

Appendix 55

Summary of Comments from the Consultation on the Draft Core Strategy

January 2013

Introduction

Comments and responses relating to Broad Lane, Rochdale

Those officer responses that are marked * are those which relate to the proposal to develop land at Broad Lane, Rochdale for housing. This proposal was included in the Draft Core Strategy and in the report and schedule that went to Cabinet in November officers recommended that that this proposal be retained despite the objections received. However, members considered that the proposal should be withdrawn from the Core Strategy when it is published for consultation. The schedule below, however, needs to reflect the initial officer responses as these were published with the committee report. Therefore please be aware that although the officer responses marked * seem to indicate that the Broad Lane proposal has been retained; it has been withdrawn from the Publication Core Strategy as requested by members at the Cabinet meeting.

Other 'officer' changes

In addition to changes made as a result of comments received on the Draft Core Strategy, a number of other minor wording changes have been made in order to improve the document. These changes mainly relate to making the document clearer and easier to read or updating factual information.

Title	Comment ID	Consultee Company / Organisation	Consultee Full Name	Agent	Summary of Comments	Summary of Officer Response
Overall Core Strategy						
Rochdale Draft Core Strategy - August 2012	DCS36	English Heritage - North West Region	Ms Judith Nelson		Support the approach taken in the Core Strategy and is a good example of how the protection, enhancement, management and enjoyment of the historic environment and heritage assets can be integrated into a local plan and provide the required positive strategy.	Support noted
Rochdale Draft Core Strategy - August 2012	DCS54	The National Trust	Mr Alan Hubbard		The National Trust have noted the positive response to comments from the previous stage and have no comments to make.	Support noted.
Rochdale Draft Core Strategy - August 2012	DCS68	Campaign to Protect Rural England	Jackie Copley		CPRE have made reference to a range of reports and studies which concern the delivery of more high quality homes on brownfield sites that are currently planned for, and point to the strong case for doing so.	Comment noted
Rochdale Draft Core Strategy - August 2012	DCS77	Campaign to Protect Rural England	Jackie Copley		Rochdale Council should undertake regular reviews of available brownfield land and complete a borough-wide Landscape Character Assessment to understand fully the local character or areas. All new housing should ensure development is sustainable and it must be subject to strong design policy to protect and enhance environmental quality across the borough.	Comment noted. The SHLAA is carried out on an annual basis alongside monitoring of Employment Land which together present a picture of available sites across the borough. The vast majority of these are on brownfield sites and together they form a robust evidence base. A broad scale landscape character assessment was included with the UDP and remains relevant. Green Infrastructure Plans for the borough's Townships will identify landscape character issues and opportunities for enhancement.
Rochdale	DCS103	Mobile	Ms Nicola	Mono	No comments to make in respect of any	Comment noted - agree

Draft Core Strategy - August 2012		Operators Association	Davies	Consultants Ltd	specific policies in the Core Strategy. However, consider the inclusion of a telecommunications policy within the emerging Local Development Framework and is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. Suggest that a policy be included with any back ground information, such as electromagnetic fields (EMFs) and public health, being contained within a separate Supplementary Planning Document.	Whilst a telecommunications policy is considered to be valuable, Core Strategy and Development Management policies should not repeat National Planning Policy guidance. A telecommunications policy should be covered by Development Management policies.
Rochdale Draft Core Strategy - August 2012	DCS120		Mr Gary Louden		Supports and welcomes many initiatives of various forms relating to the health and wellbeing of residents of the borough and the environment. It is important that the views of residents are listened to collectively work together towards making a better borough for all to live and work.	Comment noted
Rochdale Draft Core Strategy - August 2012	DCS140	EFL Consulting Ltd	Mr Eric Larmett		A flexible policy base that would allow smaller or windfall sites to be brought forward should be included to allow the delivery of specific local development needs, particularly of the rural areas both north and south in the borough.	Objection noted - disagree Rural settlements and issues across the borough are given appropriate policy support in terms of social, economic and environmental issues that affect them. Smaller or windfall sites are still eligible to come forward through the planning application process and their suitability or eligibility for development will be considered against policy and on the merits of each individual site.
Rochdale Draft Core Strategy - August 2012	DCS142	EFL Consulting Ltd	Mr Eric Larmett		A policy that recognises and encourages the use of windfall sites of rural needs should be included. The strategy for Middleton does not reflect its green/rural surroundings and concentrates development. Policy	Comments noted - Disagree. The south of the borough has important and attractive areas of countryside which is reflected in the Middleton strategy. There is no need for a specific policy approach to address rural needs over

