

# **ROCHDALE PUBLICATION CORE STRATEGY**

## **SUSTAINABILITY APPRAISAL REPORT**



**Local Development Framework**

**January 2013**



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## Chapter 1: Non Technical Summary and How to Comment

**SEA Directive Annex 1 (j)**  
(see para 2.3)

- 1.1 This document outlines the process and outcomes in respect of the Sustainability Appraisal (SA) of the Rochdale MBC Core Strategy Development Planning Document (DPD). This is required by the Planning and Compulsory Purchase Act 2004 and the European Union Directive 2001/42/EC (SEA Directive), the latter requiring 'Environmental Assessment' which may be, and in this case is, incorporated into the SA process.
- 1.2 Sustainability Appraisal assesses the potential impact of a particular plan on economic, social and environmental objectives to ensure that it promotes sustainable development. In this way the plan can be amended to take account of any negative impacts it may have. For a Development Plan Document such as the Core Strategy, integration of Sustainability Appraisal into its preparation process is vital. Thus the appraisal has been aligned with all phases of the DPD preparation.
- 1.3 This report outlines the appraisals which have taken place at various stages during the preparation of the Core Strategy, the issues that were raised during the appraisals and the steps which were taken to address these issues.

### The Core Strategy and its likely significant effects

- 1.4 The Core Strategy DPD is the key document of the Local Development Framework (LDF), the statutory land – use plan for the Borough. It will set a strategic framework for growth and development in the Borough up to at least 2026. It will have a significant impact upon where new development takes place in the borough, and therefore will significantly impact upon quality of life of residents, the number of jobs in the borough, the quality of the environment, (both natural and built) and the character of the borough. Biodiversity could be harmed or enhanced by the development of the borough, and the Core Strategy can influence this. Wider issues which the Core Strategy can influence include climate change and pollution in the region and beyond.
- 1.5 The Core Strategy contains a Spatial Vision for the borough, Strategic Objectives, a Spatial Strategy and a series of planning policies relating to the economy, housing, communities, design, the environment and accessibility. It also includes general policies relating to the delivery of planning contributions and infrastructure. These policies will help guide decision makers during the period of the Core Strategy. The Core Strategy will constitute the local development plan for the borough, and it will be taken into account when developing neighbourhood plans; it will not override national planning policies, but often will interpret national approaches for the local area.
- 1.6 The Core Strategy is being developed in a number of stages. The 'Issues and Options' stage identified six 'spatial options' for the future development of the borough. This was then refined into 'Preferred Options', containing a spatial strategy, key strategic sites and locations and core policies. There was a

further 'Pre Submission' document, and following concerns raised by an Inspector, the Core Strategy was withdrawn and a revised 'Publication Draft' has now been produced. All the stages so far have been subject to Sustainability Appraisal, and the appraisals themselves have been subject to consultation along with the various stages of the DPD documents.

- 1.7 The borough has significant areas of countryside and strong environmental assets, however the environment of the borough is under pressure from urbanisation and pollution, and there are potential flooding issues. In terms of the likely evolution of the state of the environment were the plan not to be implemented, it is likely that there would be deterioration in the environmental quality of the Borough and in its biodiversity. This is because the plan aims to ensure new development contributes positively to environmental quality and biodiversity, in a way that is stronger than the existing planning policy framework. The plan also incorporates comprehensive policy relating to tackling climate change, climate change adaptation, water management and pollution, policies which reflect the latest national, regional and local guidance.
- 1.8 The Core Strategy proposes a range of measures which are envisaged to prevent, reduce and offset significant adverse effects upon the environment, centred around requiring developers to mitigate adverse effects from developments. Additionally, it expects new developments to incorporate measures to minimise their impacts on the environment through the lifetime of the development (an example being the requirement for the incorporation of energy efficiency and renewable energy generation to minimise the CO<sub>2</sub> emissions of the development).

### The SA Process

- 1.7 The first stage in the SA process was to carry out a scoping exercise, setting the context and objectives. This involved scoping other relevant policies and plans and baseline information, leading to identification of key sustainability issues and problems and development of an SA Framework – 'sustainability objectives' against which the plan will be assessed. These objectives derive from other relevant plans or programmes, in particular the UK Sustainable Development Strategy and the local Community Strategy, and from a review of the baseline information / issues and problems. This scoping exercise and Framework development was undertaken and is outlined in the SA Scoping Report which was published in April 2009. 26 objectives were identified.
- 1.8 The six spatial options of the Core Strategy 'Issues and Options' were assessed against the objectives and this assessment influenced the development of the 'Preferred Options' spatial strategy, key sites and locations for future development and core policies. All of these were then assessed using the same objectives. The spatial strategy and core policies of the 'Pre Submission' document have also been appraised. All appraisals included consideration of the secondary, cumulative, synergistic, short, medium and long term effects.

## The difference the process has made to date

- 1.9 The initial sustainability appraisal which took place of the six spatial options helped to identify the most sustainable options and where different options performed best in sustainability terms. This informed the selection process and the subsequent preferred options document. It showed that the 'high growth' options were significantly less sustainable than the 'low growth' options, and this informed the 'Preferred Option' selection.
- 1.10 The appraisal of the key sites and locations for future development growth helped to identify the most sustainable locations and assisted in directing proposed future growth where it can be most sustainably accommodated, including suggesting refinements for the 'growth corridors' identified in the Preferred Options document, some of which are essentially a number of the sites which have been assessed. The appraisal of the core policies allowed for refinement of the policies to ensure that they will help to deliver more sustainable growth.
- 1.11 The appraisal of the Preferred Options stage indicated that the document was increasingly sustainable in terms of economic and social objectives, but will still weak in terms of environmental objectives. As a result, the policies relating to the environment were strengthened. The appraisal of the 'Pre Submission' stage of the document indicated that accessibility and design sections were strong in terms of sustainability, but there were still issues with other sections. Further measures were taken to address this.
- 1.10 The appraisal of the revised submission draft showed that, in terms of the revised approach to economic development, there was still significant conflict with environmental objectives, such as tackling emissions and protecting greenspace. However, when looking at an alternative approach, i.e. using a site based approach similar to the previous Core Strategy before it was withdrawn, the relationship with objectives relating to jobs and prosperity was even more positive and the relationship with environmental objectives even more negative. In terms of the document as a whole, this came out positively in respect of the sustainability objectives.

## Monitoring the significant effects of the plan

- 1.11 It is possible that the plan will be further amended and if there are any significant changes these will be subject to the same sustainability appraisal process. Further, the significant environmental effects of the implementation of the plan will be monitored to identify any unforeseen adverse effects and to enable appropriate remedial action to be taken. This will be done by developing indicators which relate to the sustainability objectives.
- 1.12 Monitoring the significant effects of the plan will take place on a regular basis, by continuing regular assessment of the implementation of the plan against the sustainability objectives, bearing in mind that these in themselves may be subject to review as key issues and problems evolve. This will involve looking at the baseline information and targets which constitute the indicators informing the sustainability objectives. Any significant effects identified will inform the annual monitoring report. If unforeseen adverse effects are

identified, an investigation will be undertaken to determine what action can be taken.

### How to comment on this report

The Publication Core Strategy has already been through a number of stages during which extensive consultation has taken place with a wide range of stakeholders. At this formal Publication stage, representations will be invited strictly in relation to issues of soundness (i.e. whether the Core Strategy has been positively prepared, whether it is justified and effective and whether it is consistent with national policy) and legal compliance only.

You can view this Core Strategy and other key documents:

- On-line via [www.rochdale.gov.uk/yourviews](http://www.rochdale.gov.uk/yourviews);
- At Council Customer Service Centres and libraries, either as hard copies or via the website above; or
- At the Planning Reception, Floor 1, Telegraph House, Baillie Street, Rochdale.

If you require further information about this consultation or the Core Strategy please contact 01706 924373

Comments on the proposals must be made by **Friday 8th March 2013** to:

- Strategic Planning, Planning and Regulation Services, RMBC, Telegraph House, Baillie Street, Rochdale, OL16 1JH (if possible using a comments form which you can pick up from a library or customer service centres).
- Or e-mailed to [LDF.consultation@rochdale.gov.uk](mailto:LDF.consultation@rochdale.gov.uk) (if possible using the comments form which you can download via the web site below)
- Or preferably completed online via [www.rochdale.gov.uk/yourviews](http://www.rochdale.gov.uk/yourviews)

If you write or email please give us your contact details and the policy or section you are commenting on.

## Chapter 2: Introduction

- 2.1 This document is the draft Sustainability Appraisal report (SA report) of the Rochdale MBC Core Strategy Development Planning Document (DPD), revised Publication Draft. The SA report is the key output of the SA process, documenting the work carried out during the appraisal of the DPD.
- 2.2 The purpose of Sustainability Appraisal is to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans (in this case, the proposed Development Planning Document constitutes 'the plan'). SA identifies and reports on the likely significant effects of the plan and the extent to which the implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined. It does this by assessing the plan against 'sustainability objectives' developed from relevant plans and programmes and baseline information ( the 'Framework', developed during the scoping process).
- 2.3 Sustainability Appraisal of DPDs is a requirement of the Planning and Compulsory Purchase Act 2004. The SA must also meet the requirements of the European Strategic Environmental Assessment Directive 2001/42/EC (SEA Directive). In order to clarify how this report meets the requirements of the SEA Directive, which are outlined in Annex 1 of that document and labelled (a) to (j), boxes shaded in blue throughout the report (example: [SEA Directive Annex 1 \(a\)](#) ) will signpost where a particular requirement is being met.
- 2.4 The plan will also be subject to Habitats Regulations Assessment (HRA) of its impact upon European Protected Sites. In many ways this is a similar exercise to the SA, but obviously dealing with very specific potential impacts. The HRA will be put forward for comments at the same time as the plan and the SA.

### The Core Strategy Development Planning Document and its likely impact on sustainability issues [SEA Directive Annex 1 \(a\)](#)

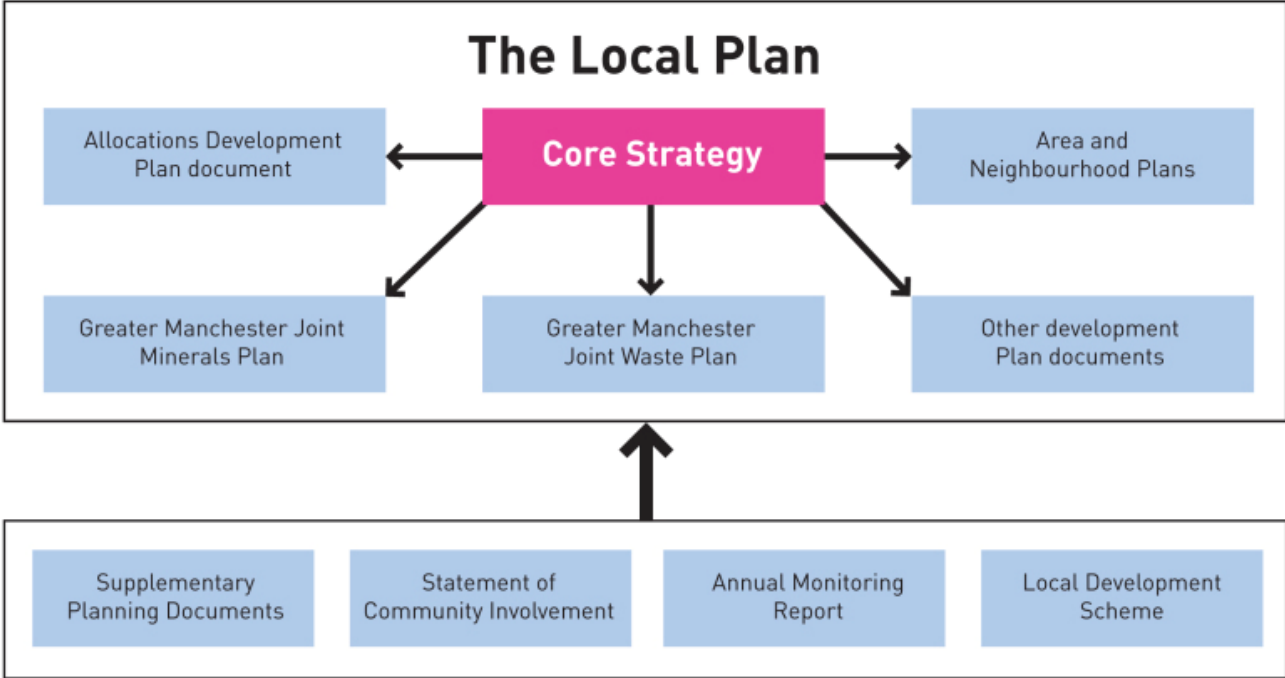
- 2.5 The Local Development Framework (LDF) will gradually replace the Rochdale Borough Unitary Development Plan (UDP), the existing statutory land-use plan for the Borough. The LDF is a portfolio of documents which primarily consists of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The existing UDP policies will be saved until they are replaced within the LDF.
- 2.6 The Core Strategy is the leading document of the Local Development Framework and it will set a strategic framework for growth and development in the Borough up to at least 2026. It sets the overall direction of growth and development, where development should be focussed, the key strategic sites required to deliver the strategy, and the broad policies for improving the borough. The key objectives of the Core Strategy are:
- Delivering a more prosperous economy
  - Creating successful and healthy communities
  - Improving design, image and quality of place



- Conserving and managing the natural environment and resources
- Improving accessibility and delivering sustainable transport

- 2.7 The direction which the Core Strategy, and its constituent elements, takes will have significant impacts upon economic, social and environmental objectives. Its influence is mainly spatial, i.e. the future spatial distribution of development in the borough, but it can also influence the types of developments that take place and how they are designed / laid out / constructed.
- 2.8 From an economic perspective, the Plan can allocate areas for future economic growth and ensure that sufficient land is available, and can influence the distribution of jobs in the borough. It can help to promote the borough to attract inward investment and encourage a visitor economy. From a social perspective, it can protect community facilities and influence the location and type of housing that is built. Environmentally, the Plan can prioritise brownfield development, can require energy efficiency standards, safeguard biodiversity and require climate change adaptation measures. It can influence the amount of pollution in the borough and the transport options available.
- 2.9 Figure 2.1 below shows the relationship of the Core Strategy with other relevant plans and programmes. It will reflect the community's key priorities (set out in the Sustainable Community Strategy 'Pride of Place') through the engagement of the Local Strategic Partnership, and will support and guide other strategies of the Council and its partners. The Core Strategy has also been progressed alongside the refresh of the Borough Renaissance Masterplan (as a means of agreeing and ensuring delivery of priority regeneration and development projects) and the Transport Strategy (in order to prioritise and help deliver the transport investment necessary to support the Core Strategy).

**Figure 2.1 relationship of Core Strategy to other relevant plans and programmes**



## Chapter 3: Context

SEA Directive Annex 1 (e)

### 3.1 Key documents relating to sustainability

The SA scoping report produced in April 2009 outlines the context of the appraisal in respect of other plans, programmes and policies in detail. However, it is worth noting again the key documents with which this appraisal process is seeking to align the Core Strategy, and how the objectives of those documents have been taken into account during the preparation of the Plan.

#### Securing the Future – The UK Government’s Sustainable Development Strategy (2005)

The Strategy highlights the renewed international push for sustainable development from the World Summit on Sustainable Development in Johannesburg in 2002. It creates shared priorities for UK action. These are:

- Sustainable consumption and production – achieving more with less;
- Climate change and energy – seeking to secure a profound change in the way we generate and use energy;
- Natural resource protection and environmental enhancement – protecting and enhancing the environment to ensure a decent environment for everyone;
- Sustainable communities – creating communities which embrace the principle of sustainable development at the local level.

The Plan puts natural resource protection and sustainable communities as two of its key objectives, and well as containing a comprehensive climate change policy.

#### Rising to the Challenge: A Climate Change Action Plan for England’s Northwest

Sets out a vision for the region and outlines outcomes to be achieved by 2020. These relate to both reducing regional greenhouse gas emissions and adapting to unavoidable effects of climate change, and the actions set out are characterized as enabling, encouraging, engaging, exemplifying and catalyzing.

The Plan relates to a number of the actions which relate to planning.

#### Pride of Place: The Community Strategy for Rochdale Borough 2011 – 2021:

Priority themes are People, Place and Prosperity.

The Plan reflects the community’s key priorities as set out in ‘Pride of Place’.

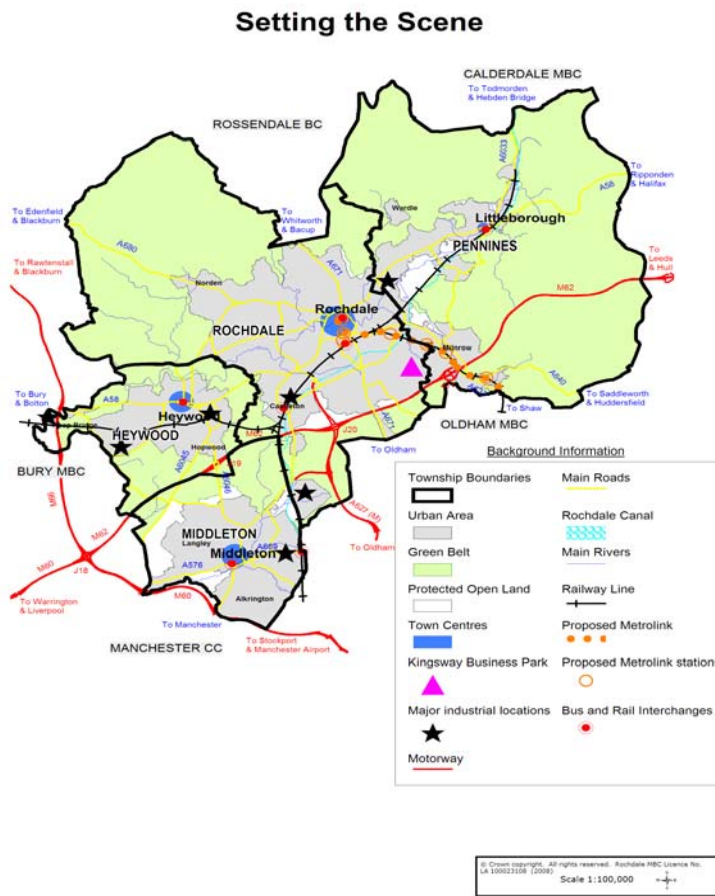
## 3.2 Key characteristics of Rochdale Borough

3.3 From the key documents and evidence base, the scoping report goes on to describe the baseline characteristics of the borough and identify the key sustainability issues. The latter can be summarised as follows:

- Housing areas in the Borough are polarised in terms of quality and price of housing
- Relatively low levels of house building in recent years has restricted choice
- An underperforming economy in comparison to the city region and north west
- Over-dependence on declining manufacturing sectors
- Poor skills profile in the workforce
- High levels of worklessness, resulting in high levels of the workforce being on benefits in particular in the inner areas
- Educational attainment and technical skills in the Borough, particularly in deprived areas, are low and accessible education and training facilities are needed to address this
- Crime and fear of crime is a problem in some parts of the Borough, particularly in the inner areas, town centres, some large housing estates and less secure employment areas
- There are national and local commitments to tackling climate change and its impacts generally including ensuring all new developments in the Borough are carbon neutral by 2020
- There is a need to widen travel choice and enhance sustainable accessibility to employment opportunities, shopping, education and local services
- The functional integrity of the Green Infrastructure network is of variable quality and is under pressure from the impacts of urban communities and the need to support economic and housing growth
- Access to the countryside is poor in many parts of the Borough and urban open spaces vary significantly in quality and diversity
- The biodiversity of the Borough is under pressure from development, poor management and design and the loss of key features such as urban garden spaces; the Borough, like all local authorities, has a duty to have regard to the conservation of biodiversity in exercising its functions
- The Borough has a very low level of tree cover (3%)
- The percentage of rivers of good or fair quality is low
- There is pressure for more renewable energy developments
- Significant parts of the borough's urban areas are designated flood zones 2 or 3 on the Environment Agency flood map
- Significant parts of the Borough are covered by Air Quality Management Zones
- The Borough produces too much waste and sends most of it to landfill sites
- There are 3 Grade 11\* listed buildings in the Borough which are on the English Heritage Buildings at Risk Register 2008
- Access to the countryside and quality greenspace is poor in many parts of the Borough
- The general health of the population is worse than the national average

