not concentrate all employment opportunities in just one area i.e. Kingsway. Consideration should be given to the other identified sites. I think Spatial Option 4 most clearly fits the bill with access already available via motorways.
259	Mr Dave Arstall	Spatial Development Manager Government Office North West			You will need to reflect the requirements for employment land set out in the revised RSS. It is understood that a sub-regional study is examining how the Greater Manchester requirement could be met and this will provide a context for the consideration of these issues in the Core Strategy. Within this context it is unclear whether the 35 hectares of additional employment land over the plan period would be sufficient.
207	Ms Judith Nelson	Regional Planner English Heritage - North West Region			Q EC1 It is not clear from the report what the release of greenfield/Green Belt land for employment will mean for the historic environment.
407	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			The National Trust would question the basis of the analysis set out here especially in the fifth paragraph on page 49 notwithstanding that the adopted RSS now includes a slightly increased figure for new employment land provision for Greater Manchester. Adopted RSS (Policy RDF1) is clearly that a priority approach should be taken to the distribution of new growth and development the first two priority locations within Greater Manchester being the Regional Centre itself and then the inner areas around the Regional Centre. Outlying towns/cities such as Rochdale are only the third priority. It is therefore unreasonable to assume that the overall target for new employment land for Greater Manchester will be split equally between the 10 Districts; clearly RSS requires that a significant concentration of this development will be in and immediately around Manchester City Centre. It is clear that an overall provision considerably less than 269 hectares should be planned for. Furthermore RSS policies MCR1 RDF1 and W3 are clear that allocations also need to comply with Spatial Principles (Policies DP1-9) and the criteria set out in Policies W2 and W3. These policies include a number of requirements such as following a sequential approach (DP4) locating development to reduce the need to travel (DP5) understanding and respecting environmental character/distinctiveness along with reclaiming derelict land/remediating contaminated land and maintaining the tranquillity of the countryside and rural areas (DP6) and maximising the use of brownfield land (W3). The statement relating to the implications of Spatial Options 1 and 2 that "if development rates on Kingsway are higher than expected there could be a shortage of employment land later in the plan period" could equally be written as "if development rates on Kingsway are lower than expected there could still be a surplus of employment land later in the plan period". Indeed given the increasing effects on development as seen on a daily basis of the 'credit crunch' it is quite likely that the latter rather than the former is going to happen. Accordingly the Trust supports Spatial Options 1 or 2 with the caveats that a) unless the employment land market collapses completely allocated sites should be retained and not changed to a housing allocation and b) a phased approach could be introduced concentrating on existing allocated sites within the urban area with the potential

					to allocate additional suitable (i.e. those that comply with RSS Policies DP1-9 RDF1 W2 W3 and MCR1) site when detailed permissions have been granted on say 85% of such sites.
292	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	We suggest that the release of greenfield / Green Belt sites for employment development be phased with the release of land only being allowed when the total land and premises supply reaches a set minimum level. We feel that there are currently previously developed sites such as those at HDP within the Borough that could be developed first before greenfield/Green Belt land is released. In order to provide the most appropriate supply of employment land and premises we feel that spatial Option 4 would be the most appropriate as this is the first of the 6 options which meet the need for additional employment land identified within the RSS and therefore supports the economic growth of the Borough.
276	Unknown	Wm Morrison Supermarkets PLC	Ms Laura Fern	Student Planner Peacock and Smith Limited	In terms of options relating to the change of use of employment land and premises our clients supports option ECB3 which would adopt a more flexible criteria based approach. By allowing a certain level of flexibility it will ensure that sites do not remain vacant and that land across the borough is used efficiently.
509	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			Question EC1 asks whether the release of greenfield/Green Belt sites for employment should be phased. In principle this seems sensible as it would help to ensure that sites do not compete with each other or with key employment sites such as Kingsway Business Park. However the need for greenfield land release first needs to be established having regard to the overall employment land requirement and the sequential approach in RSS. Additionally exceptional circumstances would need to be demonstrated to justify the release of land from the Green Belt.
489	Ms Debra Holroyd	Regional Planning Officer 4NW			The maximisation of the Kingsway Business Park for economic opportunities would provide significant employment generation opportunities in close proximity to areas of regeneration need (policy DP6) served by public transport. Maximising the benefits of Kingsway Business Park will attract modern industry and businesses and provide opportunities for indigenous businesses who wish to expand in a quality environment particularly in knowledge based and manufacturing and process industries. Pursuing this approach would be complementary to policies W1 W2 MCR1 and MCR5. 4NW support elements of the approach taken in strategic option 1 and 2 ; i.e. making more efficient use of existing sites through concentration of uses as this accords with the principles of policy DP4.
299	Mr Philip Rothwell	Senior Development Planning Manager Peel Holdings (Land & Property) Limited	Mr Peter Jennings	Indigo Planning Limited	We agree with a control on the release of Greenfield Lane/ Greenbelt sites for employment development. However further research is needed to establish the full mechanism of such a policy.
481	Mr Daniel Kershaw	Russell Homes			EC1 Employment Land Supply 2.11 EC1 Employment Land Supply asks should the release of the green field/Green Belt sites for employment development be phased with its release only



					<p>being allowed when the total land/premises supply reaches a set minimum level. In addition it enquires as to which of the spatial options in Chapter 13 of the Core Strategy provide the most appropriate supply of new employment land and premises. 2.12 In response to this Russells would advocate that the release of Greenfield/Green Belt sites for employment development should be phased however the release of land should not only be allowed when the total land and premises supply reaches a set minimum level. 2.13 The LDF core objective is to promote growth and development within the Town over a 16-year period and it is important that a Phasing Policy for the release of employment sites is included. However it should not be dependent upon local supply reaching a set minimum level. 2.14 In this scenario there would be an over dependence upon Kingsway Business Park to accommodate the economic growth and provision of short and medium term employment opportunities. The reliance upon Kingsway to provide employment opportunities within the short term places a strangle hold on competitive development and creates a monopoly situation. 2.15 A combination of the downturn in market conditions and the removal of empty rates relief on constructed buildings has resulted in a significant reduction in the likely levels of speculative development on Kingsway. The fixed costs and overheads have resulted in a reluctance to construct smaller commercial units in isolation. A collective interest or critical mass of end users is required to pay for the start up costs and overheads (which are fixed) to be mitigated across a number of units thus enabling a sufficiently satisfactory return. This approach to development on Kingsway is reducing the availability of short term delivery of industrial units. 2.16 Should market conditions change and speculative developments become more positive as a consequence of a reinstatement of empty rates tax relief it is conceivable that the rates of developments on Kingsway could increase leading to a shortage of employment land later within the Framework period. 2.17 It is evident therefore that the Authority should not put all their eggs in one basket and there should be an alternative to redevelopment opportunities rather than the over dependence on Kingsway to accommodate the majority of short and medium term development.</p>
Questions EC2 - Location of Employment Land and Premises					
208	Ms Judith Nelson	Regional Planner English Heritage - North West Region			Q EC2 Opportunities for the re-use of existing buildings should be explored.
444	Mr Iain Gerrard	Secretary Littleborough Civic Trust			While thought desirable by Rochdale Borough the Kingsway Business Park is considered by some hereabouts to be likely to attract whatever economic development that might be willing to relocate or start up in this area to the detriment of the 'outlying' districts such as Littleborough. It may well be that it will be a success from the point of view of Rochdale as a whole but it should not be promoted at the exclusion of other areas requiring developmental help. Littleborough is not an ideal location for many types of economic development being distant from the artery of the motorway and having roads unsuitable for heavy vehicles above a certain size. We believe however that it could be attractive to some smaller businesses or larger businesses which provide services or manufacture small products requiring no large vehicle movements if for no other reason that it is attractive visually and can offer easy access

					to leisure pursuits in the adjacent countryside while working and living here.
408	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			The Trust supports Spatial Option 2 (in accordance with the considerations set out in response to question EC1).
293	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	Whilst Heywood currently has a good supply of employment land we feel that the existing employment site at Heywood Distribution Park could be developed further to provide an even greater supply of employment development Land to the south of Heywood has the ability to make the best use of its proximity to the motorway network spatial Option 4 is the option that we feel could best deliver additional employment land within or adjacent to Heywood.
482	Mr Daniel Kershaw	Russell Homes			<p>ISSUE EC2 – LOCATION OF EMPLOYMENT LAND AND PREMISES 2.18 It is agreed that employment development has to be in the right locations to meet the needs of business and the workforce. It is also recognised that the following issues need to be taken account of in seeking the best location and distribution of employment land to achieve sustainable development of the Borough.</p> <ul style="list-style-type: none"> <li>• Employment development should be within easy reach of the workforce and be accessible by sustainable forms of travel. It is essential that employment opportunities have good access to the strategic transport infrastructure to be attractive to businesses.</li> <li>• Employment needs to be accessible to neighbours with high levels of employment and economic inactivity.</li> <li>• Employment opportunities need to be created where there is high housing with regeneration activity resulting in pressure to redevelop existing and often non-conforming employment sites for housing uses as they can become unwanted and obsolete.</li> </ul> <p>2.19 The spatial relationship between employment and housing is extremely important. Jobs have to be available locally to reduce the level of commuting and congestion and create more sustainable patterns of development. It is essential therefore that Rochdale provides a wide range of new employment opportunities in sustainable locations which are attractive to the business community and does not rely on existing employment commitments and opportunities at Kingsway Stakehill and Heywood to accommodate the majority of need and demand.</p> <p>2.20 Employment opportunities need to be provided throughout the town albeit there are clearly more advantageous locations.</p> <p>2.21 Problems with accessibility and the quality of the surrounding environment limits significant development within the North Rochdale and Pennine Townships however it is essential that some development within these areas is provided in order to ensure that these do not become dormitory townships for commuters working in Rochdale and Manchester beyond.</p> <p>2.22 By comparison there are clear attractions and advantages to locating the majority of employment development within Southern Rochdale Southern Heywood and North Middleton Townships as these have good infrastructure links and are genuinely attractive to the business community. In addition it is noted that the landscape quality of the land within these areas is not as distinct and important as the landscape quality of the North Pennine and North Rochdale areas and the loss of green field and Green Belt land within this area in order to accommodate the growth requirements as</p>

					<p>set out within the RSS will be more environmentally acceptable than loss of the North Rochdale/North Pennine landscape. 2.23 Accessibility is clearly an important consideration in the location of employment land and buildings and to this extent the options to increase employment growth within the M62 corridor are very important. The M62 corridor is part of the Northern European Trade Axis which links Ireland through the ports of Liverpool and Hull across into Northern Europe. The M62 corridor is a major attraction to businesses which need access to the highway infrastructure and the strategic importance of this route is critical when considering employment opportunities within Rochdale Borough. 2.24 Developments along this corridor in strategic locations will have to be augmented with better public transport connectivity and infrastructure in order to ensure that access is not wholly dependent on a car travel. 2.25 The release of employment opportunities within the Southern Rochdale North Middleton and Southern Heywood Townships subsequently needs to be undertaken in association with the understanding of how these areas could be served via new and existing public transport facilities. 2.26 In summary of issues EC1 and EC2 it is considered that growth in employment opportunities is ultimately a prerequisite for a successful Borough. Rochdale is extremely well placed along North European Trade Axis and needs to take advantage of this opportunity in order to compensate for the declining manufacturing base within the Borough. Improved housing public spaces opportunities for leisure and the quality of the built environment are ultimately all dependent upon the annual growth within the economy and this can only be achieved by the planned and considered release of suitable land employment within the Borough. 2.27 The regeneration initiatives within the Pennine Heywood Middleton and Rochdale Townships which in part seek to redevelop non-conforming and obsolete industrial uses will assist in the regeneration enhancement of the inner Rochdale areas however replacement employment sites which are suitable for the 21st Century need to replace the sites that have been redeveloped. 2.28 Providing new employment land opportunity for the growth and replacement of redundant and obsolete sites is essential for the Borough to prosper. A range of sites and opportunities is ultimately healthy for growth within the business community. Dependence on key strategic sites which could accommodate all the growth in the short to medium term potentially could have two consequences. In a struggling market the monopoly of key strategic sites to accommodate the development could restrict growth as developers limit the delivery of opportunities until such time that there is a critical mass to make such a proposal profitable. Alternatively in times of a strong economy the reliance of key strategic sites to accommodate growth may ultimately result in a short fall of opportunities later in the planned period in the event that developments cannot keep up with demand. 2.29 There should be an alternative to redevelopment opportunities rather than the over dependence of Kingsway to accommodate the majority of short and medium term employment land opportunities.</p>
Question EC3 - Change of Use of Employment Land and Premises					
26	Mrs Pat Donald				My preference here is for EC3C
394	Mr Ron Smith	Circuit Planning Representative Jehovah's			An issue frequently referred to in the report is the legacy of old commercial properties which are not suitable for modern industrial needs and are unattractive to potential occupiers. This results in vacant and underused sites in both urban and rural locations which are frequently

		Witnesses			difficult to redevelop or re-use as they are not suited to the needs of modern residents and businesses. The report also points out the need to review the future of major developed sites in green belt to consider if they are suited for other uses particularly if there is potential to enhance the sites and their surroundings rather than allowing them to decline. An alternative to allowing the above sites to lay vacant would be to permit use for purposes other than that of a commercial nature. It is therefore recommended that policy be adopted to give consideration to proposals for places of worship and other community buildings whenever commercial/industrial premises fall vacant. Reuse of land will always be subject to satisfying the requirements set out in other policies.
409	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Option EC3A is supported on the basis of maintaining employment land in or available for employment use in the most appropriate locations having regard to the framework set by adopted RSS.
294	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	We suggest that option EC3C provides the best approach to both protecting and allowing change of use of existing employment areas.
307	Mr Nick Scott	Planner The Emerson Group			It is important that the Local Development Framework refrains from being overly prescriptive with regard to development location and type as at times like at the present the deliverability of potentially important developments and regeneration schemes is becoming increasingly difficult complex and in many cases unviable. It is important that in seeking to deliver the Councils important objectives for the Borough the Core Strategy supports these objectives in a non-onerous realistic and deliverable manner. In light of the above the following Issue Options are particularly supported: • EC3B
511	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			There appears to be a degree of overlap between questions EC3 and EC4 both of which concern approaches to the range of uses on identified employment sites. The Agency would support an approach that both safeguarded key employment areas for B1 B2 and B8 uses and based on the Employment Land Review reallocated marginal sites that are no longer suited or attractive to employment use for other uses. Option EC3A would appear to be closest to such an approach. For new employment allocations we would support an approach where sites are allocated for specific use classes (i.e. Option EC4A). These questions do not explicitly consider the promotion of mixed-use developments. This would seem appropriate given that a number of sites identified in Chapter 14 are put forward as potential mixed-use developments. In addition EC3 asks whether a charge should be placed on any development that results in the loss of employment land. Having regard to the relevant tests in Circular 5/2005 we question the principle of applying such a charge particularly the requirement that planning obligations are directly related to the proposed development. As suggested above we consider it more appropriate to protect key sites (based on the findings of the Employment Land Review) and consider reallocating marginal sites for other uses. The paragraph at the foot of

					page 53 suggests that the Employment Land Study already provides a sound basis for such an approach.
300	Mr Philip Rothwell	Senior Development Planning Manager Peel Holdings (Land & Property) Limited	Mr Peter Jennings	Indigo Planning Limited	We do not agree with a charge being imposed on any development resulting in the loss of employment land. Many employment sites become re-developed for non employment use when they can no longer viably continue in employment use. A charge to redevelop employment land could prevent appropriate future development proposals.
483	Mr Daniel Kershaw	Russell Homes			Issue EC3 Change of Use of Employment Land and Premises 2.30 The management of the change of land use for existing employment areas into non-employment uses is a key consideration in achieving the objectives of economic growth and environmental regeneration specifically housing-led regeneration. 2.31 The employment opportunities within inner urban areas are in many instances run down lacking in investment and potentially obsolete for their existing purpose. In this instance it is important that consideration is given to alternative uses (bad neighbour uses) which do not conform with the surrounding environment. In doing so this would assist in the regeneration of the key inner urban areas. 2.32 In contrast to the above there are employment opportunities within the inner urban areas or along strategic growth corridors which function particularly well and which constitute a valuable resource for small local businesses at what are considered to be affordable rents. 2.33 The most important of these local employment opportunities should be identified and protected from redevelopment by their inclusion within Primary Employment Zones (PEZ's). 2.34 The protection of Primary Employment Zones however should not be absolute. The LDF covers a period up to 2026 and as such policies for the protection of existing employment opportunities should be sufficiently flexible to enable a change of land use in the event that the existing use becomes redundant. Detailed criteria for the assessment of the obsolescence of the existing land use should be set out within Supplementary Planning Documents (SPD's). 2.35 Should employment land and premises outside PEZ's become redundant the LDF should be sufficiently flexible to enable a change of use to be facilitated without long periods of vacancy. National Policy seeks to reuse redundant commercial and industrial Brownfield Development sites for amongst other uses housing where this will lead to the removal of redundant or non-conforming industrial buildings which potentially blight an area contributing little to the aesthetic and environmental quality. The criteria for the redevelopment of redundant and obsolete buildings outside PEZ's should be set out within Supplementary Planning Documents. 2.36 Question EC3 'Change of Employment Land and Premises' proposes the following question "should a charge be put on development that results in the loss of employment land in order to provide funding to improve employment areas and deliver new employment sites and economic infrastructure?" 2.37 In response to this question Russells specifically state that a charge should not be put on development that results in a loss of employment land in order to provide additional funding to improve employment areas. 2.38 The consequences of placing a cost on the loss of employment land could stymie the redevelopment potential rendering the project commercially unviable. Within the current market conditions the values of residential development land have

					<p>dropped significantly. In many locations within the four Rochdale Townships the value of commercial premises are now similar to the value of land in the event that residential planning consent is secured. Additional costs which seek to compensate for the loss of employment land will in many instances render the redevelopment potential unviable. Where the existing use is obsolete or requires substantial investment that cannot be recouped the consequences of this additional tax on redevelopment will result in the land remaining in its status quo use. Where the status quo use is obsolete this can create problems of blight as market conditions will not enable investment into obsolete premises and planning obligations will place punitive charges preventing redevelopment. 2.39 In considering when to protect and release existing employment opportunities for other uses it is essential to ensure that sufficient supply of replacement employment land is safeguarded within the plan in the event that the reuse and regeneration of obsolete sites occur early within the plan period. It is essential that the reuse of obsolete and redundant buildings which could lead to the regeneration and an urban renaissance of the HMR and inner urban areas is balanced by sustainable economic growth and a continued opportunity to access employment land. These two issues are mutually inclusive and cannot occur independently. In accordance with this principle Russells supports option EC3C which seeks to contain the current policy approach to protect best employment areas but allows for the redevelopment of obsolete employment sites whilst enabling high growth identified in Spatial Option 4 and 5.</p>
Questions EC4 - Type of Land and Premises					
27	Mrs Pat Donald				My preference here is for EC4B
278	Ms Rose Freeman	Planning Assistant The Theatres Trust			<p>Option EC4B: Creative cultural and media: Cultural activity brings economic benefits by providing employment and generating revenue. It attracts people and businesses inward investment job creation and supports the visitor economy. Creative industries are the UK's fastest growth sector generating significant revenue and employing hundreds and thousands of people. Activities at museums libraries and archives generate substantial income and investment and support the tourism and employment economy. We note on page 55 that the use class sui generis does not appear in this section so that theatres nightclubs casinos etc would be excluded. Your theatres are important community assets providing jobs skills learning and educational opportunities and offer vital secondary spend to tourism retail and leisure sectors. The Core Strategy should aim to support the continued success of these venues and support new spaces for theatre within community centres and schools throughout the community as well as in the town centres. We suggest that the development and management of cultural quarters can help address the need for affordable workspace for creative industries by providing flexible live/work space and encouraging clusters of activity that provide a trigger for local regeneration. Where they contribute to wider regeneration and mixed-use policies they should be sustained by the planning system and supported by wider economic and cultural development initiatives. To quote from page 17 of your Cultural Strategy This is a priority [the creative industry] because we need local entrepreneurs with a quality product that can compete with other similar subregional businesses. Your existing local cultural facilities should be protected and enhanced through Core Strategy policies with</p>

					provision for new or improved facilities made to ensure the continuity of successful facilities. Without such a policy it could become difficult to retain an essential community asset particularly where land values become higher for an alternative use. This policy should also state that the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community.
295	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	Option EC4C which allows only B1 82 and 88 uses on employment allocations on the best employment sites and allow a wider range of uses apart from retail in most employment areas. This option would ensure that employment generating uses could be accommodated on key employment areas but that a wider range of uses could also be provided allowing for a degree of flexibility that would help with meeting occupiers' needs This option fits with SEGRO's aspiration for the SPZ at HDP where the proposed uses include Class B employment uses along with small scale support services such as retailing leisure and assembly (Class D2) and sui generis uses.
308	Mr Nick Scott	Planner The Emerson Group			It is important that the Local Development Framework refrains from being overly prescriptive with regard to development location and type as at times like at the present the deliverability of potentially important developments and regeneration schemes is becoming increasingly difficult complex and in many cases unviable. It is important that in seeking to deliver the Councils important objectives for the Borough the Core Strategy supports these objectives in a non-onerous realistic and deliverable manner. In light of the above the following Issue Options are particularly supported: • EC4D
519	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			There appears to be a degree of overlap between questions EC3 and EC4 both of which concern approaches to the range of uses on identified employment sites. The Agency would support an approach that both safeguarded key employment areas for B1 B2 and B8 uses and based on the Employment Land Review reallocated marginal sites that are no longer suited or attractive to employment use for other uses. Option EC3A would appear to be closest to such an approach. For new employment allocations we would support an approach where sites are allocated for specific use classes (i.e. Option EC4A). These questions do not explicitly consider the promotion of mixed-use developments. This would seem appropriate given that a number of sites identified in Chapter 14 are put forward as potential mixed-use developments. Clearly Kingsway Business Park will continue to provide a significant proportion of the Borough's employment land supply over the plan period. We would therefore expect to see an appropriate policy in the Core Strategy to ensure that Kingsway is developed in accordance with established objectives for the site.
301	Mr Philip Rothwell	Senior Development Planning Manager Peel	Mr Peter Jennings	Indigo Planning Limited	We do not agree with ORESA classification of potential allocations. Allocations should follow the flexibility encouraged by draft PPS4 and not be designated for single uses.

		Holdings (Land & Property) Limited			
484	Mr Daniel Kershaw	Russell Homes			Issue EC4 - Type of Land and Premises 2.40 It is acknowledged that a range of types of employment land and premises are required to meet the different needs of modern businesses to encourage the diversification of the local economy and attract key sectors. In considering the types of employment and the needs of modern business it is considered a pragmatic approach balancing national guidance and the requirements of business should be adopted. 2.41 Specifically strategic locations with good access to the motorway network are going to be attractive to modern manufacturing and distribution uses and it is appropriate that such sites are utilised in this manner. In addition these sites maybe attractive for office uses where the end office use is not an A2 office use or where the end user may require a freehold land purchase which is generally difficult to obtain in Town Centres. 2.42 It is agreed that economic corridor sites are attractive to retail related businesses that do not wish to be located within town centres specifically car showrooms builders merchants trade counters uses garden centres etc. A pragmatic approach should be considered to the release of these quasi retail related uses which do not need to be relocated within district centres. 2.43 What is essential is that there is sufficient flexibility to enable business uses falling within use classes A2 B1 B2 B8 C1 C2 D1 D2 and sui generis uses to operate in a framework which provides suitable opportunities for expansion and growth throughout the town. 2.44 In accordance with Draft Planning Policy Statement 4 it is advocated that wherever possible sites should not be designated for single uses and that plan policies should be flexible and able to respond to economic change. It is believed that minimum employment densities should not be set for new development as this may limit and unnecessarily constrain the expansion of small businesses and businesses which require lower employment relatively to the size of the land taken. A minimum employment density requirement may have specific implications for the haulage and distribution uses which would otherwise capitalise on the strategic implication and advantages that the Southern Rochdale Heywood and Middleton areas present. 2.45 In accordance with these principles Russells subsequently support policy EC4B which would seek to identify broad areas and locations suitable for specific business sectors or Use Classes but not restrict other uses on these sites.
Questions EC5 - Visitor Economy					
28	Mrs Pat Donald				My preference here is for EC5B
29	Mrs Pat Donald				EC5B gives a more rural look to the Visitor Economy but I believe some aspects of EC5A should also be considered where this will improve town centres especially where opportunities arise through historical sites.
209	Ms Judith Nelson	Regional Planner English Heritage - North West Region			Q EC5 Heritage based tourism is supported.



237	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			We would recommend the promotion of option EC5B. Rochdale has a significant wealth of natural assets and should avoid creating honey pot effects in specific local areas but provide clear guidance in developing tourism in a sustainable and sensitive manner for these areas
410	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Option EC5A is preferred as it concentrates attention on the existing principal facilities within the Borough which are both unique attractions that can readily be promoted and areas where investment in the Borough's heritage is needed. However whilst investment should be concentrated in these identified locations it should not entirely rule out other tourism investment especially where it is sustainable both in its location and in the form of the development.
279	Ms Rose Freeman	Planning Assistant The Theatres Trust			Option EC5B: A policy to promote tourist facilities and the growth of a tourist industry should support the inclusion of theatre use. A festival or summer season may be a crucial draw and bring major economic advantage to a town but this will only be possible if suitable venues are available. A policy to promote theatre use as part of a relatively small development may make a strong contribution to the character of a town and enhance the experience of visiting the town as a tourist. Cultural services and tourism are inter-dependent with tourists attracted by museums theatres heritage sites arts sport entertainment venues festivals and events. Your existing local visitor facilities should be protected and enhanced through Core Strategy policies with provision for new or improved facilities made to ensure the continuity of successful services. Without such a policy it could become difficult to retain an essential community asset particularly where land values become higher for an alternative use. This policy should also state that the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community.
282	Ms Alison Truman	Planner (North-West) British Waterways			British Waterways is pleased to note that Options EC5A and EC5B both recognise the presence of the Rochdale Canal as a catalyst for visitor and tourism development. The Inland Waterway network is a significant tourism resource providing a route through the borough for waterborne visits providing an attraction in its own right for land based visitors as well as creating an attractive setting for other leisure and tourism based activities. As set out in "Waterways for Tomorrow" (DETR 2000) waterways are "an important national tourism resource" which can enhance the attractiveness of both rural and urban areas link places of interest and generate land or water based tourist visitors in their own right. Furthermore the DCLG "Good Practice Guide on Planning for Tourism" (May 2006) which replaced PPG21 emphasises that waterways are a 'particular tourism resource' at paragraph 4.10 in recognition of their unique characteristics and attributes and highlights the need to consider how this resource together with other resources 'might be protected developed and enhanced.' In the rural areas of the borough it should be noted that as a leisure recreation and tourism resource the canal corridor needs facilities to support its use. The canal network is not footloose nor is it entirely located within established centres and supporting facilities need to be provided within waterways corridors. These could include mooring facilities including large

					<p>marinas service facilities and facilities for land based visitors providing refreshments. Without these essential facilities the ability to realise the economic and social benefits of the canal would be undermined. For example large marina developments can only occur along the canal network and land is not available in urban areas partly because of land prices. They must therefore by their nature occur in open countryside. However they can represent appropriate development in open countryside areas and can be carefully designed to enhance the landscape as well as contributing to the rural economy tourism and leisure. British Waterways would therefore like the Core Strategy to allow for appropriate essential waterway development in rural areas. Developer Contributions The DETR documents "A Framework Document for British Waterways" (1999) and "Waterways for Tomorrow" both outline the Government's commitment to the use of planning conditions obligations or agreements as tools to secure waterway improvements and promote more sustainable transport choices. The British Waterways document "Waterways and Development Plans" (2003) contains full details (at Section 7.8) of how Section 106 monies from development in the vicinity of the waterway will be reinvested in the public asset. This document is available for viewing on our website. It is therefore essential that the Core Strategy clarifies that canalside development will be required to make a positive contribution to the waterway environment and that financial contributions will be sought in order to mitigate for any additional burden on the canal as a result of increased use of the towpath or the expectations of new residents or occupiers overlooking the canal. British Waterways receives no specific central grant funding to invest in and maintain towpaths. It is therefore crucial to improve the pedestrian and cycle networks along the canal corridor by encouraging financial contributions from developers in order to improve towpath surfacing and access improvements and to contribute towards the maintenance and cleanliness of the towpath and waterway. Such developer contributions are essential in order to fully unlock the potential of our waterways as attractive sustainable and accessible transport routes for walking jogging and cycling.</p>
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Questions EC6 - Town Centres Retail and Leisure

3	Unknown	Kirkland Developments Ltd	Mr Richard Moffat	Director Lambert Smith Hampton	<p>The fact that the existing town centres are failing to meet the retail needs of residents and visitors is acknowledged in the document is welcomed. Middleton suffers from a lack of quality shops and it is not addressing the needs of the existing population there is clear evidence that people are choosing to shop elsewhere outside the Borough. The proposed new superstore within Middleton is not likely to address this issue in isolation it is essential that sufficient sites are made available to ensure a range of shopping opportunities exist and that consumer choice is encouraged. It will be necessary to review the town centre boundaries to ensure that sites that are currently in an edge-of-centre location but are highly sustainable and have good access to means of access to public transport are drawn into the centre and identified for development thereby encouraging the development industry to deliver a competitive range of retailing opportunities. The Core Strategy should recognise that high profile sites on the edge of town centres have the potential to bring about regenerative benefits in addition to satisfying need thus site in Gateway locations offer the opportunity through retail development to improve the environmental physical social and economic potential of an area. Option EC6B is</p>
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					preferred in that it recognises the ability of edge of centre sites to improve retail provision in the Borough but does not do so in an overly prescriptive manner thereby allowing the retail industry to bring forward competitive sites
30	Mrs Pat Donald				Prefer EC6C
447	Mr Iain Gerrard	Secretary Littleborough Civic Trust			The question of accessibility of shops jobs and entertainment centres would be answered by creating or enhancing existing ones at a local level i.e. within each community. Centralisation is a failed policy leading to a lack of local facilities and worse pollution from otherwise unnecessary car journeys. We accept that certain types of shops and entertainment can only be successful when serving large populations i.e. opera houses symphony orchestras etc. While these would be uneconomical locally the tendency in the past to situate shop types and entertainments in larger 'centres' which could be provided locally while being economically successful should be curtailed.
280	Ms Rose Freeman	Planning Assistant The Theatres Trust			Option EC6D: Town centres are the heart of communities and an expression of their culture and identity. As well as shops they should provide a range of realistic functions for leisure recreation and cultural activities centred on restaurants pubs clubs theatres cinemas libraries and museums. As such all these elements play an active role in creating and maintaining vibrant town centres and contributing to a stimulating night-time economy. Facilities for future leisure and entertainment use should be concentrated in your town centres as a balanced leisure scene will entertain and stimulate visitors residents and local businesses with visiting audiences enlivening the surrounding area in the evening and providing regular custom for local bars and restaurants outside normal working and shopping hours. It would also be appropriate for the smaller towns and villages generally to provide entertainment leisure and cultural facilities of an appropriate scale and kind to serve their roles and catchments. To quote from your Cultural Strategy on page 16 Nevertheless despite the enthusiasm of local people there is no sizeable venue for arts activities in Rochdale Town centre Littleborough and Milnrow. Your existing local leisure facilities should be protected and enhanced through Core Strategy policies with provision for new or improved facilities made to ensure the well-being of the population. Without such a policy it could become difficult to retain an essential community asset particularly where land values become higher for an alternative use. This policy should also state that the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community.
270	Mr John Lappin				For the reason why Middleton has no top quality shops look no further that the Arndale which moved the main shopping to the edge of the town from the core centre of Long Street Old Hall Street Market Place and Townly Street. Which high quality store or shop wants to trade adjacent to cheap goods takeaways charity shops or estate agents which took over the empty shops.