					<p>should be developed that recognises opportunities might be forthcoming at local level rather than borough wide level.</p> <p>Neighbourhood planning should be considered as part of the new core strategy.</p>	<p>and above the existing policy framework. Green belt settlements are not sufficiently isolated to require flexibility to meet local housing needs which can be accommodated on adjacent sustainable urban sites. The Core Strategy sets out the strategic context within which neighbourhood development plans will sit.</p>
Rochdale Draft Core Strategy - August 2012	DCS211	Canal & River Trust	Ms Alison Truman		<p>The Canal & River Trust would therefore like to offer general support for the Draft Core Strategy as a whole. Also, the Trust would be keen to be involved in any form of joint working between authorities in respect of the canal corridor if this is considered appropriate.</p>	<p>Support noted</p> <p>Joint working has taken place with neighbouring authorities in line with the Council's Duty to Cooperate and there are other forums e.g. with Sustrans where joint working is underway. The Council will ensure that any further joint working that takes place in relation to the impact of development on the Canal SAC or SSSI will involve the Canal and Rivers Trust.</p>

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Chapter 1 - Introduction						
Introduction	DCS26		robert haughton		How will the Council demonstrate that development will be balanced against sustainable development?	Sustainable development is a key part of the new planning system. A Sustainability Appraisal (SA) has been carried out at every stage of preparing the Core Strategy which tests the balance between economic, social and environmental considerations.

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Chapter 2 – Spatial Portrait of the borough						
Spatial Portrait of the borough	DCS28		robert haughton		Where are 400 additional homes per annum going to be built in the south of the Borough ? Why the constant need for higher value houses in the south of the Borough and how does this compares with numbers in other parts of the Borough ? Explain how improvements to air quality along the M62 and A58 corridors will be achieved if more housing and business will be developed within a long established AQM Zone ? Given the demise of the M62 J19 Relief Road how is traffic affecting local communities in that area going to be minimised ? When is the Council going to work with Bury colleagues to provide improved access to Heywood Distribution Parks from M66 J3 ?	Comments noted - No Change. SHLAA indicates there are sufficient sites to provide much of the additional sites most of these are in the south of the borough. Need for higher value housing covers the whole of the Borough in policy C3, not just the south. Emission from traffic already being reduced through advancing vehicle technology. RMBC working with partners to enhance sustainable transport alternatives, traffic management signing and communications. Promoting change in travel behaviour - reduce need to travel home working. HA M62 J18-20 hard shoulder running scheme seeks to reduce delays and smoothes traffic flow on the motorway. RMBC already supported Bury MBC in bid for funding to address delays at M66 J3 and will continue to work with them.
Spatial Portrait of the borough	DCS38	English Heritage - North West Region	Ms Judith Nelson		The Town Hall's future within a new and vibrant Rochdale Town centre deserves specific mention.	Comment noted and agree to make reference to the Town Hall and it's role within Rochdale Town Centre.
Spatial Portrait of the borough	DCS43		Eileen Shepherd		Rochdale's setting is a major asset. It's green countryside, hills and river valleys are important for its image as a natural resource and for its residents and visitors. Objection to the development of protected open land at Broad Lane for the following reasons: Flooding; pollution; road capacity and safety; health; sufficient housing already; sufficient employment land already; loss of open space; views and natural springs.	Objection noted - Disagree. The Spatial Portrait provides a broad overview of the Borough which is considered to provide an appropriate amount of detail and broad description of the Boroughs towns and countryside and social, economic and environmental qualities and issues relating to them. These comments have been restated in respect of individual policies of the plan