### 3.4 Rochdale Borough – current state of the environment

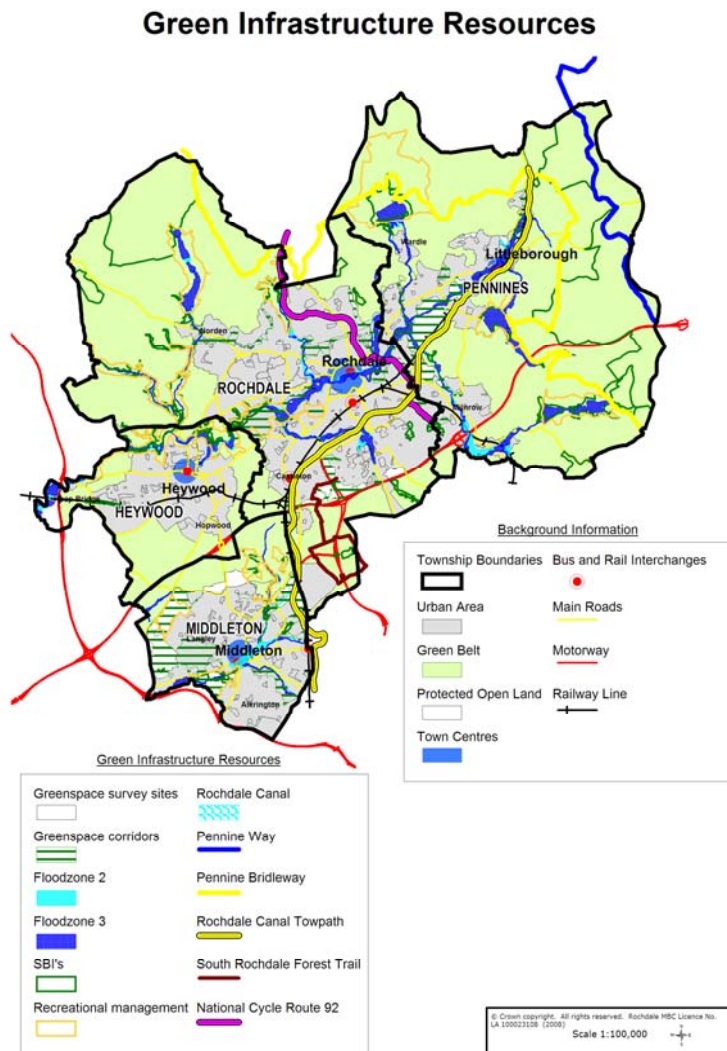
SEA Directive Annex 1 (b) and (c)



3.5 The Borough, which has an area of 160 square km (62 sq. miles), is around two thirds countryside which to the north and east includes the Millstone Grit foothills of the South Pennine Moors shared with East Lancashire and West Yorkshire. This high moorland provides an extensive backdrop for the industrial towns in the river valleys below. River valleys penetrate the heart of the urban centres and contain the primary transport corridors based on road, rail and the Rochdale Canal; the rivers Roch and Irk connect into the Mersey Basin. The M62, M60 and M66 Motorways connect Rochdale with the rest of Greater Manchester and beyond. The west and south west includes a more low level (sandstone and clay) landscape leading to the edges of the city of Manchester.

3.6 The main urban centres are the towns of Rochdale, Middleton and Heywood with the smaller settlements of Littleborough and Milnrow in the Pennine eastern fringes of the Borough. Inner urban neighbourhoods in Rochdale district contain large areas of terraced housing much of which dates back to the turn of the twentieth century and, with the manufacturing growth of Rochdale this provides a basic historic character and development pattern for the core urban areas i.e. mixed areas of industry and housing closely aligned with the main river valleys. More diverse smaller settlements are found on the

urban-rural fringes. The more affluent areas with higher value houses are mainly in the Pennines, north and west Rochdale and south Middleton.



- 3.7 The borough has a significant number of Sites of Biological Importance located throughout the urban and rural area and as part of greenspace corridors and networks. The Rochdale Canal and a significant part of the South Pennine Moors are designated as Sites of Special Scientific Interest which are also Special Areas of Conservation (the South Pennine Moors are also a Special Protection Area). Three Local Nature Reserves and one Country Park are located at Healey Dell, Hopwood Woods, Alkington Woods and Hollingworth Lake respectively.
- 3.8 Only 3% of the borough is woodland, primarily located in the river valleys and reservoir catchments.
- 3.9 Species of high conservation concern in the borough are; water vole, brown hare, pipistrelle bat, Daubenton's bat, whiskered bat, noctule bat, brown long-eared bat, skylark, linnet, reed bunting, spotted flycatcher, tree sparrow, grey partridge, bullfinch, song thrush, great crested newt, floating water plantain, grasswack pondweed, house sparrow and starling.

- 3.10 Further detail in respect of the state of the environment in the borough is contained in the Sustainability Appraisal Scoping Report.
- 3.11 In terms of the likely evolution of the state of the environment were the plan not to be implemented, it is likely that there would be deterioration in the environmental quality of the Borough and in its biodiversity. This is because the plan aims to ensure new development contributes positively to environmental quality and biodiversity, in a way that is stronger than the existing planning policy framework. The plan also incorporates comprehensive policy relating to tackling climate change, climate change adaptation, water management and pollution, policies which reflect the latest national, regional and local guidance.

## Chapter 4: Development of the Sustainability Objectives

### SA Scoping report

4.1 The Sustainability Appraisal Scoping Report was produced in June 2007, outlining how the scope of the SA was determined by examining the evidence base and relevant plans, policies and strategies. This was also the initial consultation document of the SA process, allowing the following relevant bodies to comment (amongst others):

- Natural England
- English Heritage
- The Environment Agency

4.2 Comments were received and the scoping report was revised in the light of these.

### Revised scoping report

4.3 Due to the length of the process in respect of developing the Local Development Framework, two years had passed between the production of the original scoping report in 2007 and the stage of preparation of the Preferred Options report. Due to this, and bearing in mind the importance of aligning the SA process with all stages of the DPD process, the scoping exercise was undertaken again in April 2009. This involved a new scope of relevant plans, programmes and policies, taking into account new documents produced in the period since the original scoping report. Additionally, relevant baseline information was updated and the SA framework was aligned further with the priorities of the local Community Strategy.

4.4 The updated scoping report was submitted for consultation on 7<sup>th</sup> April 2009 for a period of 5 weeks. The following bodies and organisations were consulted:

- Natural England
- English Heritage
- The Environment Agency
- Government Office for the North West
- The North West Regional Assembly (4NW)
- Greater Manchester Ecology Unit
- Greater Manchester Chamber of Commerce
- Rochdale Civic Society
- Rochdale Local Strategic Partnership
- Home Builders Federation
- Adjoining Authorities

4.5 Comments on the revised scoping report were received from the Environment Agency, English Heritage and Natural England. These comments, and the responses to them, are summarised in Table 4.1 below.



**Table 4.1 Comments on revised scoping report and responses**

<u>Matters raised</u>	<u>Comments</u>	<u>Revisions to scoping report</u>
<b><u>English Heritage</u></b>		
Table 1 misses out some key documents and you should refer to the list on page 7 and 8 of our guidance note	Best practice indicates that this stage of the scoping report should not be a comprehensive list of those documents of relevance, rather a select list. It has been decided therefore to limit the list largely to those documents which have clear key objectives and targets relevant to the plan	Addition of European Landscape Convention, Northwest Climate Change Action Plan and Northwest Tourism Strategy
Baseline information – indicators can be informed by examples in English Heritage guidance note and the section on baseline information	Noted	A wider set of indicators relating to heritage will be used to monitor the impacts of the Plan and these are set out in the revised Framework
There may well be grade II listed buildings at risk in the area, which are not covered by the English Heritage Register	Whilst we would wish to monitor condition of grade II buildings, limited resources mean that this can only be done in a limited way which may not be sufficient for the purposes of the monitoring of this document.	No revision.
The Framework has a different set of objectives from the SA objectives in Table 2. The SA Framework must include an objective for the historic environment	Agreed	Table 2 and Framework aligned so that they have the same objectives. Objective relating to historic environment included in Framework (objective 5E)
<b><u>Natural England</u></b>		
Section 5 of the report refers to Appropriate Assessment (AA) – however, this is just one stage of the process and the procedure should be referred to as Habitats Regulations Assessment Screening. Any HRA should also look wider than the Borough boundary and look for ‘pathways’ between the Borough and European sites within and outside Rochdale	Agreed	Section 5 of the report amended to reflect Natural England advice
The Biodiversity Duty is a new duty for local authorities and we would expect to see a reference to it in all relevant planning documents including the Core Strategy and its Sustainability Appraisal	Agreed	Reference to Biodiversity Duty included in Table 3 – identified as a key issue
Review of Relevant Plans, Policies and Programmes – we suggest inclusion of the following documents (list	Best practice indicates that this stage of the scoping report should not be a comprehensive list of those documents of	Northwest Climate Change Action Plan and Green Infrastructure Guide added. GM Geodiversity Action Plan will be

included)	relevance, rather a select list. It has been decided therefore to limit the list largely to those documents which have clear key objectives and targets relevant to the Plan.	added when published.
Baseline Information – could be expanded to point out the international designations of the Rochdale Canal and South Pennine Moors Sites, and reference made to later paragraphs where further detail is cited	The international designations are referred to.	Cross reference to later more detailed paragraphs.
We would welcome inclusion of baseline data in much more detail. We would welcome detailed references to the following (list follows)	Agreed that more detailed baseline data would be useful, however still prioritising that data which can be measured and monitored, and which can be impacted upon by the Plan	Baseline data revised to include more detail including in respect of most of the suggested areas.
Key Sustainability Issues – we would welcome an issue raised for development pressures potentially causing a detrimental effect on landscape (and townscape) character and quality, and the inclusion of broad issues as follows (list follows)	Agreed that some of those issues suggested are key issues facing the Borough, and should be included	Table 3 amended to take into account some of the suggested further issues.
Developing the SA Framework - We would welcome broad sustainability objectives and indicators covering the following (list follows)	Agree with the list of suggestions and there are either existing objectives relating to the list or new ones will be added	Framework revised to take account of suggestions.
<b><u>Environment Agency</u></b>		
We support the Policies, Plans and Programmes detailed. However, we feel that the Strategic Flood Risk Assessment should also be included within this section	Agreed	SFRA to be included.
It is not clear why water quality is included in objective 9 as it relates to water quality rather than flood risk	Agreed	Objectives revised to reflect comments.
Key Issues – Allocation of sites should be done in line with the SFRA.	Agreed	SFRA compliance referred to in Key Issues and the SA Framework.

4.6 As a result of the comments received the scoping report, including the Framework was revised. The revised Sustainability objectives are shown in Table 4.2 below:

**Table 4.2: The Sustainability Objectives**

Objective	Sub-questions	
1. Developing Sustainable Neighbourhoods	1A	Will the plan enable the provision of decent housing?
	1B	Will the plan create an accommodation mix which reflects the needs and aspirations of local communities?
	1C	Will the Plan encourage harmonious communities?
	1D	Will the plan ensure that new development is easily accessible and well connected to public transport, community facilities and services, and quality open space?
2. Increasing Jobs and Prosperity	2A	Will the plan support and retain the Borough's local businesses, promoting a competitive and dynamic business environment?
	2B	Will the plan enable the provision of more jobs?
	2C	Will the plan enable the provision of better paid jobs?
	2D	Will the Plan attract new retail investment to town centres?
	2E	Will the Plan raise the profile of the Borough within the North West region, attracting more investment and opportunities for local people?
3. Making Sure Every Child Matters	3A	Will the Plan help to tackle obesity and poor health in children and adults?
	3B	Will the Plan promote and enhance opportunities for safe and sustainable travel to and from schools?
	3C	Will the Plan protect and enhance local play facilities?
4. Improving Community Safety	4A	Will the Plan reduce crime and the fear of crime?
	4B	Will the Plan promote 'Home zone' schemes, reducing car access and limiting speeds, creating safer and more attractive street environments?
5. Creating a Cleaner, Greener Environment	5A	Will the Plan reduce traffic?
	5B	'Will the plan reduce local carbon emissions and energy use, contributing to national and global targets'?
	5C	Will the Plan create and protect ample and high quality green space and green infrastructure?
	5D	Will the Plan protect and enhance the historical, cultural and archaeological heritage of the Borough?
	5E	Will the Plan protect and enhance landscape (and townscape) character, quality and local distinctiveness?
	5F	Will the Plan protect and enhance biodiversity and provide opportunities for new habitat creation.
	5G	Will the plan tackle the effects of climate change?
	5H	Will the Plan encourage the efficient use of natural resources in the location, construction and use of developments?
	5I	Will the Plan ensure that flood risk is minimised?
6. Improving Health and Wellbeing	6A	Will the Plan lead to better access to healthcare services?
	6B	Will the Plan reduce health inequalities?
	6C	Will the Plan Increase sport and leisure activities to help promote healthier lifestyles?

## Chapter 5: Sustainability Appraisal

SEA Directive Annex 1 (f)

### Initial appraisal of spatial options

SEA Directive Annex 1 (h)

- 5.1 In August 2008 an initial sustainability appraisal of the six key spatial options outlined in the Core Strategy issues and options report was undertaken. This was carried out by a panel representing different disciplines, specifically sustainability and economic and environmental affairs. They took a professional judgement of the likely impacts of the Plan. The assessment was made on the assumption that all of the 'development options' identified in each of the spatial options will be realised, i.e. that all potential sites are developed; this may not be the case in reality.
- 5.2 The six spatial options considered were:
1. Dispersed development in the built up area
  2. Focus on regeneration areas in the built up area
  3. Option 2 + Focus on south Rochdale and south Pennines
  4. Option 2 + Focus on Heywood and Middleton
  5. (Options 3 + 4) Focus on the south of the borough
  6. High growth development dispersed across the borough.
- 5.3 The findings were used to inform the Issues and Options document, in particular the descriptions of key advantages / disadvantages for each option were amended to align better with the findings, and the descriptions of the impacts of each option were also amended.
- 5.4 This appraisal is shown in Appendix 1. As can be seen, each option was scored either excellent, good, fair, weak, poor or undermining in respect of each of the objectives. The sustainability objectives used related to the same issues as those outlined in the 2007 scoping report, however presentational changes included rewriting the objectives to make them more concise and aligning them with the objectives of the UK Sustainable Development Strategy and the Borough's Community Strategy.
- 5.5 The Appraisal showed that the 'High Growth' options (options 4 to 6) were significantly less sustainable than the 'Current Growth' options. Spatial Option 2 rated best overall, with Option 1 appearing weak and Option 3 rating better than Options 4 to 6.
- 5.6 Difficulties encountered and assumptions made  
The Appraisal had to assume that all of the development options identified in each of the Spatial Options will be realised, something which may not necessarily be the case. Nonetheless, the findings gave a broad indication of the sustainability of the Options.

- 5.7 The sustainability appraisal of the spatial objectives was published for consultation along with the Issues and Options report in September 2008.

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- 5.8 The strategy was then taken forward to the 'Preferred Options' stage, broadly reflecting Option 5 but with a lot less growth and development of greenfield sites outside the urban area, taking into account sustainability considerations. The emphasis on regeneration to be found in Option 2 was also taken forward in the 'Preferred Options'. Looking at the results of the appraisal in Appendix 1, it can be seen that many of the areas in which Option 5 performed poorly related to loss of open space, i.e. greenfield development, and thus this area of poor performance in relation to sustainability objectives has been addressed by the decreased emphasis on greenfield development.

**Appraisal of the Key Strategic Sites and Locations identified in the Core Strategy Preferred Options**

- 5.9 The Core Strategy Preferred Options identifies those areas where future development is likely to be concentrated. These include 'Economic Growth Corridors', which will consist of a number of key strategic development sites, and strategic employment / housing sites are also identified elsewhere (outside of the growth corridors). In addition to this, another element of the Preferred Options is an emphasis on regeneration, and specific regeneration areas are identified.
- 5.10 In order to comply with the SEA directive, it is important that alternatives are assessed, and the most sustainable of those alternatives identified. This has been done with the spatial options which were originally put forward, but it is equally important that all potential key development sites and the Economic Growth Corridors they make up are examined, so that those which are most sustainable can be prioritised and measures identified to mitigate impacts. In order to address this matter, 62 key sites around the borough were assessed against the sustainability objectives (Table 5.1), including those that made up Economic Growth Corridors. These included sites brought forward from the Issues and Options stage of the Plan, sites brought forward from the Unitary Development Plan and sites nominated by individual landowners. The assessment used a similar ratings system to the initial SA described in para. 5.1 above, except the ratings were revised to be strongly positive, positive, neutral, negative, strongly negative or unknown.
- 5.11 The growth corridors proposed in the Preferred Options document are as follows:
- Rochdale Town Centre / Kingsway Corridor
  - Castleton Corridor
  - South Heywood / J19 corridor
  - Middleton Town Centre / Oldham Road

### Rochdale Town Centre / Kingsway Corridor

This growth corridor would be made up of the following sites:

- Rochdale town centre in the north as a focus for service and office development and employment opportunities
- Kingsway Business Park in the south as a key regional employment destination with a focus on industries to broaden the economic base along with associated leisure, hotel and new housing
- Between the two a focus on new employment and housing development to regenerate the areas around the railway station, the wider Oldham Road corridor and Canal Basin.

This corridor includes the Milkstone, Deeplish and Newbold regeneration area, and is closely related to the regeneration areas which cover Falinge, Spotland and Sparth, East Central Rochdale and Kirkholt.

### Castleton Corridor

This growth corridor would be made up of the following sites:

- Sandbrook Park in the north east which contains office, retail and leisure development with some new offices still to be developed on the site.
- The Royle Works and Former Woolworths sites on Royle Barn Road which offer opportunities for employment and mixed use development in a highly accessible and sustainable location.
- Cowm Top allocated employment site.
- Land east and west of the canal at Trub and adjacent Corus site which together form a large mixed use opportunity to assist the regeneration of Castleton. This includes tourism opportunities related to canal with potential link to East Lancs Railway.

### South Heywood / J19 corridor

This growth corridor would be made up of the following sites:

- Heywood Distribution Park which is currently seeking status as a Simplified Planning Zone.
- Existing employment sites within the urban area off Hareshill Road before releasing additional land;
- New employment development on land currently in the Green Belt off Hareshill Road following development of existing sites.
- Mixed use development (housing and employment) around Collop Gate Farm with a new local centre, providing an attractive new location attracting new residents
- New link road between Junction 19 of M62 and junction 3 of M66 to service new development and reduce heavy traffic in Heywood town centre.

### Middleton Town Centre / Oldham Road

This growth corridor would be made up of the following sites:

- Improvements to the Oldham Road and Grimshaw Lane corridors, including new housing and employment development on appropriate sites;
- Regeneration of the land around British Vita including new housing and employment development, improved open space and River Irk corridor;

- Also includes East Middleton regeneration area with potential to provide good quality housing on available brownfield sites, notably around Middleton Junction and Glen Grove, and improve the overall living environment.
- 5.12 In the case of the Castleton Corridor and South Heywood / J19 growth corridors, these are essentially made up of a number of the key sites which have been assessed in Table 5.1; in the case of the two other growth corridors, these are essentially regeneration areas.
- 5.13 The column on the far right of Table 5.1 indicates whether it is intended to take a particular key site forward. This decision was made after the sustainability appraisal had taken place, and gives an indication of how sustainability objectives have influenced site selection. Decisions on a number of sites have yet to be made, as indicated.
- 5.14 Analysis of the sustainability appraisal of key sites and what it means for taking the Economic Growth Corridors forward in a sustainable manner is contained below (5.15 onwards).