277	Unknown	Wm Morrison Supermarkets PLC	Ms Laura Fern	Student Planner Peacock and Smith Limited	Do any of the town centre boundaries as identified in the UDP need to be amended? Our client would like to request that the land at former Moss Field County primary School be defined within the town centre boundary of Heywood within the Rochdale Core Strategy. We would like also to highlight that within Rochdale borough Retail Study (June 2006) Para. 9.19 states that there is modest need for further retail floorspace identified in Heywood. Our clients suggest that the expansion of the former school site within the town centre boundary would allow for this expansion in floorspace occur.
274	Unknown	Sainsbury's Supermarkets Ltd	Ms Becki Haines	Planner Turley Associates Ltd	Sainsbury's support the Council's proposed option EC6D for retail policy which would review and then identify the boundaries of Rochdale Middleton Heywood and Littleborough town centres and Milnrow District Centre through the Core Strategy and propose a policy for retail and leisure development in the rest of the borough. The Council should seek to ensure that this policy is in accordance with existing and emerging Planning Policy Statement 6.
283	Unknown	TCS Holdings Limited	Ms Nicola Sewell	Indigo Planning Limited	Central Retail Park is appropriate for retail development and should be allocated as such and given explicit policy recognition in the retail hierarchy in the Rochdale Local Development Framework. Central Retail Park is a well established retail destination and is well related to the town centre. It is situated in a highly sustainable location within easy walking and cycling (500 metres) distance to the main core bus station (450 metres) and the train station (220 metres). The site is also situated adjacent to the proposed metro link which is expected to open in 2012. TCS consider that Rochdale Town Centre should be the principle destination for retail development followed by Middleton Town Centre and Heywood Town Centres as set out in PPS 6. However in addition to Rochdale Town Centre East Area it is necessary for the LDF to identify areas for retail development within and adjacent to Rochdale Town Centre to improve the retail 'offer' for convenience and comparison goods to enable retail growth and increase Rochdale market share. TCS consider that there needs to be explicit policy recognition for appropriate established retail destinations within or adjacent to Rochdale Boundary Retail Study (2006) and the CSIO that Rochdale market share is low and there is a high level of retail capacity expenditure leakage to competing centres. The current level of trade leakage is unsustainable and it is in the interest of good planning that the forthcoming LDF should seek to sustain the level of trade leakage. Central Retail Park will assist in clawing that trade leaking outside the Borough. This will have positive impact on Rochdale Town Centre by improving the economic function of the town centre and thereby enhancing the vitality and viability of the town centre. In addition Central Retail Park has the ability to accommodate units with modern foot prints in order to attract higher retailers and improve the qualitative offer of the town centre. It is evident in the retail market that retailers particularly national operators seek large well configured floorspace in prime retail locations. Retail development at the Central Retail Park will complement the retail offer to Rochdale Town Centre and would have a positive impact on its vitality and viability. The existing retail uses at the Central Retail Park are high transportation generators and the infrastructure is already in place to accommodate these uses. By encouraging further complimentary retail and leisure uses at the Central Retail Park will facilitate linked trips with the resultant sustainability merits. There are no land ownership issues that prevent the (re) development of the site as TCS are

					the sole owners. In addition to sustaining the retail function through reconfiguration of the existing units there is the opportunity to redevelop part of the site. There are no physical or environmental constraints on the site such as conservation historic aspects or natural conservation. The site falls within a flood zone 1 (low risk) as shown on the EA website. The Rochdale LDF should include explicit policy recognition of the opportunity of Central Retail Park as a retail destination supporting its future enhancement and further commercial development.
284	Unknown	TCS Holdings Limited	Ms Nicola Sewell	Indigo Planning Limited	In summary we recommend that the Rochdale Town Centre Boundary should be extended to encompass Central Retail Park. Additionally we suggest the Park should be given explicit policy recognition in the Rochdale retail hierarchy which shall be outlined in the Rochdale Local Development Framework. These representations demonstrate that Central Retail Park is an established retail destination which is well connected to Rochdale Town Centre and by maintaining and enhancing the retail use at the Park will assist in the regeneration of Rochdale Town Centre by improving the qualitative offer and clawing back trade currently leaking to competing centres. Context of Representations Prior to responding to the CSIO the following sets out the planning context of Central Retail Park and the findings of the Rochdale Retail Study (2006). Central Retail Park Central Retail Park is a long established retail destination situated to the south of Rochdale Town Centre. Central Retail Park comprises seven retail units with approximately 13 310 sqm (143 272 sqft) of retail floorspace. In addition the site benefits from an extant planning permission for its redevelopment in part and the creation of a non food retail terrace comprising eight retail units amounting to 11 677sqm (125 694sq ft). Central Retail Park is well related to Rochdale Town Centre. It is situated in a highly sustainable location benefiting from excellent accessibility by all modes of transport. The Retail Park is just a 500m walk from the main retail core in the town centre and is located within a 200m walk of the railway station which provides frequent journeys to Leeds Bradford Manchester and Liverpool as well as local services from Milnrow and Oldham. The Retail Park is also well served by bus transport with frequent services from Manchester and also services from Oldham Baccup Bury and Burnley. There is a local Rochdale circular route which stops at the Retail Park; the circular bus links the Park with the central bus station in the town centre and runs every 15 minutes from Monday to Saturday and hourly on a Sunday. There are a number of bus stops located immediacy adjacent to the Retail Park on Drake Street and Oldham Road serving both north and south bound destinations. In addition there is a proposed metrolink adjacent to the Retail Park which is expected to operate in 2012. Rochdale Borough Retail Study (2006) Rochdale Council commissioned White Young Green to prepare a Retail Study which was published in 2006. The findings of this Study found that there was a high level of trade leaking to competing centres primarily to Oldham Bury Chadderton and Rossendale. The Retail Study (paragraph 8.4) was underpinned by a Household Survey which demonstrated that within the Rochdale Study Area existing shops retain only 63.2% of the main food shopping expenditure and 59.2% of the top of the food shopping expenditure. The Study (paragraph 8.14) identified that the comparison goods expenditure within the whole Study Area amounted to £935.6 million and that the shops in the Study Area retained only 46% of this expenditure. The Study analysed retail capacity on an

				<p>constant market share despite as set out above Rochdale's low market share and high level of retail capacity expenditure leakage to distant locations. The Retail Study noted at paragraph 8.31 in terms of convenience of floorspace that: "the qualitative provision appears to be limited especially in terms of choice and availability of the stores of sufficient type to anchor town centres." The 2006 Study also included a gap analysis of retail and leisure provision in Rochdale which found that whilst there was a strong representation of major national multiples in Rochdale Town Centre there was a heavy focus on discount sectors. the Study identified that a number of key retailers were missing such as Debenhams Next Primark BHS and TK Max. The Study stated at paragraph 5.16 that: "the current size and quality of existing units in Rochdale Town Centre is not appropriate to attract these high quality retailers." Rochdale Council have commissioned White Young Green to update their 2006 Study although to-date this Study has not been published. However the CSIO states that: "The Boroughs Town Centres in particular Rochdale are failing to meet all the retail and leisure needs of residents and visitors. A lack of good quality shops retailers and other complimentary uses needed for thriving and successful town centres is discouraging shoppers. More people are going outside the Borough to do their shopping creating a problem of leakage of expenditure with retail expenditure being lost to towns outside the Borough. This creates a circle of decline with retailers less interested in investing in the Boroughs Town Centres due to low visitor number and people less inclined to use them due to poor choice of facilities." In summary the findings of the Retail Study concluded that there is a need for qualitative improvement for convenience and comparison goods. It is evident that there is a significant level of trade leakage for comparison and convenience goods from Rochdale Borough to more distant shopping centres. The level of existing and projected trade leakage is unsustainable and it is in the interest of good planning that the forthcoming LDF should seek to stem the level of trade leakage. Planning Policy Context PPS6 PPS6 paragraph 2.3 states that Local Planning Authorities should actively plan for growth and manage change in town centre over the plan period. PPS6 encourages the extension of town centre boundaries to accommodate retail growth. At paragraph 2.6 PPS6 states that extensions to town centre boundaries "may also be appropriate where a need for large developments has been identified in the centre. Larger streets may deliver benefits for consumer and Local Planning Authorities should seek to make provision form term in this context". Representations to the Rochdale CSIO Section 2 Issue EC6 Do any of the existing town centre boundaries as identified in the UDP need to be amended? It is necessary to extend the Rochdale Town Centre boundary to accommodate retail growth and improve the market share of Rochdale which will have a positive impact on the economic function of the Borough and thereby improve the vitality and viability of Rochdale Town Centre. The Rochdale Town Centre Boundary (TCB) should be extended to encompass the curtilage of Central Retail Park as the retail units represent a town centre use and have strong pedestrian and cycle linkages with the retail core. I have attached a plan (drawing ref 590001/2) which shows the extent of the extended Rochdale Town Centre Boundary proposed by TCS. It is of significance that Rochdale Council previously found it appropriate to include the site within Rochdale Town Centre Boundary in the former adopted UDP (dated 1999). Central Retail Park is an existing well established retail destination and already functions as part of the commercial area of Rochdale Town Centre. The inclusion of</p>
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				<p>this site within the Rochdale TCB will not dissipate the commercial area and will not extend the centres geographical function given that this area is already functioning as part of the town centre. The inclusion of this site within Rochdale TCB will maintain the “retail offer” and assist in sustaining and enhancing the vitality and viability of Rochdale Town Centre by clawing back trade which is currently leaking to competing centres which is explained in detail below. The Retail Park is located adjacent to a railway line to the south and is bound by two main roads connecting to the town centre which provides a logical physical boundary for the town centre. The area beyond the site to the west is predominately residential which acts as a constraint against further expansion of the town centre. The Retail Park is well related to the town centre it is located at the junction of Drake Street and Oldham Road. Drake Street continues 400m north into the town and provides direct and easy pedestrian and cycle links to the existing town centre. The Metrolink is expected to be operating by 2012. The planning application for the third phase of works which incorporate Rochdale proposes a stop immediately adjacent to the Retail Park on Drake Street. The Metrolink will be a beneficial transport link the Retail Park and the main retail area. In conclusion there are strong planning benefits to include Central Retail Park with the Rochdale Town Centre Boundary. How else could the Core Strategy promote the improvement and regeneration of town centre? The retail policies of the emerging LDF should be positively framed to encourage retail development in Rochdale Town Centre. It is evident from the Rochdale Retail Study (2006) that Rochdale’s market share is low and there is high level of retail capacity expenditure leakage to competing centres. The CSIO should seek to increase Rochdale’s market share for convenience and comparison goods and reduce the level of trade leakage which will assist in the improvement and regeneration of the town centres particularly Rochdale which is the principal location. The aspiration should be for Rochdale to increase its market share and retain a greater proportion of trade within the Borough contributing to both the economic health and the overriding sustainability agenda of Central Government Policy. In particular this will assist in meeting the objectives of transportation policy to reduce the need of travel. The emerging policy should identify suitable and available sites to accommodate units with modern footprints in order to attract higher order retailers and improve the qualitative offer of the Town Centre. By extending the Rochdale TCB to include Central Retail Park with explicit policy recognition to maintain and enhance the Park will assist in the regeneration of Drake Street. As the pedestrian footfall will increase between Central Retail Park and the main retail core then it is likely that investors will be attracted to Drake Street. The adopted UDP identifies that Drake Street is an important route in the Town Centre but its role as a retail area has been in decline for a number of years there has been little investment and the buildings are in poor quality condition. The Rochdale Development Agency have prepared an initiative which aims to restore the commercial vitality and viability of Drake Street. Consequently the extension of the Rochdale Town Centre Boundary to include Central Retail Park will assist in the regeneration of this area as well as the town centre itself. Which of the following options would improve the retail and leisure provision on town centre and the borough? In light of the above TCS support Option EC6C which includes the following:</p> <ul style="list-style-type: none"> <li>• Review and identify town centre boundaries of Rochdale Middleton and Heywood;</li> <li>• Planning policy to be compliant with PPS6 for the retail and leisure development;</li> <li>• General actions and initiatives required to regenerate the town centres and</li> </ul>
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					<p>edge-of-centre locations; • Identification of specific regeneration opportunities and sites within and adjoining town centres such as Rochdale Town Centre East Area and parts of Heywood Town Centre. The Rochdale TCB should be extended to encompass Central Retail Park for the reasons set out above with explicit policy recognition of Central Retail Park in the retail hierarchy. Summary TCS consider that Rochdale Town Centre should be the principal destination for retail development followed by Middleton Town Centre and Heywood Town Centres as set out in PPS6. However in addition to Rochdale Town Centre East Area it is necessary for the LDF to identify areas for retail development within and adjacent to Rochdale Town Centre to improve the retail “offer” for convenience and comparison goods to enable retail growth and increase Rochdale’s market share. TCS consider that there needs to be explicit policy recognition for appropriate established retail destinations within or adjacent to Rochdale Town Centre Boundary such as Central Retail Park. It is evident in the retail market that retailers particularly national operators seek large well configured floorspace in prime retail locations. Central Retail Park has the ability to accommodate such retail uses. Whilst Central Retail Park provides services and facilities which meet the local needs of the neighbouring residential areas it also performs a wider role as it has broad range of retail representation and serves a wide catchment area. It is situated to the southern edge of Rochdale Town Centre in a highly sustainable location and is well related to the main retail core as explained in the description of Central Retail Park above. Central Retail Park has the ability to claw-back trade currently leaking to competing centres. This will have a positive impact on the main retail core through customers linking their trips with the town centre itself and thereby improve the vitality and viability of Rochdale Town Centre. This will reduce the need for residents of Rochdale to travel to more distant centres thereby meeting sustainability agenda of Central Government Policy.</p>
Question EC7 - Primary Shopping Areas					
31	Mrs Pat Donald				EC7B
Housing - Issues and Options (General)					
94	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			We fully support HMR within the Borough and seek its progress as quickly as possible in order to deliver its objectives.
188	Mrs Janet Belfield	Planning Specialist Natural England			We ask that you ensure that allocations for housing give consideration to the natural environment and protected species. Policy should also aim to provide accessible green spaces within easy reach of people's homes. Please see our Accessible Natural Green Space Standards publication.
491	Mr Daniel Kershaw	Russell Homes			3.6 An overall lack of supply of all housing is considered to be evident throughout Rochdale where relatively low levels of new homes have been built in the Borough in recent years. This has restricted housing choice and limited the social and economic benefits of new



					development. 3.7 Issue H1 of the Core Strategy Document acknowledges this with the statement that there is a need to provide sufficient additional homes to support the forecasted growth in new households and the economic growth and regeneration of the Borough. 3.8 This is a fundamental issue and in order to facilitate the regeneration of the Borough to provide a greater choice and type of housing and to enable economic growth the Adopted Regional Spatial Strategy has set a target for Rochdale to provide an additional 400 dwellings per annum between 2003 and 2021. In determining the actual annual requirements the Authority have taken into account the levels of clearance that have occurred in the Borough between the period 2003 to 2008 which resulted in a shortfall in completions over the previous 5 years. Projecting the figure up to 2026 the Core Strategy Period has subsequently set an annual new housing requirement of 450 per annum.
Question H1 - Amount of New Housing					
32	Mrs Pat Donald				H1A I believe in light of the current financial constraints due to the credit crunch that greater consideration should be given to building new socially rented accommodation. Given that we experience downturns in the economy on an irregular basis there is no longer a guarantee that owning your own home is favourable. There are people who would choose social housing as opposed to home ownership when taking into account the additional costs of insurance maintenance interest rate fluctuations. The greatest motivation for owning your own home is that rent is wasted money but so is the interest paid on a mortgage!
91	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			Option H1A – you are required to do this as a minimum by Central Government in any event. H1B – as the RSS are minimum figures this Option cannot be dismissed. Our approach supports higher growth as part of wider objectives to uplift the Borough.
92	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			We support the potential need for planned urban extensions and allocating green field sites (H1B) in order to deliver growth and we attach a site suggestion plan which equates to Site Option No. 3 and ask that this be supported as a planned urban extension for residential purposes.
79	Unknown	CEMEX	Ms Kathryn Thompson	Senior Planner Drivers Jonas LLP	CEMEX supports Option H1B which seeks to go beyond the existing draft RSS requirements in RSS to support additional growth e.g. up to a maximum of 20% above draft RSS which would equate to 550 per annum. CEMEX considers that this is the most suitable approach to housing growth as it reflects the Housing Green Paper and PPS3 requirement for more housing. In particular paragraph 33 of PPS3 states that the Government has overall ambitions to increase housing supply.
152	Mr Philip Rothwell	Senior Development Planning Manager Peel Holdings (Land			In response to Question H1 I consider that Option H1B is most appropriate. It is understood that this would require the allocation of greenfield sites either within the urban area or through planned urban extensions. It is noted that release of greenfield sites is contemplated in a number of the options and I would support Spatial Option 6 which focusses on high growth and dispersed development across the borough.

		& Property) Limited			
150	Unknown	Miller Homes (Strategic) North West	Mr Leon Armstrong	Planner Mosaic Town Planning	Background: The Council believe that their Urban Potential Study has identified sufficient housing land that will meet RSS requirements. They have stated that this supply will meet the brownfield target of 80% as promoted in RSS. Thus “would require little if any greenfield land release”. Whereas if the Council sought to go beyond RSS targets as advocated in the Housing Green Paper and PPS3 then both employment sites and greenfield sites adjacent to the urban area will be allocated as housing through the LDF process. Comment: It has been justified that to tackle problems of affordability delivery of new homes must go beyond the requirements set out in RSS. At the time of the last UDP review the Inspector recommended that ‘slippage’ should not be accounted for. However given the shortfall in delivery in the past 5 years we are of the view that the Council should consider going beyond existing regional requirements based on the past rate of delivery. The number of dwellings required should be specified as a minimum in the light of RSS changes. Furthermore it is apparent from PPS3 that the onus is on the Council to identify sufficient land so far as this is possible rather than having an over-dependence on windfalls.
411	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Option H1A is supported given a) the potential implications for employment land of option H2A and in the light of our submissions on economic development and b) the expectation that current housing projections even only at the level set out in Adopted RSS are now most unlikely to be achieved for at least the initial part of the period covered by the Core Strategy.
442	Ms Debra Holroyd	Regional Planning Officer 4NW			H1 - the housing figures set out in adopted RSS no longer state that they are maximum figures however it is important to recognise that they are not presented as minimum figures either. Policy L4 states that Local Authorities should seek to achieve the provision set out in Table 7.1 (400 average annual dwellings for Rochdale) and paragraph 7.19 states that ‘the overall housing requirement figures for the period covered by this RSS from 2003 to 2021 and the annual average figures are not absolute targets and may be exceeded where justified by evidence of need demand affordability and sustainability issues and fit with relevant local and sub-regional strategies.’ Clear evidence would need to be presented to support option H1B.
309	Mr Nick Scott	Planner The Emerson Group			It is important that the Local Development Framework refrains from being overly prescriptive with regard to development location and type as at times like at the present the deliverability of potentially important developments and regeneration schemes is becoming increasingly difficult complex and in many cases unviable. It is important that in seeking to deliver the Councils important objectives for the Borough the Core Strategy supports these objectives in a non-onerous realistic and deliverable manner. In light of the above the following Issue Options are particularly supported: • H1A
310	Mr Nick Scott	Planner The Emerson Group			It is important that the Local Development Framework refrains from being overly prescriptive with regard to development location and type as at times like at the present the deliverability of potentially important developments and regeneration schemes is becoming increasingly

					difficult complex and in many cases unviable. It is important that in seeking to deliver the Councils important objectives for the Borough the Core Strategy supports these objectives in a non-onerous realistic and deliverable manner. In light of the above the following Issue Options are particularly supported: • H4B
311	Mr Nick Scott	Planner The Emerson Group			It is important that the Local Development Framework refrains from being overly prescriptive with regard to development location and type as at times like at the present the deliverability of potentially important developments and regeneration schemes is becoming increasingly difficult complex and in many cases unviable. It is important that in seeking to deliver the Councils important objectives for the Borough the Core Strategy supports these objectives in a non-onerous realistic and deliverable manner. In light of the above the following Issue Options are particularly supported: • H6A
521	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			Option H1B specifically asks whether provision should be increased by up to 20% more than the RSS figure. The housing requirements in RSS are no longer expressed as ceilings and we would in principal be supportive of increased levels of provision where this would support economic development and regeneration. However the consultation paper currently provides no rationale for increasing the RSS figure to the extent proposed. Before commenting further we would therefore wish to see a clearer justification for the higher housing growth option. This would also need to provide an assessment of the potential implications for the Borough's housing market renewal areas.
552	Unknown	Crosby Lend Lease (North West) Ltd	Mr Mark Worcester	Associate Director Turley Associates Ltd	2.10 As noted above we support the Council's strategy of setting a minimum requirement for housing provision of 450 dwellings per annum to compensate for the historically low levels of development which have occurred in the borough in the period 2003-2007. 2.11 However this figure should be treated as a minimum and the Council should not be seeking to impose a 'ceiling' of 20% above RSS requirement or otherwise. To do so would be contrary to the principles of PPS3 and adopted RSS and may potentially stifle the development of sustainable Greenfield sites. Sustainable Greenfield sites have an important role to play in ensuring that a portfolio of housing sites capable of delivering housing choice are available.
492	Mr Daniel Kershaw	Russell Homes			Question H1 Amount of New Housing 3.9 This question seeks to enquire as to which of two proposed options is the most appropriate with regards to New Housing Provisions up to 2026. Option H1A seeks to plan for additional homes in line with the requirement of RSS which will mean providing an average 450 additional homes per year between 2008 and 2026. Option H1B seeks to go beyond the existing RSS requirements which supports additional growth which would equate to 550 units per annum up to 2026. 3.10 It is noted that within the recent past there have been comparatively low levels of housing development within Rochdale. This is in a period of unprecedented economic growth and stability. 3.11 The economic conditions of the last 10 years in addition to stimulating considerable growth in the numbers of houses that have been delivered is also in part responsible for a cultural shift towards the delivery of high density development sites. It is noted that Planning Policy Guidance Note 3 Housing (March 2000) and Planning Policy Statement 3 (November 2006) were also integral in

				<p>increasing the density of development on sites. It is considered that market conditions which have been integral in delivery of ever increasing housing densities on development sites has now ended and for the foreseeable future it is highly unlikely that developments will be provided at densities that have recently been experienced. 3.12 A key issue to be considered is the departure from the recent trends of high density apartment development schemes on infill sites. The nature of this development has in part been assisted by the wide availability of investment money at individual and institutional levels. This situation has now changed significantly. The diminished prospect of capital growth and the lack of equity being invested into property will result in a shift away from high density investor led townhouse and apartment schemes and the concentration on more traditional patterns of development. As an effect of the reduction in available capital (disposable income and mortgage products) and a reduction in capital growth the investment market in higher townhouse and apartment schemes has reduced significantly. 3.13 The consequences of this are that historic planning consents for high density townhouses and apartment schemes in excess of the 35 dwellings per hectare will need to be reassessed with the deliverability of the outstanding permissions being highly questionable. 3.14 The implications for the immediate future are that densities in excess of 35-40 units per hectare are unlikely to be delivered and if the Council are to achieve 450 units per annum it is likely that consideration of additional land in employment use or additional green field land will have to be considered in order to achieve this objective. 3.15 Russells are very much of the opinion that this unprecedented period of private high density development schemes has now ended and that it is unlikely to change significantly within the Development Framework period. 3.16 It is subsequently contended that Rochdale's Urban Potential Study should be reassessed with lower densities to be attributed to sites where high densities were previously attributed. 3.17 The implications of lower densities needs to be considered in conjunction with the regeneration initiatives which are proposed for the redevelopment of obsolete and redundant industrial sites within urban Township areas. The consequences of the loss of employment sites is that they will need to be replaced. The redevelopment of these sites will principally be for 3-bedroom family houses of which there is a dearth within the urban Township areas. The consequences for the redevelopment of the urban Township sites at lower densities and the incapacity of the open housing market to accommodate the high densities that have recently been achieved will result in a requirement to release additional land for housing and employment uses on green field sites. 3.18 With regards to the two options that have been presented it is therefore considered that in the long term the Council should seek to plan for additional homes in line with the RSS requirements providing an average of 450 units per annum. However it is considered that this option will require greater redevelopment of existing employment sites as need and demand for high density developments does not exist and that this will require the allocation of green field sites for housing and employment uses to accommodate this position. 3.19 It is also contended that the RSS figures are no longer maximum figures and in the event that housing provision does exceed 450 additional homes per annum this in itself should not be a barrier to continued development providing it is supporting the social physical or economical enhancement of the Borough.</p>
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Question H2 - Location of New Housing					
33	Mrs Pat Donald				My preference here is for Spatial Option 4
93	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			Our starting point is that the NW Region itself being one of the highest population densities of any region in Europe is a sustainable location and certainly Rochdale within the Greater Manchester City Region is comparatively well connected to the existing infrastructure. Well planned urban expansion can therefore be highly sustainable along with selective green field release. Whilst RSS seeks to focus development within the centres of the City Regions (such as Manchester and inner Salford/Trafford) we question the deliverability of the level of growth envisaged in this location especially given the complete collapse of the apartment market. There is an important role for Rochdale to play within this wider context therefore to deliver new homes within the conurbation and within the context of bringing local benefits to Rochdale itself. We therefore support a high growth strategy for Rochdale and your SHLAA will assist to identify potential locations accordingly including the attached site
107	Unknown	CEMEX	Ms Kathryn Thompson	Senior Planner Drivers Jonas LLP	CEMEX supports Spatial Option 6 which promotes high growth and dispersed development across the borough. CEMEX considers that this is the most suitable option as it requires new housing to be built more widely across the Borough including development in the existing towns and the potential for development outside the urban area. By developing both brownfield and greenfield sites this will help ensure the maximum delivery of housing. CEMEX are mindful of Central Governments' target that 60% of new housing should be located on brownfield land and the remainder 40% to be accommodated on greenfield sites. CEMEX urges however that the Council maximises the use of brownfield sites before large areas of greenfield land are brought forward for development. In addition CEMEX urges that the Council ensures that new housing is located in sustainable locations close to existing facilities in accordance with PPS3 which states the following: In support of its objective of creating mixed and sustainable communities the Government's policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs key services and infrastructure CEMEX considers that its previously developed site in Nile Street could be used to accommodate some of the Borough's housing requirement on brownfield land in a sustainable location. The site is adjacent to the existing residential uses close to existing facilities amenities and infrastructure in the immediate area and Rochdale town centre.
157	Mr Iain Gerrard	Secretary Littleborough Civic Trust			There has been too much housing development in Littleborough which has taken place without forethought driven by what we see as carelessly applied government pressure which while trying to create a sufficient housing base for the country as a whole has taken little or no account of the needs of individual localities. We feel that there should be a moratorium within Littleborough at least on any large housing proposals for the foreseeable future until such time as a satisfactory infrastructure has been built or rebuilt to satisfy the current level of housing. The government inspired idea that so-called brown-field sites be given over to housing has

					had foreseeable consequences which were as detrimental as the original reason for recommending this was laudable. Designed to ensure that otherwise disused sites would be used for housing in preference to green field sites it has led to the relatively few remaining sites in Littleborough which might have been redeveloped for some form of industry given help to be used up. Any possible introduction of new industry would now find it difficult to find somewhere to build without going onto green belt land. Already referred to above we believe the government's insistence on 400 houses per year (or whatever the latest figure is) without defining in more detail where these are needed in the country as a whole or defining what type of houses are needed is unhelpful. We are also of the view that without some form of regulation the provision of new housing can not be left to developers and the free market who invariably build to suit their own profits.
151	Unknown	Miller Homes (Strategic) North West	Mr Leon Armstrong	Planner Mosaic Town Planning	<p>Comment: Taking into account the changing national and regional perspective on housing delivery we believe that: Option 1: Does not take account of the housing shortfall in the Borough. The option fails to meet targets set at regional level and the need for a five year supply of housing set at a national level. This would stifle the economic development of the Borough as well as missing an opportunity to correct the undersupply. Option 2: The regeneration efforts in pathfinder communities are going some way to address housing renewal however for regeneration to work it needs to coexist alongside market conditions allowing economic development. We believe that focussing solely on regenerating the urban area this will effect the quality and choice of housing. This approach also places heavy reliance on the release of employment land and in turn windfall sites. Although there are potential advantages of reusing brownfield land the reality is such that Rochdale cannot base their housing supply figures solely on these resources. Option 3: Regional Spatial Strategy has designated Rochdale as a Regional Town in the settlement hierarchy of the North West. It follows that most significant development in the Borough should be focussed within Rochdale. The limitations of this approach would mean that greenfield sites would need to come forward. The notion of planned urban extensions in sustainable locations alongside allocated sites in urban areas is an appropriate method of accommodating housing growth in areas of constrained urban capacity. Option 4: As previously explained the principles of the regional settlement hierarchy are to encourage the focus of new development in the designated regional towns and cities. This option is clearly at odds with regional guidance. Option 5: The combination of the above two alternatives can go some way in identifying sufficient land for the plan period. Although RSS does not refer to the small towns of Middleton and Heywood the southern parts of the Borough covered by this strategy are undoubtedly the most accessible. Coupled with the stated transport improvements and high levels of growth within this area this option could be pursued if the housing shortfall is to be addressed. However we are of the view that this alternative should focus development primarily to the Regional Town of Rochdale and then Middleton and Heywood as underlined in the RSS settlement hierarchy. Option 6: An unfocussed high growth approach across the whole Borough is clearly incompatible with Regional and National planning policy and should not be considered as a viable option.</p>