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Chapter 2 – Spatial Portrait of the borough						
						and a more detailed response to these points will be provided under the relevant policy representation.
Spatial Portrait of the borough	DCS90		Janet Ashfield		Rochdale's Core Strategy opens with quotations of "green Countryside" and "stunning landscapes with the "largest and most attractive open spaces of any town centre in the country" then indicates that one of these areas of land should be urbanised by building houses on it.	Comment noted. The spatial portrait is a snapshot of the key assets and opportunities and challenges in the Borough. Development is an inevitable and significant part of any boroughs growth and aspiration and the Core Strategy seeks to balance the need for development with the protection of the environment.
Spatial Portrait of the borough	DCS132	Rail Future	Mr Mike Breslin		An additional challenge should be "Securing improved rail access from the borough to the Midlands and the south" . Reference to Heywood to include "the potential for the use of East Lancashire Railway to provide regular fast access to Manchester to access jobs and improve employment prospects for the towns residents is requested. Welcome recognition that improvements to Rochdale Railway Station are urgently needed.	Comment noted - Improved rail access beyond Manchester is addressed in Policy T1 but reference can also be included in the Accessibility section. Improving links to Manchester via ELR is covered in Policy T1 and the support for capacity improvements at Rochdale Railway Station is noted.
Spatial Portrait of the borough	DCS156	The Coal Authority	Miss Rachael Bust		The Coal Authority supports the acknowledgement in the Spatial Portrait that the borough contains mineral resources and that protecting the reserves for the future is a key challenge for the Rochdale LDF.	Support noted. No change.
Spatial Portrait of the borough	DCS163	Peel Holdings (Land & Property) Limited	Gillian Chiltern		Peel supports the overall thrust of the Spatial Portrait for the Borough. Peel consider that the Council needs to give further consideration to their housing evidence base and examine the opportunity for local Green Belt boundary amendments in the Borough to ensure having delivery at appropriate	The Council considers that the SHLAA appropriately identifies new locations for housing development over the next 15 years to facilitate a large range of house types. The Council does not consider a need to review its Green Belt boundaries.

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Chapter 2 – Spatial Portrait of the borough						
					levels and to ensure delivery of a wider range of housing, including larger, aspirational family housing e.g. land west of Norden Road, Bamford.	
Spatial Portrait of the borough	DCS164	Natural England	Janet Baguley		Support the recognition of "the Value of the borough's Countryside" and the challenges raised in the "Quality of Place" section. However, natural England consider that the spatial portrait does not sufficiently cover geology / geomorphology, local biodiversity assets or landscape character areas relevant to the Borough. They are also concerned about how the Council defines protection of heritage assets and would welcome inclusion of further key challenges to "conserve and enhance biodiversity and geodiversity within the Borough as well as conserve and enhance local landscape character and quality in line with the European Landscape Convention. They also consider that the environment and the Green Infrastructure sections could include more detail and clarity.	Partly agree. The spatial portrait is not the appropriate place for some detailed changes requested which are more appropriate for policies and supporting text. There is considered to be sufficient clarity in the Environment and Green Infrastructure sections as written. A Key Challenge referring to maintaining and enhancing biodiversity including priority species, habitats and networks and geodiversity assets will be included in the Green Infrastructure section.
Spatial Portrait of the borough	DCS172	Taylor Wimpey UK Limited	Mr Andrew Thorley	GVA	<p>- Economy - Support references to Kingsway Business Park and its local economic significance and providing a better choice of housing to retain / attract high income residents.</p> <p>- Object to the third paragraph in the spatial portrait as it is not considered that 400 additional houses per year is 'ambitious' or sufficient to meet demand and help regenerate the borough. They do not consider that the SHLAA is robust or flexible enough to meet short term housing demand</p>	Support for parts of the Spatial Portrait and the overall strategy is welcomed. Objections noted - disagree. The response is set out at Policy C1. Further detail and clarification will be set out in the background paper. Middleton - There is sufficient detail for a Spatial Portrait as it is a "snapshot" of the key issues and Middleton's relationship with Manchester. It is not meant to be as detailed as the background paper. We will consider the

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Chapter 2 – Spatial Portrait of the borough						
					<p>or the Core Strategy aims. More detail is provided in representation to Policy C1.</p> <ul style="list-style-type: none"> - Support for the overall strategy and key challenges listed, in particular the importance of controlling pressure for housing in the north of the borough and encouraging housing (including higher value housing) in the south. - The portrait doesn't adequately recognise the strengths of Middleton's geographical and functional relationship with Manchester Regional Centre. - The portrait suggests the housing mix overall is 'well balanced' however, this is not supported by evidence. It is considered that there should be explicit recognition of Middleton as an appropriate location for higher value housing. 	<p>wording in the spatial portrait to provide consistency across each of the townships.</p>
Spatial Portrait of the borough	DCS214	Environment Agency	Mrs Sylvia Whittingham		<p>The current spatial portrait for this aspect, is largely orientated around recreational access or flooding, and makes little mention of the current ecological status of Rochdale's biodiversity assets.</p> <p>It is recommended that key ecological/biodiversity issues that currently face the UK and also the Rochdale borough, should be reflected in this evidence section and the key challenges.</p> <p>The EA would like references to the projects in respect of Water Framework Directive and local river catchments and also to blanket bog for which Rochdale Borough holds 80% of the GM total. It is recommended that the current challenges description be reworded to better reflect these key aspects and</p>	<p>Objection noted - Partly agree. The level of detail sought is more appropriate for the Background Paper, specific policies and reasoned justifications. A reference could be added to the Green Infrastructure section around maintaining and enhancing biodiversity including priority species, habitats and networks.</p>