Hare Hill Road, Littleborough – 5D - could be positive or negative depending on quality of scheme and treatment of existing mill building.

Hopwood Hall College, Middleton – 2A & 2C - Based on potential for high tech employment linked to college.

Trafalgar Centre, Belfield Road - Assumption that development is constrained to previously developed part of site. Significant flooding issue.

Former Woolworths depot, Rochdale - For 5D (& 5E) much depends on retention of offices on Royle Barn Rd.

Rooley Moor Road (TBA) - For 5I based on fact that much of site is currently developed and therefore redevelopment may just maintain status quo.

Land at Healey Hall Mills - Some of positives for biodiversity reflect opportunity for enhancement in terms of building and landscape quality.

**Table 5.2: Sustainability appraisal of ‘Regeneration’ growth corridors**

Site name	Sustainability Objectives																								Overall score and comments			
	1A	1B	1C	1D	2A	2B	2C	2D	2E	3A	3B	3C	4A	4B	5A	5B	5C	5D	5E	5F	5G	5H	5I	6A		6B	6C	
Rochdale Town Centre / Kingsway Corridor	Light Green	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Light Green	Dark Green	Dark Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	29
Middleton Town Centre / Oldham Road	Light Green	Light Green	Dark Green	Dark Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	23

Appraisal of the Strategic Sites and Locations identified in the Core Strategy preferred options – Conclusions

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5.15 This assessment showed that many of the key sites perform badly in respect of environmental sustainability objectives, especially those objectives relating to green space. In terms of the proposed Economic Growth Corridors, the following conclusions were reached:

5.16 Rochdale Town Centre / Kingsway Corridor  
This corridor is mainly urban, providing regeneration opportunities, and the 'greenfield' elements of it (the Kingsway Business Park) is already allocated and under construction. It includes the regeneration of Rochdale town centre and public transport infrastructure improvements. This Corridor performs well against sustainability objectives (see Table 5.2).

5.17 Castleton Corridor  
The Cowm Top and Sandbrook Park areas are already allocated and under development. The remainder of the growth corridor consists of the following key sites from the appraisal carried out and shown in Table 5.1:

Site 6 – Trub Farm (west of canal) (appraisal score: -6)  
(part of) Site 42 – Trows Farm, Trows Lane (-9)  
Site 45 – Former Woolworths depot (+27)  
Site 60 – Royle Works (Dunlop) (+21)  
Site 62 - Trub Farm (east of canal) (+27)

As can be seen, sites 45, 60 and 62 score highly in respect of the sustainability appraisal, being 'brownfield' and close to public transport / shops and other services. However, sites 6 and 42 perform badly. Thus this corridor would be very good in sustainability terms provided that sites 6 and 42 are not taken forward.

5.18 South Heywood / J19 corridor  
Some of the elements of this growth corridor are urban and regeneration -based. Of main concern in respect of sustainability, therefore, are the proposed Green Belt development sites, which have been assessed under the sustainability appraisal outlined in Table 5.1 as follows:

Site 3 – Land south of Hareshill Road (appraisal score: -14)  
Site 4 – Land north of Hareshill Road (-6)  
Site 5 – Land south of Manchester Road (-2)  
Site 40 – (part of) Siddall Moor Farm, Hareshill Road (-8)

It is clear that this growth corridor does not score well in terms of environmental sustainability objectives, largely due to the fact that it involves the take up of 'greenfield' Green Belt land. However, these sites do score well in respect of accessibility and there would be a

new local centre, and they score well in comparison to other peripheral sites. It is recommended that development is contained as close as possible to the existing urban area with the minimal Green Belt loss, and that the sustainability of this corridor can be improved by the improvement of local transport links and services. If site 3 is not taken forward, and site 40 only partially taken forward, there would be a significant improvement in the sustainability of the corridor (taking into account sustainable transport and other infrastructure improvements).

5.19 Middleton Town Centre / Oldham Road

This corridor is urban, providing regeneration opportunities. It includes town centre regeneration and public transport improvements. As can be seen in Table 5.2, it performs well against the sustainability objectives.

5.20 In respect of the 62 key sites generally, analysis of the appraisal shows that there is a close correlation between those sites which perform poorly in the appraisal and those which are not being taken forward. This shows evidence that the plan is underpinned by sustainability considerations. The key exceptions to this are the sites which make up the South Heywood / J19 corridor, and this has been analysed in 5.16 above.

**Appraisal of the 'Preferred Options' spatial strategy, strategic objectives and core policies**

5.21 A workshop took place on 28<sup>th</sup> July 2009, bringing together experts from a range of disciplines. This workshop assessed the spatial strategy and core policies against the sustainability objectives which had been previously identified in the scoping report described above and which have been used to assess the key sites and locations.

Present at the workshop were the following experts:

- Andrew Eadie, Rochdale MBC Strategic Planning Officer
- Barry Simons, Rochdale MBC Sustainability Development Service Manager
- David Morris, Rochdale MBC Design and Conservation Officer
- Mike Hodge, Greater Manchester Police
- Len Harris, Oldham and Rochdale Housing Market Renewal
- Susan Ayres, Rochdale MBC Economic Affairs Unit
- Adrian Watson, Rochdale MBC Environmental Health
- Neil Hewertson, Groundwork Northwest

The workshop was chaired by independent consultants - Ian Grimshaw of TEP LLP and facilitated by Heidi Curran of C.E.C Ltd and Alison Chapman of TEP LLP.

The Core Strategy Preferred Options spatial strategy, strategic objectives and core policies are outlined in Table 5.3 below.

**Table 5.3: The Core Strategy Preferred Options Spatial Strategy and Core Policies**

**SEA Directive Annex 1 (a)**

<b>Policy ref</b>	<b>Policy</b>
SP1	The Spatial Strategy Overview
SP2	The Spatial Strategy in the south of the borough
SP3	The Spatial Strategy in the north of the borough
<b>Strategic Objective SO1: To deliver a more prosperous economy</b>	
CP1	Establishing thriving town centres
CP2	Focussing economic growth
CP3	Regenerating existing employment sites
CP4	Encouraging the visitor economy
CP5	Diversifying the rural economy
<b>Strategic Objective SO2: To create successful and healthy communities</b>	
CP6	Delivering the right amount of housing in the right places
CP7	Delivering the right type of housing
CP8	Providing affordable homes
CP9	Meeting the housing needs of gypsies and travellers
CP10	Improving health and well being
CP11	Delivering education facilities
CP12	Improving community facilities and cohesion
<b>Strategic Objective SO3: To improve design, image and quality of place</b>	
CP13	Protecting and enhancing local character
CP14	Improving image
CP15	Design of new development
<b>Strategic Objective SO4: To conserve and manage the natural environment and resources</b>	
CP16	Tackling climate change
CP17	Managing green belt
CP18	Managing other protected/reserved open land
CP19	Enhancing green spaces and corridors
CP20	Protecting biodiversity and geodiversity
CP21	Managing water resources and flood risk
CP22	Managing and improving air quality
CP23	Managing waste
CP24	Managing minerals resources
<b>Strategic Objective SO5: To improve accessibility and deliver sustainable transport</b>	
CP25	Delivering sustainable transport
CP26	Improving accessibility

- 5.22 It was recognised that each panel member was capable of giving much more detailed feedback than could be taken on the day and so they were asked to submit extra comments in writing.
- 5.23 The discussion which took place enabled a matrix to be produced, and this is shown in Table 5.4 below. It is similar in style to the initial appraisal matrix shown in appendix 1, and summarises the conclusions of the workshop. Further detail of the conclusions of the workshop is outlined in para. 5.25 below.
- 5.24 The conclusions of the workshop informed the assessment of the Preferred Options spatial strategy and policies. The workshop conclusions were then examined in detail and used to inform Appendix 2 of this document, which gives a more comprehensive assessment, expanding on the summary shown in table 5.4. The assessment takes an overview of the workshop discussions and represents a refinement of the conclusions, taking into account the wider workshop report which was produced and therefore the appendix in Appendix 2 may vary slightly from table 5.4.



**Table 5.4: Sustainability Appraisal of the ‘preferred options’ spatial strategy and core policies, 28 July 2009**

**Key:**

Strongly positive	Positive	Neutral / not applicable	Negative	Strongly negative	Unknown / not enough information

Rochdale MBC Core Strategy ‘Preferred Options’ Objectives and Core Policies		Sustainability Objectives					
		Sustainable neighbourhoods	Increasing jobs and prosperity	Making sure every child matters	Improving community safety	Creating a cleaner, greener environment	Improving health and wellbeing
<b>Spatial Strategy</b>							
SP1	The Spatial Strategy overview						
SP2	The spatial strategy in the south of the borough						
SP3	The spatial strategy in the north of the borough						
<b>To deliver a more prosperous economy</b>							
E1	Establishing thriving town centres						
E2	Focusing economic growth						
E3	Regenerating existing employment areas						
E4	Encouraging the visitor economy						
E5	Diversifying the rural economy						
<b>Creating successful and healthy communities</b>							
C1	Delivering the right amount of housing in the right places						
C2	Delivering the right type of housing						
C3	Providing affordable homes						
C4	Meeting the housing needs of gypsies and travellers						
C5	Improving health and well being						
C6	Delivering education facilities						

<b>C7</b>	Improving community facilities and cohesion						
<b>To improve design, image and quality of place</b>							
<b>P1</b>	Protecting and enhancing local character						
<b>P2</b>	Improving image						
<b>P3</b>	Design of new development						
<b>To conserve and manage the natural environment and resources</b>							
<b>R1</b>	Tackling climate change						
<b>R2</b>	Managing green belt						
<b>R3</b>	Managing other protected open land						
<b>R4</b>	Enhancing green space and corridors						
<b>R5</b>	Protecting biodiversity and geodiversity						
<b>R6</b>	Managing water resources and flood risk						
<b>R7</b>	Managing and improving air quality						
<b>R8</b>	Managing waste						
<b>R9</b>	Managing mineral resources						
<b>To improve accessibility and deliver sustainable transport</b>							
<b>T1</b>	Delivering sustainable transport						
<b>T2</b>	Improving accessibility						

## 5.25 Summary of sustainability appraisal of the 'Preferred Options' spatial strategy and core policies:

### The spatial strategy

Only two comments were received on the spatial policies following the workshop. The policies were commented upon for their impacts on two of the sustainability objectives: sustainable neighbourhoods and cleaner, greener environments. On the former, the policies were considered to be a positive approach, although it was recognised that there were some issues in the detail, which was discussed in the assessment of the core policies. With regard to the environment, the policies were considered to be generally inconclusive; it was felt that the policies would probably lead to an increase in traffic, which was negative, but that many of the other sub questions for the environment *could* be positive, depending on implementation. More information could be included within the policies regarding environmental ambitions than is present at the moment, which would go some way to clarifying the likely effect of the policy on the environmental objectives.

### Achieving economic growth and prosperity

The policies under this objective were generally considered to be positive for the sustainability objectives: the Town Centre, Regeneration, Visitor and Rural policies all received a positive response from the panel. However on one of the key policies, "Focussing economic growth", the panel was not convinced that it would achieve the "increased jobs and prosperity" objective, which one might consider that it should; at the same time the policy was likely to lead to significant environmental impacts. This calls for greater clarity in the policy regarding the ambition for jobs and skills, and ensuring that the later policies on the environment are strong enough to help mitigate the environmental effects.

### Creating successful and healthy communities

The policies under this objective were, again, generally positive, especially for increasing jobs and prosperity, children, community safety and health. They received a more mixed response for sustainable neighbourhoods and the environment. In particular, the policy to increase housing supply was assessed as negative for both of these sustainability objectives. This is an important policy and significant in terms of its impacts. The policy to "deliver the right type of housing" is important in terms of addressing the concerns raised on housing numbers and it did not resolve the issues. Both policies need to be more ambitious and specific about their goals for implementation and move away from repeating past policy goals; new concepts of sustainable neighbourhoods need to be incorporated into these policies.

### Improving quality of place, image and design

These policies were well received by the panel and considered positive across the suite of sustainability objectives, in some areas strongly positive. The panel did consider that they could be strengthened in tow areas in particular: the image policy must be about addressing issues, not just perceptions and the design policy needs to be mandatory and delivered through an SPD.

### Tackling climate change and conserving natural resources

The response to these policies was quite mixed. In terms of climate change, it was felt the policy was positive for all of the sustainability objectives and strongly positive for children, environment and health. The panel also considered the policies for green belt, green spaces, biodiversity and water to be positive across the range of sustainability objectives, However they were very uncertain about a number of the policies under this objective; more so than the earlier objectives. Managing protected land, waste and minerals were all assessed as unknown and the panel expressed their disappointment that there was too little information to make a proper assessment. This area of the strategy requires more attention and much more detail.

### Improving accessibility and delivering sustainable transport

This objective was supported for its policy on delivering sustainable transport, which was considered mostly positive for the sustainability objectives. However the policy to increase accessibility was met with a great deal of confusion and could not be fully assessed. There needs to be greater clarity in what is meant by “accessibility” for this policy to be successful.

## 5.26 Mitigation measures

The appraisal outlined above and detailed more comprehensively in Appendix 2 gives a good indication of where the spatial strategy / policies align with sustainability objectives and where they do not. The Core Strategy Preferred Options Spatial Strategy and Core Policies have been re-assessed in the light of the appraisal, and measures taken to ensure better alignment with the sustainability objectives are outlined in Table 5.5 below. This shows the sustainability issues raised and the responses to them. Responses highlighted are significant changes to the document.

**Table 5.5: Sustainability Appraisal of ‘Preferred Options’ Core Policies – issues raised and mitigation measures proposed**

SEA Directive Annex 1 (g)

**Core Policies SP1 to 3: The Spatial Strategy (note: these have now been re-named as policies SP2 to SP4)**

Key sustainability objective	Issues raised	Comments / Mitigation measures
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>SP1, and by definition SP2 and SP3, are clearly intended to focus development in the south of the borough where there are opportunities for development which supports urban regeneration objectives and reasonable connection to jobs and services. In the north the policy is one of restriction but not stagnation. This supports the development of sustainable neighbourhoods, although clearly there are some issues with the detail of how this is expressed in the core policies.</li> </ul>	Agreed and comments noted. The issues that are raised in respect of the detail of the core policies are discussed further under the relevant policies below.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Strategy to focus development in south of borough within reasonable distance of local jobs</li> </ul>	Agreed
Making sure every child matters	Unknown	
Improving community safety	Unknown	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>More support for public / sustainable transport needed (although overall strategy has some co-ordination with local / regional transport links)</li> <li>Green infrastructure is more than just ‘primary green infrastructure corridors. Also about mitigation of climate change, health and well being etc – the best societies have GI extending right into urban areas and neighbourhoods; why not Rochdale?</li> <li>There appears to be a conflict between aspirations to protect the green belt and allowing development in it – there needs to be a more explicit explanation of this</li> <li>Historical, cultural and archaeological heritage – ok</li> <li>Landscape and townscape quality and local distinctiveness – possibly needs to be more explicit on aspirations and approach</li> <li>No mention of enhancing biodiversity</li> </ul>	<p><b>Policies SP3 and SP4 amended to include specific sections relating to the delivery of sustainable transport</b></p> <p>It is a characteristic of Rochdale Borough that green infrastructure extends far into the urban areas, and the Core Strategy will seek to protect and enhance this infrastructure</p> <p>This conflict is recognised and the release of Green Belt will only be if absolutely necessary and in the most sustainable location possible.</p> <p>Aspirations and approach are outlined in the Strategic Objectives.</p> <p><b>Policies SP3 and SP4 have been amended to make specific reference to protecting and enhancing natural ecology</b></p>

	<ul style="list-style-type: none"> <li>• Little detail on how climate change will be tackled</li> <li>• No reference to efficient use of natural resources</li> </ul>	The spatial strategy ensures that development is in the most sustainable locations and this will help to tackle climate change and lead to efficient use of resources. Policy SP3 has been amended to make reference to the realising of opportunities for decentralised sustainable energy networks in the growth locations.
Improving health and wellbeing	Unknown	

### Core Policy E1 : Establishing Thriving Town Centres

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• Local centre's should provide for local needs</li> <li>• Little reference to housing or community, only to retail</li> <li>• Would there be the market for town centre living? The plan does not seem to aim for mixed use.</li> <li>• Aspiration of the policy is not worked through</li> <li>• The town centre must relate to the neighbourhood for this to succeed</li> </ul>	<p>Agreed. The policy has been changed to include housing as a use which will be supported in the town centre to enhance the role of the centre during the day and night (details of housing numbers are provided in the RTCE SPD).</p> <p>Agreed that local centre's could be made more explicit – changes have been made to include more on the specifics such as the types of uses, the identification of priority local centre's, the protection of local centre's and the creation of new one.</p>
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• This is impacted by the wider financial systems over which there is no local control. This is not acknowledged in the policy</li> <li>• Must seek a balance between the less high earning, retail etc jobs which are important at the local level, and the higher earning graduate jobs which will attract people back to the area.</li> <li>• A positive policy but there is room to strengthen the diversity of economic policy</li> </ul>	Comments noted. Kingsway is dealt with in more detail under policy CP2 which provides the economic angle. No changes recommended.
Making sure every child matters	<ul style="list-style-type: none"> <li>• There is no direct link, the policy does not aim to meet this need so generally neutral</li> <li>• Indirectly, if it is a thriving centre, it will be busier and with sustainable transport links, which would make it safer for children</li> <li>• Section 106 agreements can be used from town centre developments to secure play area for children</li> </ul>	Comments noted. No changes recommended.
Improving community safety	<ul style="list-style-type: none"> <li>• Crowd out crime - a thriving centre means more people, which reduces crime</li> <li>• Depends how thriving is defined as a busy night scene in the centre may</li> </ul>	Comments noted. The aim is to create a 24 hour economy by having a combination of uses appropriate during the day and night which should reduce the fear of crime and make it safer e.g. housing and a night

	lead to issues with alcohol related crime	economy.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• If the policy is well implemented, it will achieve this.</li> <li>• If ‘thriving’ means big box retail, or economically busy rather than a diverse range of services to cater for local needs it may not achieve this aim</li> <li>• Indirectly, if a thriving centre is unsupported by good public transport people will access it by car, which is negative for the environment</li> <li>• The introduction of more chain stores etc can reduce local character and have a negative impact on heritage and cultural assets</li> <li>• The policy is not explicit enough to achieve its aims with regard to the environment</li> <li>• Thriving needs defining or possibly replacing</li> </ul>	Comments noted. No changes recommended.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• There is no obvious link here, impact is neutral</li> <li>• It could have a negative impact on air quality, but if it is implemented in a sustainable way which a focus on reducing carbon, it should remain neutral</li> <li>• No mention of health in the policy</li> </ul>	Comments noted. The policy aims to strengthen the town centre with adjoining areas and neighbourhoods making it more accessible and improving public transport and making it easier by walking and cycling. No changes recommended.