443	Ms Debra Holroyd	Regional Planning Officer 4NW			H2 - in terms of the spatial options presented all are considered to be able to achieve the average annual dwellings figures set out in RSS (although note that the definition of current growth is the RSS annual average rate of 450 dwellings which should actually be 400 dwellings) with options 2- 6 delivering above the current RSS figures. The Programme of Development for the AGMA Growth Point identified that the need to protect employment land and to continue with the renewal process means that it would not be possible to deliver additional housing growth yet. Therefore any consideration of delivering above the adopted RSS figures would need to be clear about the timescale over which this would occur. In the short term there needs to be an emphasis on planning for RSS dwelling requirements with a continued emphasis on housing renewal to support the objectives of the HMR initiative. This is likely to mean a focus on zones A and B identified in options 3 4 and 5. On balance option 3 is probably the most appropriate of the options presented.
553	Unknown	Crosby Lend Lease (North West) Ltd	Mr Mark Worcester	Associate Director Turley Associates Ltd	2.12 We consider that Option 5 is the most appropriate spatial option in terms of housing provision with some qualification. That is the option should recognise that land outside the urban area / presently protected open land is suitable for development solely for housing purposes as well as for mixed use development. 2.13 We consider that this spatial approach would strike an appropriate balance between directing development to the identified regeneration areas whilst allowing for the release of Greenfield sites outside the defined urban area. As noted above this will allow a portfolio of housing sites to be brought forward which in turn will provide the ability to ensure the delivery of housing choice. 2.14 Furthermore the we consider that the focus which Option 5 places on the Southern areas of the borough for new development is entirely appropriate given their linkages with the strategic transportation network and the Regional Centre.
493	Mr Daniel Kershaw	Russell Homes			Issue H2 - Location of New Housing 3.20 The issue notes that in order to promote sustainable neighbourhoods new residential developments should be well served by local facilities and have a good accessibility to a range of services including employment schools and town centres by sustainable forms of travel. 3.21 Russells are supportive of this position and would add that new housing development needs to be delivered throughout the Borough and represent the needs and demands of all aspects of society. 3.22 The regeneration of the inner urban Townships is clearly a priority objective of the Township committees and the Core Strategy document. It is equally important and clearly an objective of the Core Strategy documents that the location of new housing provides an appropriate amount and reflect the choice and needs of all households within the Borough to support the sustainable economic growth of the Borough as a whole. 3.23 Russells is supportive of greater mix and choice of homes in terms of size and tenure and the provision of high quality housing which will improve the overall image of the Borough and help deliver the growth of the economy. 3.24 It is therefore essential that new house building is required to support the existing and planned regeneration proposals (specifically HMR neighbourhoods) but also in sustainable suburban areas to retain and attract people with higher incomes and satisfy aspirational housing need. 3.25 In consideration of all these points Russells therefore supports a number of the principles set out within the Spatial Options specifically where these include the release of employment

					land for housing within inner urban areas the continued regeneration and redevelopment initiatives within the inner urban areas and the release of sufficient land to accommodate development within suburban areas to retain and attract high income households and enable aspirational households the opportunity to move within the town. It is considered that best opportunities for new housing and employment growth in accordance with these points will be delivered by Spatial Option 5. This promotes high development within the Rochdale Southern Heywood and Northern Middleton areas and less development within the North Rochdale and Northern Pennine areas. 3.26 Development should continue to occur within Northern Rochdale and Northern Pennine areas however the limited opportunities for expansion and the relationship with future employment opportunities dictate that these areas should not be seen as major growth areas. 3.27 In summary with regards to H2 H3 and H4 it is advocated that a mix of housing be provided across the Borough but that a clear focus on the central and southern Rochdale areas Middleton area and the Heywood area should be seen as a priority. Problems of accessibility within the Northern Rochdale and Pennine Townships and the high environmental quality of the landscape result in a limited opportunity for further expansion within these areas.
Questions H3 - Priority Areas for Housing Regeneration					
95	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			The Core Strategy should identify regeneration areas and perhaps use AAPs for these but these must be realistic in terms of development costs and the timing of delivery as such areas are typically problematic to redevelop. Policy needs to actively support redevelopment of such areas and avoid placing obstacles to achieving this.
446	Ms Debra Holroyd	Regional Planning Officer 4NW			H3 – 4 NW agree that the Core Strategy should identify broad areas for regeneration and set out the approach to be adopted. Adopted RSS identifies in Policy RDF1 and supporting text para 5.5 that the Housing Market Renewal Areas are overall priorities for investment and regeneration activity and so this should be included within the policy.
494	Mr Daniel Kershaw	Russell Homes			3.27 In summary with regards to H2 H3 and H4 it is advocated that a mix of housing be provided across the Borough but that a clear focus on the central and southern Rochdale areas Middleton area and the Heywood area should be seen as a priority. Problems of accessibility within the Northern Rochdale and Pennine Townships and the high environmental quality of the landscape result in a limited opportunity for further expansion within these areas.
Question H4 - Type of New Housing					
34	Mrs Pat Donald				I favour H4B. There has to be some flexibility in the types and tenures of new properties and this should be influenced by market need. There does need to be some restrictions on buy to let because this could have a detrimental effect on social landlord's abilities to reduce anti-social behaviour where private landlords allow those who have been evicted to rent their properties but do not monitor their behaviour.



96	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			Your Housing Needs/Market Assessment will inform this aspect of the Core Strategy. Equally there needs to be sufficient flexibility in policy for developers to prescribe types as we need to be confident that units will sell in this difficult market. There needs to be policy support for aspirational new homes to diversify the mix.
159	Mr Iain Gerrard	Secretary Littleborough Civic Trust			Reference is made to the age and unsuitability of much of the present housing stock. We do not disagree with this but would be concerned with any wholesale destruction of such housing without first appraising its suitability for conversion to bring it up to present standards. One area we feel needs special protection is the very centre of Littleborough with its quaint arrangement of streets and alleys interesting backwaters and intimate small areas. The street pattern has grown over a long period of time and represents the very essence of Littleborough. We would like to think that it can be protected from unsympathetic redevelopment.
448	Ms Debra Holroyd	Regional Planning Officer 4NW			H4 - Providing clear guidance on the size and type of new housing based on the evidence gathered through the Strategic Housing Market Assessment would provide more certainty for developers. This is supported in Policy L2 and L4.
554	Unknown	Crosby Lend Lease (North West) Ltd	Mr Mark Worcester	Associate Director Turley Associates Ltd	2.15 We have a strong preference for Option H4B. It is important that any policy which seeks to deliver genuine housing choice within the borough is flexible enough to respond to the particular market conditions which may be prevailing at any particular time. We believe Option H4B would achieve this. Option H4A would however potentially preclude such flexibility and may result in the slavish application of policy when individual applications are being dealt with. 2.16 With a policy such as H4B in place it would still be within the gift of the authority to negotiate amendments to the housing mix on any particular development proposal providing of course that any such requests are justified.
495	Mr Daniel Kershaw	Russell Homes			3.27 In summary with regards to H2 H3 and H4 it is advocated that a mix of housing be provided across the Borough but that a clear focus on the central and southern Rochdale areas Middleton area and the Heywood area should be seen as a priority. Problems of accessibility within the Northern Rochdale and Pennine Townships and the high environmental quality of the landscape result in a limited opportunity for further expansion within these areas.
Question H5 - Affordable Housing					
97	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			In terms of affordable housing consideration must be given to the split between social rented and intermediate and RSL's ability to secure HC grant funding according as this dictates what is delivered.
260	Mr Dave	Spatial			The recent Blyth Valley judgement emphasised the need to take account of advice in PPS3 in

	Arstall	Development Manager Government Office North West			respect of affordable housing as the document progresses. In particular paragraph 29 advises that plan wide-targets for affordable housing should reflect an assessment of the likely economic viability of land for housing within the area. We recently circulated an advice note from CLG on this issue which included the following link to the evidence prepared by South Hams District Council as an example of how this issue might be approached: (Link to South Hams Evidence)
158	Mr Iain Gerrard	Secretary Littleborough Civic Trust			Despite above comments there is one exception where it would be seen as acceptable to create a number of affordable houses in the town to accommodate local people who are struggling to own houses of their own. These would need to be of a one or two bedroom design a size which has had almost no provision in any of the recent developments which have been almost exclusively three four or more bedroom types attractive to and affordable only by out-of-towners who owe no allegiance to the locality. An influx of such people can be accommodated on a reasonable scale but the numbers over the last ten years or more have been anything but that. One exception to the larger size of dwellings has been in apartment blocks where some have been one- or two- bedroom units but these are considered as unsuitable for the area and almost useless for families indeed they add to the feeling that Littleborough is in danger of becoming a dormitory town attracting short stay tenants who will never put down any real roots.
449	Ms Debra Holroyd	Regional Planning Officer 4NW			H5 - The proposed approach to affordable housing is appropriate however consideration may need to be given to varying targets across the Borough where appropriate and supported by evidence.
555	Unknown	Crosby Lend Lease (North West) Ltd	Mr Mark Worcester	Associate Director Turley Associates Ltd	2.17 The proposed approach to affordable housing provision is a continuation of that set down in the Council's Supplementary Planning Document which amongst other things requires the provision of affordable housing on all sites containing 15 dwellings or more. 2.18 We would object to the incorporation of any threshold and target contributions within the Core Strategy unless they have been informed by an assessment of the economic viability including the impact on overall levels of housing delivery as is required by paragraph 29 to PPS3. 2.19 Our position on this particular issue is informed by the case of (1) Persimmon Homes (North East Ltd) (2) Barratt Homes Ld (3) Millhouse Developments Ltd v Blyth Valley Borough Council May 2008 (CO/7040/2007). In this particular case Mr Justice Collins quashed a policy known as H4 in the Blyth Valley Core Strategy relating to affordable housing on the basis that it failed to comply with the requirements of paragraph 29 of PPS3. That decision has recently been upheld by the courts of appeal.
496	Mr Daniel Kershaw	Russell Homes			3.28 Issue H5 'Affordable Housing' has acknowledged that there is a need for affordable housing and that current approach seeks the provision of affordable housing on all sites of 15 dwellings or more. 3.29 Russells support the provision of affordable housing but would qualify this with a note that affordable housing should not be rigidly applied where its inclusion would prejudice delivery of a site which would otherwise be acceptable. Where there are clear benefits that can be achieved from the redevelopment of a particular site but the inherent development costs are so prohibitive so as to exclude provision of affordable housing then the

					policy should be sufficiently flexible to enable affordable housing contribution to be reduced or removed.
Question H6 - Density of New Housing					
98	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			We are mindful of the cautious approach taken in RSS. We recommend that you avoid a prescriptive policy on density. A generic policy could state that higher density in sustainable urban locations will be considered or that density will be determined by: market conditions; locational factors. We strongly urge the avoidance of policies that would support a high density of development (ie. Apartments) which in these market conditions will simply not be built to the detriment of the area. We would rather your policies achieve new investment on the ground.
210	Ms Judith Nelson	Regional Planner English Heritage - North West Region			Q H6 PSS 3 sets out that housing density should have regard to the characteristics of the area; H6B is supported. There should also be policies to bring into residential use empty housing and buildings.
556	Unknown	Crosby Lend Lease (North West) Ltd	Mr Mark Worcester	Associate Director Turley Associates Ltd	2.20 We would not be supportive of a policy which seeks to set maximum density levels for particular parts of the borough. 2.21 Whilst it is important to ensure that new developments make the most efficient use of land and in this regard setting a minimum requirement of 30dph would be appropriate the setting of maximum limits would potentially stifle creativity and innovation in design and lead to the slavish application of policy. 2.22 We consider that even without specification of maximum allowable densities the Council would still be able to ensure that new developments are appropriate to the character and appearance of the area in which they are situated through the application of normal development control powers.
497	Mr Daniel Kershaw	Russell Homes			H6 - Density of New Housing 3.30 Core Strategy states that there is generally a lack of sites available for new housing and therefore it is important to ensure that efficient use of land is available. 3.31 PPS 3 sets an indicative minimum density of 30 dwellings to the hectare with high densities encouraged on sites in and around town centres and those that are served well by public transport and local services. 3.32 It is considered that the density of the residential development should be considered on a site specific basis and a policy should be not introduced which sets a range of densities in different locations within the Borough. To this end Russells is supportive of Policy H6A which sets a Borough wide range for density in accordance with PPS3 of a minimum of 30 dwellings to the hectare with the potential for high densities in sustainable locations. 3.33 There should be no areas or locations within the Borough that are specifically identified as being required to provide densities in excess of the minimum PPS3 requirement. Development Briefs and Area Master Plans can be used to illustrate areas where high density developments is preferable however determination of actual density should be through the planning application process with Area Action Plans Development Briefs and Master Plans being a material consideration.
Questions H7 - Gypsies Travellers and Showmen					
261	Mr Dave Arstall	Spatial Development			The Core Strategy will need to set out criteria for the location of gypsy and traveller sites and those for travelling showpeople which will be used to guide the allocation of sites in the

		Manager Government Office North West			relevant DPD.
160	Mr Steve Staines	FFT Planning			Circular 1/2006 indicates that core strategies should set out criteria for the location of Gypsy and Traveller sites which will be used to guide allocations and meet unexpected demand. Hence the policy should list factors to identify locations the circular gives a guide to the sorts of factors which will be required. FFT would like to take this opportunity to remind the council that sites selected should be available affordable and achievable. While the identification of broad areas for sites may be useful it should not deny the possibility of sites being developed elsewhere. Involvement of the local Gypsy and Traveller community will be essential to this process if identification of potential sites as highlighted in the attached sheet.
Questions H8 - Older People and Other Vulnerable Groups					
450	Ms Debra Holroyd	Regional Planning Officer 4NW			H8 - 4NW are currently developing a Regional Supported Housing Strategy. This will provide important context for any policy on meeting the needs of vulnerable groups. As part of this process a needs model is being developed which will provide a picture of need to 2020. For more information on this work contact Martin Morton (martin.morton@4nw.org.uk 01942 776940).
Questions QP1 - Protection of the borough's heritage					
4	Unknown	Kirkland Developments Ltd	Mr Richard Moffat	Director Lambert Smith Hampton	QP1C is the preferred Option. The suggestion that buildings should be contained on a local list is fundamentally flawed. English Heritage provide independent assessment of buildings which merit protection and conservation. The use of local lists has no basis in planning legislation and gives rise to subjective views being taken about the quality of existing buildings based upon purely local affections. Local lists result in an over protective approach to existing buildings thwart regeneration and stifle high quality modern designs.
35	Mrs Pat Donald				QP1D I believe it is important for communities to have their own identity. If we ignore things whether parks or buildings that contribute to an area's character then we lose our background and heritage. Modern can quite comfortably fit in with old without detracting from either and in some instances could even enhance the characters of both.
211	Ms Judith Nelson	Regional Planner English Heritage - North West Region			Q QP1 The special character and appearance of Rochdale's historic environment comprises many elements both statutorily designated and locally important. The introduction of a system of local listing is supported. It is also important to capitalise on wider economic social and environmental benefits which can flow from the historic environment.
455	Mr Iain Gerrard	Secretary Littleborough Civic Trust			This is a worthwhile issue to promote or retain but there can not be a quality of place if the area is covered with more and more housing estates. Each estate filling with people coming to the area because they like living close to the countryside and enjoy overlooking green fields only to find that these views are soon lost to further housing development which then attracts people coming to the area because they like living.... ad nauseum! This is a problem created

					by government demands which override much of the ability of local planners to control development in a manner suitable for the area.
412	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			The National Trust does not support any of the suggested options individually it considers that the policy approach needs to be based upon: <ul style="list-style-type: none"> <li>• Regular reviews of the Borough's heritage resources including new Conservation Area designations if they are needed but not simply for the sake of it</li> <li>• Protection and enhancement of designated heritage assets and their wider settings in accordance with Statute PPG15 and RSS Policy EM1</li> <li>• Ensuring that new development respects and reinforces local distinctiveness where this is a valued component of the local built environment</li> <li>• Utilising the benefits of the historic environment to lead regeneration projects providing a focus and identity for new development</li> <li>• Encouraging the sensitive introduction of sustainable construction techniques including the provision of renewable energy in historic structures. There are now several examples of how this can be successfully achieved e.g. the Trust's conversion of Gibson Mill at Hardcastle Crags – a Listed Building now used as a visitor centre with a cafe and related facilities which is autonomous of all mains connections other than a telephone line.</li> </ul>
Questions QP2 - Design quality of new development					
36	Mrs Pat Donald				QP2C
212	Ms Judith Nelson	Regional Planner English Heritage - North West Region			Q QP2 English Heritage and CABI have published a number of documents on securing the right development in the right place. We have recently published Constructive Conservation in Practice. It is wrong to suggest that protection of the borough's heritage is in opposition to creating a modern built environment as in Issue QP1. The Core Strategy should be pursuing the win win outcomes illustrated in the above document and in Building in Context. The starting point will be a clear understanding of what makes a place special in order to inform how development can be achieved with losing its significance.
189	Mrs Janet Belfield	Planning Specialist Natural England			Design – QP2 – we would support policies to ensure high standards of sustainable design and sustainable materials throughout the borough. Both design and materials should contribute to local character and distinctiveness. This should relate to both buildings and the spaces around them.
413	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			It is considered that the options are not alternatives but can and indeed should be pursued concurrently. To quote PPS1 paras 33 and 34 – “good design is indivisible from good planning” and: “Planning authorities should plan positively for the achievement of high quality and inclusive design for all development including individual buildings public and private spaces and wider area development schemes. Good design should contribute positively to making places better for people. Design which is inappropriate in its context or which fails to take the opportunities available for improving the character and quality of an area and the way it functions should not be accepted.”
Question QP3 - Image					

37	Mrs Pat Donald				There has to be a way to improve all of these areas. Visitors to the Borough would feel cheated if the gateways and corridors made promises it did not keep when they visited unexciting town centres passing through boring and dreary housing areas.
Climate Change Pollution and Natural Resources - Issues and Options (General)					
109	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Again there is no reference to the contribution made by transport to CO2 emissions and pollution and therefore the need to encourage sustainable travel. No mention is made to the potential contribution of Metrolink trams to reducing pollution and carbon emissions.
439	Ms Debra Holroyd	Regional Planning Officer 4NW			In relation to climate change there is a need to ensure that new development integrates sustainable design such as SUDs and the use of Green Infrastructure to help tackle and adapt to climate change effects. Wherever possible new development should be located in areas where flood risk is low. The Core Strategy needs to take account of the actual calculated risk of flooding and levels of mitigation in the area when deciding where development should and should not take place. Sequential tests / Strategic Flood Risk Appraisal (SFRA) should highlight areas of flooding and the potential levels of risk in terms of probability analysis. Development should be guided by the technical/support document and the SFRA. In terms of air pollution and energy issues Rochdale should ensure that the Borough supports sustainable development; if the population can access jobs and services near to their homes then this has a positive affect on climate change. There is also a need to ensure that within new development measures are taken to ensure we conserve energy and protect the natural environment for example taking steps towards the Code for Sustainable homes.
Questions C1 - New development and climate change					
62	Mr David Hardman	Asset Protection United Utilities			Drinking water is a natural resource and the water cycle of production distribution drainage treatment and disposal itself carries a significant carbon footprint. Therefore saving the natural resource of drinking water also reduces our carbon footprint!
38	Mrs Pat Donald				C1A
191	Mrs Janet Belfield	Planning Specialist Natural England			We would support options C1A and C1C and welcome policy to support promotion of energy efficiency and adaptation to the effects of climate change.
238	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			We support all of the options proposed for new development and climate change. Whilst it may be more feasible to take forward option C1A on a borough wide basis it may be beneficial to combine some of the aspirations from option C1B and have some landmark buildings/developments to be exemplars of good practice.
255	Unknown	Crosby Lend Lease (North West) Ltd	Mr Mark Worcester	Associate Director Turley	2.23 It is important to recognise that the arena of renewable energy technology is constantly evolving. In the circumstances we consider that it would be inappropriate to set specific requirements for developments to meet a proportion of their energy requirements through

				Associates Ltd	renewable energy technologies. 2.24 Rather we consider that the focus should be on ensuring that new developments are more energy efficient; that is reducing their demand for energy in the first instance. This can be achieved through measures such as high levels of insulation site layout and orientation of properties at detailed design stage. 2.25 Whichever option is favoured it is important to ensure that policies avoid references to energy efficiency / renewable energy as 'requirements'. Rather they should be expressed as 'targets' thereby allowing flexibility within the development control process; a consideration which will be particularly important when developments are proposed on sites of marginal financial viability.
451	Mr Iain Gerrard	Secretary Littleborough Civic Trust			Climate change issues must not be allowed to lead to the destruction of the 'rural beauty' (Wera Hobsons' words!) of our nearby moorland. The quite disastrous policies of this government to force through the imposition of wind turbines such as those on Scout Moor must be resisted at all levels and this includes building into the Local Development Framework whatever safeguards against such developments that can legally be formulated.
414	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Option C1C is supported provided it is made clear that it applies to all new development (e.g. including changes of use) and that having met relevant measures at the top end of the energy hierarchy (energy efficiency energy conservation) that it also encourages the use of renewable energy technologies appropriate to their location (including micro-generation).
296	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	Option CIA is supported as at the current time this equates to the level of energy reduction that is currently required through Building Regulations. The other two options are considered too onerous to achieve without considerable expenditure. None of the options take into account viability considerations associated with cost of development which we feel should be included or else marginal development sites will not come forward.
306	Mr Nick Scott	Planner The Emerson Group			With regard to Chapter 9 and Option C1 and climate change whilst the objective of the policy is understandable the Council should be aware that at present the construction industry as a whole is undergoing a relatively radical and rapid transformation with regard to improving the environmental performance of buildings and incorporating renewable energy technologies. Future improvements in these areas are scheduled via the Building Regulations process. Presently work towards the proposed standards is proving complex time consuming and costly and it is suggested that any additional requirements imposed by the Authority at a local level in this area would be potentially economically unviable. It is suggested that with regard to the environmental performance of buildings the Authority work toward and adhere to national and regional requirements.
499	Mr Daniel Kershaw	Russell Homes			Issue C1 New Development and Climate Change 4.1 The location design and construction of new development can determine the impact it has in relation to climate change and how well it can adapt to climate change. To this end the Borough is committed to ensuring that all new developments are carbon neutral by 2020 achieved through renewable energy and energy efficiency. 4.2 Russells are supportive of the climate change initiatives and the need to combat reductions in greenhouse gases through energy efficiency and the use of renewable energy

					technology. It is unclear that the renewable energy technologies are capable of delivering a carbon neutral development by 2020 and Russells would welcome further clarity and information from the Council as to how this will be achieved and the implications this will have for the wider strategic objectives of economic growth and annual household provision.
Question C2 - Renewable energy					
39	Mrs Pat Donald				Yes
262	Mr Dave Arstall	Spatial Development Manager Government Office North West			As regards renewable and low carbon energy generation to what extent do you have an evidence based understanding of the local feasibility and potential for renewable and low-carbon technologies including microgeneration to supply new development in the Borough? The PPS1 Climate Change Supplement at paragraph 26 indicates that drawing on this evidence-base the LPA should: I. set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is viable. The target should avoid prescription on technologies and be flexible in how carbon savings from low energy supplies are to be secured; II. where there are particular and demonstrable opportunities for greater use of decentralised or low-carbon energy than the target percentage bring forward development area or site-specific targets to secure this potential; and in bringing forward targets III. set out the type and size of development to which the target will be applied; and IV. ensure there is a clear rationale for the target and it is properly tested.
193	Mrs Janet Belfield	Planning Specialist Natural England			We support the approach in C2 and would welcome microgeneration being promoted throughout the borough subject to the stated caveats at the end of the text. It refers to urban areas and the fringes of urban settlements but it needs also to include isolated houses in countryside locations too where landscape impact would be relevant.
228	Ms Helen Little	Policy Adviser, Environment NFU North West Region			Renewable energy is something that we must begin to take seriously and it is pleasing to see the strategy make consideration of that need. The NFU has a vision that in future all rural businesses will become net energy exporters. This will only be achieved by working closely with the Planning system
454	Mr Iain Gerrard	Secretary Littleborough Civic Trust			The comments on the renewable energy are disputable. The energy produced by the Scout Moor wind turbines is at a cost which we feel is not worth the benefits if any. Variable in production the amount of energy produced is significantly below the claimed potential of the turbines and is usually found to be little more than a quarter of this. Further development along similar lines will deface the moorlands over which so much is made in the Quality of Place section. This form of renewable energy is not acceptable in that we can't have it both ways: if the scenery is valuable then it needs protection from such industrial development.
415	Mr Alan Hubbard	Land Use Planning Adviser (E			Approach generally agreed but would be improved by a specific reference to Landscape Character Assessment.



		Midlands & NW) The National Trust			
275	Unknown	Wm Morrison Supermarkets PLC	Ms Laura Fern	Student Planner Peacock and Smith Limited	Our client supports the Local Authority's approach to maximising its potential for sustainable development of renewable energy. In our view it is supported that the Local Authority encourages the use of renewal energy within commercial developments. However we consider that any such policy should incorporate renewable energy equipment within a development. Accordingly WM Morrison requests that any such policy on renewable energy includes text to confirm that any requirements for developments are subject to tests of viability and suitability. This would therefore meet the intentions of Government Guidance within PPS 22 and its companion guide.
Question C3 - Development and flood risk					
63	Mr David Hardman	Asset Protection United Utilities			United Utilities supports the wording to minimise flood risk both on site and downstream
40	Mrs Pat Donald				Yes
194	Mrs Janet Belfield	Planning Specialist Natural England			We broadly support policy approach C3 concerning flood risk and the promotion of standards to provide measures to ensure development adapts to the effects of climate change.
239	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			The first line of the approach refers to "...minimise flood risk both on site and through increasing flood risk in other areas". It is not clear whether this refers to mitigating flood risk by allowing other areas to flood so that flood risk is reduced elsewhere or whether this is an error and needs to be replaced with 'reducing'. We would ask that this is clarified within the DPD. Some of the urban fringe areas along core river valleys (such as the Roch Spodden Beal) have suffered from a legacy of poor and inappropriate development which has left many sections of river corridor in a highly degraded state. With an emphasis on redeveloping along these core river valley corridors there is significant opportunity to rehabilitate and enhance these river corridors with integrated development that can have a multitude of benefits in respect to landscape amenity biodiversity and flood risk.
416	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Overall approach generally agreed but specific policy development should include a reference to the utilisation of SUDs.
522	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			The approach to flood risk outlined under C3 appears to largely repeat national policy as set out in PPS 25. We see no need for the LDF Core Strategy to repeat national policy.