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Chapter 2 – Spatial Portrait of the borough						
					challenges. i.e., promoting a high quality green infrastructure in a way that supports sustainable growth.	
Spatial Portrait of the borough	DCS234	Network Rail	Ms Diane Clarke		Rochdale - Suggest adding "At Rochdale Station, Northern Hub improvements will see the opening of an extra through platform which will increase the operational capacity, creating space for extra Manchester – Rochdale services, and facilitate the journey time improvements that are planned for the Calder Valley route". Suggest deleting "variety of improvements to the rail station are also urgently needed to improve connectivity and promote regeneration".	Comments noted and agree. Amend end of Para 7 of the Rochdale (P16) section as suggested.

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Chapter 3 – Our Spatial Vision for the borough						
Our Spatial Vision for the borough	DCS11		Mr Neil Longsdon		There is an objection to the proposal to develop POL off Broad Lane for housing. The location includes open green fields with an abundance of wildlife; public footpaths, and is used for recreational purposes by the public. This would be in conflict with the plan in terms of protecting green spaces and also committee decision and public opinion.	*Comments noted. Disagree. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is considered to be sustainable for housing development and would not be in conflict with the plans wider objectives for protecting green spaces.
Our Spatial Vision for the borough	DCS167	Natural England	Janet Baguley		Reference to geodiversity should be included in the spatial vision and suggest rewording.	Comments noted. Agree.

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Chapter 4 – Strategic Objectives						
Strategic Objectives	DCS12		Mr Neil Longsden		Objection to the development of POL off Broad Lane and how it will address the housing needs in inner Rochdale	*Comments noted. However, It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met across the Borough. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land
Strategic Objectives	DCS32		Karen Salisbury		Typing error in document	Comment noted. Agree
Strategic Objectives	DCS46		Eileen Shepherd		Springhill is overdeveloped and further housing will exacerbate issues around health, congestion and pollution.	*Comments noted. However, It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met across the Borough. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land
Strategic Objectives	DCS49	The Theatres Trust	Miss Rose Freeman		Culture' should be included in Strategic Objective.	Comment noted. Agree.
Strategic Objectives	DCS155	Broad Lane Action Group	Tracy Wilson		Objection to the development of protected open land at Broad Lane for reasons of	*Comments noted. However, It is considered important to retain this site within the Core Strategy in order to ensure that the

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Chapter 4 – Strategic Objectives						
					flooding, pollution, health, sufficient housing already and loss of open space.	requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy contains policies in respect of flood risk and the environment to ensure that such issues are fully considered in any proposals.
Strategic Objectives	DCS175	Taylor Wimpey UK Limited	Mr Andrew Thorley	GVA	Support for SO1 To deliver a more prosperous economy but cross reference to housing choice and quality is sought. Support for SO2.	Support noted.
Strategic Objectives	DCS176	Peel Energy Limited	Mark Flaherty		Reference to the importance of renewable energy and the economic benefits of onshore wind development should be included.	Comment noted. Disagree
Strategic Objectives	DCS179	Peel Energy Limited	Mark Flaherty		Reference to the importance of renewable energy and local carbon energy development should be included.	Comment noted. Disagree
Strategic Objectives	DCS185	Peel Energy Limited	Mark Flaherty		Reference to the importance of renewable energy and the economic benefits that it brings.	Comment noted - Disagree.
Strategic Objectives	DCS217	Environment Agency	Mrs Sylvia Whittingham		The value and function of green infrastructure should be balanced against the overall environmental quality to ensure they are well	Comment noted. The points raised are clearly considered in the appropriate policies in the Core Strategy and given further amplification in the Biodiversity and Development SPD and Green Infrastructure plans.