**Core Policy E2: Supporting jobs and prosperity**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• All the development is proposed for the south of the Borough, this could hinder the northern neighbourhoods</li> <li>• Rochdale has its own economic centre and encourage people to work in the area, and is not dependant on Manchester</li> </ul>	<p>The policy for the north maintains existing levels of employment, this allows protection of the environment and thus quality of life and jobs.</p> <p>This is acknowledged and the strategy aims to maintain the balance that currently exists. The relationship with Manchester can be beneficial to Rochdale Borough and the strategy seeks to exploit this.</p>
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Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Need to make Rochdale more attractive than other places for inward investment, for example through leading the way in green energy provision and sustainable buildings.</li> <li>• Location is key – businesses are drawn to the accessibility of the M62, but there is a need to ensure they use the local work pool too.</li> <li>• Can the policy deliver its objectives; it could allow warehouses to dominate as it is not specific about favouring high quality investment which provides jobs.</li> <li>• Could take the policy a step further and be sector specific in attracting inward investment</li> <li>• Kingsway is the most important economic site and the council should hold strong for high quality investment which will bring jobs, and not settle for large warehouse developments. This is a 15 year plan and should look ahead with vision, as it is trying to do</li> </ul>	<p>Agree. The policy wording has been expanded to include specific reference to promoting green industries.</p> <p>Agreed. The policy makes reference to this point.</p> <p>Draft PPS4 is explicit that planning authorities should not be restrictive in this respect.</p> <p>The policy does mention specific sectors, but the impact of planning on this is limited. The Manchester Independent Economic Review (MIER), for example, advises against this.</p> <p>Kingsway already has outline planning permission based on transport assessment and this sets out limits on amount of B1, B2 and B8. This is being reviewed.</p>
Making sure every child matters	<ul style="list-style-type: none"> <li>• No direct link but increasing jobs and prosperity will increase quality of life for the community which will have a positive effect in the long term</li> </ul>	Agreed
Improving community safety	<ul style="list-style-type: none"> <li>• This policy should lead to a busier, thriving town and consequently more people, which will reduce crime</li> <li>• However, a more prosperous area could attract different sorts of criminal</li> <li>• Well designed, mixed use residential and employment areas means there are people in the area at all times, which reduces crime</li> </ul>	Agreed
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• A growth policy could harm the environmental credentials of an area</li> <li>• It would depend on how the policy was implemented</li> </ul>	Acknowledged. Therefore the plan ensures that growth is mitigated through e.g. public transport, landscaping, design, location. Policy DM1 ensures the inter-relationship between all the aspects of the plan.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• There is no direct link and no mention of health in the policy</li> </ul>	



**Core Policy E3: Regenerating existing employment sites**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• Policy allows flexibility and is aiming in the right direction</li> <li>• There is potential for live work units</li> <li>• Must not encroach onto greenbelt land</li> </ul>	GB release is possibly required to meet land release targets. Will only be released as and when required.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• This policy could lead to the loss of employment sites to residential as it does not state that the sites must be regenerated to employment uses</li> <li>• An overall loss of employment land</li> <li>• However, traditional manufacturing industry will decline and the sites need to be regenerated in some way</li> <li>• Mixed developments and live/work units would be successful</li> </ul>	<p>Acknowledged. Seeking to ensure that land is put to its best possible use. Brownfield land is only real source for sustainable housing development</p> <p>Policy will seek to ensure adequate provision of employment land through allocation (210 hectare supply proposed)</p> <p>Mixed use will be encouraged but there is often a lack of demand</p>
Making sure every child counts	<ul style="list-style-type: none"> <li>• No direct links, generally a neutral policy</li> <li>• If the parents work locally this is likely to have a positive effect on the children</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>• This will have a positive impact as the fewer derelict or unused areas, the less opportunity for crime</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• It depends on the implementation</li> <li>• Should seek opportunities to restore some areas to open space or green corridors, and ensure new buildings are sustainable</li> <li>• There could be some loss of Heritage, for example the old mill buildings, if the derelict buildings are demolished</li> </ul>	<p>Agreed. Such opportunities will be sought.</p> <p>Policy P1 will seek to protect the borough's heritage.</p>
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• If implemented well this policy could have a positive effect, especially if it is more site specific, for example it could tackle contamination on the TBA site</li> <li>• Contaminated land remediation would be positive for health</li> <li>• There is an strong demand for allotments, if the sites were cleaned up and regenerated to open space, urban gardens etc this policy would have a positive impact</li> </ul>	Opportunities for providing and improving open space will be taken.

**Core Policy E4: Encouraging the visitor economy**

General	The Pennines and Hollingworth Lake are key visitor attractions but the Borough has other attractions which should not be overlooked. The policy is lacking a list of specific sites and attractions which it would be useful to have. •	The policy has been amended to include a list.
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• Acknowledges all the key elements and should have a positive influence</li> <li>• If it encourages the improvement of green spaces to make the area more attractive to visitors, this would benefit local communities too</li> </ul>	
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Second jobs, such as running a stable or a B&amp;B contribute to the visitor economy</li> <li>• No vision as to how this will be achieved, for example, there has been discussion towards encouraging a new visitor attraction in the area; perhaps this could be mentioned specifically</li> </ul>	It is felt that the best approach would be to re-invigorate and enhance the existing characteristics and attractions of the borough.
Making sure every child matters	<ul style="list-style-type: none"> <li>• If the policy was more explicit, it could have a more positive impact</li> <li>• Most attractions are out door, especially in the northern areas with access to the Pennines. If this was promoted and made accessible it would bring benefits to children</li> </ul>	It is considered that the improvement of the visitor economy will benefit all age ranges.
Improving community safety	<ul style="list-style-type: none"> <li>• Visitors are not street wise to the local area and can provide opportunities for crime</li> <li>• Visitors often arrive by car and then park them in remote places while they go walking for the day which also presents opportunities for crime</li> </ul>	The enhancement of visitor facilities should be designed in a crime – excluding manner, as outlined in policy P3.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• This would bring an increase in traffic and the number of people on the moors etc which may have a negative impact</li> <li>• If the policy was specific about protecting the environment whilst encouraging the visitor economy that would be helpful, policies 5c – 5f are useful in that respect</li> </ul>	This is agreed. Development of the visitor economy must have regard to the protection and enhancement of the natural resources, as outlined in policy R5.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• The local people could also use the facilities which would benefit their quality of life mental wellbeing. The out door activities would increase fitness</li> </ul>	

**Core Policy E5: Diversifying the rural economy**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• If well implemented, it has the potential to be positive.</li> <li>• Depends if it includes housing, developers are keen to develop Littleborough further. If rural areas are protected from inappropriate development then it is potentially positive</li> </ul>	This policy is not referring to rural housing, but to economic development within the rural area through small scale rural business activity.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• There is a range of ways to diversify especially in the clean fuel and reducing carbon emissions sector, including forestry, energy crop growing, renewable energy provision</li> <li>• Has to have a positive effect on prosperity</li> </ul>	The focus of this policy is rural economic regeneration which may be from a number of sectors including renewable energy clean fuel. It is not appropriate to include greater detail on a specific sector within this policy, as it is included in policy 16: Tackling Climate Change
Making sure every child counts	<ul style="list-style-type: none"> <li>• Children will benefit from a stronger and more diverse economy but there is no direct link</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>• Economic input into the rural economy will have a positive impact on the rural community and should reduce crime</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• The success of the policy depends on people not going for just housing development. The economic driver for housing is so strong it may crush other objectives and the rural land may get released for employment, but in reality be used for housing</li> <li>• The scale of development has to be realistic, for example, large scale wind energy developments are not appropriate</li> <li>• It is aiming in the right direction and if carefully implemented should be successful</li> </ul>	<p>This policy is not referring to rural housing, but to economic development within the rural area through small scale rural business activity.</p> <p>Large scale wind farm developments would not be appropriate to this policy which is focused on small scale rural business development appropriate to the rural landscape.</p>
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• If the rural community is sustained by its own economy and people are content with their local area they will be less inclined to travel far reducing carbon emissions and improving the air quality.</li> <li>• More likely to use the local area for recreation if there are the opportunities which will improve fitness</li> </ul>	Agreed.

**Core Policy C1: Delivering the right amount of housing in the right places**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• This policy has been taken forward well. The regeneration guidelines have been followed and the right locations have been focused on.</li> <li>• There has been some consideration of jobs and mixed use development; the housing areas relate to the employment areas well, although care should be taken to ensure it is realistic.</li> <li>• Perhaps it is not visionary enough; it should aim for mixed use sustainable communities.</li> <li>• It focuses on numbers and deals with the pressure to meet housing targets but does not address the need for sustainability and how this will be achieved</li> </ul>	<p>There is potential to bring the ‘sustainable’ elements of this policy more to the fore. The first two comments are quite positive but the overall score is negative presumably based on the overall focus on delivering numbers. This may be a contextual problem in that the need to demonstrate how we will meet our targets is a fundamental objective of this policy. <b>However, through relatively minor changes the overall sustainable approach, linked to regeneration, use of brownfield sites and sustainable locations, could be made more explicit.</b></p>
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• There will be construction activity every year as a result of new development</li> <li>• There will be indirect jobs for refuse collection, local shops, local police etc; it has a high potential to create jobs</li> </ul>	<p>No change required.</p>
Making sure every child counts	<ul style="list-style-type: none"> <li>• No direct impact</li> <li>• The proximity of new housing to schools will be a key issue</li> </ul>	<p>The issue of proximity to schools can be best addressed through the Infrastructure Planning element of the Core Strategy which seeks to ensure that major new development is aligned with the provision of facilities and services.</p>
Improving community safety	<ul style="list-style-type: none"> <li>• New houses, in the right place, which are well designed, will help reduce crime. Design out crime.</li> </ul>	<p>No change required.</p>
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• Any development is generally negative for the environment, but assuming development is a necessity, it is a positive policy</li> <li>• Too much focus on numbers which is unsustainable</li> <li>• The pressure may mount to use green belt areas as they are easier and more desirable.</li> <li>• There is a need to be strict and not allow cheap, quick development. It should be well designed and aesthetically pleasing</li> <li>• Any new housing development will increase carbon usage, water usage, traffic</li> </ul>	<p>Given the statement at the end of the first point it is surprising that this has subsequently come out with a negative score. The issue of the focus on numbers is dealt with above and is required in relation to regional and national policy.</p>
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• No direct impact. The health of the new residents will be improved if the housing is well located and with good access to facilities</li> </ul>	<p>I would have expected the delivery of new homes could have a positive impact in terms of peoples health and well being, especially since new homes will not have those problems that older, poorly maintained housing can have e.g. damp.</p>

**Core Policy C2: Delivering the right type of housing**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• The north/south divide in the area could lead to issues, for example it could emphasis the split in richer areas and poorer areas</li> <li>• There is not enough higher value housing in Rochdale</li> <li>• Potential to build higher value houses in the areas which traditionally have smaller houses and vice versa</li> <li>• The policy does not break the cycle, it does not makes any changes from existing policy so compounds the existing issues</li> </ul>	<p>The north / south split is more about accessibility, and subsequently sustainability, and it is therefore surprising that this element has not been considered in a more positive way.</p> <p>The policy does mention the need for higher value housing across the borough to provide for local demand and redress the current imbalance in the housing stock. Even in higher value areas across the borough, there are smaller properties e.g. Littleborough, Norden, Wardle etc. Given the general need to deliver more high value housing and create attractive housing locations it would seem inappropriate to try and direct lower value dwellings to these areas. It is acknowledged that there needs to be better quality and higher value housing in the poorer areas in order to widen their appeal but this should not result in needing to direct smaller houses elsewhere.</p> <p>Potential to consider wording to emphasise the objective to create stronger, more balanced and sustainable housing markets in the longer term.</p>
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Larger houses will attract graduates back to the area</li> <li>• A diverse range of housing type will provide for all the different skill sets in the local population</li> </ul>	Comments noted. No change required.
Making sure every child counts	<ul style="list-style-type: none"> <li>• If there are more of the right types of houses to cater for families then the children would experience a better home situation and a better quality of life.</li> </ul>	Comments noted. No change required.
Improving community safety	<ul style="list-style-type: none"> <li>• High density housing which is designed well and provides a high quality mix of housing will reduce crime</li> </ul>	Comments noted. No change required.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• It the housing is well designed and is sustainable it would be positive, however, there is no mention of this in this policy.</li> </ul>	It may be useful to make the design message stronger within this policy and this may improve the neutral score for this objective.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• This policy would help increase quality of life</li> </ul>	Comments noted. No change required.

**Core Policy C3: Providing affordable homes**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>The aim of the policy is to provide sustainable affordable homes so it has a positive impact on this objective</li> <li>It is easier to achieve this in new housing areas which can be designed from scratch, it is more difficult in areas of existing development</li> </ul>	Comments noted. No change required.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Jobs will be provided through construction work, and in the longer term through service provision to the residents</li> </ul>	Comments noted. No change required.
Making sure every child counts	<ul style="list-style-type: none"> <li>The aim is to increase the quality of life for the children who will be resident in these homes so the policy impact is positive on this objective</li> </ul>	Comments noted. No change required.
Improving community safety	<ul style="list-style-type: none"> <li>This depends on the quality of the housing provided. It should not be implemented through provision of lower grade properties. It must meet good design and safety principles, for example, strong windows and doors, good locks, or it will lead to problems. They are likely to be built by social housing companies so should be good quality.</li> <li>If they are built by developers as a consequence of having to provide some affordable housing as part of a planning condition they could be cheap and have a negative impact</li> </ul>	As with previous policy, the design element of the policy could be brought out a bit stronger in terms of the quality of the affordable housing to be provided.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Same issues as above – depends on good quality and design</li> </ul>	See comments above.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Same issues as above - depends on good quality and design</li> </ul>	See comments above.

**Core Policy C4: Meeting the housing needs of gypsies and travellers**

General	<ul style="list-style-type: none"> <li>There are some obvious problems with site location for the existing local community but overall it is the management of risk and avoidance serious negative issues. It is a very positive policy for the traveller population.</li> </ul>	
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Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>It is useful to have a specific site as this reduces other problems such as encroachment onto green space, untidy sites when travellers move on, nuisance.</li> <li>It is broadly sustainable policy which would benefit neighbourhoods</li> </ul>	Comments noted. No change required.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>By creating a specific site the issues are removed from other, less appropriate areas and prosperity of the whole area should increase</li> </ul>	Comments noted. No change required.
Making sure every child counts	<ul style="list-style-type: none"> <li>For the gypsy and traveller children, this should improve their quality of life considerably</li> </ul>	Comments noted. No change required.
Improving community safety	<ul style="list-style-type: none"> <li>This policy should increase harmony and decrease tension which leads to safer communities</li> </ul>	Comments noted. No change required.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>By finding a specific site the environmental damage which can be created is much reduced. Although there may be some local environmental issues, a high negative impact is avoided elsewhere</li> <li>The scale of the sites should be limited.</li> </ul>	Comments noted. No change required.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>It should lead to better access to doctors, schools and all services and facilities for the traveller population</li> </ul>	Comments noted. No change required.

#### Core Policy C5: Improving health and well being

General	<ul style="list-style-type: none"> <li>This policy is a bit vague and although it has good aims, there is not enough definition in it. The implementation plan needs strengthening.</li> </ul>	
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>If well implemented, this policy can only strengthen communities</li> <li>Are the aims of the policy achievable through the implementation strategy?</li> </ul>	Comments noted. No changes recommended.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>This would lead to less sick days and a stronger and happier working population, which would increase prosperity</li> </ul>	Comments noted. No changes recommended.
Making sure every child counts	<ul style="list-style-type: none"> <li>Positive aims but how is it to be achieved? There needs to be a stronger structure.</li> </ul>	Again the focus of this policy is everyone in the borough and is does not preclude anyone group. The plan aims to tackle problems of obesity including child obesity. Reference to children's centre's such as Surestart could be included – part of joint health centres.
Improving community safety	<ul style="list-style-type: none"> <li>Needs to be more specific</li> </ul>	As mentioned before this policy tries to bring together a number of issues which is dealt with in more detail in other policy areas. There is a reference to crime and safety through design but the specifics are dealt with under policy P3. Reference included in policy to reflect this.

Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• Good quality play areas and open space is really important and should have more emphasis</li> <li>• Potential to replace 'well being' with 'sustainable', or any number of words. The policy needs more definition.</li> </ul>	Comments noted. No changes recommended.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• Strongly positive aims but a bit weak on implementation</li> </ul>	Comments noted. No changes recommended. See above comments.

### Core Policy C6: Delivering education facilities

General	<ul style="list-style-type: none"> <li>• This policy has more substance and is underpinned with specific goals for implementation. If all come to fruition, the policy will achieve its aims.</li> </ul>	
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• This policy will have a positive impact</li> </ul>	Comments noted. No changes recommended.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• The education facilities are the bedrock of improving the economic situation of an area</li> <li>• This will provide jobs in the educational facilities as well as job training for future employees</li> <li>• Construction jobs</li> </ul>	Comments noted. No changes recommended.
Making sure every child counts	<ul style="list-style-type: none"> <li>• Some secondary school children go outside the Borough as there is competition for places at present. The policy seeks to improve this situation</li> <li>• The school green areas could be used by the local children for recreation out of school time if well designed. At present school fields are often fenced off and inaccessible</li> <li>• Overall, improving educational facilities should benefit every child</li> </ul>	Comments noted. No changes recommended.
Improving community safety	<ul style="list-style-type: none"> <li>• A good education can reduce the number of future criminals so more good quality, well designed schools could reduce future crime</li> </ul>	Comments noted. No changes recommended.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• English Heritage are trying to protect historic education school buildings as the present trend is knock them down and start again. This policy could therefore have a negative impact</li> <li>• Travel to school distances could be improved if there were more, well located schools</li> <li>• Rochdale has a strong reputation for sustainable schools and leading the way in sustainable design. This fact should be accentuated, and could be incorporated into the policy.</li> </ul>	It is appropriate that this matter is addressed in policy 13, which seeks to protect the best of the borough's heritage.
Improving health	<ul style="list-style-type: none"> <li>• Positive impact</li> </ul>	Comments noted. No changes recommended.



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**Core Policy C7: Improving community facilities and cohesion**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>This is a new area for planning policy. The intention is positive but more detail is needed for it to work.</li> <li>Does not deliver on specifics</li> </ul>	Agreed. The policy now reflects the needs and aspirations of the community and ensures that new development is easily accessible and located in a sustainable location, well connected to public transport, serve the community and meet a mix of opportunities for everyone.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Improving the community as a whole should increase economic activity and create more jobs</li> </ul>	Comments noted. No changes recommended.
Making sure every child counts	<ul style="list-style-type: none"> <li>Positive intentions</li> </ul>	Comments noted. No changes recommended.
Improving community safety	<ul style="list-style-type: none"> <li>If the community works well and manages itself, there is less crime</li> </ul>	Comments noted. No changes recommended.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>People who are happier in their surrounding environment will respect it so this policy should bring benefits for the environment</li> </ul>	Comments noted. No changes recommended.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>If people respect their community there should be a better sense of place which will lead to increased well being</li> </ul>	Comments noted. No changes recommended.

**Core Policy P1: Protecting character**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Local distinctiveness is a reason why people come to an area. All places have character, even the less affluent areas and a strong character can give meaning and well being to poorer areas</li> </ul>	Comments noted. No changes recommended.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>The image of a place is important as it attracts investment which increases prosperity which attracts more businesses to an area. If the image poor the community will decline</li> </ul>	Comments noted. No changes recommended.
Making sure every child counts	<ul style="list-style-type: none"> <li>The environment and local character of a neighbourhood shapes how the child grows up giving a mildly positive but indirect impact from this policy</li> </ul>	Comments noted. No changes recommended.
Improving community safety	<ul style="list-style-type: none"> <li>People are more likely to protect their area and leave it neglected if it has a strong character. This reduces the potential for crime</li> <li>A neighbourhood with a strong character leads to a lower fear of crime</li> </ul>	Comments noted. No changes recommended.

Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• If it has a strong character it should be protected with a designation</li> <li>• This is the right type of policy but more detail is needed in the implementation</li> </ul>	Agreed. Detail to be provided in a further Supplementary Planning Document drawing on Landscape Character Assessment which will be carried out.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• Same as previous comments</li> </ul>	See above.

### Core Policy P2: Improving Image

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• There is an image issue in the Rochdale area; giving image and improving the environment a high priority is important.</li> <li>• Emphasis should be placed on design and quality</li> </ul>	Comments noted. No changes recommended.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Strengthening the image of a place, for example the gateways and corridors, encourages inward investment. Rochdale has a poor image and is below its potential for attracting investment</li> </ul>	Comments noted. No changes recommended.
Making sure every child counts	<ul style="list-style-type: none"> <li>• This policy could indirectly improve the quality of life for children but there is no direct impact</li> </ul>	Comments noted. No changes recommended.
Improving community safety	<ul style="list-style-type: none"> <li>• If implemented, this would send messages that the community was well cared for, which would reduce crime</li> </ul>	Comments noted. No changes recommended.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• The policy is vague and focuses on improving the perception only, not the actual heritage.</li> <li>• Enhancing and protecting the existing heritage will benefit this policy aim</li> <li>• Should be more than a marketing drive</li> </ul>	There will be more emphasis on specific heritage assets incorporated into policy 13 above, and a further detailed policy for development control in respect of heritage assets will follow.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	No comments made.