Question C4 - New development and pollution					
64	Mr David Hardman	Asset Protection United Utilities			United Utilities supports the wording on pollution prevention.
196	Mrs Janet Belfield	Planning Specialist Natural England			We do not entirely support C4 concerning new development and pollution. If development is truly sustainable it should not cause pollution
417	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			It is not considered that the options are mutually exclusive alternatives. All have an important part to play and should be taken forward. However it also important that these issues are considered at a catchment-wide scale and in particular the implications for key natural resources especially water soil and air. For example proper management of the catchment can ensure that peat and soil resources are stable not liable to be washed out and retain a water holding capacity; as a result a number of issues downstream can be managed much more readily – including flooding issues siltation of streams and reservoirs and contamination of water supplies. These concerns are partially picked up in Adopted RSS Policy EM5 but need more detailed and local expression through the Core Strategy.
501	Mr Daniel Kershaw	Russell Homes			Issue C4 New Development and Pollution 4.3 It is acknowledged that new development can contribute towards pollution. It is also considered that new development can improve the environment and ameliorate the pollution caused or assisted by previous uses. 4.4 Russells supports approach C4 noting that the development should not contribute unacceptably to levels of pollution through its location design construction operation and traffic generation. In addition to this where development clearly has potential to ameliorate pollution this consideration should lend support to the development.
Question C5 - Rural landscapes					
41	Mrs Pat Donald				Combination of C5A and C5B
197	Mrs Janet Belfield	Planning Specialist Natural England			We do not have any specific comments to make concerning the options listed however we do consider that all landscapes matter and we would welcome that being reflected in your own policies. We are committed to a future where England's changing landscapes are managed sustainably and are highly valued distinctive expressions of local identity. We consider that landscape is a key aspect of the natural environment and a vital resource. An understanding of landscape character is essential and we fully support the use of landscape character assessments as an evidence base to provide a key foundation for Core Strategies.
229	Ms Helen Little	Policy Adviser, Environment NFU North West Region			Issue C5 expresses concern that the increasing demand for renewable energy will mean the rural landscape is adversely affected. This need not be the case for example the use of wood fuel generated locally by the aboricultural industry and forestry practices offers a currently untapped resource. The installation of small scale Combined Heat and Power generators by rural businesses would cause minor if any landscape impact and make use of a waste generated locally in a sustainable fashion without the need to plant grow & harvest the very

					fashionably described 'biomass' within the Borough
523	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			Issue C5 refers to diversification of the rural economy but only in terms of negative impacts on the rural landscape. We should like to see this issue expressed in a way which positively supports appropriate and sensitive diversification of rural businesses. We would support Option C5B with the proviso that instead of requiring the re-use of farm buildings to contribute to improving rural landscapes the appropriate test is that they have no detrimental impact on rural landscapes. We would also point out that Options C5A and C5C address entirely different issues and are not therefore alternatives to Option C5B.
Question C6 - Waste					
42	Mrs Pat Donald				Yes
386	Ms Alethea Faulkner	Planner (Minerals and Waste) Greater Manchester Geological Unit			The proposed policy direction seems to be in line with the approach set out within both national and regional planning policy. As a result the policy direction fits well with the current direction of the Greater Manchester Joint Waste DPD. However there may be a need as set out within Planning Policy Statement 10 (PPS10) paragraph 16 to refer to the Greater Manchester Municipal Waste Management Strategy as this is a key document which the Core Strategy must be informed by and in turn inform. GMGU has prepared a guidance note for use when preparing the Core Strategy policies for waste PINS/GONW have been involved in the development of this note although it is not endorsed by them. Please find this note attached to this letter for your information.
Question C7 - Minerals					
43	Mrs Pat Donald				Yes
199	Mrs Janet Belfield	Planning Specialist Natural England			we broadly support the approach identified but we would welcome an addition that restoration should contribute to conservation and enhancement of the natural environment.
240	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			In respect to promoting sensitive restoration quarry sites can offer significant nature conservation possibilities after extraction but frequently these opportunities are lost or not pursued. The 'after minerals' website ( <a href="http://www.afterminerals.com/index.aspx">http://www.afterminerals.com/index.aspx</a> ) provides a useful information source in guiding sensitive restoration and aftercare to ensure such opportunities are not lost in the borough
387	Ms Alethea Faulkner	Planner (Minerals and Waste) Greater Manchester Geological Unit			As with Issue C6 – Waste Issue C7 – Minerals appears to be in line with the approach set out within both national planning policy (in particular MPS1) and regional planning policy.
418	Mr Alan Hubbard	Land Use Planning			The discussion around minerals make no reference to the advice in Adopted RSS and in particular the 20% target for recycled/secondary construction aggregates set out in Policy

		Adviser (E Midlands & NW) The National Trust			EM9 and the more general need to take account of the role of substitute/recycled/ secondary minerals as set out in Policy EM7. These considerations need to be overtly expressed in the CS.
Accessibility and Sustainable Transport - Issues and Options (General)					
110	Ms Rosemary Olle	Senior Land Use Planner GMPTE			The last paragraph on page 84 implies that the funding sources identified (LTP TIF and Community Infrastructure Levy) are all definite sources of funding whereas there is no certainty about either TIF or Community Infrastructure Levy yet. It is suggested that the sentence referring to 'congestion charging' is replaced by: "Under the Greater Manchester Future Transport package Greater Manchester would receive 50 years' worth of normal transport investment in just 5 years. The congestion charge will only be introduced in 2013 after at least 80% of the transport solutions have been delivered." If the referendum in December is successful the TIF proposals for Rochdale will include investment in Metrolink rail bus services public transport integration and travel behavioural change measures. More detailed information from each of these work streams is available from GMPTE if required. However it is important to stress that future levels of funding for transport improvements are uncertain until there is a decision on TIF. In order to show that the spatial options are deliverable the Local Infrastructure Plan when developed will need to show that any necessary transport improvements can be funded either by the public sector or developers through planning obligations and Community Infrastructure Levy.
203	Mrs Janet Belfield	Planning Specialist Natural England			We do not wish to favour any particular transport option over any other at this stage. We do however broadly support the promotion of a sustainable transport policy.
452	Ms Debra Holroyd	Regional Planning Officer 4NW			The overall strategy for accessibility and sustainable transport displays integrated thinking and understanding of the key issues and the linkages between them. The vision emphasises improved access and connectivity to key destinations (e.g. community services employment opportunities and development areas) strengthening the level of transport interchange to create a multi-modal network and also exploiting the geographical location of the borough. There is a commitment to matching transport investment with areas which have been identified as priorities for development and regeneration while also seeking to maximise the use of existing transport infrastructure.
503	Mr Daniel Kershaw	Russell Homes			Accessibility and Sustainable Transport Issues and Options 5.1 Issue 1A: Accessibility notes that development should be located where it is accessible by choice of transport modes. Russells agree that accessibility to jobs education shopping leisure and other essential facilities are influenced by determining factors specifically where development is located and the quality and choice of transport links available to serve that development. Russells further agree that accessibility should be tackled at the strategic Borough wide and local levels. The consideration of accessibility with regards to specific development opportunities will need to be considered on a site by site basis and will be dependent on the scale of the proposed development. 5.2 Russells supports the strategic view whereby the Borough needs to draw on

					and contribute to the prosperity of the city region and the Northern Way Initiative. Further consideration to the Borough wide accessibility initiatives is required. Specifically detailed consideration is required with regards to the location of employment opportunities and the accessibility of these employment areas to households across the Borough. At the local level Russells support the view that good access to community facilities local centres and transport interchanges are important to improve quality of life meet sustainability objectives and are essential for the economic growth of the Borough.
Question A1 - Accessibility					
44	Mrs Pat Donald				Options 4 and 5
111	Ms Rosemary Olle	Senior Land Use Planner GMPTE			See comments relating to Chapter 13 which considers each of the Spatial Options in turn.
513	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			Figure 1.1 Predicted Traffic Speeds along the M66 (respective AM and PM time periods)
532	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			Summary Our foremost concern is the operation of and safety on the SRN. Within this context it is vital that there is a full assessment of the transport implications of the strategic land use planning proposals being brought forward by RMBC. The Agency must be satisfied that the LDF documents are both comprehensive and supported by evidence which justifies the objectives whilst being mindful of the implications for the SRN. The scale and location of developments will be dependant upon proposals which are firmly evidence based and deliverable. There is scope for a strategic transport appraisal of the authority to help guide the site selection process and the overarching spatial option which is to be pursued. We also welcome the opportunity to be consulted on further Core Strategy materials and all other associated LDF documents. The overall approach of the Agency is to identify issues and potential problems at an early stage to help guide the content of the LDF process and assist the plan-led system therefore we would be very happy to attend any meetings RMBC require to discuss matters.
498	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			The background paper under the theme of 'congestion' identifies that along sections of the M62 M60 and A627(M) corridors an Air Quality Management Area (AQMA) has been established to deal with high emissions of nitrogen dioxide and fine particulates. Whilst it is acknowledged that these Motorways carry a large volume of through traffic the implications of additional development in Rochdale will need to be considered with due regard to congestion and the associated AQMA. Figure 1.1 provides a snap shot of traffic speeds on the Strategic Road Network (SRN) in the vicinity of Rochdale during the respective AM and PM periods. Whilst the operation of the SRN varies during the course of the days it also experiences differing pressures throughout a typical week. It can however be seen that sections of the M66 M60 and M62 within RMBC experience high volumes of traffic flow during most notably the morning peak hour.
524	Mr Ian Wray	Chief Planner Northwest			Question A1 asks which of the spatial options would provide the most accessible and sustainable pattern of development. This is difficult to answer given the uncertainty over the

		Regional Development Agency			scale of housing and employment land requirements over the plan period. The consultation paper suggests that Spatial Option 2 would provide the most sustainable pattern of development as it focuses new development within the existing built-up area. By focusing development in and around town centres transport hubs and strategic transport corridors this option would be consistent with national and regional planning policies. In terms of sustainable transport we would wish to see Option 2 giving more explicit recognition to the potentially significant role of the Metrolink corridor as a catalyst for development and regeneration along its route. In our comments on the spatial options we explain why we do not consider the current growth scenario (on which Options 1 and 2 are based) to be realistic. Nevertheless given its focus on urban areas and regeneration we consider that Option 2 should form an essential component of the Council's preferred option.
490	Ms Debra Holroyd	Regional Planning Officer 4NW			The development of Kingsway Business Park is a key priority of the strategy. While it is a development of strategic regional importance the scale of the site and suggested employment figure of 7 000 jobs may have a significant impact in terms of the number of vehicles generated through journey-to-work trips and other movements (i.e. HGVs). This is of particular relevance given the proximity of the site to the town of Rochdale and its position directly adjacent to Junction 21 of the M62. It is important that the operation of the strategic route network is not adversely impacted upon particularly at peak travel times. There is likely to be a strong need to provide viable sustainable alternatives to private car travel – this is mentioned in the possible provision of a dedicated rail station and future Metrolink access.
505	Mr Daniel Kershaw	Russell Homes			Question: A1 Accessibility 5.3 With respect to the above points Russells believes that Spatial Option 5 is the most suitable option to integrate the wider housing and economic objectives with the strategic multi-modal transport infrastructure proposals for the Borough. There are clear benefits that can be taken from a number of the options and Spatial Option 5 should not be looked at in isolation however taking a comprehensive view it is considered that the other options cannot deliver the required economic growth and housing delivery as such and the wider planning objectives will be prejudiced. 5.4 Economic growth cannot be dependent upon large scale development within the North Rochdale and North Pennine Townships as these areas suffer from poor accessibility. The concentration of development within Rochdale (which is the Borough's public transport hub) would create a more sustainable pattern of development however in spatial planning terms the opportunities for economic growth within the centre of Rochdale area are limited. Expansion of Kingsway and the strategic significance of this site is clear and this position is to be pursued however a more integrated public transport system is required to link in with wider Township areas of Middleton and Heywood. It is considered that this path should be a priority. The availability and reduced costs of public transport provision through to Kingsway and the surrounding Townships needs to be operational before Kingsway can operate in a fully sustainable manner. 5.5 It is considered that of all the options Option 5 will serve the wider interests of the Borough. Option 5 can enable the delivery of strategic transport improvements throughout the Borough and will not concentrate exclusively on core Townships at the expense of peripheral areas. The infrastructure for Kingsway has in part been provided and funds have been allocated for the delivery of additional services

					<p>specifically the Metro Link extension and the bus services provision. 5.6 It is considered that Spatial Option 5 is the only option which is of a sufficient focus to improve accessibility within the Borough as a whole. The lack of Borough wide focus of Spatial Option 1 will result in difficulties in tailoring new infrastructure improvements to new development. This will inevitably lead to development and public transport initiatives that are uncoordinated and unconnected which will not minimise journey requirements but which will lead to greater dependence of a car. 5.7 Spatial Option 2 will lead to a focus primarily on the core Rochdale area and will not address problems that exist in the outer Townships or the issue of accessibility to these adjacent areas and the wider city region. It will not take advantage of the strategic growth opportunity associated with the M62 corridor (The North European Trade Axis). 5.8 Spatial Option 3 fundamentally fails to strengthen transport links with Heywood and Middleton and there is nothing to address ongoing problems within these outer Townships. 5.9 Spatial Option 4 would allow for the growth of employment opportunities taking advantage of the M62 strategic corridor. It does not sufficiently address the need and opportunity for investment and improvement of core Township areas of Rochdale and Central and Northern Pennine areas. 5.10 Spatial Option 6 has far too little spatial focus and the proposed levels of unplanned development could have significant consequences in terms of accessibility without any of the planned mitigation which is proposed within previous spatial options. This ad hoc approach to the development is clearly contrary to principles of spatial planning and the unplanned consequences are likely to prove detrimental in the long term to the growth and economic development of the Borough. 5.11 In summary it is considered that Spatial Option 5 is the only option which can accommodate the required balance of economic growth housing provision and accessibility on a Borough wide basis.</p>
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**Question A2 - Strategic Transport Improvements**

11	Miss Jean Barlow				<p>I oppose strongly option A2E the proposed Southern Relief Road between M62 junction 19 and Heywood Distribution Park. This proposal has been raised previously in other discussions about the future of Heywood and was quickly dropped after local opposition. I feel that this proposal is not in any way justified and I would like to see evidence that significant numbers of heavy goods vehicles use the route via the town centre to the Distribution Park rather than using the proper motorway links. This relief road would entail a massive cost and would have a massive impact on local people and properties and would be yet another erosion of the local green belt. If evidence can be produced to justify a relief road there are other less costly and lower-impact solutions to the problem. It seems that this proposal has been sneaked into the minute detail of this document without much publicity. A great deal more thought and consultation would be required before any such development is planned.</p>
16	Mrs Lynn Byrne				<p>I am opposed to the option A2E of the Southern Relief Road to M62 Junction 19. This option would have a great impact on local people and their properties and entail huge costs. I feel that HGVs do not pose a problem in Heywood town centre and most likely the majority use the proper motorway link roads. This option would also entail more green belt land disappearing where major development has already taken place in the last few years. If this option goes</p>

					ahead there will be no green belt areas left around the Pilsworth area.
45	Mrs Pat Donald				All of these options sound good but public transport will only attract more users when services are more regular safer and cleaner. Walking in the rain to a smashed bus stop waiting for a bus only for it to pass by because it is full or if you do get on the driver is less than amenable or the bus is dirty or full of foul mouthed youths is not conducive to encouraging more users.
121	Ms Rosemary Olle	Senior Land Use Planner GMPTE			It is suggested that this option becomes two options as they are in fact two separate proposals i.e. a Town Centre Interchange and a Park and Ride at Rochdale Station.
122	Ms Rosemary Olle	Senior Land Use Planner GMPTE			We are pleased to see a reference to this proposal. GMPTE supports the introduction of sections of guided busway between Manchester and Rochdale and has been working on an outline proposal. However a considerable amount of appraisal work and consultation would be needed before a decision could be taken on whether to seek funding for it.
123	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Suggested rewrite to: "Operation of all purpose passenger services on the East Lancashire Railway to Manchester Victoria Bury and points to Rawtenstall". I have removed the reference to Castleton (see comments above) and also avoided making specific reference to 'commuter services' since this implies that there is no market outside the peak periods. GMPTE are currently carrying out a study into the operation of passenger services on the East Lancashire Railway but detailed proposals have yet to be finalised and the feasibility of this proposal assessed.
124	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Reference to modal shift towards public transport could usefully be mentioned in this paragraph. Reference to Castleton should be deleted see previous comments.
125	Ms Rosemary Olle	Senior Land Use Planner GMPTE			All the options listed are important and have a role to play in helping to address borough wide and cross-borough accessibility issues. The list could also include the establishment and development of good quality pedestrian routes to public transport infrastructure particularly in relation to new development. GMPTE also supports the option proposing private contributions to transport improvements in order to complement public sector investment.
112	Ms Rosemary Olle	Senior Land Use Planner GMPTE			The following re-wording is suggested: "The need to complement the extension of Metrolink to Rochdale Town Centre by providing park and ride facilities at Rochdale Station and interchange with bus and rail services."
113	Ms Rosemary Olle	Senior Land Use Planner GMPTE			I am not sure that the East Lancashire Railway scheme would serve Castleton as it is already served by the heavy rail service from Rochdale to Manchester. If a direct public transport link is needed to Heywood a bus based scheme would provide a more attractive frequency far more cost effectively. It is suggested that this sentence is changed to "Maximising the potential of the East Lancashire Railway by operating passenger services that link Heywood Manchester Victoria Bury and Rawtenstall". Also see below "Enhancing Rail Services".



114	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Consideration might be given to merging the sections on 'East Lancashire Railway' and 'Enhancing Rail Services' since they are closely linked together.
530	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			General Comments There are capacity constraints which exist on the SRN and RMBC need to be conscious of these. Also to consider is the implications of additional pressures on local roads cascading across on to neighbouring Trunk Roads and Motorways. Weighting should be placed on Sustainable Transport Corridors and further detail given as to the actual capacity available on the associated public transport services. Given the desire to accommodate development in sustainable locations it is important that additional demand can be accommodated so as not to disincentives potential users and potentially lead to an avoidable increase in car borne trips. With regard to Transport Improvements detailed consideration would need to be given to any measures which are identified to redistribute HGV movements particularly with regard to the point at which vehicles are likely to enter the SRN. This will ensure there is capacity to not only cope with additional demand but that the characteristics associated with such vehicles can be accommodated.
477	Ms Sarah Lee	Planner Manchester Airport			The Core Strategy options currently make no reference to the Manchester Hub . Any improvements in access to Rochdale via the Manchester Hub or other external initiatives would be of great benefit to both the local and regional economy as it would strengthen connections to Manchester Airport and other economic drivers.
466	Mr Iain Gerrard	Secretary Littleborough Civic Trust			We have serious doubts over the long term benefits of Metrolink. Instead of concentrating on greater ways and means for people to leave the Rochdale area each day we feel efforts to attract work to the area would in the long term be of greater benefit. Metrolink is unlikely to bring people to the area (other than returning home in the evening) until the issues of desirability are addressed; desirability to live work be schooled in and be entertained here rather than elsewhere. This is likely to affect Littleborough significantly. The issues of pollution and poor air quality some two thirds of which is attributable to road traffic seem to be forgotten amidst the eagerness for a Metrolink connection. One thing which never seems to be addressed is where the cars will park which people drive to the station and then leave all day; there is nowhere that these could be accommodated in this town without first flattening large areas of it. We are of the view that public transport will never replace the private car. It may alleviate the problem to some extent although with the projections for future car ownership we have seen this is in considerable doubt and we feel that the answer lies in reducing the need and therefore the desire to use the car at all particularly for commuting. This is one of the reasons that we are so keen to promote the idea of communities; places where most of what people require are reasonably close to hand. The Rochdale Canal may present opportunities for attractive developments which benefit from being close or adjacent to a waterway but it will never be a major source of development in itself until such issues as the supply of water and the ridiculous importance given to a miserable water weed are overcome. It has achieved the undesirable characteristic of a canal to be avoided by many boaters even if they could use it between its many closures.
457	Ms Debra	Regional			Specific options are identified to achieve these objectives. These options such as the

	Holroyd	Planning Officer 4NW			Rochdale Interchange park and ride enhanced rail and bus services improved cycle links and stronger travel planning requirements are all in line with wider regional transport objectives.
434	Mr Rob Haughton				During rush hour periods of the day most especially in the morning the levels of traffic on the M62 & M60 are absolutely horrendous from 07:00 to 09:00 and it is recognised by the business community that this is one of the most congested parts of the motorway network in the UK which was demonstrated on the night of the presentation when both the M62 & M60 were gridlocked for over 11 miles. Therefore any plans for the increase in new employment or new housing in this area will simply exacerbate this problem especially in respect of the increased levels of HGV traffic that will result. I have a national role in the Logistics Industry within the UK and this is quite simply our biggest issue in respect of delivering food to our business throughout the UK that include schools hospitals care homes emergency services etc and especially as the majority of food distribution related activities are heavily time critical especially in terms of the daily supply of fresh food products. Unfortunately whether we like it or not for some considerable time now the exiting network is not adequate to meet our current requirements let alone our future needs and plans to introduce more development in an already congested area is in my opinion unrealistic without substantial improvements to the motorway infrastructure. I believe that this fairly fundamental aspect is key in delivering this strategy as a whole and I am disappointed that at this stage this does not look to have been considered in any great detail.
539	Mr Gregory Birch				The southern relief road appears to contradict other considerations within the Core Strategy document. The construction of this road will seriously affect the pollution control zone referred to on page 63. There are no employment sites to access from this road. It is obvious that the intention of this road is to create these sites not to enhance existing. The traffic problem to Middleton Road of HGV's accessing Green Lane will not be relieved by this road. The suggestion that it is a relief road appears weak since it would move the heavy traffic from J18 to J19 which is a relocation of the problem not a resolution. The heavier traffic on the roundabout would increase the difficulty of access from the Middleton Road junctions causing greater traffic queues in a residential area which would require additional crossing controls at peak times The proposed road will carve up arable farmland and destroy the wild life that currently habituates the area.
302	Mr Philip Rothwell	Senior Development Planning Manager Peel Holdings (Land & Property) Limited	Mr Peter Jennings	Indigo Planning Limited	A2E - We support the principle of the proposed link road from Junction 19 of the M62 to Heywood Distribution Park. We see merit in release of some Greenbelt sites and the requirement to generate contributions from this land to contribute toward the link road.
535	Mr David Povey				On a separate issue but related to development – the rail infrastructure must be improved between Manchester City Centre and Heywood especially with the proposed Congestion Charge. In addition has any thought been given to improving the cycling facilities between

					Heywood and Manchester City Centre? I used to cycle into work every day but recently stopped for safety reasons. If the council wants to encourage more cycling and save lives greater consideration needs to be given to (ideally) segregated cycling lanes – some more would be a start. Amsterdam (and even London is better) physically separate the cycling lanes from the motorists.
297	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	We support the proposed Heywood Southern Relief Road to junction 19 of M62.
508	Mr Daniel Kershaw	Russell Homes			Issue A2: Strategic Transport Improvements 5.12 In association with the support of Spatial Option 5 it is recognised that strategic transport infrastructure improvements will be required. In support of this Russells would agree that all 5 options set out at issue A2 'Strategic Transport Improvements' could be facilitated in event that Spatial Option 5 was promoted. The Borough wide benefits are associated with these strategic transport improvements would include much greater connectivity and sustainable transport patterns which ultimately benefits all aspects of the Borough. Economic growth can be facilitated to allow sustainable transport travel patterns to be implemented therefore congestion can be reduced as connectivity to the wider Manchester region to be improved.
Question A3 - Movement within and across the borough					
126	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Phase 3a of Metrolink does not provide a link between Rochdale Railway Station and Kingsway Business Park. As stated above The Kingsway Business Park Metrolink Stop is not currently in the scope of the Phase 3a scheme although Phase 3a makes passive provision for the addition of the stop in its design. The stop is an optional addition to the Phase 3b Rochdale Town Centre scheme subject to developer funding.
127	Ms Rosemary Olle	Senior Land Use Planner GMPTE			GMPTE support the improvement of rail stations and the provision of park and ride facilities at suitable locations but also recognise the importance of improving pedestrian links both for short journeys on foot and for providing access to public transport.
263	Mr Dave Arstall	Spatial Development Manager Government Office North West			Issue A3 – Movement within and across the Borough With regard to the section on improving cycle links you might also give consideration to the need to provide secure cycle parking and facilities.
241	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			We would support the establishment and improvement of cycle links in the borough (A3A) by way of a cycling strategy to identify priorities.
242	Mrs Helen Telfer	Planning Liaison Officer			We would raise significant concerns in respect to any A58 relief road (A3F) located within the Roch Valley with consequent large scale environmental impacts.