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Chapter 4 – Strategic Objectives						
Strategic Objectives	DCS226	United Utilities	David Sherratt	CBRE Ltd	integrated. Request reference in SO4 to areas identified by UU that maybe at risk from future surface water or sewer flooding through new development.	Comment noted. Too detailed for this section of the Plan. A reference has been made to United Utilities role in identifying areas of risk in the reasoned justification to policy G8 which can be amended in this context.
SO5 - To improve accessibility and deliver sustainable transport	DCS133	Rail Future	Mr Mike Breslin		Support for SO5 particularly reference to improving strategic transport connections.	Support noted.

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Chapter 5 – Delivering Sustainable Development						
Delivering Sustainable Development	DCS13		Mr Neil Longsdon		Objection to the release of POL off Broad Lane for housing development. The local housing strategy shows that there are sufficient sites available in the Borough.	*Comments noted. However, It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met across the Borough. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land

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Chapter 6 – Spatial Strategy						
SP1 - Rochdale borough's role in the city region	DCS14		Mr Neil Longsden		Objection to development of exclusive executive homes at POL off Broad Lane.	Objection noted - disagree. The types of housing that a developer could build on this site will be determined by the planning application process.
SP1 - Rochdale borough's role in the city region	DCS134	Rail Future	Mr Mike Breslin		Support improvement to transport infrastructure and sustainable transport but road schemes should not be supported as they are not sustainable. There is also the opportunity to improve transport infrastructure such as electrification of the main Calder Valley rail route and developing the East Lancashire Railway as a means of improving links with neighbouring towns.	Support noted. We disagree with the point on road schemes as the borough does have a limited number of priority road schemes. With regards to the electrification of the main Calder Valley rail route we are lobbying for this with neighbouring authorities. We are also promoting ELR in policy T1.
SP1 - Rochdale borough's role in the city region	DCS177	Taylor Wimpey UK Limited	Mr Andrew Thorley	GVA	We support the content of Policy SP1 and associated Map 1.	Support noted
SP1 - Rochdale borough's role in the city region	DCS180	Peel Energy Limited	Mark Flaherty		Support and maximise renewable energy generation in suitable locations where any adverse impacts can be addressed satisfactorily so that the borough makes a substantial contribution to meeting the energy requirements of the Manchester City region through renewable sources.	Comment noted - partially agree. It is agreed that the borough has a role in renewable energy delivery.
SP2 - The Spatial Strategy for the borough	DCS7		Ms Jean Barlow		Objection to the overall strategy of the borough which seeks development of the south and not the north.	Objection noted - disagree. The south of the borough presents more development opportunities for employment and housing supported by the M62 and excellent accessibility,

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Chapter 6 – Spatial Strategy						
						whereas there is limited scope/opportunity in the North.
SP2 - The Spatial Strategy for the borough	DCS15		Mr Neil Longsden		Concern over the general development in the borough which is discouraging people from using facilities in Rochdale in favour of Manchester and building on Greenfield land instead of Brownfield land.	Comments noted. Rochdale is part of the Manchester City region and we contribute to the overall success of it through employment, housing, transport, energy and infrastructure. Rochdale has a successful record of building homes on previously developed land.
SP2 - The Spatial Strategy for the borough	DCS33		Mr Louis Henry		Objection to the overall strategy of the borough which seeks development of the south and not the north.	Objection noted - disagree. The south of the borough presents more development opportunities for employment and housing supported by the M62 and excellent accessibility, whereas there is limited scope/opportunity in the North.
SP2 - The Spatial Strategy for the borough	DCS158	Broad Lane Action Group	Tracy Wilson		Objection to the development of POL off Broad Lane due to unrealistic housing target and outstanding residential planning permissions in the borough.	The RSS target of 400 is considered realistic and achievable, as in the past year 454 additional homes were completed. The main issue affecting the borough in recent years has been the deliverability of sites, not the availability of them. Sites with planning permission for housing cannot be enforced.
SP2 - The Spatial Strategy for the borough	DCS174	Peel Energy Limited	Mark Flaherty		Peel Energy submits that existing and future renewable energy generation potential should be reflected in the spatial strategy for the borough as a positive asset, and text should be inserted into the spatial strategy accordingly.	Comment noted - disagree. It would be inappropriate to include this suggestion in terms of the general vision for the borough. The borough will be committed to many things, and it would be inappropriate to include a list of these within the vision.
SP2 - The	DCS178	Taylor Wimpey	Mr Andrew	GVA	Support for SP2 and Broad Lane.	SP2 - support noted.