**Core Policy P3: Improving design**

General	<ul style="list-style-type: none"> <li>This could be a more strongly worded policy. Should be aiming for more. A Greater vision.</li> </ul>	Noted but this policy provides detail which fleshes out the vision provided in policies 13 and 14 above.
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Generally a good policy, respecting the local built form and using it to guide future development is sound policy</li> <li>There are occasions when inventive design are required but this is sometimes restricted</li> <li>Does the design Guide have SPD status and is it up to date? Developers will not follow the guidance if it is not obligatory.</li> </ul>	The Guide has SPD status. This policy is essentially the 'list' of design principles and the bridge between the more visionary policies 13 and 14 above and the SPDs.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	No comments made.
Making sure every child counts	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	No comments made.
Improving community safety	<ul style="list-style-type: none"> <li>Designing out crime is an essential part of good design</li> </ul>	Noted.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Sustainable design is the key to the future</li> <li>There could be an issue if sustainable design is more expensive to implement and run</li> <li>The design guide should be updated to incorporate sustainable principles</li> </ul>	The policy updates the design guide in sustainability matters. As well as this, a climate change adaptation SPD will follow.
Improving health and wellbeing	<ul style="list-style-type: none"> <li></li> </ul>	No comments made.

**Core Policy R1: Tackling climate change**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Site location is key when designing sustainable communities</li> <li>Any new development sites must conform to the rules in this policy and there will be an overall positive impact from the policy</li> <li>Larger development proposals will be more likely to be accepted by the community if it has sustainable credentials</li> </ul>	Comments noted. No changes recommended.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Green travel plans are a requirement for new businesses in the area which will benefit employees and the environment</li> <li>If renewable energy costs more, fuel poverty may be an issue in the future</li> </ul>	Disagree that renewable energy is conducive to fuel poverty. More likely to reduce fuel poverty in the long run.
Making sure every child counts	<ul style="list-style-type: none"> <li>Indirect positive impacts for the future</li> </ul>	Comments noted. No changes recommended.

Improving community safety	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	No comments made.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>This is a comprehensive policy which addresses environmental and heritage issues and will have strongly positive benefits for the environment</li> </ul>	Comments noted. No changes recommended.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>This would improve air quality and have a positive influence on flooding issues in the long term</li> <li>Generally positive but the benefits would apply to the wider area and would be long term</li> </ul>	Comments noted. No changes recommended.

### Core Policy R2: The Green Belt

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Restricting the outward spread, sometimes sprawl of urban areas is good for well formed neighbourhoods.</li> </ul>	
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>If the site at Heywood is agreed the benefits will spread to the wider area</li> <li>There is potential for small scale forestry and energy crops in the green belt and greener fuels are being more common</li> </ul>	
Making sure every child counts	<ul style="list-style-type: none"> <li>The green belt provide open space for children, often within relatively easy access</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>Neutral. There are different criminal issues in the greenbelt and this policy would not affect the safety of the area</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>There is always considerable pressure on the green belt. Care should be taken to ensure it is not nibbled away slowly as this would have a long term negative impact on the environment</li> <li>The policy has a positive outlook which will benefit the environment</li> </ul>	<ul style="list-style-type: none"> <li>Land will not be released until and if it is needed. It is hoped that the Green Belt will be increased in other areas to compensate.</li> </ul>
Improving health and wellbeing	<ul style="list-style-type: none"> <li>The green belt provides opportunities for recreation and outdoor exercise which will benefit the health and well being of local residents in the long term</li> </ul>	

### Core Policy R3: Other protected open land

General	<ul style="list-style-type: none"> <li>The focus of this policy is unclear. Does it relate to the release of land for development or does it relate to site protection.</li> </ul>	The policy safeguards land not in the Green Belt but identifies land which may have potential for development. <b>The policy has been amended and the options clarified.</b>
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Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• Need more information</li> </ul>	
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• There is local opposition to schemes which would create jobs on this open land as it is often in semi-rural areas</li> </ul>	The need to meet housing and employment land requirements means that some land outside the urban area may be needed. Refining options for land release has taken account of the relative sustainability impacts of different locations.
Making sure every child counts	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• Once it is not protected as part of the green belt designation it is under huge pressure, especially for housing. This policy is unclear and ambiguous. More information is needed</li> </ul>	The policy protects long term safeguarded land as though it is green belt even though it may not meet the purposes of green belt set out in government policy. <b>The policy has been amended and options clarified.</b>
Improving health and wellbeing	<ul style="list-style-type: none"> <li>•</li> </ul>	

#### Core Policy R4: Enhancing green spaces and corridors

General	<ul style="list-style-type: none"> <li>• The use of 'no net loss' is defensive and lacks vision. It could aim for an 'increase' in green spaces.</li> </ul>	<b>The reference to no net loss has been removed. Text amended to refer to proposals providing new GI where possible and enhancing existing GI.</b>
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• The concept that if you lose the green area through necessity in one area, you replace it in another is a sound policy</li> <li>• The policy is a bit bland and lacks vision</li> <li>• Could aim to create a green grid, or set higher targets</li> <li>• Recreation land has been passed down from previous policies, there is the potential to transform this into a GI network</li> </ul>	Policy reference to a green grid or targets are more appropriate to consider in the context of the Borough's developing GI Strategy. <b>An expanded reference to a strategic GI approach and the importance of a GI network has been included.</b>
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• The multi-functional emphasis on Green Infrastructure developments is beneficial to the wider community and the attracting new business to the area</li> </ul>	
Making sure every child counts	<ul style="list-style-type: none"> <li>• Safe green corridors linking recreation and play area will improve child safety</li> <li>• It will also increase the sense of community and access to green space and nature for every child</li> </ul>	
Improving	<ul style="list-style-type: none"> <li>• Similar to above</li> </ul>	

community safety		
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>This policy should be more focused on how it can assist with mitigating for the impact of climate change</li> </ul>	A specific policy is included for Climate Change and it is important not to repeat more detailed policy contained therein. A further reference to climate change impacts has been included in the opening paragraph of the policy.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>This policy will provide access to the recreation areas which will increase fitness</li> <li>It will increase the sense of well being found when people have access to nature</li> </ul>	

#### Core Policy R5: Protecting biodiversity and geodiversity

General	There is a general recognition of the fact that biodiversity will change with the effects of climate change. There is a need to accept this and adapt to the changes, rather than try and protect the existing situation.	Agreed, however, there is currently no substantial agreement as to the effect that climate change will have on biodiversity. Hence, we need to both protect and enhance the existing biodiversity and allow for change as appropriate through preventing fragmentation, and linking and buffering existing habitats to allow for migration etc as appropriate. Have now included a reference to preventing fragmentation and linking and buffering for climate change.
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>With a positive focus on creating new habitats, this policy should have a positive impact on sustainable neighbourhoods</li> </ul>	
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Indirectly, this will attract inward investment as it will provide a valuable contribution to high quality working environments</li> </ul>	
Making sure every child counts	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Rochdale does not have its own BAP, it uses the Greater Manchester BAP. Potential to take this policy further and create a Rochdale BAP</li> </ul>	Agreed, this policy now includes a reference to the Local (Rochdale) BAP. Although currently unfinished, this will be completed during 2009.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>With access to nature, the well being of the population should increase</li> </ul>	

**Core Policy R6: Managing water resources**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>This policy is an essential part of a sustainable community</li> </ul>	Comments noted. No changes recommended.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>If the water resource is well managed, there would be lower overall usage, which would lead to an economic saving for the wider population</li> </ul>	Comments noted. No changes recommended.
Making sure every child counts	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	No comments made.
Improving community safety	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	No comments made.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>There are flooding issues in Rochdale, for example in Littleborough, and this policy has the potential to manage the situation to reduce this risk</li> <li>A surface water management plan would be beneficial</li> </ul>	Policy to be amended to refer to possible specific flood mitigation measures and the possibility of surface water management plans.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>There are some water quality issues which need addressing, which this policy would seek to achieve. There is potential for the plan to be more specific and tackle individual water quality problems</li> </ul>	Policy to be amended appropriately

**Core Policy R7: Improving air quality**

General	<ul style="list-style-type: none"> <li>This is a reactive not a proactive policy. There should be more visionary, it needs 'teeth'. The specific areas with air quality issues should be named. This will help remediate individual air quality problem areas. It is not ambitious enough.</li> </ul>	The policy will be amended to be more proactive and specific to certain areas, e.g. Air Quality management Zone.
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Congestion and sustainable transport are the main issues in this policy. The policy tries to address these and should be effective</li> </ul>	Comments noted. No changes recommended.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Some companies will look for areas with cleaner air to benefit their employees</li> <li>If the air quality is not high, it may put investors off</li> </ul>	Noted; reason for strengthening the policy, which will be done.
Making sure every child counts	<ul style="list-style-type: none"> <li>There will be broad, long term benefits for the wider population</li> </ul>	Comments noted. No changes recommended.
Improving community safety	<ul style="list-style-type: none"> <li>There is no relation between crime rates and air quality</li> </ul>	Comments noted. No changes recommended.

Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>This is a weak policy which accepts the present situation. It should be aiming for an improvement</li> <li>It only focuses on new development, there should be aim to improve the present situation too</li> </ul>	The policy will be amended to be more proactive and specific to certain areas, e.g. Air Quality management Zone.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>The intention is positive put the policy is weak</li> </ul>	See above.

### Core Policy R8: Managing Waste

	<ul style="list-style-type: none"> <li>There is not enough background supporting information to make informed judgments on this topic</li> </ul>	This will be provided by the GM Joint Waste Plan.
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>There should be a drive to reduce waste? It was agreed this probably was included in the policy as part of the waste hierarchy but this would be unclear to most readers.</li> <li>A missed opportunity; the policy needs more drive</li> </ul>	Measures to reduce waste generated as opposed to waste minimization through the treatment and management of waste are necessary but are largely beyond the scope of the Local Development Framework. However, the policy has been amended to clarify the 'waste hierarchy' to assist readers.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>A waste management site would create jobs</li> <li>If the waste disposal requirements were too stringent for businesses stricter rules may drive new investment away</li> </ul>	Noted. Waste legislation will be largely responsible for setting such rules rather than the Core Strategy or the GM Joint Waste Plan.
Making sure every child counts	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Unknown</li> </ul>	



**Core Policy R9: Managing minerals resources**

General	<ul style="list-style-type: none"> <li>• There is not enough information in this policy to assess it correctly. The impacts are mostly unknown. Generally, it was felt the policy should be more forward thinking and identify local opportunities to increase sustainability.</li> <li>• Using local building stone would be far more sustainable than importing foreign stone but there are very strict regulations against opening local quarries</li> </ul>	It is not always the case as extraction can have other environmental impacts depending on where it is. It is possible for man made materials to replicate natural stone. The policy refers to recycling of construction waste eg. through site management plans. The purpose of safeguarding local mineral resources is to ensure that extraction can more easily meet local markets to meet local construction needs.
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Making sure every child counts	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	

**Core Policy T1: Delivering sustainable transport**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• This is a positive, detailed policy</li> <li>• Delivery is the key issue and will depend on individual transport schemes including rail links, bus routes and cycle tracks.</li> </ul>	The schemes included are those that can feasibly be delivered in the life of the Core Strategy. For longer term aspirations there is only a commitment to establish a justification and business case or not.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Sustainable access to employment areas is really important and a sound transport network will encourage businesses to an area</li> </ul>	
Making sure every child counts	<ul style="list-style-type: none"> <li>• This policy assists create safer roads and clearer air, which will have an indirectly positive impact on children</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>• If well implemented, it should make the roads, and all modes of transport safer</li> </ul>	Continuation of already established approach through GM LTP.

Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• There should be more of a focus on reducing carbon emissions, it does not explicitly states CO2 needs to be reduced.</li> <li>• If you improve the transport network and road connectivity, then you automatically increase the number of cars on the road which is a negative impact of the policy</li> </ul>	Strengthening the sustainable transport offer will reduce carbon emissions if they are successful. 16 out of 19 proposals improve sustainable travel and contribute to tackling CO <sub>2</sub> . <b>Strengthened explicit links between the two.</b> HA's motorway hard shoulder running is proven to reduced emissions and Heywood Relief road will reduce travel distances in accessing the distribution parks and contribute to CO.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• If the policy set more visionary targets, it could seriously benefit the air quality which would have a positive impact on health. However, at present the policy is not strong enough to implement a serious change</li> </ul>	No the responsibility of LDF Core Strategy to set Health and Wellbeing targets only to provide policies and measures that will contribute to those set by LSP and in LAA.

### Core Policy T2: Improving Accessibility

General	The ambitions of the policy are good but it is all a bit unclear. Does the policy relate to the mode of transport and accessibility to the wider transport network, or does it relate to access to services e.g. doctors. Needs clarifying.	<b>The accessibility policy section has been re-written to clarify, with an introduction to Policy T2.</b> It is a development control policy outlining the council expectations from itself, its partners and developers in the transport assessment, travel plan accessibility requirements etc in preparing all new development and infrastructure improvements. Standards will be the same for both public sector and private development.
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Making sure every child counts	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>	

## **Assessment of the 'Pre Submission' document spatial strategy, strategic objectives and core policies**

5.27 Once the 'Preferred Options' document had been revised and refined into a draft version of the 'Pre Submission' document, the Sustainability Appraisal Panel was re-convened, and another workshop took place, on the 5<sup>th</sup> August 2010. Due to work commitments, the make up of the panel was not exactly the same as previously, and was as follows:

- Kerrie Smith, Conservation Officer
- Sue Ayres, Rochdale Economic Affairs Unit
- Michelle Wilder, Housing Market Renewal Design Officer
- Barnaby Fryer, Sustainability Team
- Adrian Watson, Environmental Health

The Chair and Facilitator was Andrew Eadie, Rochdale Council Strategic Planning

5.28 The Panel used the same set of sustainability objectives as previously, to ensure consistency. The discussion which took place enabled a matrix to be produced, and this is shown in Table 5.4 (b) below. It is similar in style to the initial appraisal matrix shown in appendix 1, and summarises the conclusions of the workshop.

5.29 The conclusions of the workshop informed the assessment of the Pre Submission spatial strategy and policies.

**Table 5.4 (b): Sustainability Appraisal of the ‘pre submission’ spatial strategy and core policies, 5<sup>th</sup> August 2010**

**Key:**

Strongly positive	Positive	Neutral / not applicable	Negative	Strongly negative	Unknown / not enough information

Rochdale MBC Core Strategy ‘Pre Submission’ Objectives and Core Policies		Sustainability Objectives					
		Sustainable neighbourhoods	Increasing jobs and prosperity	Making sure every child matters	Improving community safety	Creating a cleaner, greener environment	Improving health and wellbeing
<b>Spatial Strategy</b>							
SP1	Rochdale borough’s role in the city region						
SP2	The spatial strategy for the borough						
SP3	Heywood						
SP3	Middleton						
SP3	Pennines						
SP3	Rochdale						
<b>Delivering a more prosperous economy</b>							
E1	Establishing thriving town and local centres						
E1 / R	Establishing Rochdale as a thriving town centre						
E1 / M	Establishing Middleton as a thriving town centre						
E1 / H	Establishing Heywood as a thriving town centre						
E1 / L	Establishing Littleborough as a thriving town centre						
E2	Increasing jobs and prosperity						

E3	Focusing on economic growth corridors						
E4	Encouraging the visitor economy						
E5	Supporting and diversifying the rural economy						
<b>Creating successful and healthy communities</b>							
C1	Delivering the right amount of housing in the right places						
C2	Focusing on regeneration areas and economic growth corridors						
C3	Delivering the right type of housing						
C4	Providing affordable homes						
C5	Meeting the housing needs of gypsies and travellers						
C6	Improving health and wellbeing						
C7	Delivering education facilities						
<b>Improving design, image and quality of place</b>							
P1	Protecting and enhancing local character						
P2	Improving image						
P3	Design of new development						
<b>Conserving and managing the natural environment and resources</b>							
R1(a)	Tackling and adapting to climate change						
R1(b)	Energy and new development						
R1(c)	Wind farm developments						
R2	Managing green belt						
R3	Managing other protected / reserved land						
R4	Enhancing green infrastructure						
R5	Increasing the value of biodiversity and geodiversity						
R6	Managing water resources and flood risk						
R7	Reducing the impact of pollution						
R8	Managing mineral resources						
R9	Managing waste						
<b>improving accessibility and delivering sustainable transport</b>							

T1	Delivering sustainable transport						
T2	Improving accessibility						
Managing delivery and monitoring progress							
DM1	Delivery and management of new development						
DM2							

### 5.30 Summary of sustainability appraisal of the 'Pre Submission' spatial strategy and core policies:

#### The spatial strategy

Comparison between the previous appraisal at Preferred Options stage and this appraisal shows that a lot more of the sustainability objectives have become relevant, suggesting that the spatial strategy has become more aligned with sustainability issues. However, there was still felt to be insufficient reference to the pressures of climate change, and the spatial strategy is still considered to be insufficiently influenced by the climate change agenda.

#### Delivering a more prosperous economy

Table 5.6 would appear to indicate that this section has come out slightly more negatively than was previously the case. Proposals for town centres came out generally positive, however more mention of housing needs to be made in respect of Rochdale town centre, and the policy for Heywood town centre needs more recognition of the importance of independent retailers. The focus on economic growth corridors was rather negative due to a perceived emphasis on roads and therefore unsustainable means of transport.

#### Creating successful and healthy communities

This section of the document was the section which had the most negative reaction, although it also produced some very positive reactions. Issues raised centred around the perception of an insufficiently robust approach to affordable housing what was seen as an inevitable conflict between meeting the needs of gypsies and travellers and the rest of the community (although it was accepted that the latter point should not necessarily mean changing the proposed policy). The positives in respect of this section included in respect of improving health and wellbeing.

#### Improving design, image and quality of place

This section was felt to have a generally positive relationship with the sustainability objectives. However, there appeared to be a clear discrepancy between policy P1, which positively promotes heritage assets and was well received, and policy P2, which did not place enough emphasis on heritage assets.

#### Conserving and managing the natural environment and resources

Previously there had been issues in respect of the 'protected open land' policy, and whether it did in fact offer adequate protection, and the pollution and minerals and waste policies, which were felt to be insufficiently focused on being proactive and far-reaching in terms of improving the environment. The protected open land policy has now

received a much more positive response, similarly the pollution policy, although the waste and minerals policies have still produced a negative reaction, being considered 'wishy washy' and repetitive of national policy / not covering whole waste hierarchy respectively.

#### Improving accessibility and delivering sustainable transport

There has been significant improvement in the way this section relates to sustainability objectives, in comparison with the assessment at Preferred Options stage. However, it was still felt that there needed to be more in terms of accessibility and social inclusion.

#### Managing delivery and monitoring progress

This is a new section which was felt to relate very well to the sustainability objectives.

### 5.31 Mitigation measures

The appraisal outlined above gives a good indication of where the spatial strategy / policies align with sustainability objectives and where they do not. The Core Strategy Pre Submission Stage Spatial Strategy and Core Policies have been re-assessed in the light of the appraisal, and measures taken to ensure better alignment with the sustainability objectives are outlined in Table 5.5 (b) below. This shows the sustainability issues raised and the responses to them.



**Table 5.5 (b): Sustainability Appraisal of ‘Pre Submission’ Spatial Strategy and Core Policies – issues raised and mitigation measures proposed**

Panel met 5<sup>th</sup> July 2010 and comprised: Sue Ayres (Economic affairs unit), Adrian Watson (Environmental Health), Barnaby Fryer (Sustainable Development), Michelle Wilder (Housing Market Renewal), Kerrie Smith (Building Control - Conservation)

Key sustainability objective	Issues raised	Comments / Mitigation measures
General comment	The economy and community sections in particular do not get to grips with dealing with an increasingly ‘carbon-constrained economy’	Disagree. The Core Strategy should be assessed in its entirety, as well as individual sections. The chapter on objectives makes clear that the objective SO4 to deliver a ‘Greener Environment’ is as important and critical to delivering our Vision of a more sustainable borough as delivering SO1 ‘A more prosperous economy’. The policies to deliver SO4 are set out in chapter 9.