		Environment Agency			
531	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			We would expect any development which may impact on the SRN to provide a Transport Assessment and these should be further supported by Travel Plan documents. RMBC should seek to ensure that where Travel Plans are conditioned there is a monitoring regime in place to continual assess and review the performance of these working documents.
458	Ms Debra Holroyd	Regional Planning Officer 4NW			Specific options are identified to achieve these objectives. These options such as the Rochdale Interchange park and ride enhanced rail and bus services improved cycle links and stronger travel planning requirements are all in line with wider regional transport objectives.
510	Mr Daniel Kershaw	Russell Homes			Issue A3: Movement Within and Across the Borough 5.13 Russells agrees that transport improvements are required to enhance accessibility transport integration and regeneration objectives within and across Rochdale Borough. The problems and opportunities that need to be addressed including cycle links encouraging non-car trips improving bus accessibility and reliability improved access to Kingsway Business Park private contributions to transport improvements by development and the A58 peak time congestion release are all initiatives which will improve and enhance movement within and across the Borough. In answer to the question A3 Russells do not believe that there is one best option which addresses the issue of cross-Borough accessibility. The options proposed are not mutually exclusive and need to be considered as a whole.
Questions A4 - Accessibility to Town Centres Transport Hubs and Local Services					
15	Miss Jean Barlow				I am concerned that there has been little evidence of any strategic planning for Heywood Town Centre. We currently have the development of a large Joint Service Centre with no provision of parking facilities in what is already a problem area for parking. I understand that employees working in the building will have to use a car park some distance away but what about the many visitors to the building ? Why does the council not make good use of prime land available in the town centre such as the large site of the former Mossfield School ? A4C Northern Relief Road - Heywood Town Centre : I believe that the route which has previously been discussed for such a relief road - West Starkey Street - is not suitable - this road has along history of subsidence due to the disused mine workings underground. It also runs alongside the soon-to-be-redeveloped Sports and Leisure Centre. Is it really sensible to plan to have all the pollution of a major truck road alongside an outdoor sports facility ? And there are also footballs occasionally coming over the fence into the roadway. And there are sheltered housing complexes for elderly people situated along this road. I would like to see some more strategic thinking to redevelop the town centre in Heywood.
17	Mrs Lynn Byrne				I am opposed to option A4C. There is no evidence to show that this option will improve the flow of traffic through Heywood town centre. The proposed relief road route is entirely unsuitable. West Starkey Street has persistent subsidence problems. All but 3 of the residential properties on this stretch of road are for the elderly population and pedestrian numbers will rise significantly when the new Leisure Village is built. I do not agree that HGVs

					are a problem in Heywood town centre - the majority of these vehicles are those delivering to Morrisons - and it should be this problem that is addressed. This option will also result in yet more loss of recreational land - namely the green bordered by George St Peel Street and Bank Top Street.
459	Ms Debra Holroyd	Regional Planning Officer 4NW			Specific options are identified to achieve these objectives. These options such as the Rochdale Interchange park and ride enhanced rail and bus services improved cycle links and stronger travel planning requirements are all in line with wider regional transport objectives.
541	Mr Ray Stowell				I SUPPORT THE REQUIREMENT FOR GREATER ACCESS TO PUBLIC TRANSPORT HOWEVER To quote your own definition. Paths pavements and street furniture Paths should be 1800mm wide. They should be even firm non-slip and smooth. At road crossings make sure the pavement is lowered to 10mm only above the level of the road. Crossings should be directly opposite each other and at least one metre away from corners. The ramp should be no steeper than 1:20. Street furniture such as benches or lamp posts should be a different colour from the surroundings to make them easier to see. Cashpoints letter boxes etc should be set at a height of 1040mm. Under feet you should be able to feel a texture which gives a warning of obstacles. Avoid placing advertising boards outside shops. I WOULD LOVE TO USE PUBLIC TRANSPORT BUT I AM UNABLE TO EVEN GET FROM MY FRONT DOOR TO THE NEAREST BUS STOP IN MY WHEELCHAIR (50MTRS AWAY ) AS THERE ARE NO DROPPED KERBS THE ENTIRE LENGTH OF BURY OLD ROAD.
512	Mr Daniel Kershaw	Russell Homes			Issue A4: Accessibility to Town Centres Transport Hubs and Local Services 5.14 Russells supports the view that local transport improvements are required to improve access to community facilities town centres and transport hubs in the Borough. To this end improving pedestrian links rail station improvements are supported as is the relief of congestion and HGV's in Heywood Town Centre. With specific regards to this last point it is considered that the proposal to construct a one-way Eastbound relief road to the north of the town centre is not viable and such a proposal should be dismissed. 5.15 The need to ease congestion within Heywood Town Centre is important however the one-way relief road to the north of the Town Centre will have a negative impact on commercial businesses as it will remove passing traffic within a prime shopping area. It is anticipated that approximately 10-15% of trade within Heywood is established as a consequence of the through traffic. The removal of the through traffic will subsequently have a significant effect on the gross revenue generated within the district centre. 5.16 Furthermore it will not remove the issue of HGV's travelling through the Town Centre as there will still be a route through the town Centre and out to Junction 19 of the M62. 5.17 A more sustainable and deliverable option to this proposal would be to promote the southern relief road which would link the junction of Hareshill Road and Manchester Road with Junction 19 of the M62 motorway. This proposal would have significant benefits over and above the proposed northern relief road. Accessibility - Heywood Southern Relief Road 5.18 Russells supports the industrial link from Hareshill Road to Junction 19 of the M62. It would enable a second route onto the Motorway network providing relief at Junction 3 of the M66 and at Junction 18 of the M60/M62. Traffic from Heywood Distribution Park would have a link

				<p>in an easterly direction to Leeds and could therefore avoid these Junctions. 5.19 It is understood that a number of proposals have been suggested. One initial proposal was for a dual carriageway from M62 Junction 19 through to the M66 Junction 3. It is considered that the environmental cost of this proposal is too high. 5.20 The second proposal is for an industrial distributor road linking from Hareshill Road to Junction 19. This would not be a dual carriageway. 5.21 In order to facilitate the delivery of the relief road a comprehensive development of land between Manchester Road Hareshill Road and the M62 Motorway would be required to fund this road. 5.22 These representations support the release of a mixed use development opportunity on the site. The extent of the size is still to be established but as a minimum some 50-60 acres are advocated in order to facilitate a comprehensive development and the delivery of the relief road. 5.23 It is considered that development would enable the Heywood Relief Road without competing directly and compromising the principles of development at Kingsway. The objectives on Kingsway need not necessarily be compromised by the release of a mixed use development site at Heywood as the two objectives are not mutually exclusive. Kingsway is a regional development site attracting regional interests. Heywood is more localised and on a smaller scale. 5.24 There are many advantages from the creation of the link road and new development within this area. Haulage and distribution wagons travelling to Heywood Distribution Park from Leeds have to add on an additional 20% to the journey to drive passed Junction 19 of the M62 and arrive via Simister Island (Junction 18 of the M60) and Junction 3 of the M66. The additional 20% is both an environmental and economic cost and the creation of the link road mitigates this. 5.25 The existing alternative to the extended journey via Simister Island results in HGV's access the Heywood Distribution Park through the Town Centre of Heywood. Traffic calming and restriction measures have been put in place on Hareshill Road however HGV's consequently drive through the centre of Heywood which in turn creates problems of congestion pollution and manoeuvrability within the Town Centre and along the A58 highway network. 5.26 In summary with regards to the Northern Relief Road within Heywood Russells are of the opinion that this is not a deliverable proposal. The deliverability of this proposal is limited. It will not remove HGV's that will still come through the Town and it will take passing traffic away from the centre of Heywood. It is believed that 10%-15% of trade within the town comes from passing traffic and if this is removed there are real concerns that this will lose 10% - 15% of turnover. The Southern Relief Road is a much more deliverable practical and preferable solution. 5.27 Russells are therefore actively promoting the allocation of an industrial led mixed-use development scheme which would include residential industrial and non-retail commercial development on the Collop Gate Farm site. The scheme has the potential to facilitate the wider objectives of economic growth employment provision reversal of the recent decline in the population enhancement of the operational facilities of the existing Heywood Industrial Estate the removal of congestion within Heywood Town Centre the provision of good quality residential development which is required within Heywood and the benefit to the community in terms of economic prosperity and environment sustainability. It will alleviate wider congestion problems by redirecting traffic around Simister Island through Junction 3 of the M66 to access Heywood Distribution Park. It will also enable the traffic calming proposals along Heap Brow (Heywood) to be implemented as it provides a necessary second relief road out of Heywood Distribution Park.</p>
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Green Infrastructure (Open Space and Countryside) - Issues and Options (General)					
223	Mrs Janet Belfield	Planning Specialist Natural England			We would welcome references to conservation and enhancement of geodiversity as this appears to have been omitted from the document.
174	Mr Brian Green	Regional Planning Manager Sport England North West			<p>Sport England seeks a planned approach complemented by the protection of existing facilities and the provision of new ones where appropriate. The relevant objectives and policy approaches are as follows: Theme Policy Objective Policy approaches A planned approach</p> <p><b>PLANNING POLICY OBJECTIVE 1:</b> To ensure that a planned approach to the provision of facilities and opportunities for sport and recreation is taken by planning authorities in order to meet the needs of the local community. The level of provision should be determined locally based on local assessments of need and take account of wider than local requirements for strategic or specialist facilities.</p> <ul style="list-style-type: none"> <li>• encompass a planned approach to the provision of sports facilities based on sound assessments of current and future needs for strategic and local sports facilities which take account of any deficiencies;</li> <li>• support a mix of facilities which comprise strategic local and specialist facilities;</li> <li>• take account of the priorities set out in local sports strategies and national governing body facility strategies; and</li> <li>• take account of cross-boundary issues for major or specialist facilities which have extensive catchment areas.</li> </ul> <p>Protecting existing places for sport</p> <p><b>PLANNING POLICY OBJECTIVE 2:</b> To prevent the loss of facilities or access to natural resources which are important in terms of sports development. Should redevelopment be unavoidable an equivalent (or better) replacement facility should be provided in a suitable location.</p> <ul style="list-style-type: none"> <li>• seek to protect or enhance existing sites and facilities and access to natural resources which are important for sport;</li> <li>• identify important sites for sport on the proposals map for protection (including open space and playing fields and facilities which provide access to natural resources such as launching and landing facilities); and</li> <li>• require at least an equivalent replacement in terms of quality quantity and accessibility if the loss of a facility is unavoidable unless it can be proved that the facility is genuinely redundant and there is no demand for a replacement based on a thorough local assessment.</li> </ul> <p>Providing for sport through new development</p> <p><b>PLANNING POLICY OBJECTIVE 8:</b> To promote the use of planning obligations as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance to meet the needs arising from new development</p> <ul style="list-style-type: none"> <li>• indicate the circumstances in which planning obligations will be sought;</li> <li>• use the support of local assessments of community requirements likely to be generated by new development and which take account of the adequacy of existing provision and local Sport and Recreation Plans/Strategies;</li> <li>• ensure that adequate provision of sports facilities is secured as part of major new residential development. Additional requirements could be specified in a development brief;</li> <li>• seek developer contributions from small scale residential developments towards new or enhanced provision where the development will create additional demand or place additional pressure on existing sports facilities;</li> <li>• where it is not practicable to provide new facilities as an integral part of a new development seek contributions towards off-site provision or enhancement which is directly related to the development;</li> <li>• seek financial contributions to the long-term maintenance of any new facilities</li> </ul>

					<p>provided as a result of a new development; and</p> <ul style="list-style-type: none"> <li>• encourage the provision of more places for sport in association with major commercial and retail developments. Derived from the above and looking ahead to the production of the Core Strategy Preferred Options Document as a minimum there should be policy-related consideration of:</li> <li>• open space provision and protection;</li> <li>• facility provision;</li> <li>• access for all/equality of access;</li> <li>• quality of provision;</li> <li>• the needs of specific sports and user groups; and</li> <li>• opportunities for countryside recreation.</li> </ul> <p>• In all cases a sound evidence base is required to underpin any policy which is developed to address these issues as noted above. In helping sport and recreation to take a stronger role in the Core Strategy the following checklist of aspirations for sport and recreation might be helpful:</p> <p>Theme Does the Core Strategy ...</p> <ul style="list-style-type: none"> <li>• Objective-setting</li> <li>• Set out clear objectives for sport and recreation?</li> <li>• Reflect community strategy objectives for sport and recreation?</li> <li>• Safeguard facilities?</li> <li>• Promote accessible facilities?</li> <li>• Development of a strategic framework for the provision of sport opportunities?</li> </ul> <p>Developing and using the evidence base</p> <ul style="list-style-type: none"> <li>• Employ a sound evidence base to help inform policy making?</li> <li>• Identify a hierarchy of sport and recreation provision?</li> <li>• Use policies which anticipate future sport and recreation needs?</li> </ul> <p>Connecting policies and plans</p> <ul style="list-style-type: none"> <li>• Recognise the role of sport in contributing to a wide range of spatial planning issues: regeneration health promotion crime reduction quality of life etc?</li> <li>• Establish connections between different policy arenas?</li> </ul> <p>Promoting sustainability and quality of life issues</p> <ul style="list-style-type: none"> <li>• Promote sustainable design of sports facilities?</li> <li>• Promote sustainable resource management/stewardship through the relationship between sport and the natural environment?</li> <li>• Promote mixed use schemes such that there is an appropriate presence of sport and recreation as part of a balanced community?</li> </ul> <p>Developing spatial planning approaches</p> <ul style="list-style-type: none"> <li>• Maximise contributions to spatial planning initiatives such as greenspace networks or better use of the urban fringe and the wider countryside?</li> <li>• Develop policies which respond to the expressed needs and demands of marginal or controversial sports with due regard to resource protection and wider sustainability issues?</li> <li>• Explore opportunities for sport and recreation to make a contribution to unprogrammed development proposals?</li> </ul>
252	Ms Cindy Huxley	Secretary Castleton (EC) Residents Association			<p>Any plan that does not include the further degeneration of Castleton is preferable to me and mine. To make any area an attractive vibrant and thriving place where people want to live work visit and do business the people who live there have to be happy. There is nothing better than personal recommendation. PPG17 (2002) - 'Planning for Open Space Sport and Recreation provides guidance on how local authorities need to provide local networks of high quality well managed and maintained open spaces and recreational facilities to help create attractive and safe urban environments and assist with nature conservation and biodiversity. Open spaces can contribute to the quality of life of all those living in both urban and rural areas. Developments on existing open spaces should generally be resisted and efforts made to enhance and improve those spaces .....'</p> <p>This has not yet happened in Castleton. The local amenities have been significantly reduced over the past few years including the loss of open space with the demise of Cowm Top. The last UDP gave some protection to Trub and the land south of Cripplegate Lane with the inclusion of green space corridors.</p>
215	Ms Jacqui				I read your notice concerning having a say in the future development of the borough in the



	Robinson				<p>Middleton Guardian. Having recently moved to the Alkrington area and now having a 10 month old son I am very disappointed at the lack of playgrounds or play facilities in the area. I am aware that there are several areas that have previously been used as play areas and now these areas (Penrhyn Park Kirkway Stocks Boardman Fold/Worcester Road etc.) are derelict and covered with broken grass dog dirt and litter. I have no choice but to drive out of the area to Chadderton Park Foxdenton Park or one of the many parks in the Bury area. This is not ideal as I am currently on maternity leave and on a tight budget. Additionally I also resent having to use my car given the current emphasis on the environment and it is not conducive to promoting a healthy lifestyle. In an area where there are many families (one third of Alkrington households are families according to the RMBC census) and I find it unacceptable that there are no suitable facilities that can be readily accessed. I urge the Rochdale council to provide parks and recreational areas where our children can play run around and work towards a healthy active lifestyle. The children of Alkrington and Middleton are being deprived of this. Councils like Bolton provide children of all ages with play areas soccer pitches and numerous grounds for the more active. As close neighbouring councils Oldham Bury Bolton and Manchester all manage to provide so much more for the children in their area. Rochdale has provided small pockets of provision seemingly forgetting about Middleton.</p>
216	Ms Zena Campbell				<p>I have seen your notice in my local paper regarding the future development of the borough and am writing to you with great hope and expectation! I feel as an Alkrington resident that Rochdale council does not give Alkrington or Middleton a fair cut of resources. I read with outrage that a sham of a consultation process had taken place regarding the development of Penrhyn Park. The proposals were posted on a van on Penrhyn Avenue...for immediate residents only to see. The local councillors should have engaged all local residents in the consultation about what to do about Penrhyn Park and all the other play areas in Alkrington a decision which affects one in three (according the census data on RMBC website) Alkrington households decisions cannot be made just by the 16 people who voted no to the very limited democratic consultation the council carried out. I too have grown up on Alkrington and remember many happy hours spent on Penrhyn Park Kirkway Stocks Mainway East and Worcester Road play areas. It had been a while since I had made use of these facilities but last year as I now have a son of my own I took a walk around my old childhood memory areas only to find barren patches of grass where the play equipment once was and that their sole use is now a for dog walking (or should that be fouling) - and not a child in sight. I feel cheated that I have to drive out of the Middleton area to get to a well maintained park. If only Rochdale council could liaise with Bury council who have vast number of well kept respected childrens play areas catering for all age ranges. Opposition to the Penrhyn Park proposal seems to lie with fears of the play equipment encouraging more anti-social behaviour. I am very sceptical of this view and believe Rochdale council has provided the children here with nothing more than areas of derelict waste land and it is currently being given no regard and used as sights for anti-social behaviour. If we give our children something to be proud of and keep it well maintained and on top of security surely we can achieve something close to what Bury has. It is a scary thought to look at statistics predicting 1 in 5 children will be obese by 2010 surely providing good quality well maintained play areas that they can walk to has never been more</p>

					important. Parks are areas where children can play run and exercise - the children of Alkrington and Middleton are being deprived of this.
218	Ms Zena Campbell				An issue close to heart at the moment is the total lack of free play and recreation facilities in the Alkrington area of Middleton. We have already had a handful of residents protesting and stopped a derelict park area on the grounds of Penrhyn park being redeveloped. The view of the opposition is that ASB will prevail. Our younger children have no where safe or well maintained to play during the day and the teenagers have nothing provided for them to do at nights. I remember being able to play on a variety of play areas in Alkrington as I grew up...all have now been left to rot! Bury Bolton and Oldham councils all seem to be aware of the importance of creating play and recreation areas for their children. They are helping to allow children to exercise free of charge socialise in their communities and give them a sense of pride about their areas. Just take a look at the above Council websites to view the work they have put into their parks and recreational spaces.
226	Mrs Lou Campbell				I have seen the notice in the Middleton Guardian and felt compelled to write on this topical issue: ALKRINGTON NEEDS PLAY AREAS & RECREATIONAL GROUNDS!! I have lived on Alkrington for 36 years with my husband and brought up four children here all of whom we were able to walk to Penrhyn Park. Now with a young grandson I have found we can no longer do what is considered the eco-friendly option and have to drive outside of the Middleton area to find well maintained play areas. We were disgusted to read that proposals for transforming Penrhyn Park had been posted on a play vehicle on Penryhn Avenue last week. The park would not be used exclusively by Penrhyn Avenue residents. The Park grounds have been there for years probably before many of the residents chose to buy their house next to a park. Only 76 people voted with a majority of 16 people deciding on such a massive decision that affects thousands of people in Alkrington. How can this be democracy? Research has proved that if we give our children good quality well maintained areas to play on they will be cared for. (Green Spaces Better Places - DTLR) Currently Penrhyn Park is a derelict area and is treated with an equal disregard by many dog owners and teenagers. In the summer I was saddened to see three children all under the age of 8 'playing' on the overgrown grassed area here. Their game was to find empty beer bottles and throw them to smash them. I urge the council to allow our children to have safe well maintained play areas. Our younger children need play equipment and our older children recreational areas to play sports on instead of congregating outside shops.
437	Ms Debra Holroyd	Regional Planning Officer 4NW			The text within the Core Strategy seems to be positive in terms of the natural environment and we welcome the use of Green Infrastructure as a means of creating a network of natural and green space that has multiple benefits' for Rochdale. However there is a need to ensure this is continued throughout the future preparation of the Strategy. In terms of the natural environment there is a need to ensure that growth has a limited impact on biodiversity green areas including open space and green belt. The Core Strategy should encourage new areas for biodiversity /conservation / green space on balance with growth within the Borough. 4NW would like emphasise the importance of protecting conserving and enhancing the historic

					assets of the Borough and that growth within the borough has a positive impact on these assets - this should be stressed through out the Core Strategy.
Question G1 - Biodiversity					
46	Mrs Pat Donald				G1B
219	Mrs Janet Belfield	Planning Specialist Natural England			Biodiversity is one of Natural England's core interests and each Local Authority through its Duty imposed by the Natural Environment and Rural Communities Act is obliged through its functions to conserve and enhance biodiversity. We support G1B as it particularly covers identifying key areas for biodiversity interest and seeks opportunities through all development to conserve and enhance. It is a more strategic approach to identify and deliver opportunities for biodiversity conservation and enhancement. Biodiversity exists everywhere; even brownfield sites make contributions to conserving and enhancing biodiversity. This needs to be reflected in the Core Strategy.
243	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			We would support option G1B in respect to biodiversity which actively promotes positive measures.
419	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Option G1B is the preferred one but it is considered that there are a number of related matters that it should seek to address: <ul style="list-style-type: none"> <li>• Promoting biodiversity does in the wider sense have a part to play but more importantly in addition to protecting existing biodiversity features it is necessary to a) enhance them and b) extend them – i.e. provide more/better habitats in appropriate locations.</li> <li>• Locational considerations should specifically consider the role of wildlife corridors not just for the purposes of foraging but also as part of the wider requirements to adapt to the impacts of climate change e.g. by enabling species (flora and fauna) to migrate.</li> <li>• Some back gardens may well provide important nature conservation habitats but linkages and the role of water corridors together with the ability to enhance footpath and other transport linkages with appropriate boundary planting are arguably of greater importance.</li> </ul>
Question G2 - River Valleys					
47	Mrs Pat Donald				G2A
220	Mrs Janet Belfield	Planning Specialist Natural England			We support the comprehensive approach identified in G2A and it should link this comprehensive approach to all aspects of green infrastructure and not just river valleys
244	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			We would support option G2A for river valleys particularly in its approach in identifying opportunities for enhancement which not only will have recreation and biodiversity benefits but can also have positive flood risk reduction water quality as well as enhance the overall image of the area.

467	Mr Iain Gerrard	Secretary Littleborough Civic Trust			There are conflicting demands being made on much of the various areas and these require resolution. As stated above the Rochdale Canal can not serve its proper modern function as a tourist attraction and resort if it is to be permanently hamstrung by the lack of a decent water source to carry it through all conditions and the restrictions imposed by the protection afforded to insignificant water weed. We understand that this weed is not unique to this area but is rare in the United Kingdom while being reasonably common elsewhere in Europe. Its protection is based upon casual 'let's see if this works' figures and decisions made at the time of the canal's reopening and which are not based on any scientifically proven formula or consideration. These early decisions have never been followed up to 'see if it works' and remain like a millstone around further development of the canal's potential. The weed is given more importance than the need to open the canal up to greater use by boats. A degree of compromise is necessary; the weed could be protected to a greater extent physically by 'fencing off' strips of canal along the edge without creating bottlenecks any worse than exist already. The canal is barely capable of description as a 'wide canal' in parts so maintaining its full original width could be compromised if this allowed many more boat movements. The lack of water which is fundamental to the working of the canal for boats is not being addressed by British Waterways which while being charged with the maintenance of the canal is working reactively to problems rather than proactively via a proper maintenance schedule. This attitude is crippling attempts locally to create a marina in Littleborough which would greatly add to the leisure appeal hereabouts and increase the economic returns to the area not to mention creating a few jobs.
421	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Option G2A is supported.
Question G3 - Open Spaces					
48	Mrs Pat Donald				G3B
221	Mrs Janet Belfield	Planning Specialist Natural England			support G3A and aspects of G3B. We do not support the loss of open spaces and do not genuinely consider that there should be any net loss in amount of open space by permitting alternative development on sites used by the communities they serve. We do concur that some problem sites may not be solved through investment alone. The council should ensure 'no net loss' of open spaces and should provide for the needs and desires of those in the communities that use them. Open spaces will also host value for biodiversity and this should be reflected too
420	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands &			Option G3B is generally supported but policy development will also need to consider the wider multi-functional benefits of open spaces e.g. in flood control addressing climate change issues providing health benefits and forming wildlife corridors.

		NW) The National Trust			
271	Mr John Lappin				Green belt and open green spaces should be sacrosanct and the public expect no demand that councils protect them on their behalf. "To take on the developers not work with them".
Question G4 - Countryside					
49	Mrs Pat Donald				G4A
222	Mrs Janet Belfield	Planning Specialist Natural England			We support the targeted approach advocated by G4A but would welcome a further approach that safeguarded access for those communities with good access at present and minimised pressure on 'honey pot' sites. Access to green spaces and enjoyment of them has a direct link to the health and well-being of communities and needs to link in with option 12 below.
245	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			We would also support option G4A in respect to countryside in creating improved access to the countryside particularly where there is a opportunity to co-ordinate this with other strategic issues such as A3A (sustainable transport links to key sites such as Kingsway).
422	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Option G4A is preferred.
People and Community - Issues and Options (General)					
217	Ms Zena Campbell				As a resident Alkington within the borough of Rochdale council and also a teacher I am very aware of every schools responsibility to participate in community cohesion. In short the Education and Inspections Act 2006 introduced a duty on all maintained schools in England to promote community cohesion and on Ofsted to report on the contributions made in this area. The duty on schools came into effect on 1 September 2007 and the duty on Ofsted was due to commence in September 2008. Broadly a school's contribution to community cohesion can be grouped under three headings: 1. Teaching learning and curriculum Helping pupils to learn to understand others to value diversity whilst also promoting shared values to promote awareness of human rights and to apply and defend them and to develop the skills of participation and responsible action. 2. Equity and excellence To ensure equal opportunities for all to succeed at the highest level possible striving to remove barriers to access and participation in learning and wider activities and working to eliminate variations in outcomes for different groups. 3. Engagement and extended services To provide reasonable means for children young people their friends and families to interact with people from different backgrounds and build positive relations: including links with different schools and communities and the provision of extended services with opportunities for pupils families and the wider community to take part in activities and receive services which build positive

					<p>interaction and achievement for all groups. Numerous case studies can be viewed on teacher.net in particular the case study which highlights a reduction in violence and vandalism by improving community relations in Tower Hamlets. Acts of violence and vandalism have massively reduced and the school now opens its doors to a wide range of community groups and events. Links have been developed with a range of agencies in the area including the Safer Neighbourhood Team the Rapid Response Team Tenancy Groups and other community and youth service groups. This case study came to the summary that: Working alongside different organisations and individuals in the local area to enhance the community environment. I am pleased that the council is having a 'Consultation on the issues &amp; opinions for the future development of the borough.' However I feel that although this meeting is open to all a limited cross section of the borough will be represented. Key issues like anti-social behaviour and provision of children's play areas and recreation grounds should involve the children and teenagers of our Borough. I want to keep my letter as succinct as possible and will therefore not go into the masses of research that has been carried out proving a positive correlation between involving children's ideas putting them into practice and reduction in ASB crime etc .I am asking if the authority could contact ALL of its LEA schools with a general letter to the PSCHE/Community Cohesion leader asking for the children to voice their opinions on what they feel should be happening in their local area. The information provided above is to make the point that it is now every schools responsibility to become involved in its wider community. An issue close to heart at the moment is the total lack of free play and recreation facilities in the Alkrington area of Middleton. We have already had a handful of residents protesting and stopped a derelict park area on the grounds of Penrhyn park being redeveloped. The view of the opposition is that ASB will prevail. Our younger children have nowhere safe or well maintained to play during the day and the teenagers have nothing provided for them to do at nights. I remember being able to play on a variety of play areas in Alkrington as I grew up...all have now been left to rot! Bury Bolton and Oldham councils all seem to be aware of the importance of creating play and recreation areas for their children. They are helping to allow children to exercise free of charge socialise in their communities and give them a sense of pride about their areas. Just take a look at the above Council websites to view the work they have put into their parks and recreational spaces. I look forward to hearing your views and hope you will research the viability of working with the EA schools to help to make our borough one to be proud of.</p>
Question PC1 - Health					
50	Mrs Pat Donald				Both options need to be implemented.
Question PC2 - Education					
51	Mrs Pat Donald				Yes
471	Mr Iain Gerrard	Secretary Littleborough Civic Trust			We fundamentally disagree with Rochdale's present approach to higher (11 - 18 years old) education. We believe that schools are a necessary part of any community and should be within the community. The present policy appears to be towards larger and fewer schools with the result that particularly in the case of Littleborough school children in higher education have to leave the town to go to school. This results in many more and longer school journeys

					inevitably by cars in the main and where children who are involved in extra-curricular activities they remain out of their community while these are carried out. School buildings which could and should be multi-purpose with some of their facilities being available to the general population are therefore also out of town. Too much emphasis is placed on pupil numbers to the exclusion of any other consideration; another approach which leads to the destruction of communities. We feel that a significant chance has been lost by this blinkered approach. Hollingworth High is due for a complete refurbishment. A new school could have been built in Littleborough to replace it without disturbance to the existing school and a transfer made when it was finished. The released land in Milnrow could then have been used for alternative purposes or sold.
Questions PC3 - Access to Community Facilities					
52	Mrs Pat Donald				PC3A amd PC3B
171	Mr Brian Green	Regional Planning Manager Sport England North West			Sport England welcome reference to sport and recreation facilities under this section but are concerned that as noted above there is an absence of reference to any background material that might assist the reader in making an informed choice. The spatial portrait and reference to the evidence base should have supported this but in the document as it stands appears not to do so.
468	Mr Iain Gerrard	Secretary Littleborough Civic Trust			References to community infrastructure appear to exclude places of entertainment (as against recreation). The need for a theatre either amateur or professional is possibly greater than would be apparent to the casual observer.
424	Unknown	National Offender Management Service (NOMS)	Ms Ailie Savage	Planning Consultant Atkins	PPS12 'Local Development Frameworks' notes that the core strategy development plan document should set out broad locations for delivering the housing and other strategic development needs such as essential public services. Paragraph 4.1 encourages early involvement of government agencies in the preparation of LDFs while paragraph B3 requires local planning authorities to develop a strategic approach to infrastructure provision (including community facilities) when preparing local development documents. Circular 3/98 'Planning for Future Prison Development' highlights the continuing overcrowding within the prison estate and the need to replace outdated and inadequate facilities. Specifically there is a need to identify more sites for new prisons. The Secretary of State expects that local planning authorities will work together with the Prison Service to identify land for new prisons through the development plan process. The Circular advises that in order to enable authorities to make provision for prisons within their development plans the Prison Service will consult with authorities about likely areas of future need (paragraph 7). Circular 3/98 recognises at Paragraph 2 that there should be guidance in development plans on community facilities and infrastructure requirements and also that they should take account of the need for new prison developments which should be identified through the planning system. The Circular notes that in identifying potential prison sites the Prison Service has to take account of local and regional requirements for additional prison places the court catchment areas served and the relationship of the site to nearby population centres. It goes on to specify a number of other site development considerations and also recognises that the objectives of sustainable

					development and in particular the need to reduce unnecessary travel should apply to site selection. Prisons should not be located too far from the centres of population they serve and there should be reasonably good accessibility to public transport services. While there are no specific proposals for new prison development in your district at present nor specific sites identified in line with Government guidance NOMS requests that you consider the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period. I would be pleased to propose a detailed policy for inclusion in your Development Plan Document and would welcome your views on how this proposal should be taken forward.
Question PC4 - Community Safety					
53	Mrs Pat Donald				Yes
Spatial Options (General)					
173	Mr Brian Green	Regional Planning Manager Sport England North West			Whilst it is appreciated that the spatial options are necessarily drawn at a high level and focused on how housing growth will be accommodated across the Borough this should be accompanied by the systematic consideration of community facilities such as sport and recreation resources. Again this is only possible where there is up-to-date picture of open space and sports facility provision and use.
285	M Taylor				Of the six options presented in your consultation document we believe that Options 1 or/and 2 are the only ones which fully address the gateway issues. There is considerable interest in preserving green belt and protected open land currently both in the national press and also government thinking. Environmentally the replacement of natural open land by buildings has a major affect on both the eco system and drainage / ground water absorption. We believe there are many brown field sites which are available for development and/or improvement within the borough and these should be used fully before the use of green belt/protected open land which as you are well aware will never be returned to their original condition if they are appropriated for development. The borough does not need to become a sprawling conurbation to enable commercial/residential development to meet future needs.
Questions SO - Spatial Options					
10	Miss Jean Barlow				I disagree with the proposed development of green belt land to the south of Heywood as described in spatial options 4 5 and 6. I oppose in principle any industrial development on green belt land and in particular feel that this area has had more than enough erosion of green belt recently. Please see my comments against site options 7 8 and 9 where I provide more detailed reasons. The target of providing 450 additional dwellings per annum is inconsistent with the background document and also the spatial portrait section of this document which state the RSS target to be 400 not 450.
100	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			We are less comfortable with the Zonal approach of Options 3 4 and 5 although Options 4 and 5 do support the attached site put forward for new housing. We also support regeneration objectives (Option 2) but this on its own will constrain investment and deliverability.



128	Ms Rosemary Olle	Senior Land Use Planner GMPTE			It would appear that some of the options particularly Options 1 and 6 which are looking at dispersed development patterns could lead to congestion problems and encourage the use of the private car. In the interests of sustainability and the use of public transport GMPTE does not support these two options. Options 5 and 6 appear to depend on considerable investment in public transport to enable new sites to be accessed in a sustainable manner and this may not be achievable for financial reasons. Options 3 4 and 5 which focus new development in particular zones within the Borough could also be disadvantageous in terms of accessibility as people would need to travel from one area of the borough to another which could add to congestion problems. From a public transport perspective I would consider that Option 2 would probably meet GMPTE's desire to see new development located in areas of good accessibility by public transport.
213	Ms Judith Nelson	Regional Planner English Heritage - North West Region			Spatial Options From the information included in the report the spatial options all appear to have both negative and positive impacts upon the historic environment. At this stage therefore I am unable to make any detailed comments.
224	Mrs Janet Belfield	Planning Specialist Natural England			We have no desire at this time to express favour for one over another spatial option. Whilst we would broadly support policies to promote urban concentration we would not support policies that lead to a loss of urban gardens and other green space. Brownfield sites can host biodiversity interests and this should be considered in any future redevelopment proposals. Areas of green and open space and should be conserved and enhanced and safeguarded to ensure no net loss. They contribute to enhanced quality of life for residents and provide habitat for wildlife contributing to urban biodiversity. We would welcome a planned approach to the development of Rochdale with 'green infrastructure' at its heart. We consider it appropriate to refer you to our publication 'Accessible Natural Greenspace Standards in Towns and Cities'. The publication aims to encourage the provision of green space within 300m of every home. A link is available here: <a href="http://naturalengland.communisis.com/naturalenglandshop/docs/R526%20part%201.pdf">http://naturalengland.communisis.com/naturalenglandshop/docs/R526%20part%201.pdf</a> Greenfield development has the potential to directly or indirectly cause detrimental effects upon biodiversity and the natural environment. If this option is pursued we ask that you give significant consideration to issues concerning designated sites (including European Sites SSSIs LNRs and BHSs); habitat and species; biodiversity and geodiversity; landscape character and quality; green infrastructure; and recreation and access to the countryside in working up any preferred options.
253	Ms Cindy Huxley	Secretary Castleton (EC) Residents Association			(see 252) It is for these reasons I find Spatial Option 4 to be the better option if it means the regeneration of Castleton without further loss of open space and amenities. Although I disagree with the building on green belt that this plan proposes.
246	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			The spatial options will need to be sequentially tested where specific development sites have been proposed in order to justify them from a flood stance. A completed level 2 SFRA will need to be in place in order to do this. Therefore at this stage the Environment would object to any option being taken forward that has specific strategic sites until they have been

					sequentially tested.
153	Unknown	Miller Homes (Strategic) North West	Mr Leon Armstrong	Planner Mosaic Town Planning	We believe that of the six options provided by the Council Option 3 provides the best alternative based on National and Regional guidance.
507	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			<p>We are keen to discuss with RMBC officers the various assessment exercises which have already been undertaken including Stress Maps which will help develop the preferred option. Option Appraisal Appended to this letter is a table presenting the differing options the comments of RMBC and the observations of the Agency to the respective scenarios. We acknowledge that these sites do not represent firm options but an assessment has been undertaken to gain an appreciation of the wider strategic options exclusive of the Kingsway Business Park. The Agency has utilised PENELOPE (Program Evaluating North of England Land-use Options and Population Effects) to identify the likely distribution patterns associated with the various options for development and the associated sites. The gravity modelling process gives a first impression of the likely pressures which could be placed on the SRN. The modelling has relied on various 'broad brush' assumptions which can be refined as site selection and the quantum of development is better defined. Figures 1.2 1.3 1.4 and 1.5 provide a visual representation of the potential Greenfield Development Sites and the likely distribution of trips on to the road network. Whilst the assessment is undertaken in isolation of associated highway considerations it can be seen that there is the potential for particular options to generate notable movements on the SRN. In summary we are conscious that particular development scenarios could place pressures on our network at locations which already experience high traffic levels at peak times. It is important that RMBC seek to explore the implications of the differing scenarios to provide a Transport evidence base. In order for RMBC to justify and prove the deliverability of the preferred spatial option it is crucial that assessments are undertaken to outline the anticipate implications of development. We are consequently unable to comment upon a preferred option without such detail being presented. We acknowledge that RMBC have sought to identify potential transport issues which may conflict with the presented options but it is important that these matters are assessed potentially through a strategic transport appraisal. Figure 1.2 Spatial Option 3 – Trip Distribution Exercise (in vehicle numbers) Figure 1.3 Spatial Option 4 – Trip Distribution Exercise (in vehicle numbers) Figure 1.4 Spatial Option 5 – Trip Distribution Exercise (in vehicle numbers) Figure 1.5 Spatial Option 6 – Trip Distribution Exercise (in vehicle numbers) Evidence Base The general methodology appears consistent with the LDF guidance. The transport element of the document has been identified as being integral to development and weighted accordingly. We are however conscious of the need to further interrogate the site selection process so as to justify the preferred option. There is a 'key evidence' chapter which outlines the reference documents but lacks any transport specific documents beyond the Greater Manchester Local Transport Plan. There is a lack of modelling of the transport implications of the differing development scenarios with regard to the spatial options. Whilst strategic transport improvements have been identified the extent of their geographical impact can be further explored. There is also scope for a thematic representation of the cumulative sustainability factors associated with different locations helping to provide an evidence base.</p>

					<p>We acknowledge that particular site allocations will be explored in future documents but the overarching strategy should be reinforced with an evidence base at this stage. The transport related impacts of the proposed options should be assessed so as to help identify why alternatives will ultimately be discounted and importantly to reinforced the preferred option. Matters relating to sustainability are key and we supports the recognition of strategic borough wide and local level considerations. Furthermore the discussion of funding mechanisms is also welcomed at this early stage in the process. The Agency is conscious of the opportunities for the local authority to assume a 'ring master' role to help bring together different interests and it is hoped that on larger developments such an approach could be adopted. We note RMBC have considered 'Strategic Objective 5 – Accessibility and Sustainable transport' against each of the proposed spatial options. We would be keen to encourage developments in locations where public transport will reduced the dependency on car borne trips. However it is important that the available public transport infrastructure is assessed to see if there is adequate residual capacity. Particular Spatial Options will be dependant on transport improvements and this would need to be explored accordingly. In pursuing a preferred option it is important that infrastructure improvements can be identified and as such development brought forward in a managed and focused approach. The North West of England Plan Regional Spatial Strategy (RSS) 2021 The latest RSS document was published during the consultation period associated with the LDF document and as such should be considered within any forthcoming option appraisals to ensure consistency and general conformity with the overarching regional document. The document discusses Transportation under the theme of 'connecting people and places' with specific policies relating to Transport and the wider integration of sustainable development. The North West of England Plan Regional Spatial Strategy (RSS) 2021 The latest RSS document was published during the consultation period associated with the LDF document and as such should be considered within any forthcoming option appraisals to ensure consistency and general conformity with the overarching regional document. The document discusses Transportation under the theme of 'connecting people and places' with specific policies relating to Transport and the wider integration of sustainable development. We are aware of the wider planning environment associated with RMBC given the Renaissance Masterplan (March 2005) and the broader investment in the Authority. The transport interchange in the town centre also builds upon the aspirations to develop 'accessible and sustainable' transport.</p>
479	Ms Sarah Lee	Planner Manchester Airport			<p>Generally the majority of the Options considered within the document feel very inward looking and overlook a major opportunity to make improvements to the borough through external influences. While the document does recognise that these external influences exist they need to be incorporated into the Options.</p>
380	Mr David Williams	Walks Co-ordinator Ramblers Association			<p>All green belt land should be vigoursly protected i.e. options 4/5 or 6 unacceptable.</p>
445	Ms Debra	Regional			<p>H2 - in terms of the spatial options presented all are considered to be able to achieve the</p>

	Holroyd	Planning Officer 4NW			average annual dwellings figures set out in RSS (although note that the definition of current growth is the RSS annual average rate of 450 dwellings which should actually be 400 dwellings) with options 2- 6 delivering above the current RSS figures. The Programme of Development for the AGMA Growth Point identified that the need to protect employment land and to continue with the renewal process means that it would not be possible to deliver additional housing growth yet. Therefore any consideration of delivering above the adopted RSS figures would need to be clear about the timescale over which this would occur. In the short term there needs to be an emphasis on planning for RSS dwelling requirements with a continued emphasis on housing renewal to support the objectives of the HMR initiative. This is likely to mean a focus on zones A and B identified in options 3 4 and 5. On balance option 3 is probably the most appropriate of the options presented.
316	Mrs N Delafield				I wish to complain regarding your thoughts of swallowing up the last remaining pieces of grassland surrounding Middleton. We are a town in our own right and should be respected as such but over the years the greed of Rochdale has eroded most of fields. Rochdale has acres of green land but always looks towards Middleton. Is'nt it enough that we have no metro links now and none are planned but we are expected to vote to be charged on roads with no better travel plans in the pipeline for us. You have taken away most of our fields so please leave alone what we have left.
305	Mr Nick Scott	Planner The Emerson Group			PPS 3: Housing; states that the planning system should deliver a flexible responsive supply of land managed in a way that makes efficient and effective use of land including the re-use of previously developed land where appropriate whilst PPG 4: Industrial commercial development and small firms; highlights that the planning system should adopt a positive approach to accommodating employment related development. To meet these objectives it is felt that a combination of the principles established in Spatial Options 1 and 6 are better suited to facilitate the broad national policy objectives noted above and the local objectives contained within the Issues and Options paper. A general dispersal of development across the Borough is judged to provide the optimum level of flexibility to the Council and developers in future however it is noted that this need not be at the level of 'high growth' included within the Issues and Options Spatial Option 6 unless the Authority deemed this higher level necessary. A general dispersal approach in accordance with the requirements of the adopted RSS would be deemed satisfactory. Whilst we would agree that certain forms of development could be concentrated within particular areas for instance the majority of major retail proposals could be prioritised within Rochdale Town Centre it is believed that to focus residential and employment development within a set geographic area would be potentially too prescriptive and contrary to the national policies noted above. Whilst Spatial Options 1 and 6 are more general a combination of their objectives would provide the Council and developers alike greater flexibility in preparing and assessing proposals based more on individual merits rather than a particular set geographic location or indicative regional and sub regional summaries. It is important that the Local Development Framework refrains from being overly prescriptive with regard to development location and type as at times like at the present the deliverability of potentially important developments and regeneration schemes is becoming increasingly

					difficult complex and in many cases unviable. It is important that in seeking to deliver the Councils important objectives for the Borough the Core Strategy supports these objectives in a non-onerous realistic and deliverable manner.
382	E Webster				I don't see any benefit to Heywood in any of the options here. What we need are more bungalows for Heywood people not for anyone who just fancies moving into the area. We would like you to leave our green belt area alone we don't need any more of it going to business parks. Why don't you give Heywood people the chance to say what we want not what you have already decided we are going to get.
525	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			As well as considering the broad distribution of new development the spatial options consider alternative growth scenarios ranging from 'current growth' under Option 1 to 'high growth' under Option 6. With regard to employment land the current growth scenario proposes no new allocations on top of the existing supply and is in effect a 'no growth' scenario. Having regard to the RSS requirement for Greater Manchester and the Council's Employment Land study we do not consider this scenario to be realistic. We have also previously referred to the need for a more rigorous exercise to apportion the RSS employment land requirement between the Greater Manchester districts and there being no clear rationale for the higher level of housing provision proposed under the high growth scenario. For these reasons we do not consider ourselves to be in a position to express support for any of the spatial options set out in the consultation document. In our view the preferred option must be underpinned by a robust evidence base detailing: a) the scale of employment land required with reference to Rochdale's share of the overall requirement for Greater Manchester as set out in RSS; b) the likely impact of any additional housing provision over the minimum requirement in RSS on housing markets in the HMR areas; and c) the supply of land for housing and employment as set out in the Council's Employment Land Review and Strategic Housing Land Availability Assessment; With regard to specific spatial options we would make the following observations: Spatial Option 1 would provide no clear priorities for regeneration. By adopting an 'unplanned' approach to development within the urban area it would be overly reliant on windfall housing sites (and thus contrary to advice in PPS 3). For these reasons alone we would suggest that this option is discounted. Option 2 has a more targeted approach to regeneration focusing on the existing urban area and making best use of existing resources and infrastructure The Agency considers that Option 2 should form an integral component of the Council's preferred option. The need for additional allocations outside the urban area (as proposed under Options 3 4 5 and 6) is very much dependent upon the evidence base The consultation paper says that Option 3 seeks to maximise the benefits of Kingsway Business Park. Again we would see this as an essential component of the LDF Core Strategy whichever spatial option is chosen. We would therefore suggest that the preferred option should feature the following core elements: a) the role of Kingsway Business Park in delivering economic development in the Borough; b) the role of Metrolink as a catalyst for economic development and housing growth along a sustainable transport corridor; c) Rochdale's role within the Manchester city-region with particular reference to its share of the overall employment land requirement set out in RSS.

488	Ms Debra Holroyd	Regional Planning Officer 4NW			The 6 spatial options put forward will have varying impacts upon the delivery of economic development opportunities for Rochdale. From a purely economic perspective Option 5 would provide the greatest number of opportunities to meet the requirements set out in RSS however meeting these requirements would come at the cost of pursuing mixed use development on protected open land and designated Green Belt sites an approach that would not be supported when considering the wider scope of RSS. Taking this into account Option 3 appears to be the most sustainable option in terms of economic development whilst also delivering opportunities for improvements to the local economy and in turn helping to achieve the policy aspirations as set out in W1 W2 W3 and W4.
303	Mr Philip Rothwell	Senior Development Planning Manager Peel Holdings (Land & Property) Limited	Mr Peter Jennings	Indigo Planning Limited	We have no particular views regarding the 6 Spatial Options. We note that the proposed link road to Heywood Distribution Park forms part of options 4 5 and 6.
514	Mr Daniel Kershaw	Russell Homes			SPATIAL OPTIONS 6.1 Of the 6 Spatial Options that have been proposed Russells have consistently argued that Spatial Option 5 is the most comprehensive of the 6 options. Option 5 will achieve strategic objectives of economic growth housing delivery and sustainable and integrated transportation patterns in a planned and controlled format which is in the best interests of all aspects of the community and which need not compromise the green infrastructure and environmental initiatives. It can deliver a quality and lasting environment with the principles of good design being the foundation of the option. 6.2 Looking at alternative options it is quite evident that Spatial Option 1 is far too unplanned lacks uncertainty and will not deliver the large infrastructure and regeneration led development projects that are being proposed. It will not shape the Town and it will not enable the Town to link in with the adjoining regions in terms of housing transportation or economy. It is a reactive rather than a proactive approach and it is generally weak in all areas. It will lead to ad hoc and unplanned development and is contrary to national and regional planning principles. 6.3 With regards to Spatial Option 2 there are many aspects of this initiative which are beneficial. It will facilitate housing led regeneration within priority areas. It will enable development along key strategic corridors within the Rochdale area however it would not deliver the economic growth that is vital for the long term prospects of the Borough and it would lead to a greater loss of employment land. Finally it does not deliver a real choice of housing and it does not provide high quality high value homes which are needed in order to retain and attract people with higher incomes and to satisfy aspirational housing need. In the long term the narrow focus of the option would be prejudicial to the wider interests of the Borough. 6.4 Spatial Option 3 widens the focus of Spatial Option 2 and provides for further economic growth within the Rochdale and Pennine Townships however limits opportunities for employment growth within Middleton and Heywood which benefit from a key strategic location. It will direct housing only into inner urban areas of the Heywood and Middleton Townships and it will not provide

					<p>opportunity for high value homes and aspirational households. 6.5 Option 3 does limit the opportunities for growth within North Rochdale and North Pennine Townships and in principle this position is supported. There is limited opportunity for expansion and poor accessibility within these areas. However employment opportunities within these areas should not be completely dismissed as there is a real risk that these areas will become dormitories for commuting to Rochdale and Manchester. 6.6 Spatial Option 4 focuses primarily on Heywood and Middleton while retaining some of the regeneration principles of Spatial Option 2. Whilst the principle of development in Middleton and Heywood is supported there are concerns that this option does not fully relate to Rochdale as sub regional centre and fails to offer sufficient choice of household locations within the Borough as a whole. 6.7 For all the above reasons Russells supports Spatial Option 5. It is considered that this option can deliver the Core Objectives within a comprehensive and planned Development Framework.</p>
Spatial Option 1 - Dispersed development in the built up area					
129	Ms Rosemary Olle	Senior Land Use Planner GMPT			<p>GMPT does not consider this option favourably because without any spatial focus it would be difficult to plan for sites to be well served by public transport. It would be difficult to promote sustainable travel with this scenario.</p>
264	Mr Dave Arstall	Spatial Development Manager Government Office North West			<p>As the plan progresses the options will need to be developed further to indicate the proportions of development which would take place in different parts of the borough. As spatial option 1 does not have any spatial focus it is difficult to see how it can amount to a spatial option for the future development of the borough. This option also appears to conflict with advice in PPS3 (paragraph 59) that allowances for windfalls should not be included in the first ten years of land supply unless robust evidence can be provided of genuine local circumstances that prevent specific sites being identified. In consulting on options a summary of the SA implications of each option should be set out within the main document itself in order that consultees are able to clearly appreciate the impacts of the options. The SA implications of the strategic sites will also need to be explained.</p>
540	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			<p>This could lead to longer trips between homes and jobs as development growth will be less coordinated and transport infrastructure not planned with new development. Under all the Spatial Options Kingsway will account for a large proportion of the new trips generated and transport investment will need to be focused on making Kingsway accessible by sustainable transport from across the borough. Without identified sites the deliverability of transport improvements would be difficult to bring forward due to the uncertainty within the spatial strategy. The modelling of development scenarios would be difficult to present. No PENELOPE appraisal undertaken given absence of defined sites.</p>
460	Ms Debra Holroyd	Regional Planning Officer			<p>Spatial Option 1 It is difficult to determine the potential linkages between development and existing/planned transport infrastructure and therefore the potential impact that this might have</p>

		4NW			on the transport network. Given the lack of focus it is possible that the wider spatial principles of the RSS would not be met particularly those which seek to promote sustainability reduce the need to travel and marry opportunity and need. Transport objectives targeted at managing travel demand and promoting an integrated approach to transport provision may not be met owing to this lack of strategic planning. However this option indicates that development would take place in the built up area. This implies that a level of the required transport infrastructure is likely to be in place as opposed to development in more peripheral areas where transport infrastructure and therefore the potential for sustainable travel is perhaps more limited.
391	Mrs Jayne Poole				We feel the spatial options 1 and 2 are the best and that the Green Infrastructure is the most important. We feel the regeneration of the towns is very important the now disused areas (derelict mill sites etc) could be used for housing and employment. There is a lot of empty property in the town but there is also a lack of appropriate housing. The towns need to be made attractive and vibrant in order to encourage people to want to live and work there. We need people to spend and invest in their town and to take a pride in it. The green belt needs to stay as green belt for the future generations and not to be built upon. Businesses need to be encouraged to make better use of existing industrial sites. Existing transport regulations need to be enforced HGVs need to be kept on the motorways and out of the towns.
319	Mr William Sheerin	Chairman Castleton (EC) Residents Association			This option would appear to maintain the levels of regeneration and development on lands which are already allocated in the current UDP. However because it does not place any limits on the level of development in any particular part of the borough this would not be a desirable path to follow. In addition there is already land designated for development in the existing UDP which has not been made use of.
373	P Williams				Spatial Options 1 & 2 are the most beneficial to the residents of Rochdale. We need to keep our green spaces whilst regenerating inner Rochdale.
365	Mr John Benson				Support spatial options 1 & 2 mainly because they do not further eat into our green belt. After losing all the countryside between Rochdale and Milnrow to the Kingsway Business Park I do not believe that any development on countryside green belt or not should be allowed. As a resident of Heywood I feel particularly strongly that the countryside which separates Heywood from the rest of the so called "Greater Manchester Conurbation" should be preserved. The alternative is continuous development from Stockport to Littleborough.
515	Mr Daniel Kershaw	Russell Homes			6.2 Looking at alternative options it is quite evident that Spatial Option 1 is far too unplanned lacks uncertainty and will not deliver the large infrastructure and regeneration led development projects that are being proposed. It will not shape the Town and it will not enable the Town to link in with the adjoining regions in terms of housing transportation or economy. It is a reactive rather than a proactive approach and it is generally weak in all areas. It will lead to ad hoc and unplanned development and is contrary to national and regional planning principles.



Spatial Option 2 - Focus on regeneration areas in the built up area					
130	Ms Rosemary Olle	Senior Land Use Planner GMPTE			This option focuses new development in locations that are generally well served by public transport and as stated 'a key advantage of this option is to promote the efficient use of land and create sustainable patterns of development' GMPTE supports this concept.
163	Mr John Lappin	Secretary Middleton Environment Group			We cannot support any new development which will encroach on any green land especially designated green belt areas. The generation soon after W.W.II had the foresight to realise what would happen if there was no restriction put on developers Councils etc. regarding new builds throughout the country especially in the Manchester area. They insisted that future generations should and would have green open spaces or 'lungs' where they could enjoy fresh air and exercise just as the more privileged people were enjoying and experiencing those who did not have to live and work in large cities and towns. Without green belt areas there would now be concrete and bricks from the airport to the south to Littleborough in the north Hyde to the east to Bolton/Wigan and the one in the west and then to Liverpool. We must not betray that generation who realised that they were the custodians of the environment for their grand children just as we are the custodians for our own grandchildren. They also deserve as we have the right to see cows and horses grazing haymaking crops growing and to smell all those country smells. The wild life must not be denied the hedges on which they depend or the birds which nest on the ground skylarks lapwings etc. M.E.G therefore put forward that option 2 especially as it covers town centre regeneration as the way forward for Middleton and no way should options 3 4 5 & 6 be considered.
543	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			This makes best use of the existing network by directing new development around transport hubs interchanges gateways and strategic routes. The existing network could be improved by addressing bottlenecks and capacity. The identified areas would be within the existing built up area which has existing public transport service but the capacity of the infrastructure to accommodate additional demand would need to be investigated. No PENELOPE appraisal undertaken as development sites not identified beyond acknowledged regeneration areas.
423	Mr Alan Hubbard	Land Use Planning Adviser (E Midlands & NW) The National Trust			Overall the Trust prefers Spatial Option 2 but would question the appropriateness of seeking any housing growth in excess of that in Adopted RSS especially in the current economic climate. It is agreed this approach would require careful management to ensure that existing valued employment land opportunities were not lost unnecessarily but equally attention is drawn to the more detailed response to Question EC1 and the view that too much provision is made for employment land.
461	Ms Debra Holroyd	Regional Planning Officer 4NW			Spatial Option 2 By focusing development at areas already better served by public transport transport objectives which seek to manage travel demand are met. Additionally those spatial principles which seek to promote sustainability reduce the need to travel and make the best use of existing infrastructure are all addressed. Given the indicated concentration of development in specific locations (south Rochdale Heywood and Middleton) it is important that the spatial principles and transport objectives are met so that additional strain is not put on the local road network in these areas through an increase in private car use. As with Spatial

					Option 1 a focus of regeneration in built up areas rather than more rural areas should reduce the need to travel in itself. However as stated in the strategy a concentration solely on regeneration areas may not address those objectives which seek to improve links to adjacent areas and the wider region.
472	Mrs Jayne Poole				We feel the spatial options 1 and 2 are the best and that the Green Infrastructure is the most important. We feel the regeneration of the towns is very important the now disused areas (derelict mill sites etc) could be used for housing and employment. There is a lot of empty property in the town but there is also a lack of appropriate housing. The towns need to be made attractive and vibrant in order to encourage people to want to live and work there. We need people to spend and invest in their town and to take a pride in it. The green belt needs to stay as green belt for the future generations and not to be built upon. Businesses need to be encouraged to make better use of existing industrial sites. Existing transport regulations need to be enforced HGVs need to be kept on the motorways and out of the towns.
320	Mr William Sheerin	Chairman Castleton (EC) Residents Association			Under this option the emphasis seems to be on increased housing development but at the expense of land for employment opportunities. This may be desirable in view of the good transport links to other areas of employment and it would also protect green field sites open land outside the urban area and the green belt included in the current UDP.
273	Mr John Lappin				Option 2 is the way forward consign options 3 4 5 and 5 to the bin.
374	P Williams				Spatial Options 1 & 2 are the most beneficial to the residents of Rochdale. We need to keep our green spaces whilst regenerating inner Rochdale.
366	Mr John Benson				Support spatial options 1 & 2 mainly because they do not further eat into our green belt. After losing all the countryside between Rochdale and Milnrow to the Kingsway Business Park I do not believe that any development on countryside green belt or not should be allowed. As a resident of Heywood I feel particularly strongly that the countryside which separates Heywood from the rest of the so called "Greater Manchester Conurbation" should be preserved. The alternative is continuous development from Stockport to Littleborough.
516	Mr Daniel Kershaw	Russell Homes			6.3 With regards to Spatial Option 2 there are many aspects of this initiative which are beneficial. It will facilitate housing led regeneration within priority areas. It will enable development along key strategic corridors within the Rochdale area however it would not deliver the economic growth that is vital for the long term prospects of the Borough and it would lead to a greater loss of employment land. Finally it does not deliver a real choice of housing and it does not provide high quality high value homes which are needed in order to retain and attract people with higher incomes and to satisfy aspirational housing need. In the long term the narrow focus of the option would be prejudicial to the wider interests of the Borough.
Spatial Option 3 - Focus on Rochdale (as the sub regional centre) (Zone B)					

131	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Whilst this option focuses on an area which is well served by public transport it may leave other less accessible areas of the borough without employment opportunities which could generate more trips to the urban centre and lead to increased congestion. It also seeks to focus development in areas with easy access to the motorway such as Kingsway Business Park which could encourage an increased number of car trips and make it difficult to encourage people to travel in a sustainable manner.
167	Mr John Lappin	Secretary Middleton Environment Group			M.E.G therefore put forward that option 2 especially as it covers town centre regeneration as the way forward for Middleton and no way should options 3 4 5 & 6 be considered. Issue 5 would then not be a priority no car owner will ever volunteer to give it up and issue 6 green infrastructure would not be damaged and would be preserved.
154	Unknown	Miller Homes (Strategic) North West	Mr Leon Armstrong	Planner Mosaic Town Planning	- Option 3 is compatible with the strategic aims of Regional Planning Guidance in so far as Rochdale being identified as a Regional Town and the need for development to be centralised in such locations. As stated in Policy RDF1 the Regional Towns should b
544	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			This offers the benefits of option 2. Concentrating new development in Rochdale which is the borough's public transport hub could offer a more sustainable pattern of development. The new allocations in the south of Rochdale will generate additional traffic requiring wider coverage and strengthening of the sustainable transport network. The focus upon central Rochdale with the identified sites would generate trips on the SRN but these would be notably less than options 4 and 5.
462	Ms Debra Holroyd	Regional Planning Officer 4NW			Spatial Option 3 Rochdale is the borough's identified strategic transport hub and as such a focus on development in this area is likely to be more sustainable given its proximity to public transport services. The additional focus on areas to the south of Rochdale and elsewhere further away from the town centre may lead to an increase in traffic which would need to be complemented by sustainable travel options.
321	Mr William Sheerin	Chairman Castleton (EC) Residents Association			Zone B suggests two areas of green field development in Castleton and one are at Broad Lane Rochdale: No. 1 – land at Trub Farm Castleton No. 2 – land to the south of Cripplegate Lane Castleton No. 3 – land at Broad Lane Rochdale The above three areas are currently green field pasture and area 1 is allocated as green space corridor areas 2 and 3 are allocated as protected open land. If built upon there would be a serious negative impact upon the surrounding areas. The A627 (M) and the M62 corridors are already areas of significant air pollution as a result of the 24-hour traffic movement along the two motorways. This fact is clearly identified in the Core Strategy Issues and Options Report dated September 2008. It is very important to try to lessen the impact of pollution from the motorways by providing as many buffer zones of open space as possible. Junction 20 of the M62 is a major link for motorway access between the towns of Rochdale and Oldham so if the land south of Cripplegate Lane were to be built on there would be very significant increase in further pollution/carbon emissions in this locality. In addition this area has poor access problems. Land at Trub Farm would also fall into the same category but to a slightly lesser degree. However located on the land at Trub is the now closed factory of Whipp & Bourne which we

					understand may probably be demolished and designated for housing and mixed development. Under these circumstances therefore why would it be necessary to include the land at Trub Farm in the new plan? With regard to the land at Broad Lane Rochdale this is adjacent to the massive Kingsway business park development covering an area of approximately 110 ha. We understand that the actual take up of space on the Kingsway development is currently less than 10 ha. per annum. Under these circumstances no further development in this area can be justified.
370	J Grimshaw				In the present 'Credit Crunch' I think Spatial Option 3 (Zone B) Green Belt in all areas need to be kept.
426	Mr H Davenport				The Metrolink extension to Rochdale seems to make Option 3 the most appropriate. Land between and near the railway and Metrolink would give easy transport and reduce road congestion.
517	Mr Daniel Kershaw	Russell Homes			6.4 Spatial Option 3 widens the focus of Spatial Option 2 and provides for further economic growth within the Rochdale and Pennine Townships however limits opportunities for employment growth within Middleton and Heywood which benefit from a key strategic location. It will direct housing only into inner urban areas of the Heywood and Middleton Townships and it will not provide opportunity for high value homes and aspirational households. 6.5 Option 3 does limit the opportunities for growth within North Rochdale and North Pennine Townships and in principle this position is supported. There is limited opportunity for expansion and poor accessibility within these areas. However employment opportunities within these areas should not be completely dismissed as there is a real risk that these areas will become dormitories for commuting to Rochdale and Manchester.
Spatial Option 4 - Focus on Heywood and Middleton (Zone A)					
54	Mrs Pat Donald				This is my main preference
132	Ms Rosemary Olle	Senior Land Use Planner GMPTE			This option could lead to the development of sites outside the urban area on protect open land / Green Belt sites which currently have poor access by public transport. Therefore if congestion is to be controlled this option would depend on substantial additional investment in public transport which may not be achievable.
168	Mr John Lappin	Secretary Middleton Environment Group			M.E.G therefore put forward that option 2 especially as it covers town centre regeneration as the way forward for Middleton and no way should options 3 4 5 & 6 be considered. Issue 5 would then not be a priority no car owner will ever volunteer to give it up and issue 6 green infrastructure would not be damaged and would be preserved.
162	Mr David Povey				The area of focus is again on the south of Heywood in Hopwood - we have just seen a significant number of houses being built next to the Fire Station. Little impact through the proposals are seen towards the north of Heywood/Rochdale where the land is more plentiful.