**Core Policy SP1: Rochdale borough’s role in the city region**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>The reference to improved housing quality is welcomed</li> </ul>	Support noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Making sure every child matters	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted

**Core Policy SP2: The Spatial Strategy for the borough**

Sustainable	<ul style="list-style-type: none"> <li>Will provide a mix in terms of types of houses, but not types of houses</li> </ul>	Noted. However still allows for a range of locations within the north and
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Neighbourhoods	and locations	south of the borough. Although there is a focus on the south it does not mean a range of sites cannot be delivered in the north
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Positive</li> </ul>	Noted
Making sure every child matters	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• There is no specific mention of the pressures of climate change. The spatial strategy should be influenced by the climate change agenda</li> </ul>	There is reference to climate change being tackled across the borough in the reasoned justification to the policy
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• There could be more mention in respect of targeting deprivation and inequalities</li> </ul>	Disagree – one of the reasons behind the overall strategy is to focus regeneration and tackle the more deprived areas

#### Core Policy SP3 - Heywood

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• New homes – doesn't specify whether they are decent</li> </ul>	The issue of quality is picked up in the Creating successful and healthy communities policies
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Positive</li> </ul>	Noted
Making sure every child matters	<ul style="list-style-type: none"> <li>• Slightly positive</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>• Neutral</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• Overall positive</li> </ul>	Noted
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• Positive</li> </ul>	Noted

#### Core Policy SP3 - Middleton

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• Positive</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Positive</li> </ul>	Noted
Making sure every child matters	<ul style="list-style-type: none"> <li>• Slightly positive</li> </ul>	Noted

Improving community safety	<ul style="list-style-type: none"> <li>Improved linkages to the town centre</li> </ul>	Policy does refer to improving sustainable transport links to the town centre
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted

### Core Policy SP3 - Pennines

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Be more explicit about what the canalside sites are going to be for</li> </ul>	These are likely to be for housing but it is not necessary to be to specific in this policy
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Potential for visitor economy and more retail for Littleborough</li> </ul>	This is picked up in relation to Littleborough town centre
Making sure every child matters	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted

### Core Policy SP3 - Rochdale

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Making sure every child matters	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted

**Core Policy E1 : Establishing Thriving Town Centres**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Some of the appropriate references are made</li> </ul>	Noted.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>The model of retail-led development for town centres is in serious question. The emergence of a carbon – constrained economy could well require a different model.</li> </ul>	<p>The main focus for town centres is and will remain a retail and commercial one for the foreseeable future, unless national policy changes. We are restricted by national policy and unless this changes retail will remain a main focus for town centres. However, this is not to say that other uses are not acceptable. Both the policy and PPS 12 recognise the important of other uses in the town centre to help their viability and vitality. Every use has not been listed in the policy because this would only repeat national policy which has been discouraged.</p> <p>However, other uses such as housing and food and drink could be made explicit in the policy.</p>
Making sure every child matters	<ul style="list-style-type: none"> <li>Not applicable</li> </ul>	Noted.
Improving community safety	<ul style="list-style-type: none"> <li>There should be an explicit reference to crime and safety.</li> </ul>	This is more a development management and design issue which is best picked up through the design policies and planning applications which relate to all development not just town centres.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>There should be an overall reduction in traffic. Per capita CO2 emissions will reduce but overall CO2 emissions will increase.</li> </ul>	Noted.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>There is some potential for improvement in health resulting from this policy.</li> </ul>	Noted.

**E1/R: Establishing Rochdale as a thriving town centre**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>There should be specific mention of whether there's going to be any housing</li> </ul>	Agree – include mention of desire to increase the amount of housing in all centres
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Offices should lead to better paid jobs</li> </ul>	Noted.
Making sure every child matters	<ul style="list-style-type: none"> <li>Sixth form college development is positive in this respect</li> </ul>	Noted.
Improving community safety	<ul style="list-style-type: none"> <li>Removing traffic from around the town hall will be a benefit</li> </ul>	Noted.

Creating a cleaner, greener environment	o Removal of traffic will be a benefit	Noted.
Improving health and wellbeing	o Slightly positive in this respect	Noted.

**E1/M: Establishing Middleton as a thriving town centre**

Sustainable Neighbourhoods	o There is no mention of residential opportunities	Agree – include mention of desire to increase the amount of housing in all centres
Increasing jobs and prosperity	o The reference to shopping needs should be deleted, because a retail led model is not necessarily the appropriate way forward	The main focus for town centres is and will remain a retail and commercial one for the foreseeable future, unless national policy changes. We are restricted by national policy and unless this changes retail will remain a main focus for town centres.
Making sure every child matters	o Not applicable	Noted.
Improving community safety	o Slightly positive in respect of this	Noted.
Creating a cleaner, greener environment	o The town centre could be strengthened by links to green areas such as St Leonards	Noted.
Improving health and wellbeing	o Slightly positive	Noted.

**E1/H: Establishing Heywood as a thriving town centre**

Sustainable Neighbourhoods	o Could be bolder, e.g. ‘investigate’ is not a strong enough word	Agree – change to ‘seek to’
Increasing jobs and prosperity	o The reference to shopping needs should be deleted, because a retail led model is not necessarily the appropriate way forward. In any case, Heywood’s strength is in good independent retailers	The main focus for town centres is and will remain a retail and commercial one for the foreseeable future, unless national policy changes. We are restricted by national policy and unless this changes retail will remain a main focus for town centres.
Making sure every child matters	o Positive	Noted.
Improving community safety	o Slightly positive	Noted.
Creating a cleaner,	o Positive	Noted.

greener environment		
Improving health and wellbeing	○ Positive	Noted.

**E1/L: Establishing Littleborough as a thriving town centre**

Sustainable Neighbourhoods	○ The policy should be more explicit in terms of likely uses for Akzo, durn and Ealees	Policy E4 is explicit about its uses.
Increasing jobs and prosperity	○ The policy is a bit retail – centric. Could better use be made of the rural location?	The main focus for town centres is and will remain a retail and commercial one for the foreseeable future, unless national policy changes. We are restricted by national policy and unless this changes retail will remain a main focus for town centres.
Making sure every child matters	○ N/A	Noted.
Improving community safety	○ N/A	Noted.
Creating a cleaner, greener environment	○ Somewhat negative on this. There is no mention of measures to reduce traffic, create / protect ample high quality greenspace and no mention of the Conservation Area	Noted. Reference to reducing traffic is more explicit in the transport policy which looks at promoting more sustainable modes of traffic to central locations such as town centres and the A58 improvement. Policy R3 and R4 look in more detail at the greenspace in relation to Littleborough. <b>Agree reference to the Conservation Areas could be mentioned.</b>
Improving health and wellbeing	○ Positive	Noted.

**Core Policy E2: Supporting jobs and prosperity**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• This policy needs to be strong in terms of the importance of sometimes prioritising employment over housing; mixed use sites always seem to end up becoming wholly residential, for instance</li> </ul>	Noted. The policy seeks achieve a realistic balance between protecting appropriate existing employment locations and allowing residential development where continued employment use is not appropriate or viable. The appropriate mix of uses has to be determined for individual proposals.
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Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Part 2 – north of the borough – is not strong enough. It should be more than ‘seek to maintain’ existing levels. Lack of ambition. No mention of the low carbon economy.</li> </ul>	Disagree. The strategy is to increase the number of jobs available in the south of the borough (where major employment development is appropriate) and to seek to keep the same number of jobs in the north, but not necessarily increase them. The suggestion of a more ambitious target is contrary to the overall strategy. The target does <u>not</u> suggest that the employment rate for residents in the north should not increase. Response to low carbon economy issue is above.
Making sure every child matters	<ul style="list-style-type: none"> <li>Slightly positive</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>N/A</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>There may be emissions reductions because of the accessible locations. There is no reference to low carbon infrastructure.</li> </ul>	Noted. Measures to deliver a lower carbon infrastructure are in Chapter 9 of the strategy.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positioning of jobs will help with inequalities. Goes as far as it needs to go.</li> </ul>	Noted

**Core Policy E3: Focusing on economic growth corridors**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>The references to mixed use are welcome. There should be a mention of Quality Bus Corridors.</li> </ul>	First point noted. Second point disagree, there is no need to mention QBC’s as these are adequately in Chapter 10.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>N/A</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>N/A</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>There is a conflict between bus and road promotion; there is too much emphasis on roads as opposed to more sustainable methods of transport. There should be a mention of Green Infrastructure – this provides an attractive setting which encourages investment</li> </ul>	Disagree. The policy indicates that all the growth corridors have been identified due to their existing, or potential for, good access by public transport. Noted. This point is made in the Strategic Objectives chapter.
Improving health	<ul style="list-style-type: none"> <li>N/A</li> </ul>	

and wellbeing		
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**Core Policy E4: Encouraging the visitor economy**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>This policy is useful in encouraging local shops etc. However, it is very important to emphasise that visitors don't have to be from outside the borough.</li> <li>RJ: increase the visitor to this amount from what? What level of ambition is there? </li> </ul>	<p>Noted and accepted. Amend RJ to indicate also applies to resident population.</p> <p>This target is based on the Visitor Strategy, which does not indicate a base point. This may be deleted from the RJ.</p>
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Will they be better paid jobs? Not necessarily. But a better range. This policy also helps to raise the profile of the borough</li> </ul>	<p>Noted. The strategy seeks to increase the range and choice of jobs to match the skill levels of the workforce.</p>
Making sure every child matters	<ul style="list-style-type: none"> <li>If it is visitors from within the borough, then the policy is positive in respect of this.</li> </ul>	<p>Noted</p>
Improving community safety	<ul style="list-style-type: none"> <li>There should be a reference to crime / fear of crime. Any development will be sensitive to personal security issues, e.g. there should be a specific reference in the canal section</li> </ul>	<p>Disagree. The plan should be read as a whole and this issue is addressed in policy Policy DM1.</p>
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Positive</li> </ul>	<p>Noted</p>
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Again, it is important to emphasise visitors from within the borough</li> </ul>	<p>Noted and responded to above.</p>

**Core Policy E5: Supporting and diversifying the rural economy**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>The reference to re-using buildings is welcome.</li> </ul>	<p>Noted</p>
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>RJ: should be specific mention of leisure and woodfuel jobs and small scale enterprise possibilities</li> </ul>	<p>Noted. Not considered necessary.</p>
Making sure every child counts	<ul style="list-style-type: none"> <li>N/A</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>N/A</li> </ul>	



Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>The reference to re-use of mills etc is positive. However, growth creates pressure for more development. The third bullet point of E5 should make specific reference to biodiversity</li> </ul>	The Core Strategy policies will constrain development to appropriate levels.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>This policy should have a positive impact on these matters</li> </ul>	Noted

**Core Policy C1: Delivering the right amount of housing in the right places**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>There is no mention of decent homes – please amend the first paragraph to mention the ‘specific’ housing needs of the borough. Should mention housing at Kingsway – it is mentioned in policy C2?</li> </ul>	‘Decent homes’ is actually a phrase more related to improving the standard of Council housing. The section as a whole makes adequate reference to quality homes. More specific housing needs is covered under policies C3, C4 and C5. Housing is mentioned in relation to Kingsway under policy C2
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Positive because of the opportunity for construction jobs</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>There is a mention of accessibility to schools. However, point e – should be <i>sustainable</i> access</li> </ul>	Unnecessary to clarify this point as Section 10 outlines the requirements for new developments to be accessed sustainably
Improving community safety	<ul style="list-style-type: none"> <li>There could be implications for community safety, although this is not mentioned.</li> </ul>	This is more a design issue which is best picked up through the design policies which relate to all development not just housing
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Wording could be strengthened to relate better to these issues</li> </ul>	This is better picked up through the policies on design and image and green infrastructure
Improving health and wellbeing	<ul style="list-style-type: none"> <li>This policy can be a positive influence in this respect</li> </ul>	Noted

**Core Policy C2: Focusing on regeneration areas and economic growth corridors**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>There is quite a lot of mention of open space and play facilities</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted

Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>The flood risk issue is pertinent to east Rochdale. Strong account needs to be taken of water management issues</li> </ul>	Pick up in policy specifically relating to water management
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Slightly positive</li> </ul>	Noted

### Core Policy C3: Delivering the right type of housing

General	<ul style="list-style-type: none"> <li>The last two paragraphs presumably refer to both north and south; this needs to be made clear</li> </ul>	This policy has been amended to make it clearer in terms of what applies to the north and the south.
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Not enough mention of affordable housing in the north of the borough. The tone of the policy is too devisive. There is a real problem with 2a – unlike 1a, it makes an assumption of what the needs and aspirations are. Please omit ‘ but with an emphasise on larger, higher value housing’. Descriptions of need which are too specific are in danger of becoming outdated over the plan period . Part 2, in particular, is unnecessarily limiting</li> </ul>	Generally there is an emphasis on higher value housing but it also refers to meeting housing needs. Affordable housing is covered in detail under C4 and this applies the need for affordable housing consistently across the borough.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>Neutral</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>Neutral</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>There is too much focus on new development; bringing vacant properties back into use is better. This point should be also relevant to policy C2</li> </ul>	Vacancy in the borough is currently relatively low. It may be appropriate to make better use of the existing stock. It is agreed that this is also relevant for C2. Will add wording to the RJ of policy C2 to refer to role of the existing housing stock.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>The right type of housing should have a positive impact on this</li> </ul>	Noted

**Core Policy C4: Providing affordable homes**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Where does the 7.5% come from? And why is there a reference to negotiation? Should 7.5% be expressed as a minimum? This requirement needs to be strengthened as it appears very weak; it would surely be better to talk about a percentage of the development.</li> <li>Please define 'exceptional circumstances'; this is a license for developers to get out of meeting the requirements</li> <li>RJ: If we can't realistically meet all need, how much can we meet?</li> </ul>	<p>This target is based on 15% of the development at an average discount of 50%. This equates to 7.5% of the total development value. The reason for setting it out in this way is to make it clear to developers what the requirement is in financial terms and this can therefore be taken account of as early as possible in drawing up the proposal. This reflects the approach set out in the affordable Housing SPD which provides more guidance and explanation to the policy. Some explanation has been added to the reasoned justification.</p> <p>Agreed. <b>The policy has been amended to explain these.</b></p> <p>RJ amended in any case to reflect more up to date information from the Strategic Housing market Assessment.</p>
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>This would be a positive impact if it weren't for the doubts about the effectiveness of the policy outlined above</li> </ul>	Noted. Hopefully these have been addressed to some extent by the comments above.
Improving community safety	<ul style="list-style-type: none"> <li>As above</li> </ul>	Noted. See above.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Neutral</li> </ul>	Noted.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Concerns as above</li> </ul>	Noted. See above.

**Core Policy C5: Meeting the housing needs of gypsies and travellers**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>It is hard to argue that this would meet the needs and aspirations of local communities</li> </ul>	Noted. The issues surrounding provision of sites for gypsies and travellers is acknowledged, however we do have a duty to meet the needs of gypsies and travellers as member of the local community.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Unlikely to have a positive impact</li> </ul>	Noted.
Making sure every child counts	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted.
Improving	<ul style="list-style-type: none"> <li>Negative</li> </ul>	This is a slightly negative response based on image and perception. The

community safety		provision of well designed sites in appropriate locations would assist with this and also mitigates the problems of unauthorised encampments.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>There will be traffic impacts</li> </ul>	Noted but not much more significant than a traditional housing development.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Gypsies and travellers have poor health statistics, so this policy will be very positive</li> </ul>	Noted.

**Core Policy C6: Improving health and wellbeing**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>There are welcome specific references</li> </ul>	Noted.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Slightly positive</li> </ul>	Noted.
Making sure every child counts	<ul style="list-style-type: none"> <li>There should be a mention of local play facilities</li> </ul>	Agree.
Improving community safety	<ul style="list-style-type: none"> <li>Quite positive</li> </ul>	Noted.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Should promote greater availability of allotments. The specific reference to climate change is welcome</li> </ul>	Noted. Reference to allotments is mention in policy R4.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Very positive, although there should be a reference to mental wellbeing, e.g. in first point add 'and mental wellbeing' to the end</li> </ul>	Agree. Will amend to reflect this

**Core Policy C7: Delivering education facilities**

General	<ul style="list-style-type: none"> <li>Please enumerate the points like the other policies, e.g a,b and so on</li> <li>Policy is too narrow – lacks enough reference to skills / training</li> </ul>	Agree.  Noted. Policy C7 does support wider skills training and education of all residents and not just the young.
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Reference to co-location of facilities is welcome</li> </ul>	Noted.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Reference to employment skills is welcome</li> </ul>	Noted.
Making sure every child counts	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted.
Improving	<ul style="list-style-type: none"> <li>Neutral</li> </ul>	Noted.

community safety		
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Should mention carbon emissions / climate change issue. Please expand the last point by addressing the expanding remit of living a lower carbon life. There should be the encouragement of specific facilities relating to the low carbon economy</li> </ul>	Noted. This is more a climate change issue which is best picked up through the climate policies which relate to all development not just education.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>This policy should have a positive impact on these matters</li> </ul>	Noted.

#### Core Policy C8: Improving community, sport, leisure and cultural facilities

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>There is a slight over-emphasis on town centre facilities</li> <li>Not much about protecting existing facilities – it's all about new facilities</li> </ul>	<p>Noted. The policy seeks to follow a sequential approach which requires development proposals first in town centres, local centres, edge of centres and then out of centres. Centres are accessible and sustainable locations and reduce the need to travel.</p> <p>Agree. Will include protecting existing facilities.</p>
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Not necessarily better paid jobs</li> </ul>	Noted.
Making sure every child counts	<ul style="list-style-type: none"> <li>Should help with obesity and poor health</li> </ul>	Noted.
Improving community safety	<ul style="list-style-type: none"> <li>This policy should have a positive effect</li> </ul>	Noted.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>There is a big omission in respect of Middleton's heritage and culture. There is no mention of proposed cultural facilities (see Kerrie Smith).</li> <li>Biodiversity is crucial to a number of leisure activities, particularly in Littleborough</li> </ul> <p>Facilities could be countryside facilities such as bridleways</p>	<p>Agree. To include – will liaise with Kerrie</p> <p>Agree. Will amend accordingly</p>
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted.