					If the proposals continue - Hopwood will become joined with Langley with little 'natural' space.
545	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			This offers the benefits of option 2. This will require substantial investment in the whole of the transport network to ensure that development is accessible sustainable and does not impact on local amenity. This option will have a greater impact on the motorway network and will require the support of the Highways Agency. With an increase in identified sites there will need to be an increase in journeys on the SRN but this would be coupled with a reduction associated with Transport Improvements. There are notable sites which have been identified in close proximity to the Agency's network.
463	Ms Debra Holroyd	Regional Planning Officer 4NW			Spatial Option 4 This option requires investment in the necessary highway infrastructure required to support peripheral development. It is important that there are viable alternatives to private car travel so that an increased generation in trips does not adversely affect the strategic road network and serve to worsen congestion particularly given the identified area's proximity to the M62 motorway.
322	Mr William Sheerin	Chairman Castleton (EC) Residents Association			SPATIAL OPTION 4 – which is the preferred option of the Castleton (EC) Residents Association This option concentrates on the areas of Middleton and Heywood which includes extending the area already occupied by the Stakehill Industrial Estate. Because of its immediate link onto the motorway system this would seem to be the most logical spatial option for the creation of employment in the South Rochdale/North Middleton area. However this land was designated as green belt in the last UDP. There are a great number of empty industrial units already on the Stakehill Industrial Estate so rather than allocate more land for development areas within existing industrial zones should first be fully utilised. The land at Slattocks should only be made available for industry as a last resort if seriously needed. We consider that an amendment to the Slattocks industrial allocation is needed to prevent the long-established housing on Bentley Avenue from having industrial units at the front and back of their properties and affecting their quality of life. No. 5 – land north of Langley Lane (East) Middleton No. 6 – land north of Langley Lane (West) Middleton Both of these areas are presently designated as green field pasture and allocated as protected open land in the last UDP. However these two areas would present a good opportunity for employment and mixed use development because of their proximity to Junction 19 of the M62 and the ease with which they could be reached by people living on the nearby large housing estate at Langley. The needs to satisfy the Government requirement for Greater Manchester should be more focused in the south of the region were there is closer access to both the M60 ring road and bisecting the M62. The medium level of housing and high level of employment this would provide would more suit the region and the current economic climate.
436	Mr Rob Haughton				However I would like to comment on one particular aspect of these proposals that will directly affect my family along with many other local residents/neighbours many of which because of the poor levels of communication seen to date for such a far reaching report are totally unaware of and this is in respect of Spatial Option 4 – Focus on Heywood & Middleton (although Options 5 & 6 are also of concern to me) and in particular development in and

					<p>around Hareshill Road ( Site Options 7 8 &amp; 9) and the proposal for a Southern Relief road from Junction 19 of the M62 motorway to Heywood Distribution Park. Whilst in principle I can understand the need to review the access to this site I am extremely concerned given the suggested route for such a road seems to be very close to residential housing accessed via Lenten Grove an area that already has a significant number of properties close to the motorway and for the avoidance of any doubt these noise &amp; indeed air pollution levels are a constant for 24 hours per day 7 days per week for 365 days per year. The proposal to site what is effectively a motorway link road from the above mentioned motorway junction that would run even closer to these properties will have the effect of increasing both noise and air pollution levels considerably if this were allowed to go ahead. Although I am not privy to the exact plans for such a relief road I feel it only appropriate that I raise my concerns at this early stage to register my concern along with a number of other residents I have spoken to in respect of this development. Clearly I am not in a position to comment on all the other options that may have been considered and/or rejected for such a relief road but I would like to know of the other alternatives that were considered especially via Junction 3 of the M66 at Pilsworth which would look to have less of an impact certainly from a pollution perspective on the local residents &amp; tax payers and it appears to offer a more direct shorter route and therefore a potentially cheaper option to access the Heywood Distribution Park through almost unpopulated areas? However I am aware following the Touchstones Meeting that this junction of the M66 would appear to come under the jurisdiction of Bury Council rather than yourselves would this have had an impact on your decision for a Southern Relief Road? Although the impact of HGV's travelling through Heywood Town Centre is mentioned in the report there is no reference to the size of this problem and surely this is solvable by way of suitable traffic calming measures similar to those currently on Hareshill Road? I would be interested if possible to have sight of these findings if only to enable me to have a better understanding of the scale of this problem? Also it would seem that in the very recent past that there have already been speculative purchases of land in respect of the sites identified in Spatial Option 4 which again raises my level of concern that this would seem to be already in process. In addition and since the Touchstones Meeting I have attended a Open Day in Heywood Civic Centre hosted by Peel Holdings who are planning to submit an outline planning proposal valued at £12million to yourselves to develop Hareshill Business Park with a mix of light industrial distribution premises next to the existing Yearsley's Depot off Hareshill Road which looks to be a fairly substantial development which they believe can be serviced via the M60/M66 rather than via the M62. Presumably this potential development will now be included in the Core Strategy?</p>
372	Mrs A Kershaw				I would suggest that Spatial Option 4 (Zone A) should be the one to choose as it has good road links and Castleton has had more than its share of industry over the last few years.
354	Mr W Sheerin				Spatial Option 4 - Reason it will provide more than needed employment land and medium levels of housing development. This I consider is what is needed in the current economic climate. Other issues have been covered by the C.R.A. Residents Association and I am in agreement with their comments.

375	Mr S Meade				The document is worded in such a way that options 4 and 5 are presented as preferred options. Any development on protected and green belt land can and should be avoided. Development on this land is an easy and lazy option for the Council. Regeneration of run down areas and brownfield sites are not as popular with developers but building on the outskirts of towns leads to neglect and superficial improvements only in town centres. Why option 6 has "little focus and at a cost to the environment" whilst only containing 2 extra Greenfield Developments against options 4 and 5 suggests a bias towards option 4 and 5. As the UDP adopted only 2 years ago focused on regeneration my options would be 1 2 or 3.
350	Jane Keegan	Bowlee Park Housing Association			Spatial Option 4
369	Mr Ian Heppenstall	Bowlee Park Housing Association			My personal preference would be spatial option 4 and look forward and strongly support the Greenfield development on the perimeter of Middleton to increase housing and employment.
361	Councillor Jim Gartside	Rochdale Borough Council			Option 4 appears to have best balance. Higher levels of housing may mean higher densities and even less garden/parking space per dwelling. But need a high level of development for employment and this is the area which needs the extra infrastructure even now.
542	Mr Ray Stowell				I WOULD SUPPORT SPATIAL OPTION 4 FOR OBVIOUS REASONS IT IS MY LOCAL AREA THAT NEEDS THE MOST DEVELOPMENT.
298	Unknown	SEGRO Industrial Estates Ltd	Mr John Pearce	Senior Planner Barton Willmore	Out of the six spatial options that are proposed we support Spatial Option 4. The focus of this option is to direct new development to Heywood and Middleton which we support due to SEGRO's interests at Heywood Distribution Park. The proposed SPZ at Heywood Distribution Park will assist with meeting the objectives of this option through increased job creation in Heywood.
518	Mr Daniel Kershaw	Russell Homes			6.6 Spatial Option 4 focuses primarily on Heywood and Middleton while retaining some of the regeneration principles of Spatial Option 2. Whilst the principle of development in Middleton and Heywood is supported there are concerns that this option does not fully relate to Rochdale as sub regional centre and fails to offer sufficient choice of household locations within the Borough as a whole.
Spatial Option 5 - Focus in the south of the borough (Zones A & B)					
133	Ms Rosemary Olle	Senior Land Use Planner GMPTE			As indicated in the commentary this option could lead to increased congestion and a greater need to travel and would require significant investment in public transport to serve some of the peripheral development sites.
169	Mr John Lappin	Secretary Middleton Environment			M.E.G therefore put forward that option 2 especially as it covers town centre regeneration as the way forward for Middleton and no way should options 3 4 5 & 6 be considered. Issue 5 would then not be a priority no car owner will ever volunteer to give it up and issue 6 green

		Group			infrastructure would not be damaged and would be preserved.
546	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			This option combines the implications of options 3 & 4. To address these will require significant investment in the transport network which are set out under issues A2 to A4. Without appropriate transport improvements air quality could worsen. The increase in development sites is reflected in a greater potential for movements on the Agency's network. RMBC note that this option would be TIF dependant and no other funding mechanism is identified.
464	Ms Debra Holroyd	Regional Planning Officer 4NW			Spatial Option 5 This option identifies the need for significant investment in the public transport network to accommodate for the proposed level of growth with the TIF process being important in the delivery of any infrastructure. Given the existing level of uncertainty surrounding TIF there may be an issue in funding the necessary public transport improvements should TIF funding not be allocated.
323	Mr William Sheerin	Chairman Castleton (EC) Residents Association			SPATIAL OPTIONS 5 and 6 - Both of these options suggest uncontrolled development which far outweighs the current requirements. In particular Option 6 is without any constraints and would present many problems including further congestion and pollution.
351	Mrs S Wright				Preferred option 5.
352	J Street	Moorend Trust			Spatial Option 5 - This appears to be the most sensible defence of one of the best features of Rochdale i.e. The marvellous open spaces and hills at the end of the great Manchester conurbation i.e. hooking NE & N to the Pennines.
376	Mr S Meade				The document is worded in such a way that options 4 and 5 are presented as preferred options. Any development on protected and green belt land can and should be avoided. Development on this land is an easy and lazy option for the Council. Regeneration of run down areas and brownfield sites are not as popular with developers but building on the outskirts of towns leads to neglect and superficial improvements only in town centres. Why option 6 has "little focus and at a cost to the environment" whilst only containing 2 extra Greenfield Developments against options 4 and 5 suggests a bias towards option 4 and 5. As the UDP adopted only 2 years ago focused on regeneration my options would be 1 2 or 3.
353	Unknown	Heywood Pensioners Association			I would go for option 5.
520	Mr Daniel Kershaw	Russell Homes			6.1 Of the 6 Spatial Options that have been proposed Russells have consistently argued that Spatial Option 5 is the most comprehensive of the 6 options. Option 5 will achieve strategic objectives of economic growth housing delivery and sustainable and integrated transportation patterns in a planned and controlled format which is in the best interests of all aspects of the community and which need not compromise the green infrastructure and environmental initiatives. It can deliver a quality and lasting environment with the principles of good design



					being the foundation of the option. 6.7 For all the above reasons Russells supports Spatial Option 5. It is considered that this option can deliver the Core Objectives within a comprehensive and planned Development Framework.
Spatial Option 6 - High growth and dispersed development across the borough					
99	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			We support Spatial Option 6 (High Growth and Dispersed Development) as this will deliver the greatest level of investment into Rochdale. Spatial Option 6 should therefore be refined to take into account specified regeneration areas and planned urban extensions in order to impose some criteria for new development although this needs to enable development rather than suppress it.
170	Mr John Lappin	Secretary Middleton Environment Group			M.E.G therefore put forward that option 2 especially as it covers town centre regeneration as the way forward for Middleton and no way should options 3 4 5 & 6 be considered. Issue 5 would then not be a priority no car owner will ever volunteer to give it up and issue 6 green infrastructure would not be damaged and would be preserved.
155	Mr Philip Rothwell	Senior Development Planning Manager Peel Holdings (Land & Property) Limited			It is noted that release of greenfield sites is contemplated in a number of the options and I would support Spatial Option 6 which focusses on high growth and dispersed development across the borough.
147	Unknown	CEMEX	Ms Kathryn Thompson	Senior Planner Drivers Jonas LLP	CEMEX supports Spatial Option 6 which promotes high growth and dispersed development across the Borough.
134	Ms Rosemary Olle	Senior Land Use Planner GMPTE			As with Option 1 there appears to be no spatial focus and therefore it would be difficult to plan for development sites to be well served by public transport. As stated in the report this option could lead to increased congestion along key routes particularly the A58. As with Option 5 if congestion is to be controlled this option would depend on substantial additional investment in public transport which may not be achievable.
547	Mrs Victoria Ridehaugh	LDF Manager Highways Agency			This option has the same implications as option 5 but may cause additional peak time capacity issues on the A58 and the Caldervale railway line. The most intensive option could potentially have significant implications for the SRN. Whilst Transport Improvements are identified a comprehensive modelling of the implications would need to be undertaken as with all the options.
465	Ms Debra Holroyd	Regional Planning Officer 4NW			Spatial Option 6 As with Spatial Option 1 a lack of focus or strategic planning for development raises the issue of whether or not development would make the best use of existing infrastructure or be located in areas which afford a high level of accessibility via sustainable modes.

325	Mr William Sheerin	Chairman Castleton (EC) Residents Association			SPATIAL OPTIONS 5 and 6 - Both of these options suggest uncontrolled development which far outweighs the current requirements. In particular Option 6 is without any constraints and would present many problems including further congestion and pollution.
304	Mr Derek Hargreaves				Spatial option 6 which seems to propose additional development in the Roch valley corridor and Greenfield development to the east of the borough towards and into the Pennines township would exacerbate the already serious issues of road congestion along the A58 corridor. Loss of open space and green corridor in the Roch valley would also reduce the quality of life for residents in the east of the borough and along the A58 corridor.
381	Mr Edward Graham				We need an integrated portfolio as in Spatial Option 6. We need to use the brown field sites in Littleborough for the future development of the people. All interested forward thinking people need to get together to aid this future development. People of all area need to work together on the best futuristic development plans and not work out plans to suit just the area that they live in. Each area in the township should put forward all positive ideas that they believe will benefit the Town and our future. REMEMBER INTEGRATED DEVELOPMENT PLANS WITH POSITIVE IDEAS.
Questions Site Options					
55	Mrs Pat Donald				All of the sites seem sound but would need to be phased as per earlier questions.
65	Mr David Hardman	Asset Protection United Utilities			Several of the sites have utility apparatus crossing and we require maintenance strips dependant on the size and depth of the apparatus. There are some sewer flooding issues in the vicinity of some sites and it is important to separate surface water slowing the run off rate and discharge to soakaway or watercourse to avoid exascerbation of flooding.
119	Mr David Finch	Volunteer Project Officer Lancashire Wildlife Trust			It would appear that most designated wildlife sites will not be effected by the development of any of these sites although in some cases there will be an effect on Green Belt
120	Unknown	CEMEX	Ms Kathryn Thompson	Senior Planner Drivers Jonas LLP	The CEMEX site in Nile Street is located within an area that is predominately residential. The site adjoins the River Roch and according to Environment Agency mapping data is in an area which benefits from flood defences. CEMEX considers that the Nile Street site presents the opportunity for residential development. Previously it was a concrete batching plant however the site has ceased to be operational and therefore CEMEXwishes to promote this previously developed site for an alternative use. Developing a residential use in this location would accord with the Council's aspiration to increase the numbers of houses within the Borough. In addition CEMEX considers that the site is suitably located close to existing transport infrastructure and services and would therefore contribute to the creation of thriving and sustainable neighbourhood. The site is located close to the A671 which acts as a ring road around the town centre with the A640 and A58 and provides access to the M62 and key public transport routes around the City. The nearest railway station is less than a mile away at Rochdale Railway station which is the main station serving the town and providing a rail link into Greater Manchesterand manchester City Centre. A number of key services such as GP

					<p>surgeris and shops are located within 1 mile of the site. CEMEX therefore considers that the use of the site for residential development would accord with Planning Policy Statement 3 paragraph 10 which supports housing developments in suitable locations which offer a good range of community facilities and with good access to jobs key services and infrastructure. The site is also identified as brownfield land. Developing the site for an alternative use will help the Council to make the most efficient use of land in accordance with Planning Policy Statement 1. CEMEX is mindful that the area of land adjacent to the river has recreational value designated as a Greenspace Corridor and that the area in general is at risk of flooding. Any development would therefore seek to protect the southern edge of the site adjacent to the River exploring opportunitiesto integrate the land into the development schemeand appropriately mitigating any floodrisk.</p>
214	Ms Judith Nelson	Regional Planner English Heritage - North West Region			<p>Site Options English Heritage does not have access to the full range of information on the historic environment in its regional offices it is therefore important that the council's conservation officer and the Greater Manchester archaeologist are consulted about these sites. It would helpful in appraising the sites if the plans could include environmental information or additional information in the commentary box. My researches show that site 1 includes listed bridge and lock structures associated with the Rochdale Canal and site 12 includes the listed Dob Wheel Mill. The listed Green Farm complex is adjacent to site 11. Other sites include farms with may have locally important traditional farm buildings on the site. The appraisal of these sites and their settings must cover the historic environment (including archaeology). Please contact me if there are any issues arising from your assessment of the above sites or in relation to my comments.</p>
148	Mrs Blanca Aydin				<p>I would like to suggest that the land between 800 - 820 Rochdale Road Slattocks Middleton Manchester M24 2RB be allow developmend of a small bungalow. a dwelling on this land will enhance the village. It is bounded on 3 sides by residential development and the 4th side by Council land a eco friendly one bedroom bungalow would improve the local amenity.</p>
247	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			<p>All of the sites may be at risk from surface water have potential to increase run-off and could be difficult to drain. In order to determine the risks to and from each site a level 2 SFRA will need to be undertaken</p>
156	Mr Philip Rothwell	Senior Development Planning Manager Peel Holdings (Land & Property) Limited			<p>It is submitted that many of the sites listed in Chapter 14 are not suitable for development and many are in unsustainable locations. I put forward a site at Norden Road Bamford as a potential housing site. See sparate Site Nomination Form. This would provide an attractive site for quality family housing in a sustainable location.</p>
336	Mr Ray Barber	Secretary Todmorden Angling Society			<p>Off Ballard Close Calderbrook Road Littleborough (land behind 92-94 calderbrook road) Site Size: 0.5 hectares</p>

265	Mr Dave Arstall	Spatial Development Manager Government Office North West			Site Options The sites put forward are almost wholly greenfield with some being located in the Green Belt. This does not accord well with the strategic priorities set out in RSS and the need for such sites would need to be fully justified. As regards the Green Belt sites it will be necessary to consider in the context of RSS Policy RDF4 whether the release of such sites would represent an exceptional substantial strategic change to the Green Belt or whether they would involve local detailed boundary changes. Policy RDF4 says that there is no need for any exceptional substantial strategic change to the Green Belt in Greater Manchester before 2011. After 2011 the presumption will be against exceptional strategic change to the Green Belt in Greater Manchester. Strategic studies undertaken by the RPB together with relevant stakeholders should investigate both the need for change and options for implementation. The findings will inform future reviews of RSS and subsequent reviews of plans and strategies.
345	Mr Edward Tabner	Agricultural Surveyor Wilbys Chartered Surveyors			Stake Hill Slattocks Middleton I consider that this land given its proximity to the motorway junction and the nearby distribution centre to be ideally suited for employment use whether in the form of an expansion to the distribution centre or out of town office use.
335	Mr Brian Murray	SLW Designs			Land off Stubley Lane Littleborough Site Size: 0.75 hectares The site was previously refused planning permission for 18 dwelling houses for reasons including flood risk and loss of historical features e.g. the mill lodges and trees. As the proposal would initially be for 4 no. detached houses there would be scope to build on the area of the site away from the flood plain and for any features of historical value / interest to be incorporated into the landscaping of the site if necessary. Alternatively the proposed construction could be raised above the existing site levels and adequate land drainage / flood defense be incorporated into areas of hardstanding and landscaped areas. (additional supporting information included - see attached)
333	Mr Philip Rothwell	Senior Development Planning Manager Peel Holdings (Land & Property) Limited			Land to the west of Norden Road Site Size: 5.0 hectares This site is being promoted in the knowledge that other greenfield / green belt sites are being considered for development within the context of the Core Strategy Issues and Options consultation. Although this site is not included in any of the identified options it is submitted that the site is actually far more suitable for development than many other sites identified in the consultation document. It is submitted that the site would make a significant contribution to the Council's objective of delivering an appropriate amount choice and range of housing. The site is in an appropriate and sustainable location and can take advantage of the existing facilities and infrastructure. In the context of a sustainability appraisal it is submitted that this site is far more sustainable than many of the sites that the Council has identified in Chapter 14 - Site Options.
334	Mr David Lean				Land to the west of Bridgefold Road Rochdale OL11 5BZ Site Size: 0.5 hectares Recent discussions with RMBC Planning Officers have led me to understand that the principal of a residential development on this piece of land is agreeable.
346	Glenis				Siddal Moor Farm Hareshill Road Heywood Site Size: 14.6 Hectares

	Green				
473	Mr Daniel Kershaw	Russell Homes			Land at Healey Hall Mills Dell Road Rochdale Site Size: 4.596 hectares Detailed comments - see attached document
344	Unknown	Kirkland Developments Ltd	Mr Richard Moffat	Director Lambert Smith Hampton	Parkfield Industrial Estate Kemp Street Middleton Site Size: 1.0 hectares The site comprises a highly sustainable location on which to provide a high quality retail environment in close proximity to Middleton Primary Shopping Area. The proposal will bring about the regeneration of site and thereby result in physical environmental economic and social improvements to urban Middleton.
337	J McCormick				Wildhouse Lane Milnrow Rochdale
340			Ms Barbara Brownridge	Graham Bolton Planning Partnership Ltd	Land off Pleasant St Hooley Bridge Heywood Site Size: 2.9 hectares Remove from green belt.
341			Ms Sarah Cunliffe	Planner Indigo Planning Limited	Land off New Road Stubley Littleborough Site Size: 0.54 hectares The site lies within the urban area and comprises brownfield land. The site provides no amenity value to the area and fly tipping is a problem on site which is an environmental concern. Development of the site would provide an active use fronting New Road and eliminate any environmental issues. The site is in a highly sustainable location on a main bus route and close to local services. Development of the site in the short term (0-5years) is appropriate and would contribute to the housing supply in the borough.
342			Ms Sarah Cunliffe	Planner Indigo Planning Limited	Land off New Street Stubley Littleborough Site Size: 7.07 hectares The site forms a sustainable extension to Littleborough and development of the site would serve to meet the housing targets for the borough in the longer term (8-20 years). Paragraph 55 of PPS3 sets out that along with the identification of a 5 year housing land supply local authorities should identify a further supply of specific developable sites for years 6-10 and where possible for years 11-15. Where it is not possible to identify specific sites for years 11-15 broad locations for future growth should be indicated. As part of the Core Strategy this site should be considered for development as part of an identification of the longer term supply of housing in the borough. The site is located in a sustainable location with good access to public transport and local services and as such is a suitable location for residential development in the longer term.
343			Ms Sarah Cunliffe	Planner Indigo Planning Limited	Land off New Road Stubley Littleborough Sites Size: 0.22 hectares The site lies within the urban area and comprises 50% brownfield land. The site currently detracts from the amenity of the area and its redevelopment would serve as a natural infill along New Road. The site is located in a highly sustainable location on a main bus route and close to local services. Development of the site in the short term (0-5years) is appropriate and would contribute to the housing supply in the borough and would serve to improve the appearance of the local areas

					and provide an active use on New Road.
526	Mr Ian Wray	Chief Planner Northwest Regional Development Agency			The Agency does not wish to comment on the specific sites identified in the consultation document or propose other sites for development. In this regard we would ask the Council to have due regard to latest advice in PPS 12 which says that LDF Core Strategies should avoid site-specific detail and only allocate strategic sites that are central to the achievement of the strategy.
474	Mr Daniel Kershaw	Russell Homes			Collop Gate Farm Manchester Road Heywood Site size: 29.4 hectares Detailed additional information provided - see attached document
332	Unknown	Lebron Properties Limited	Mr Majid Zameer	Investment Director McCafferty Asset Management Ltd	Trafalgar Centre Belfield Road Rochdale OL16 Site size - 2.20 hectares The present use of the site as an employment generator is declining. In recent years the number of employees on the site has fallen dramatically following changes in business operations of tenants on site. Given the current economic conditions and the forecast economic prospects for the next few years the owners of the site are concerned that the site will be rendered unviable and may fall into disrepair. The opportunity exists through this planning consultation exercise for the Council to meet their planning objectives by securing viable and long term sustainable employment opportunities through the redevelopment of the site introducing alternative uses which will cross subsidise and ensure that any future redevelopment is deliverable despite economic market conditions. (Submitted additional supporting evidence - see attached)
347	Unknown	TCS Holdings Limited	Ms Nicola Sewell	Indigo Planning Limited	Central Retail Park Rochdale OL16 4SZ Site Size: 4.4 hectares Central Retail Park is appropriate for retail development and should be allocated as such and given explicit policy recognition in the retail hierarchy in the Rochdale Local Development Framework. (Additional supporting information submitted - see attached).
Site Option 1					
66	Mr David Hardman	Asset Protection United Utilities			Two public sewers pass through the middle of the site and we will not allow building in their vicinity. There are sewer flooding risks in the vicinity and it important to keep surface water out of the foul/combined sewer.
77	Mr David Finch	Volunteer Project Officer Lancashire Wildlife Trust			Our main area of concern is Site Option 1 which borders on the Rochdale Canal. The canal is Designated as a Site of Special Scientific Interest (SSSI) and a Grade 'A' Site of Biological Importance (SBI). Our concern would be that if this area was developed for employment or a mixed development there would be a danger of damage to wildlife on the banks of the canal and of water pollution.
248	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			Adjacent to the Rochdale Canal and may be at risk from flooding should a breach/overlapping occur.
135	Ms Rosemary	Senior Land Use Planner			This site is well served by public transport being within 400 metres of bus stops on the Manchester – Rochdale Quality Bus Corridor and within 800 metres of Castleton station. The

	Olle	GMPTE			QBC has daytime bus services with a frequency of up to every six minutes and Castleton station has a daytime half hourly train service to Manchester and Rochdale. Pedestrian access from the site to both Castleton station and the bus stops on Manchester Road would need to be improved and incorporated into the site development the Rochdale canal currently acts as a barrier to pedestrian movement.
326	Mr William Sheerin	Chairman Castleton (EC) Residents Association			The previous UDP allocated land for industry at Cowm Top north of Cripplegate Lane Castleton. This allocation was strongly opposed by the residents of the village to such an extent that after several years of opposition it reached the High Court. The village has an historic industrial centre focused along the canal corridor. Branching out from this industrial core is housing much of it of terraced construction built in the late 19th and early 20th centuries. Behind this housing is green space. The Cowm Top allocation saw the start of the green space being lost to industrial units and the housing of East Castleton becoming surrounded by industry with the subsequent loss of recreational countryside and a downturn in the quality of life for the villagers. The previous UDP inspector did not allow the allocation of the land south of Cripplegate Lane (which was also being proposed for industry and would have completed the encirclement) but introduced green space corridors into the land to protect the wildlife. He understood the need for this green open space and the gateway into Rochdale to be attractive. The re-introduction of this land in Spatial Options 3-5 and 6 into an industrial and mixed use allocation is very much resented by the villagers who vigorously fought for the land north of Cripplegate Lane. This is a similar position with the land at Trub where again the previous UDP inspector realised that there was a need for open space on the west side of the canal corridor. The current state of the village is poor regarding many vacant industrial properties empty warehouses and the lack of quality shops and facilities. The decline can be traced to the building of the motorway system and the focus of the planners allocating land close to the motorway access point for industry at the expense of housing and amenities. The villagers consider that this decline will be continued if the land at Cripplegate South and Trub is allowed for industry which is contrary to the plan to make Rochdale an attractive vibrant and thriving place to live work and do business. Castleton is a village that already has all the infrastructure regarding transport which a thriving community should have with a mainline railway station two major bus routes and two access points to the motorway. Allowing more industry is a waste of these facilities. Empty warehouses should be demolished derelict land utilised and quality housing built on brown field sites. We consider that this is the only way to regenerate the area.
317	Councillor Pat Flynn				Councillor Ted Flynn Councillor Peter Davison and Councillor Pat Flynn would like to register our objection to any future development on land to the south of Cripplegate Lane and that at Trub Farm.
Site Option 2					
136	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Most of this site is inaccessible by public transport and falls outside of the 400 metre buffer zone on the Rochdale accessibility map. It is therefore considered an unsuitable location for new development.

327	Mr William Sheerin	Chairman Castleton (EC) Residents Association			The previous UDP allocated land for industry at Cowm Top north of Cripplegate Lane Castleton. This allocation was strongly opposed by the residents of the village to such an extent that after several years of opposition it reached the High Court. The village has an historic industrial centre focused along the canal corridor. Branching out from this industrial core is housing much of it of terraced construction built in the late 19th and early 20th centuries. Behind this housing is green space. The Cowm Top allocation saw the start of the green space being lost to industrial units and the housing of East Castleton becoming surrounded by industry with the subsequent loss of recreational countryside and a downturn in the quality of life for the villagers. The previous UDP inspector did not allow the allocation of the land south of Cripplegate Lane (which was also being proposed for industry and would have completed the encirclement) but introduced green space corridors into the land to protect the wildlife. He understood the need for this green open space and the gateway into Rochdale to be attractive. The re-introduction of this land in Spatial Options 3-5 and 6 into an industrial and mixed use allocation is very much resented by the villagers who vigorously fought for the land north of Cripplegate Lane. This is a similar position with the land at Trub where again the previous UDP inspector realised that there was a need for open space on the west side of the canal corridor. The current state of the village is poor regarding many vacant industrial properties empty warehouses and the lack of quality shops and facilities. The decline can be traced to the building of the motorway system and the focus of the planners allocating land close to the motorway access point for industry at the expense of housing and amenities. The villagers consider that this decline will be continued if the land at Cripplegate South and Trub is allowed for industry which is contrary to the plan to make Rochdale an attractive vibrant and thriving place to live work and do business. Castleton is a village that already has all the infrastructure regarding transport which a thriving community should have with a mainline railway station two major bus routes and two access points to the motorway. Allowing more industry is a waste of these facilities. Empty warehouses should be demolished derelict land utilised and quality housing built on brown field sites. We consider that this is the only way to regenerate the area.
362	Mr J Keeling				We object to the change of use of land at Cripplegate Lane South. For industrial use as we feel Castleton is only a small village that has already enough Industrial units that are empty. This lands the last bit of green open space we have in Castleton.
318	Councillor Pat Flynn				Councillor Ted Flynn Councillor Peter Davison and Councillor Pat Flynn would like to register our objection to any future development on land to the south of Cripplegate Lane and that at Trub Farm.
348	Mrs Norma Brown	Honnor Marine Ltd			Site Size: 20.7 acres To our knowledge our land is protected open lane and contains part green space corridor. we have an agreement with he owners of the land North of our site for an access roadway through their site right into our land. We have through the years had lot's of developers interested in our site but on applying to the planning department they have been put off for one reason or another. We feel that because of the size of our land that it is suitable for housing/industrial as well as leisure. We are off junction 20 of the M62 which we feel is the



					main motorway exit into the town centre of Rochdale. We cannot understand with this shortage of Hotel accommodation in Rochdale why there is not a hotel at this junction which is clearly seen off the motorway. (Additional supporting information - see attached)
Site Option 3					
67	Mr David Hardman	Asset Protection United Utilities			A trunk water main passes through the middle of the site and we will not allow building in its vicinity.
101	Mr Simon Artiss	Planning Manager Bellway Homes Ltd (North West Division)			We support the allocation of Site 3 (Broad Lane) for new housing. We will investigate all other potential sites and seek to work with the planning authority in the SHLAA process as a key stakeholder in the delivery of new homes to the Borough.
137	Ms Rosemary Olle	Senior Land Use Planner GMPTE			This site is well served by buses particularly the western end nearest to Oldham Road but inaccessible by rail. Approximately half the site is within 400 metres of the bus stops on Oldham Road which forms part of the Rochdale – Oldham – Ashton – Hyde Quality Bus Corridor and has frequent (up to every 7 minutes) bus services between these destinations. The eastern end of the site is within 400 metres of the bus stops on Broad Lane which offer access to a half hourly local bus service between Rochdale and Shaw. Pedestrian access to both Oldham Road and Broad Lane bus stops would need to be a consideration in the design and layout of any site development.
349	Unknown	Crosby Lend Lease (North West) Ltd	Mr Mark Worcester	Associate Director Turley Associates Ltd	Same as site option 3 but with some minor boundary alterations. See attached supporting information.
339			Mr Andrew Laing	Indigo Planning Limited	Site Submitted Land off Broad Lane Rochdale Site Size: 8.09 hectares The site is located in a sustainable location close to Rochdale town centre and development of the site would serve to meet the housing targets in the borough in the medium term. Paragraph 55 of PPS3 sets out that along with the identification of a 5 year housing land supply local authorities should identify a further supply of specific developable sites for years 6-10 and where possible for years 11-15. The Core Strategy also identifies the site area as an option for greenfield development within Spatial Option 5 which is supported. The development of the site would serve to provide a sustainable development close to public transport links and therefore is a suitable location for residential development.
558	Unknown	Miller Homes (Strategic) North West	Mr Leon Armstrong	Planner Mosaic Town Planning	Site Submitted Ginnel Farm Rochdale Site Size: 6.625 hectares The client's site is particularly suitable as the M62 provides a defendable boundary to the south beyond which development would not progress in the future. The allocation and subsequent development of the client's site would also provide an extension to the current residential area directly to the north and west in line with the expansion of Kingsway Business Park. This Business Park is a large area of employment that has recently been developed directly to the east of the site. The increased

					employment and improved transport infrastructure created by this means that housing at Ginnell Farm will be complementary to it. When phasing is complete this will be a 170 hectare business focused mixed-use development providing 7250 jobs. It will also provide for improvements in the local public transport infrastructure. Kingsway Shuttle Buses will be available for all employees between Rochdale bus station train station and MetroLink station. The Kingsway Metro Station is due to be completed in 2013. Demand Responsive Transport buses will also be in operation to all nearby towns. We believe this site could form a complimentary development to the Kingsway and provide a suitable location for a residential allocation in the forthcoming LDF.
Site Option 4					
68	Mr David Hardman	Asset Protection United Utilities			A trunk water main passes through the North of the site and we will not allow building in its. There are sewer flooding risks in the vicinity and it important to keep surface water out of the foul/combined sewer.
138	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Most of this site is inaccessible by public transport and falls outside of the 400 metrebuffer zone on the Rochdale accessibility map. It is therefore considered an unsuitable location for new development without substantial investment in local bus services. A small section of the site is just within 400 metres of bus stops on Bowness Road which offer access to a frequent (10 minute) service between Langley Middleton and Manchester. There is only an hourly bus service on Heywood Old Road which is a limited stopping service to Manchester.
312	Mr John Fishwick	Treasurer Middleton Environment Group			Proposals to develop land adjacent to Heywood Old Road Middleton. Middleton Environment Group wish to object to the above proposals for the following reasons: 1. The increase in traffic 2. The loss of green land between Middleton and Heywood. 3. Any new housing/industrial developments should be on brownfield sites. In our view Middleton Rochdale and Heywood have enough industrial/ distribution sites ie Stakehill and the new Kingsway. We are not convinced that these sites will generate the promised employment opportunities for local people.
272	Mr John Lappin				I wish to comment on your latest core strategy and am very disappointed that the green land between Middleton and Heywood and the green corridor along Heywood Old Road is being considered for development. Over the last 25 years these areas have on numerous occasions been highlighted for development but public opinion prevailed and plans were withdrawn the Heywood Old Road area only about 2 years ago. If the green area between Middleton and Heywood is built on then both towns will lose their own identity as already happened between Middleton and Manchester due to Alkrington Moss being built on in the 1960's. It is now concrete asphalt and bricks all the way to the airport.
431	Ms Jane Costigan				I and I am sure many others are totally opposed to any developing the green areas around Rhodes Langley and Hollin Lane. The development of this land would change the appearance of the area dramatically and block some great views of our lovely Lancashire countryside These are two reasons mainly why I feel this applications should not be allowed. I have to add

					also that we have already built on extensively on Slattocks Hollin fields and surrounding area and over the other side of town Middleton Technology playing fields. Whatever the reasoning there can be no excuse to get rid of the last green space we have around Middleton its just not good enough. If its for specifically for housing what is the point anyway has there been a count of how many new build empty properties there are already in the middleton area plenty from what I can see have a look around. Are these things taken into consideration before more decisions are made I would hope so. I think another campaign is called for here.
Site Option 5					
12	mr Fred Harper				There is no need to use green belt or protected land for more houses employment or mixed use development. Take a look around the immediate vicinity and you will see that Birch Industrial estate has expanded together with Heywood Industrial estate and Langley estate is still being regenerated thus providing local housing and employment. We should retain our green areas and focus on urban areas that are or have been developed but now need updating to keep up with modern requirements. We need to keep some quality in our environment.
69	Mr David Hardman	Asset Protection United Utilities			Two trunk water mains pass through the North of the site and we will not allow building in their vicinity.
139	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Despite being adjacent to Hollin Lane which forms part of the Northern Orbital Quality Bus Corridor network most of this site is currently more than 400 metres from the nearest bus stops and therefore considered inaccessible by public transport. However there is a frequent (10 minute) bus service between Manchester Middleton Heywood and Bury which runs along Hollin Lane and accessibility of much of the site could be improved with the addition bus stops within the frontage of the site pedestrian crossing facilities and well designed pedestrian routes.
313	Mr John Fishwick	Treasurer Middleton Environment Group			Proposals to develop land adjacent to A6046 Middleton. Middleton Environment Group wish to object to the above proposals for the following reasons: 1. The increase in traffic 2. The loss of green land between Middleton and Heywood. 3. Any new housing/industrial developments should be on brownfield sites. In our view Middleton Rochdale and Heywood have enough industrial/ distribution sites ie Stakehill and the new Kingsway. We are not convinced that these sites will generate the promised employment opportunities for local people.
328	Mr William Sheerin	Chairman Castleton (EC) Residents Association			No. 5 – land north of Langley Lane (East) Middleton No. 6 – land north of Langley Lane (West) Middleton Both of these areas are presently designated as green field pasture and allocated as protected open land in the last UDP. However these two areas would present a good opportunity for employment and mixed use development because of their proximity to Junction 19 of the M62 and the ease with which they could be reached by people living on the nearby large housing estate at Langley. The needs to satisfy the Government requirement for Greater Manchester should be more focused in the south of the region were there is closer access to both the M60 ring road and bisecting the M62. The medium level of housing and high level of employment this would provide would more suit the region and the current economic climate.

388	Mr Robert Taylor				The Local Development Framework and with respect to your options of proposed development of the open land between Middleton and Heywood. Please note that I object most strongly to any building on this open land. The land is one of the few remaining open areas around Middleton and should be protected at all costs. Over the years the vast majority of Middleton has been buried under bricks and mortar by successive councils and what remains should now be regarded as sacrosanct. Too many previous administrations have taken "just this little bit" away from us and it is now time to draw a line around what is left. It is a breath of fresh air to drive up Hollin Lane and also along Langley Lane and to see those fields to destroy them for ever under yet more buildings would be tantamount to a criminal act. I know that many people in Middleton agree with my views and I request therefore that any such building proposals be deleted from the plan.
433	Ms Jane Costigan				I and I am sure many others are totally opposed to any developing the green areas around Rhodes Langley and Hollin Lane. The development of this land would change the appearance of the area dramatically and block some great views of our lovely Lancashire countryside. These are two reasons mainly why I feel this applications should not be allowed. I have to add also that we have already built on extensively on Slattocks Hollin fields and surrounding area and over the other side of town Middleton Technology playing fields. Whatever the reasoning there can be no excuse to get rid of the last green space we have around Middleton its just not good enough. If its for specifically for housing what is the point anyway has there been a count of how many new build empty properties there are already in the middleton area plenty from what I can see have a look around. Are these things taken into consideration before more decisions are made I would hope so. I think another campaign is called for here.
384	L Walsh				Leave things as they are at present on the land to the North of Langley Lane. However the land to the north of Langley Lane designated I understand at the moment as protected open lane. Some years ago the government inspector from his vantage point at the north end of the Hebers boundary – adjacent to Stott Lane entrance said quote "Heywood is near enough to Middleton as it is". I totally agree and would like the open land in question to be left as it is. We have only three fields between us and Oakenbank Road.
427	Mr H Davenport				At the last U.D.P it was deemed that the green corridor between Langley Lane and Heywood was already at a minimum. Construction in this area should therefore be precluded. It should be kept in mind when considering building on green land that the ridiculous change in the price of the land contributes largely to the prohibitive price of the buildings.
378	Miss M Davenport				In the past so much of the land in Middleton has been taken for housing & industry that there is no little "green" land left. So I am pressing for the land north of Langley Lane to be kept free of any construction. The industrial sites in the borough are Not full there are so many empty houses and open spaces near the railways proposed METRO and roads in the borough that this narrow corridor between Heywood & Middleton need not be used. The inspector at the last UDP Inquiry stated the corridor was narrow enough.

357	Mr R Richardson	Langley Lane / Hebers Residents Association			Against any building on land north of Langley Lane due to the lack of land for the boundary between Heywood and Middleton. There is plenty of waste land already in the borough. If building on land north of Langley Lane took place we would lose any boundary between Heywood and Middleton. It's the only bit of green land space we have left in the area. There is plenty of waste land within the borough to use for building.
355	Mrs A Oldham	Langley Lane / Hebers Residents Association			I am against the building on land north of Langley Lane because of the lack of land between Heywood and Middleton boundary. There is plenty of land elsewhere in the borough of Middleton.
359	L Laslett				I am against the using of any farm land off Langley Lane or Hollin Lane for any type of building work either industrial or housing as this is the only bit left of green belt in the Middleton area. There is enough derelict land that can be used instead.
367	John Webb	Langley Lane / Hebers Residents Association			Opposed to building in area between Heywood & Middleton otherwise there will be no green area left. It is unnecessary to build because there are many unoccupied buildings at present in this area (Middleton especially). We don't want Heywood and Middleton "running into each other" as has happened with London where the parks are the only green areas left! Decent apartments built in this area especially have often not been sold.
Site Option 6					
13	mr Fred Harper				There is no need to use green belt or protected land for more employment or mixed use development. Take a look around the immediate vicinity and you will see that Birch Industrial estate has expanded together with Heywood Industrial estate and Langley estate is still being regenerated thus providing local housing and employment. We should retain our green areas and focus on urban areas that are or have been developed but now need updating to keep up with modern requirements. We need to keep some quality in our environment.
140	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Much of this site is just within 400 metres of the bus stops on Hollin Lane which offer access to frequent services (see above site 5). Additional bus stops on Hollin Lane would improve accessibility for the northern part of the site. Langley Lane farm at the western end of the site is approximately 650 metres from the bus stops on Hollin Lane and therefore the western end of the site is considered less accessible by public transport.
314	Mr John Fishwick	Treasurer Middleton Environment Group			Proposals to develop land adjacent to Langley Lane Middleton. Middleton Environment Group wish to object to the above proposals for the following reasons: 1. The increase in traffic 2. The loss of green land between Middleton and Heywood. 3. Any new housing/industrial developments should be on brownfield sites. In our view Middleton Rochdale and Heywood have enough industrial/ distribution sites ie Stakehill and the new Kingsway. We are not convinced that these sites will generate the promised employment opportunities for local people.
329	Mr William Sheerin	Chairman Castleton (EC)			No. 5 – land north of Langley Lane (East) Middleton No. 6 – land north of Langley Lane (West) Middleton Both of these areas are presently designated as green field pasture and allocated

		Residents Association			as protected open land in the last UDP. However these two areas would present a good opportunity for employment and mixed use development because of their proximity to Junction 19 of the M62 and the ease with which they could be reached by people living on the nearby large housing estate at Langley. The needs to satisfy the Government requirement for Greater Manchester should be more focused in the south of the region were there is closer access to both the M60 ring road and bisecting the M62. The medium level of housing and high level of employment this would provide would more suit the region and the current economic climate.
390	Mr Robert Taylor				The Local Development Framework and with respect to your options of proposed development of the open land between Middleton and Heywood. Please note that I object most strongly to any building on this open land. The land is one of the few remaining open areas around Middleton and should be protected at all costs. Over the years the vast majority of Middleton has been buried under bricks and mortar by successive councils and what remains should now be regarded as sacrosanct. Too many previous administrations have taken "just this little bit" away from us and it is now time to draw a line around what is left. It is a breath of fresh air to drive up Hollin Lane and also along Langley Lane and to see those fields to destroy them for ever under yet more buildings would be tantamount to a criminal act. I know that many people in Middleton agree with my views and I request therefore that any such building proposals be deleted from the plan.
432	Ms Jane Costigan				I and I am sure many others are totally opposed to any developing the green areas around Rhodes Langley and Hollin Lane. The development of this land would change the appearance of the area dramatically and block some great views of our lovely Lancashire countryside. These are two reasons mainly why I feel this applications should not be allowed. I have to add also that we have already built on extensively on Slattocks Hollin fields and surrounding area and over the other side of town Middleton Technology playing fields. Whatever the reasoning there can be no excuse to get rid of the last green space we have around Middleton its just not good enough. If its for specifically for housing what is the point anyway has there been a count of how many new build empty properties there are already in the middleton area plenty from what I can see have a look around. Are these things taken into consideration before more decisions are made I would hope so. I think another campaign is called for here.
385	L Walsh				Leave things as they are at present on the land to the North of Langley Lane. However the land to the north of Langley Lane designated I understand at the moment as protected open lane. Some years ago the government inspector from his vantage point at the north end of the Hebers boundary – adjacent to Stott Lane entrance said quote "Heywood is near enough to Middleton as it is". I totally agree and would like the open land in question to be left as it is. We have only three fields between us and Oakenbank Road.
428	Mr H Davenport				At the last U.D.P it was deemed that the green corridor between Langley Lane and Heywood was already at a minimum. Construction in this area should therefore be precluded. It should be kept in mind when considering building on green land that the ridiculous change in the price of the land contributes largely to the prohibitive price of the buildings.

379	Miss M Davenport				In the past so much of the land in Middleton has been taken for housing & industry that there is no little “green” land left. So I am pressing for the land north of Langley Lane to be kept free of any construction. The industrial sites in the borough are Not full there are so many empty houses and open spaces near the railways proposed METRO and roads in the borough that this narrow corridor between Heywood & Middleton need not be used. The inspector at the last UDP Inquiry stated the corridor was narrow enough.
358	Mr R Richardson	Langley Lane / Hebers Residents Association			Against any building on land north of Langley Lane due to the lack of land for the boundary between Heywood and Middleton. There is plenty of waste land already in the borough. If building on land north of Langley Lane took place we would lose any boundary between Heywood and Middleton. It’s the only bit of green land space we have left in the area. There is plenty of waste land within the borough to use for building.
356	Mrs A Oldham	Langley Lane / Hebers Residents Association			I am against the building on land north of Langley Lane because of the lack of land between Heywood and Middleton boundary. There is plenty of land elsewhere in the borough of Middleton.
360	L Laslett				I am against the using of any farm land off Langley Lane or Hollin Lane for any type of building work either industrial or housing as this is the only bit left of green belt in the Middleton area. There is enough derelict land that can be used instead.
368	John Webb	Langley Lane / Hebers Residents Association			Opposed to building in area between Heywood & Middleton otherwise there will be no green area left. It is unnecessary to build because there are many unoccupied buildings at present in this area (Middleton especially). We don’t want Heywood and Middleton “running into each other” as has happened with London where the parks are the only green areas left! Decent apartments built in this area especially have often not been sold.
<b>Site Option 7</b>					
7	Miss Jean Barlow				I am absolutely opposed to the proposed use of the green belt land identified as site option 7 for any kind of development. I am against any further erosion of the green belt around Heywood but especially in this area for the following reasons : • This site along with site 8 is part of an area for a proposed equestrian centre. In the past two to three years there has been enormous local opposition to this proposed equestrian centre because the plans for it include a five-year period of landfill prior to any development work. RMBC was itself party to the opposition of the development and gave evidence at the appeal proceedings which were unsuccessful. Having opposed development on the grounds of maintaining the area as green belt how can RMBC now possibly propose its use as development land ? • Within about a mile of site 7 surrounded by green belt is the landfill and waste disposal site operated by Viridor which until recently was the cause of serious pollution throughout Heywood for many years.
18	Mrs Lynn				I am opposed to the use of green belt land for any kind of development. There has been huge

	Byrne				local opposition in the past few years to using any of this land and yet recently permission was granted for an equestrian centre to include a 5 year period of landfill. RMBC was against this development and gave evidence at appeal proceedings how can RMBC now propose the use of this land for development?
70	Mr David Hardman	Asset Protection United Utilities			A trunk water main passes through the South West of the site and we will not allow building in its vicinity.
141	Ms Rosemary Olle	Senior Land Use Planner GMPTE			This site is considered inaccessible by public transport and falls outside of the 400 metre buffer zone on the Rochdale accessibility map. It is therefore considered an unsuitable location for new development.
Site Option 8					
8	Miss Jean Barlow				I am absolutely opposed to the proposed use of the green belt land identified as site option 8 for any kind of development. I am against any further erosion of the green belt around Heywood but especially in this area for the following reasons : • This site along with site 7 is part of an area for a proposed equestrian centre. In the past two to three years there has been enormous local opposition to this proposed equestrian centre because the plans for it include a five-year period of landfill prior to any development work. RMBC was itself party to the opposition of the development and gave evidence at the appeal proceedings which were unsuccessful. Having opposed development on the grounds of maintaining the area as green belt how can RMBC now possibly propose its use as development land ? • Adjacent to this site is land owned by Peel Holdings who are currently preparing to submit an outline planning application for considerable further industrial development. We do not want to add yet more industrial development in this area by agreeing that site 8 should be converted from green belt into d development land. • There are a number of established residential properties within the boundary of this site whose residents will be severely affected by any development proposals. • Within about a mile of site 8 surrounded by green belt is the landfill and waste disposal site operated by Viridor which until recently was the cause of serious pollution throughout Heywood for many years.
19	Mrs Lynn Byrne				I am totally opposed to use of green belt land for any development. the area of green belt here is being eroded by developments year after year and must now stop.
71	Mr David Hardman	Asset Protection United Utilities			There are sewer flooding risks in the vicinity and it important to keep surface water out of the foul/combined sewer.
142	Ms Rosemary Olle	Senior Land Use Planner GMPTE			This site is considered inaccessible by public transport and falls outside of the 400 metre buffer zone on the Rochdale accessibility map. There is only an hourly daytime bus service on Manchester Road and even these bus stops are further than 400 metres from the majority of the site. It is therefore considered an unsuitable location for new development.
Site Option 9					
6	Miss Jean				I am absolutely opposed to the proposed use of the green belt land identified as site option 9



	Barlow				for any kind of development. I am against any further erosion of the green belt around Heywood but especially in this area for the following reasons : • Last year despite great local opposition (supported by RMBC) an appeal was upheld for the use of local green belt for landfill for a period of five years – this operation has just started. This landfill site is just a few yards away from the proposed site 9. • This site is in a pleasant residential area and runs alongside the main gateway into Heywood from the motorway network. We do not want to despoil the area the residential properties Heywood's main gateway and residents' lives by converting this pleasant green belt land into an industrial wasteland. • Within about a mile of site 9 surrounded by green belt is the landfill and waste disposal site operated by Viridor which until recently was the cause of serious pollution throughout Heywood for many years. • In the last few years we have had a large development of approximately 188 large houses (known as Heritage Place adjacent to the Fire Station) just across the road from this site. • The site is identified as an “Area Of Significant Pollution” in the Core Strategy Background Document. The existing properties near to this site already suffer great noise pollution because of the motorway. In summary I feel that this area of Heywood has more than its fair share of development and loss of green belt without any further developments being proposed.
20	Mrs Lynn Byrne				I am opposed to the use of green belt land identified as site option 9. Last year both local people and RMBC opposed the use of nearby green belt for land fill but the appeal was upheld. The above mentioned site is just a few yards away from site 9. A large residential development already exists -(heritage place). I think this area has had its fair share of development in the past few years.
72	Mr David Hardman	Asset Protection United Utilities			There are sewer flooding risks in the vicinity and it important to keep surface water out of the foul/combined sewer.
161	Mr David Povey				I live on the Lenton Grove estate near Junction 19 of M62. My views are in reference to the proposed building of Houses / Buildings for whatever use on Green Belt land near to junction 19 of M62 (On the existing Collop Farm fields especially). Please note the following: Green Belt – the land suggested for development is green belt and other more sustainable options must be progressed first – the devastating impact on the environment natural habitat and the ‘eye’ speaks for itself. Congestion – the infrastructure around the proposed area is already suffering through traffic – mainly lorries trying to access Pilsworth Industrial estate – the area cannot cope with additional demands. Access to suggested sites would cause total gridlock at peak times Amenities – the local schools and recreational facilities are already at ‘bursting’ point – the closure of a local secondary school in the borough is further going to exacerbate the issues – more housing in the immediate area would be madness Quality of housing - The houses on Lenton Grove estate already suffer from the noise from the M62 - to build further houses near to the motorway would create houses that no one would want to live in being on top of the motorway.
143	Ms Rosemary	Senior Land Use Planner			Approximately half of this site could be considered accessible by public transport whilst the other half lies outside the 400 metre buffer zone on the Rochdale accessibility map. The

	Olle	GMPTE			eastern half of the site is within 400 metres of Middleton Road which forms part of the Northern Orbital Quality Bus Corridor network and has a frequent (10 minute) bus service between Manchester Middleton Heywood and Bury. However it would be necessary to establish an access between the site and Middleton Road. The western half of the site is considered inaccessible by public transport and therefore an unsuitable location for new development.
Site Option 10					
73	Mr David Hardman	Asset Protection United Utilities			There are sewer flooding risks in the vicinity and it important to keep surface water out of the foul/combined sewer.
249	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			Includes several small reservoirs which may provide a source of residual risk of flooding.
144	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Apart from a small section in the western corner the majority of this site is inaccessible by public transport and falls outside of the 400 metre buffer zone on the Rochdale accessibility map. Only a small section of this site (behind the residential properties on Bentley Avenue) is within 400 metres of the bus stops on Rochdale Road which forms part of the Manchester – Rochdale Quality Bus Corridor and has daytime bus services with a frequency of up to every six minutes. The rest of this site is beyond 400 metres considered inaccessible by public transport and therefore an unsuitable location for new development.
330	Mr William Sheerin	Chairman Castleton (EC) Residents Association			There are a great number of empty industrial units already on the Stakehill Industrial Estate so rather than allocate more land for development areas within existing industrial zones should first be fully utilised. The land at Slattocks should only be made available for industry as a last resort if seriously needed. We consider that an amendment to the Slattocks industrial allocation is needed to prevent the long-established housing on Bentley Avenue from having industrial units at the front and back of their properties and affecting their quality of life.
363	Mr J Keeling				In our opinion there is none land available at Slattocks Bentley Ave. Where there is already some industrial units and very access to the motorway network Castleton already has the high est Asthma rate in Rochdale and therefore any more Industrial allocation would be detrimental to the health of Castleton people.
Site Option 11					
74	Mr David Hardman	Asset Protection United Utilities			Two public sewers pass through the middle of the site and we will not allow building in their vicinity. There are sewer flooding risks in the vicinity and it important to keep surface water out of the foul/combined sewer.
250	Mrs Helen Telfer	Planning Liaison Officer			Risk of fluvial flooding

		Environment Agency			
145	Ms Rosemary Olle	Senior Land Use Planner GMPTE			Approximately half this site is within 800 metres of Smithy Bridge rail station provides access to a half hourly daytime service between Manchester Rochdale Littleborough and Halifax. Much of the site is within 400 metres of various bus stops on Halifax Road which provide access to frequent services between Rochdale and Littleborough. The majority of this site is therefore accessible by public transport but pedestrian access from the site to both Smithy Bridge station and the bus stops on Halifax Road would need to be improved and incorporated into the site development. The River Roch currently could restrict pedestrian movement throughout the site.
Site Option 12					
75	Mr David Hardman	Asset Protection United Utilities			There are sewer flooding risks in the vicinity and it important to keep surface water out of the foul/combined sewer.
251	Mrs Helen Telfer	Planning Liaison Officer Environment Agency			Risk of fluvial flooding
146	Ms Rosemary Olle	Senior Land Use Planner GMPTE			As above (site 11) much of this site is within 400 metres of bus stops on Halifax Road which provide access to frequent services between Rochdale and Littleborough. It is therefore considered accessible by public transport. Pedestrian access to the Halifax Road bus stops would need to be a consideration in the design and layout of any site development and Ash brook could restrict pedestrian movement throughout the site.
Glossary of Terms					
393	Mr Ron Smith	Circuit Planning Representative Jehovah's Witnesses			It is good that when the report at page 24 highlights the importance of the community infrastructure it includes "places of worship". In a multi-cultural community with a variety of religious faiths this is sensible and relevant. For the sake of consistency it would be seem appropriate to substitute "places of worship" for the words "church or village halls" as included in the definition of "Community Infrastructure" in the glossary of terms on page 146.



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