#### Core Policy P1: Protecting character and heritage

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Will help to raise the profile of the borough and will contribute to the offer for the visitor economy</li> </ul>	Noted

Making sure every child counts	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>The enhancement of canal towpaths etc changes perception and helps with safety issues</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>This is very positive, however perhaps there could be references to the heritage of energy technology development and Touchstones collection</li> </ul>	An additional bullet point will be included in the explanatory text relating to the heritage of energy development especially in relation to water
Improving health and wellbeing	<ul style="list-style-type: none"> <li>The opening up of water bodies will have health benefits</li> </ul>	Noted

### Core Policy P2: Improving Image

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Will help to engender community pride</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Will help to attract inward investment</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>Please insert the word 'safe' i.e. 'people friendly <i>safe</i> vibrant public areas</li> </ul>	Policy wording amended accordingly.
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Greening urban environment – should give more examples, e.g. green roofs, green walls, etc</li> <li>Not specific enough about making the most of existing heritage assets. Highlight existing rather than just new; could include the re-use of buildings</li> </ul>	<p>RJ amended to include reference to green roofs and walls: "As well as more 'traditional' forms of greening, such as street trees, green roofs and walls will often be appropriate."</p> <p>Policy amended to say that we will improve image by: "Promoting the development and re-use of under-used land and buildings, and the enhancement of heritage assets"</p>
Improving health and wellbeing	<ul style="list-style-type: none"> <li>There will be indirect health benefits from greening the urban environment</li> </ul>	Noted

### Core Policy P3: Improving design of new development

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Positive, especially the last two points; adds to the overall image and profile of the borough</li> </ul>	Noted

Making sure every child counts	<ul style="list-style-type: none"> <li>Improved outdoor spaces and ease of movement will help with obesity and access to schools issues respectively</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>The ‘diversity’ section needs clarifying; could conflict with sustainability</li> </ul>	This section has been amended to make it clear that sustainable diversity is required
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted

### Core Policy G1: Tackling and adapting to climate change

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>It is not clear that ‘standalone’ renewable energy developments covers community renewable projects, which should be explicitly encouraged</li> </ul>	Wording of policy changed to include reference to community projects
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Will enable more jobs in these sectors. It is questionable whether they would be better paid. However, there is potential to raise the profile of the borough</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Would it be possible for new developments to submit a ‘pathway to 2050’ statement, i.e. bearing in mind future targets</li> <li>Should it be CO2 emissions <i>per capita</i>?</li> <li>No mention of edible planting</li> <li>Do not agree with tree planting as an allowable solution; there are much more effective allowable solutions</li> </ul>	<ul style="list-style-type: none"> <li>Developments will be required to submit a carbon budget statement outlining how they will meet the target framework to zero carbon</li> <li>The policy references the CO2 emissions of developments rather than per capita</li> <li>The area of edible planting is one over which the planning system’s influence is limited, however it is encouraged by the Green Infrastructure policy</li> <li>The explanatory text only gives examples of allowable solutions, as these are yet to be confirmed in line with national and regional policy and will form the subject of an SPD. At this point it is considered reasonable to allude to the possibility that they may include the use of natural CO2 reduction systems; however the reference to tree planting will be changed to a more general point in respect of natural systems</li> </ul>

Improving health and wellbeing	<ul style="list-style-type: none"> <li>• Positive</li> </ul>	Noted
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**Core Policy G2: Energy and new development**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• Energy-efficient housing is part of decent housing</li> <li>• Doesn't necessarily encourage harmonious communities, but this may happen if community systems are promoted</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>• Will create jobs in the borough</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>• There is a positive in terms of lifting children out of energy poverty and the resulting health issues</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• Make sure it is clear which part L is being referred to</li> <li>• Do not think tree planting should be an allowable solution</li> <li>• Energy efficiency refurbishments of existing properties should be an allowable solution</li> <li>• Strategic / local infrastructure</li> <li>• Should there be a further reference to national targets and definitions</li> </ul>	<ul style="list-style-type: none"> <li>• The policy is worded so that the most relevant Building Regulations will apply</li> <li>• The explanatory text only gives examples of allowable solutions, as these are yet to be confirmed in line with national and regional policy and will form the subject of an SPD. At this point it is considered reasonable to allude to the possibility that they may include the use of natural CO2 reduction systems; however the reference to tree planting will be changed to a more general point in respect of natural systems</li> <li>• The City Region fund recognises that GM solutions may sometimes be more appropriate</li> <li>• This policy is all about implementing national targets and definitions</li> </ul>
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• Fuel poverty will be addressed by community schemes</li> </ul>	Noted

**Core Policy G3: Renewable and low carbon energy developments**

General	<ul style="list-style-type: none"> <li>• There are doubts about the necessity of this policy. Does it not just repeat national guidance?</li> <li>• Should it be wind turbines rather than wind farms</li> <li>• What are 'unacceptable' impacts?</li> </ul>	<ul style="list-style-type: none"> <li>• The policy has been re-named 'renewable and low carbon energy developments' and expands upon national policy by addressing local impacts</li> <li>• Unacceptable impacts are essentially those which would conflict with other policies of the Core Strategy</li> </ul>
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• Neutral</li> </ul>	Noted



Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Neutral</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>Neutral</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>Neutral</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Reference to heritage assets this should be heritage assets generally, not just designated. A lot of archaeological assets are not designated</li> </ul>	The policy wording has been changed so that it refers to heritage assets rather than just designated assets
Improving health and wellbeing		Noted

#### Core Policy G4: Managing Green Belt

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>This will be positive in stopping sprawl and focusing development</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>This will be positive in respect of the employment development at Heywood</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>The Green Belt helps to reduce traffic and is a vital source of cooling</li> <li>2c – should provide local benefits period; ‘where possible’ dilutes the policy</li> </ul>	Noted - In relation to the 2 <sup>nd</sup> bullet point it is not considered that using the phrase ‘where possible’ dilutes the policy.
Improving health and wellbeing	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted

#### Core Policy G5: Managing protected open land

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Local benefits ‘where possible’ is not enough</li> </ul>	See comment above
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Although employment development is constrained in these areas, the green areas do raise the profile of the borough</li> </ul>	Noted. Any schemes would have to take account of environmental impacts and this would include good quality landscaping
Making sure every child counts	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted

Improving community safety	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>There is an unsatisfactory judgement call in the RJ: 'don't all provide a vital green infrastructure resource'. Where is the evidence for this? All these areas can be important for biodiversity etc</li> </ul>	Point noted but this is about balancing against development needs. What the reasoned justification is simply saying that not all provide a <u>vital</u> green infrastructure resource
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Increased leisure activities in these areas is a positive</li> </ul>	Support noted

#### **Core Policy G6: Enhancing green infrastructure**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Access to open space and local urban open spaces – references to these are welcome</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>May be more jobs but not necessarily better paid. However, a raised borough profile will attract investment</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>Might be worth mentioning in the policy about making areas such as canal towpaths safer</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Why not adhere to the national standard for open space?</li> </ul>	The local needs assessment, including the playing pitch strategy, indicates that the local need for formal outdoor sports is less than the national standard, however it should be noted that we require more than the national standard (1 hectare per 1000 population as opposed to 0.6 hectares) of local open space including children's play
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted

#### **Core Policy G7: Increasing the value of biodiversity and geodiversity**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Again there is no mention of the new government's proposals for local community greenspaces. Access to quality open space is a positive</li> </ul>	
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>This will help to raise the profile of the borough</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>N/A</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>N/A</li> </ul>	

Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Broadly positive – however there is very little about geodiversity. Might be worth getting in touch with GMAU about this. Needs greater understanding and expert input</li> </ul>	
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted

**Core Policy G8: Managing water resources and flood risk**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>The de-culverting of the River Roch would raise the profile of the borough a great deal. Should this be specifically mentioned</li> </ul>	Policies P1 and G1 both make specific references to the importance of de-culverting, and this includes the River Roch through the town centre
Making sure every child counts	<ul style="list-style-type: none"> <li>N/A</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>Overall community safety will be improved</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Strongly positive</li> </ul>	Noted
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Measures to improve water quality will have a positive impact on health</li> </ul>	Noted

**Core Policy G9: Reducing the impact of pollution**

General	<ul style="list-style-type: none"> <li>Needs to be clear whether this includes CO2 emissions. This could be made clear in the introduction</li> </ul>	The introduction has been amended to include a cross reference to policies G1 and G2
Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Neutral</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Neutral</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>This issue can be linked to poor health</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>This policy will help in the longer term</li> </ul>	Noted

Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• More work needs doing</li> </ul>	Noted
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• Positive</li> </ul>	Noted

**Core Policy G10: Managing minerals resources**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>○ If mineral resources are found, there will be jobs</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>• Neutral</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>• There should be something about the impact on heritage assets and recognition of the need for local materials. d) is very wishy washy. Clarify the intention</li> </ul>	This policy is necessarily fairly general as its role is to provide a hook for the detailed policies contained within the GM wide plan, such as policies in respect of local supplies
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• Not positive</li> </ul>	It is considered that the policies of the GM plan must not have a negative impact on health matters. The plan will be developed by all 10 districts

**Core Policy G11: Managing waste**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>○ The waste hierarchy applies to more than just waste management facilities. Would expect more in terms of all developments and the waste hierarchy</li> </ul>	
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>○ There should be a positive impact in terms of jobs</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>○ N/A</li> </ul>	
Improving community safety	<ul style="list-style-type: none"> <li>○ N/A</li> </ul>	
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>○ One specific point – mention the canal as a potential source of sustainable transport, alongside rail</li> <li>○ Site waste management plans – this is a legal requirement, so why put it here</li> </ul>	
Improving health	<ul style="list-style-type: none"> <li>• Positive</li> </ul>	Noted

and wellbeing		
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**Core Policy T1: Delivering sustainable transport**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Positive</li> </ul>	No action
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Very positive</li> </ul>	No Action
Making sure every child counts	<ul style="list-style-type: none"> <li>Useful mentions of pedestrian and cycle routes</li> </ul>	No Action
Improving community safety	<ul style="list-style-type: none"> <li>Good references to these issues</li> </ul>	No Action
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>New roads mean more traffic</li> </ul>	Proposal for new roads have been kept to a minimum and are the option of last resort in line with the DfT's DaSTS (Delivering a Sustainable Transport System) process. All highway proposals will include supporting sustainable transport measures that are deliverable. No Action
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positive</li> </ul>	No Action

**Core Policy T2: Improving Accessibility**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>This policy could be stronger in respect of the needs of the disabled. There needs to be a lot more about accessibility and social inclusion. Accessibility for all is not strong enough. This issue relates to the whole chapter</li> <li>What about reducing the need to travel generally?</li> <li>Should mention next generation broadband</li> </ul>	Strengthened references to mobility impaired in both Policies 1 and 2 and explained in the Reasoned Justification what this means. Disabled is too narrow and Mobility impaired includes people with disabilities, elderly people, parents with small children either on foot or in prams / pushchairs, wheelchair users or people who lack confidence in using the transport network. Reject the panels comment as being too narrow. Strengthened the references to reducing the need to travel through eg homeworking and enhanced IT communication networks. Not just next generation broadband as that definition is also too narrow. There may be numerous generations of broadband between now and 2026.
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Positive</li> </ul>	No action

Making sure every child counts	<ul style="list-style-type: none"> <li>Positive</li> </ul>	No action.
Improving community safety	<ul style="list-style-type: none"> <li>Specifically references Home Zones</li> </ul>	No action
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Part c – should be 30 or more vehicle movements per hour, not 50</li> <li>Part f – Highways improvements should be at the bottom of the list and modal shift measures should be at the top</li> <li>Please take out picture of road sign</li> </ul>	Amended part c in line with comment and DfT guidance on Transport Assessments (2007). Revise order of points in Part f. Core Strategy editorial group to consider changing signpost photo.
Improving health and wellbeing	<ul style="list-style-type: none"> <li></li> </ul>	No action

**Core Policy DM1: Delivery and management of new development**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Creating a cleaner, greener environment	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Improving health and wellbeing	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted

**Core Policy DM2: Delivering planning contributions and infrastructure**

Sustainable Neighbourhoods	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Increasing jobs and prosperity	<ul style="list-style-type: none"> <li>Developers will face this wherever they go</li> </ul>	Noted
Making sure every child counts	<ul style="list-style-type: none"> <li>Positive</li> </ul>	Noted
Improving community safety	<ul style="list-style-type: none"> <li>Neutral</li> </ul>	Noted

Creating a cleaner, greener environment	<ul style="list-style-type: none"><li>• Positive</li></ul>	Noted
Improving health and wellbeing	<ul style="list-style-type: none"><li>• Positive</li></ul>	Noted

## Appraisal of the revised Draft Core Strategy

- 5.32 Following the withdrawal and revision of the Core Strategy, a further Sustainability Appraisal was carried out. This took place on 12<sup>th</sup> June 2012 and the panel was slightly altered to previous appraisals due to staffing changes.
- 5.33 The Panel consisted of:
- Susan Ayres, Economic Affairs Unit;  
Barnaby Fryer, Sustainable Development & Natural Resources;  
Andrew Saunders, Inspired Spaces;  
Nicola Rogers, Environmental Health Development Manager
- 5.34 The Appraisal was divided into two parts. This was because it was considered important to concentrate on one particular part of the document, i.e. the section which had changed significantly since the previous appraisal, namely the 'Delivering a more prosperous economy' section. This section had changed in response to the Inspector's concerns regarding the proposed Economic Growth Corridor to the south of Heywood. He considered that there was insufficient evidence to back this release of Green Belt land, given the existence of other land, such as Protected Open Land.
- 5.35 Thus, the first part of the appraisal consisted of appraising the key economic policies which had changed, namely policies E2, E3 and E4, against each of the Sustainability Appraisal objectives. Policy E4 is a new policy consisting of criteria that would be used to identified sites for additional employment land over the plan period This policy was assessed, along with the deletion of the more specific South Heywood proposal (which was included in policies E2 and E3) to allow a comparison of the two different options.
- 5.36 The second part of the appraisal consisted of appraising the document as a whole against each of the Objectives. Whilst much of the document remained very similar to how it was during the previous appraisal, this does not take into account possible changes in national policy and other circumstances which may have altered, and it was felt that it was a good opportunity to ensure that the document as a whole remained as sustainable as possible.



**Table 5.5 (c): Sustainability Appraisal of Draft Core Strategy (2012) – policy E2**

		APPRAISAL	MITIGATION MEASURES PROPOSED
1A	+	Whilst encouraging delivery of housing, employment uses could also have a negative impact on residential areas.	These negative impacts will be addressed through policy DM1.
1B	N	The policies may help to address need but not necessarily aspirations.	Noted, however this matter is addressed by policy C3.
1C	+	Higher employment rate will encourage more harmonious communities. However, the range of uses permitted in some areas is narrow, excluding cultural and leisure uses.	Noted, however we feel that there is sufficient reference to other employment generating uses.
1D	-	Most proposed employment areas are well connected to public transport.	Noted.
2A	++	This is the main thrust of the policy.	Noted.
2B	+/-	Separate scores reflecting approaches to north (-) and south (+) of the borough. There is not enough flexibility for increased employment in the north.	Agreed – the policy has been amended to take a more positive approach to employment opportunities in the north of the borough.
2C	+	E2(f) – the emphasis on quantity should be altered to include reference to quality. Needs to be more balanced in this respect.	Noted. However, we feel that this issue is sufficiently covered within the document.
2D	+	Will support town centres in the south of the borough more than in the north.	The reference to town centres relates to identified corridors, and town centres are covered in more detail elsewhere in the document.
2E	+		Noted.
3A	+	Should improve prosperity, which will have a positive impact on this Objective.	Noted.
3B	N	Increased development could lead to increased safety issues.	Noted.
3C	N		Noted.
4A	N	Doesn't encourage cash rich businesses.	Noted.
4B	N		Noted.

<b>5A</b>	-		Noted, other policies in the document will address mitigation in respect of this matter.
<b>5B</b>	-	No mention of low carbon infrastructure (3 <sup>rd</sup> bullet point, E2).	Agreed that decentralised energy networks should be included under infrastructure, and the policy will be altered to reflect this.
<b>5C</b>	-		We feel this matter is best addressed by other policies in the document.
<b>5D</b>	-	Negative by omission of mention of these matters.	There are specific other policies in the document which will address this issue.
<b>5E</b>	-	As 5D	There are specific other policies in the document which will address this issue.
<b>5F</b>	-	As 5D	There are specific other policies in the document which will address this issue.
<b>5G</b>	-	No consideration or allusion to this matter, e.g. by saying don't build on floodplains.	There are specific other policies in the document which will address this issue.
<b>5H</b>	<b>N</b>	This will be mainly down to the developer. However, the policy does make more efficient use of land.	Noted.
<b>5I</b>	-	There will development on open land, which will lead to increased run-off issues.	Noted. This matter will be addressed by policies in the 'promoting a greener environment' section of the document.
<b>6A</b>	<b>N</b>		Noted.
<b>6B</b>	<b>+</b>	Health is better if there is increased employment.	Noted.
<b>6C</b>	<b>N</b>		Noted.

**Table 5.5 (d): Sustainability Appraisal of Draft Core Strategy (2012) – policy E4  
OPTION 1: PROPOSED CRITERIA BASED APPROACH**

		APPRAISAL	MITIGATION MEASURES PROPOSED
<b>1A</b>	<b>N</b>		Not applicable.
<b>1B</b>	<b>N</b>		Not applicable.
<b>1C</b>	<b>+</b>	The criteria should allow the identification of a sustainable site with no unacceptable impact upon amenity. However, it is possible that sites may be quite peripheral.	Noted.
<b>1D</b>	<b>+</b>	The proposed criteria addresses the issue of sustainable transport, but does not mention the other issues. E4(F) – suggesting that locations should be capable of being served by public transport is insufficiently strong – should be ‘should be served’.	Agreed that the wording will change to “the site is in a sustainable location and is, or will be, well served by motorway access and public transport”.
<b>2A</b>	<b>+</b>	This is the main thrust of the policy. However, it gives plenty of flexibility, without guaranteeing anything.	Noted.
<b>2B</b>	<b>++</b>	The policy encourages release of land for employment use.	Noted.
<b>2C</b>	<b>+</b>	There is an emphasis on high quality employment uses.	Noted.
<b>2D</b>	<b>N</b>		Noted.
<b>2E</b>	<b>+</b>	This could be very positive, but is dependent on location. Without specific allocations it is difficult to tell.	Noted.
<b>3A</b>	<b>+</b>	The emphasis on high quality jobs should have a positive impact in this respect.	Noted.
<b>3B</b>	<b>N</b>	Increased development could lead to increased safety issues.	Noted.
<b>3C</b>	<b>N</b>		Noted.
<b>4A</b>	<b>+</b>	New development is likely to be built in accordance with the latest standards in respect of designing out crime. Doesn't encourage cash rich businesses.	Noted.

<b>4B</b>	<b>N</b>		Noted.
<b>5A</b>	-	Depends on location.	It is recognised that new development will increase traffic, however other policies within the Core Strategy will ensure that adverse impacts are mitigated as far as possible.
<b>5B</b>	-	Depends on location.	As 5A.
<b>5C</b>	-	If greenfield, could take up green space.	Agreed that this could happen, but it would be dependent on demand outside our control. Other policies in the Core Strategy will help to mitigate the loss as much as possible.
<b>5D</b>	-	No specific mention of this.	Other policies in the Core Strategy will address this issue.
<b>5E</b>	-	As 5D.	Other policies in the Core Strategy will address this issue.
<b>5F</b>	-	As 5D.	Other policies in the Core Strategy will address this issue.
<b>5G</b>	-	No consideration or allusion to this matter, e.g. by saying don't build on floodplains.	Other policies in the Core Strategy will address this issue.
<b>5H</b>	-	This will be mainly down to the developer.	Noted.
<b>5I</b>	<b>N</b>	The policy does prioritise brownfield sites.	Noted.
<b>6A</b>	<b>N</b>		Noted.
<b>6B</b>	<b>+</b>	Health is better if there is increased, better paid employment.	Noted.
<b>6C</b>	<b>N</b>		Noted.

**Table 5.5(e): Sustainability Appraisal of Draft Core Strategy (2012) – policy E4  
OPTION 2: ALTERNATIVE, SITE BASED APPROACH**

		APPRAISAL	MITIGATION MEASURES PROPOSED
<b>1A</b>	<b>N</b>	Possible that the identification of a specific site may mean considering supporting uses e.g. housing, in order to make the scheme viable.	This option not selected.
<b>1B</b>	<b>N</b>	As 1A.	
<b>1C</b>	-	The identification of a site which is not brought forward may lead to planning blight.	
<b>1D</b>	+		
<b>2A</b>	++	The increased certainty of this approach will help in this respect.	
<b>2B</b>	++	See 2A.	
<b>2C</b>	++	See 2A.	
<b>2D</b>	+		
<b>2E</b>	++	See 2A.	
<b>3A</b>	+	Increased prosperity will have a positive impact on this Objective.	
<b>3B</b>	<b>N</b>		
<b>3C</b>	<b>N</b>		
<b>4A</b>	+	New development is likely to be built in accordance with the latest standards in respect of designing out crime. Doesn't encourage cash rich businesses.	
<b>4B</b>	<b>N</b>		
<b>5A</b>	-	Identified sites are more likely to be greenfield.	
<b>5B</b>	-	As 5A	
<b>5C</b>	-	As 5A	

<b>5D</b>	-	As 5A	
<b>5E</b>	-	As 5A	
<b>5F</b>	-	As 5A	
<b>5G</b>	--	There is a problem in that there is an inherent inefficiency in bringing forward a site which may not really be required	
<b>5H</b>	--	There is a problem in that there is an inherent inefficiency in bringing forward a site which may not really be required	
<b>5I</b>	-		
<b>6A</b>	<b>N</b>		
<b>6B</b>	<b>+</b>	Health is better if there is increased, better paid employment.	
<b>6C</b>	<b>N</b>		

**Table 5.5 (f): Sustainability Appraisal of Draft (2012) Core Strategy**

		APPRAISAL	MITIGATION MEASURES PROPOSED
<b>1A</b>	<b>+</b>		Noted.
<b>1B</b>	<b>N / +</b>	Neutral for north of the borough, positive for the south.	Noted, however it is felt that the policy is an acknowledgement that the scale of development in the north will not be as high.
<b>1C</b>	<b>+</b>	The policies promote a wider tenure choice.	Noted.
<b>1D</b>	<b>+</b>	This is encouraged by policy c6 (e,f and j).	Noted.
<b>2A</b>	<b>+</b>	This is particular promoted by policy E1.	Noted.
<b>2B</b>	<b>+</b>		Noted.
<b>2C</b>	<b>N</b>	The emphasis is on quantity rather than higher paid. Also dependent on how much offices are promoted, which is not clear.	Noted, however we feel that there is sufficient reference to quality in the document. It should be noted that offices are not necessarily higher paid jobs.
<b>2D</b>	<b>+</b>	Yes, but – general point – there is too much emphasis on retail in respect of town centres, and not enough on other leisure uses which will be increasingly important over the plan period.	Noted, however E1 makes reference to leisure uses, and we feel that any focus on retail is a necessary reflection of quantified need.
<b>2E</b>	<b>+</b>		Noted.
<b>3A</b>	<b>+</b>	References need updating – a lot of the facilities mentioned will be completed by the time of the adoption of the plan. It was questioned how appropriate it is to list specific developments in this way, given the lifespan of the plan.	Agreed – the references have now been updated.
<b>3B</b>	<b>+</b>	There needs to be greater reference to safe transport.	It is felt that there is sufficient reference in policy T1, 4(c) It is considered that there is sufficient reference to play in policy C6 (h).
<b>3C</b>	<b>N</b>	Include play in C6 (e or f), with a specific reference to protecting play areas.	
<b>4A</b>	<b>+</b>	The third bullet point of policy P3 is helpful in this matter. But it only refers to new development. There is also no	It is felt that the Core Strategy is only relevant to new development, as it relates to future planning decisions.

		mention of lighting.	However, it is agreed that there should be a reference to improved lighting as appropriate.
<b>4B</b>	<b>+</b>	This is referenced in policy T2.	Noted.
<b>5A</b>	<b>-</b>	More new development will mean increased traffic levels. There is emphasis only on managing existing demands.	Disagree. There is emphasis on managing new demand, such as with the requirement for travel plans.
<b>5B</b>	<b>-</b>	More new development will mean increased carbon emissions.	Noted. However, there are policies in the Core Strategy which will ensure that new developments meet national targets for reduced carbon emissions, and it is considered this is as far as the document can go.
<b>5C</b>	<b>+</b>	There is a conflict between elements of the housing policy and policy G6.	It is considered that policy G6 allows the right balance between the need for new development and the protection of green infrastructure.
<b>5D</b>	<b>+</b>		Noted
<b>5E</b>	<b>+</b>		Noted
<b>5F</b>	<b>+</b>		Noted
<b>5G</b>	<b>+</b>	To the extent that it can, within its limits. G1(d).	Noted
<b>5H</b>	<b>+</b>		Noted
<b>5I</b>	<b>+</b>	There is a conflict between the push for new development and the statement in G8 that there should be no development that leads to increased flooding.	Disagree. All new development must be flood neutral at worst, in line with the requirements of the Environment Agency. New developments will be expected to provide mitigation measures as appropriate to ensure that this is the case, in line with Core strategy policies.
<b>6A</b>	<b>+</b>		Noted
<b>6B</b>	<b>+</b>	Increased employment should lead to less health inequalities.	Noted
<b>6C</b>	<b>+</b>		Noted



## **Conclusions**

- 5.37 The appraisal of the revised submission draft showed that, in terms of the revised approach to economic development, there was still significant conflict with environmental objectives, such as tackling emissions and protecting greenspace. However, when looking at an alternative approach, i.e. using a site based approach similar to the previous Core Strategy before it was withdrawn, the relationship with objectives relating to jobs and prosperity was even more positive and the relationship with environmental objectives even more negative.
- 5.38 In terms of the document as a whole, this came out positive in respect of most of the sustainability objectives.
- 5.39 As a result, changes will be made to the text of the document, reflecting the comments highlighted in yellow in tables 5.5 (c to f) above.

## **Comments received during consultation**

- 5.40 A number of comments were received during consultation on the revised Sustainability Appraisal, and minor amendments have been made to the text of this document and a revision of the Non Technical Summary has taken place.
- 5.41 At the cabinet meeting in November 2012 to agree changes to the draft Core Strategy prior to publication, members requested that reference to the residential development of land at Broad Lane, Rochdale be withdrawn from the Plan. Whilst there is reference to Broad Lane in a number of places in the Core Strategy, the two policies that this decision impacts upon with significance are C1 (Delivering the right amount of housing in the right places) and G5 (Managing Protected Open Land). In light of this decision, the Sustainability Appraisal in relation to these two policies has been revisited (December 2012), with the scores revised where appropriate (see table 5.6 below).
- 5.42 It is important to note that, in the Core Strategy, the Broad Lane site was not identified as a specific allocation as such, as reference was made to the need to define specific boundaries and more detail through the Allocations DPD. Given the scale of the development likely to take place at the Broad Lane site (in the region of 170 houses) it is not considered necessary to reassess the overall strategy following the decision to withdraw reference to this site.

**Table 5.6: Review of SA, December 2012**

	<b>Excellent: makes a close to optimal contribution to the objective</b>
	<b>Good: makes a significant direct contribution to the objective</b>
	<b>Fair: makes some direct or significant indirect contribution to the objective</b>
	<b>Weak: makes a minor, indirect contribution to the objective and is a missed opportunity</b>
	<b>Poor: does not contribute to the objective and is a missed opportunity</b>
	<b>Undermining: has potential to significantly undermine the objective</b>
	<b>N/A</b>

Policy	Sub-questions																										
	1 A	1 B	1 C	1 D	2 A	2 B	2 C	2 D	2 E	3 A	3 B	3 C	4 A	4 B	5 A	5 B	5 C	5 D	5 E	5 F	5 G	5 H	5 I	6 A	6 B	6 C	
<b>C1</b>																											
<b>G5</b>																											

5.42 Table 5.6 above indicates that, with the change as outlined in 5.41 above policy C1 still has a mixed impact in sustainability terms, with some negative impacts in environmental terms and positive impacts in social terms. It can be concluded that the change does not significantly alter the impact of policy C1 in sustainability terms.

5.43 Table 5.6 shows generally neutral or positive impacts in terms of policy G5, which is an improvement in sustainability terms on previous appraisals. This is because the emphasis of the policy is now stronger in terms of environmental protection.

**Conclusion on the Sustainability Appraisal of the Core Strategy DPD to date**

5.44 The Sustainability Appraisal of the six spatial options assisted with the selection process for the Preferred Option and was able to lead to refinements of that option in order that sustainability considerations genuinely underpinned the Preferred Option.

5.45 The Sustainability Appraisal of the key sites and locations helped to identify those sites with the most positive impact in sustainability terms and the sites which are proposed to be taken forward correspond well with the SA findings. The comparison between site based and criteria based approaches showed the latter to be more positive in meeting the

sustainability objectives, and this is the approach which it is intended will be taken.

- 5.46 The Core Strategy has been appraised at a number of key stages during its development, and the appraisal of the pre-submission documents was able to lead to further refinement of the Core Strategy in order to align it further with sustainability objectives. Following the withdrawal of the Core Strategy and the production of a revised draft document, withdrawing proposals in the Green Belt and on protected open land, further appraisal indicated a more positive relationship with environmental objectives.
- 5.47 The Sustainability Appraisal process has led to an incremental improvement in the relationship between the Plan and Sustainability Objectives, although it was felt that, as the Plan was based on sustainability considerations from the start, we were able to start from a positive position and improve it even further.

## Chapter 6: Next steps and monitoring framework

[SEA Directive Annex 1 \(i\)](#)

### Next steps

- 6.1 Following consultation upon this document and the DPD the documents will be reviewed in the light of comments made and, where appropriate, changes will be made to the documents prior to adoption by the Council. If there are significant changes to the DPD that have not already been the subject of this SA it will be necessary to assess these changes against the SA framework to ensure that the significant social, environmental and economic effects are appraised. A further SA report will be submitted alongside the submission of the Plan.

#### Monitoring significant effects

- 6.2 Monitoring the significant effects of the plan will take place on a regular basis, by continuing regular assessment of the implementation of the plan against the sustainability objectives, bearing in mind that these in themselves may be subject to review as key issues and problems evolve. This will involve looking at the baseline information and targets which constitute the indicators informing the sustainability objectives; these are outlined in Table 6.1 below. Any significant effects identified will inform the annual monitoring report. It is recognized that the indicators identified below are incomplete and further work will take place to refine them.
- 6.3 If unforeseen adverse effects are identified, an investigation will be undertaken to determine what action can be taken.

**Table 6.1: Monitoring indicators for significant effects of the plan**

(AMR = Annual Monitoring Review)

Sustainability Objective	Sub-questions	Indicators	Remedial Action (column for future use)
1. Developing Sustainable Neighbourhoods	1A	% of Council houses and other dwellings meeting national decency standards (AMR); Number of vulnerable households living in fuel poverty; Improvement in relevant scores in residents satisfaction surveys;	
	1B	% of housing stock empty (Housing Strategy); Affordable dwellings completed as a % of all new housing completions (Audit Commission / Housing Needs Survey)	
	1C	% of people who believe people from different backgrounds get on well together in their local area (LAA)	
	1D	Amount of new residential development within 30 minutes public transport time of: a GP; a hospital; a primary school; a secondary school; areas of employment; and a major retail centre (AMR)	
2. Increasing Jobs and Prosperity	2A	Total amount of additional floorspace (AMR)	
	2B	Total number of jobs in the Borough (AMR; Pride of Place); Employment rate (Economic Development Strategy)	
	2C	Skill levels (Economic Development Strategy)	
	2D	Total amount of floorspace for 'town centre uses' (AMR)	
	2E	Increase in visitor numbers (Aiming High) - Indicators to be developed -	
3. Making Sure Every Child Matters	3A	Year on year rise in childhood obesity (AMR); % of 5-16 year olds participating in a minimum of two hours each week of high quality PE and school sport (Community Strategy)	
	3B	% of schools with a travel plan (Aiming High)	
	3C	Amount and quality of play facilities (Green Infrastructure Survey); % of play areas conforming to LEAP standards (Community Strategy)	
4. Improving Community Safety	4A	% of residents who feel that the Borough is a safe place to live (Pride of Place); Domestic burglaries per 1000 population (Audit Commission); Reduction in key crimes (Aiming High)	
	4B	- Indicators to be developed -	
5. Creating a Cleaner, Greener Environment	5A	Traffic levels (annual area wide traffic reports, GMTU)	
	5B	% of people travelling to work by car, public transport and foot / bicycle; Rail patronage (AMR); Number of Travel Plans secured as part of a new development (AMR); Per capita CO2 emissions in the LA area (Audit Commission); Energy efficiency of the housing stock (Community Strategy); Renewable energy installed by type (AMR)	

	5C	% of residential properties within 400 metres of a good quality natural greenspace, woodland, greenspace corridor or national cycle network / national trail (LAA / Economic Development Strategy); % of eligible open space managed to Green Flag award standard
	5D	% of listed buildings at risk (English Heritage Buildings at Risk register); Number / extent of Conservation Areas
	5E	Number of planning applications refused on the grounds of poor design;
	5F	Woodland cover (Pennine Edge Forest Strategy); Change in areas and populations of biodiversity importance (AMR); % of rivers of good or fair quality (Environment Agency General Quality Assessment)
	5G	- Indicators to be developed -
	5H	% of household waste recycled (RMBC / Defra); % of development on brownfield land (AMR / RSS); Housing Density (AMR)
	5I	Number of planning applications granted contrary to the advice of the Environment Agency on flood defence grounds
6. Improving Health and Wellbeing	6A	- indicator to be developed -
	6B	General health as a % of all people (Census data); Life expectancy; gap in health inequalities
	6C	% of adults participating in at least 30 minutes moderate intensity sport and recreation on 3 or more days per week; % of population within 20 minutes travel time (urban – walking; rural – driving) of a range of 3 different sports facility types, at least one of which has achieved a quality mark








## Appendix 1: Sustainability Appraisal of the six spatial options outlined in the Core Strategy issues and options report












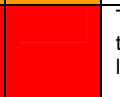

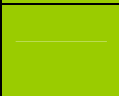










Explanation: The Appraisal objectives derive from the UK Sustainable Development Strategy and are aligned with the Borough Community Strategy: Pride of Place.

For more details of the Spatial Options, please see the Core Strategy Issues and Options Report.

The comments represent a summary of the panel discussion.

Key:

	<b>Excellent: makes a close to optimal contribution to the objective</b>
	<b>Good: makes a significant direct contribution to the objective</b>
	<b>Fair: makes some direct or significant indirect contribution to the objective</b>
	<b>Weak: makes a minor, indirect contribution to the objective and is a missed opportunity</b>
	<b>Poor: does not contribute to the objective and is a missed opportunity</b>
	<b>Undermining: has potential to significantly undermine the objective</b>
	<b>N/A</b>

Appraisal Objectives	Spatial Options						Summary of panel conclusions
	1	2	3	4	5	6	
<b>Better access to healthcare services, reducing health inequalities, promoting health and well-being throughout the borough's neighbourhoods and communities</b>							Increased traffic generation and loss of green space of higher growth options may have negative health impacts.
Increasing sport and leisure activities and greater access to the countryside and other open spaces to help promote healthier lifestyles							The higher growth options result in pressure for the development of greenfield sites and also some loss of countryside.
<b>Improving lifelong education and training, enabling people of all ages to acquire knowledge and skills</b>							Initiatives in respect of this objective are already taking place, especially in regeneration areas, and these initiatives are likely to remain in place for all the options
Supporting and retaining the borough's local businesses, promoting a competitive and dynamic business environment, providing local people with more and better paid jobs							Low growth options may result in businesses in regeneration areas being displaced by housing. The higher growth options, on the other hand, provide new employment development opportunities.

<b>Redeveloping the borough's town centres, attracting new retail investment to the primary shopping areas</b>							Options 1 to 3 include initiatives in respect of town centres, and whilst options 4 to 6 do also, they could potentially encourage out-of-centre retail which could damage the viability of town centres.
Achieving a locally and nationally well-connected transport system, particularly in terms of public transport							Although options 3 to 5 have advantages over 1 and 2, such as the promotion of East Lancs railway, new roads could be negative in terms of this objective and option 6 is likely to lead to increased traffic problems.
<b>Conserving and enhancing the Borough's diverse built and natural heritage</b>							The higher growth options, with loss of green space, could have a very negative impact.
Raising the profile of Rochdale within the North West region, attracting more investment and opportunities for local people							Higher growth options can be good for the Borough's profile, however option 6 could lead to a more negative image because of the visual and environmental impact of less restrained development
<b>Further reducing crime and the fear of crime</b>							The options that focus on regeneration perform well against this objective, with regeneration initiatives tackling this subject. However, option 6 has less focus on regeneration.
Protecting and enhancing biodiversity and habitats and providing opportunities for new habitat creation							There are some initiatives in connection with regeneration programmes. Higher growth options, however, mean loss of green space / countryside and negative impacts on habitats / biodiversity.
<b>Ensuring a reduced impact upon the local and global environment; reducing pollution and waste and saving energy and water to within empirically tested environmental limits</b>							All the options could have a negative impact unless policies address these issues. Increased land take and traffic generation of the higher growth options meant they scored particularly badly.
Tackling climate change through reducing local carbon dioxide emissions and energy use, contributing to national and regional targets related to mitigation							Option 2, with its focus on regeneration, was felt to align with the high regeneration standards in this area as well as minimising increased traffic. Growth options involving new roads were felt to have a negative impact on this objective.
<b>Achieving effective climate change adaptation</b>							Increased land take up can increase the urban heat island and greenfield development leads to increased run-off. Option 6 potentially allows development on flood plains.

Ensuring that flood risk is minimised							Some regeneration initiatives are in flood areas, and this potential problem needs to be addressed. With the higher growth options, increased run-off is an issues and their was particular concern in respect of the British Vita site.
<b>Protecting or improving inland waters</b>							None of the options were felt to have significant benefits for this objective, and this needs to be picked up at further stages. Higher growth options, with increased land take, could cause flood pulses.
Reducing the need to travel and promoting walking, cycling and public transport							Regeneration areas are generally close to public transport and some of the possible development areas are also. It was felt that much depended on the details of implementation, although option 6 was likely to lead to residential areas some distance from employment.
<b>Creating decent, warm, safe and secure houses cutting energy use, with choice of location, size and tenure</b>							Whilst it was felt that regeneration initiatives were improving the situation in respect of this objective, it was felt that the higher growth options might impact negatively on accessibility, and therefore choice, of locations for some groups.
Ensuring that the future development of the Borough benefits all sectors of the community and all ethnic groups							Whilst regeneration initiatives, to some extent, seek to benefit some sectors of the community, it was felt that more needed to be done. Growth points in higher growth options appear to be focused on less diverse areas.
<b>Ensuring sustainable communities by improving the local environment</b>							Policies will need to ensure that opportunities are taken in regeneration areas. Option 6 might be particularly negative as there will inevitably be less focus on regeneration areas.



## Appendix 2: Appraisal of the Preferred Options Spatial Strategy and Core Policies

Key:

Strongly positive	Positive	Neutral / not applicable	Negative	Strongly negative	Unknown / not enough information

Core Strategy 'Preferred Options' Objectives and Core Policies	Sustainability Objectives																										
	1. Sustainable Neighbourhoods				2. Increasing jobs and prosperity					3. Making sure every child matters			4. Improving community safety		5. Creating a cleaner, greener environment							6. Improving health and wellbeing					
	A	B	C	D	A	B	C	D	E	A	B	C	A	B	A	B	C	D	E	F	G	H	I	A	B	C	
<b>Spatial Strategy Overview</b>																											
SP1: The Spatial Strategy Overview																											
SP2: Spatial Strategy – south of borough																											
SP3: Spatial Strategy – north of borough																											
<b>To deliver a more prosperous economy</b>																											
E1: Establishing thriving town centres																											
E2: Focussing economic growth																											
E3: Regenerating existing employment areas																											
E4: Encouraging the visitor economy																											
E5: Diversifying the rural economy																											
<b>To create successful and healthy communities</b>																											
C1: Delivering the right amount of housing in the right places																											
C2: Delivering the right type of housing																											
C3: Providing affordable homes																											

C4: Meeting the housing needs of gypsies and travellers																							
C5: Improving health and wellbeing																							
C6: Delivering education facilities																							
C7: Improving community facilities and cohesion																							
To improve design, image and quality of place																							
P1: Protecting character																							
P2: Improving image																							
P3: Improving design																							
To conserve and manage the natural environment and resources																							
R1: Tackling climate change																							
R2: managing green belt																							
R3: managing other protected / reserved open land																							
R4: Enhancing green spaces and corridors																							
R5: Protecting biodiversity and geodiversity																							
R6: Managing water resources and flood risk																							
R7: managing and improving air quality																							
R8: managing waste																							
R9: Managing mineral resources																							
To improve accessibility and deliver sustainable transport																							
T1: Delivering sustainable transport																							
T2: Improving accessibility																							