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Chapter 6 – Spatial Strategy						
Spatial Strategy for the borough		UK Limited	Thorley		Propose that land north of Langley Lane/Hollin, Middleton should be identified for new housing.	The site at Langley / Hollin is not considered appropriate or necessary for residential development. The current SHLAA also demonstrates that there is sufficient land to meet the housing target without the release of the site at Langley / Hollin
SP2 - The Spatial Strategy for the borough	DCS181	Peel Energy Limited	Mark Flaherty		Amend part 2 of policy SP2 to reflect 'renewable energy appropriate to the character and accessibility of the area' and Figure 5 to reflect the potential for sensitively designed and located renewable energy development in the northern areas of the borough.	Comments noted - disagree. It would be incorrect to describe renewable energy generation as a focus in the same way as the other improvements; it is something that comes into the category of commercial developments.
SP2 - The Spatial Strategy for the borough	DCS183	Peel Energy Limited	Mark Flaherty		The ellipse's used in the Key diagram is unclear for Norden and Hollingworth Lake.	Comments noted - disagree The ellipse areas shown on the spatial strategy relate to enhancing both the South Pennine and North Pennine gateways.
SP2 - The Spatial Strategy for the borough	DCS200	Wainhomes (Development) Ltd	Mr Richard Chamberlain	Emery Planning Partnership	Support policy SP2 and C1 however, the reference to further Greenfield releases should be included to ensure delivery of new homes.	Support noted. In terms of the need to release additional Greenfield sites this is not considered necessary given the evidence in the SHLAA.
SP3 - The Spatial Strategy for the townships	DCS4	Yeagate Limited	Mr William Ullathorne		Consider recognition of Birch Business Park in the spatial Strategy, at least at the Heywood level.	Comments noted - Agree. It will be appropriate to refer to Birch Business Park within the reasoned justification to this policy and its wider role within South Heywood in terms of economic growth.
SP3 - The Spatial Strategy for	DCS6		Ms Jean Barlow		SP3/H should include the promotion of office developments in Heywood.	Comments noted - disagree. We are promoting office development in all town centres as the preferred location

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Chapter 6 – Spatial Strategy						
the townships						(see policy E1), however, there is currently no opportunity in Heywood centre.
SP3 - The Spatial Strategy for the townships	DCS39	English Heritage - North West Region	Ms Judith Nelson		The Town Hall is a significant building and should be identified under the section heading 'key challenge' in the Spatial Strategy for Rochdale, particularly in helping to deliver the regeneration of Rochdale town centre.	Comment noted. However, actually refers to Spatial Portrait and town centre policy and is dealt with in those sections
SP3 - The Spatial Strategy for the townships	DCS45		Mr Louis Henry		A new link road at J19 M62 will not alleviate problems of congestion, problems with HGV's or general traffic and other solutions should be looked at such as Infrastructure improvements to existing roads and access, having dialogue with Bury MBC to improve Pilsworth Road Bury access from M66 Junction. Objection to allowing medium sized retail units in Heywood town centre will have a detrimental impact on existing shops and services	A feasibility study looks at the route improvement from the M66 from junction 2 and 3 in the Draft Transport Strategy. Heywood Town Centre - Comment noted. Heywood Town Centre currently lacks retail representation from some multinational shops. People/shoppers are leaving the borough to neighbouring town centres to get a better shopping experience. To change the shopping pattern the Council will support medium sized units which will help meet the retail needs of Heywood.
SP3 - The Spatial Strategy for the townships	DCS70		Mr Louis Henry		Objection to building new homes on Kingsway Business Park as this should remain only for the purpose of employment particularly as more land will be needed for the plan later on. There is a concern that residential dwellings at or near a business park attracts environmental problems of various sorts not least amenity.	Comments noted. It is government policy that areas of development should be sustainable and accessible and Kingsway Business Park is considered sustainable urban extension. Also, Rochdale Town Centre / Kingsway Business Park has been identified as an economic growth corridor and to support future growth, this location is the most sustainable

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Chapter 6 – Spatial Strategy						
						location for housing.
SP3 - The Spatial Strategy for the townships	DCS96		Mrs Anne Storah		Support the strategy and aspiration of the East Lancs Railway to link up the railway line to the main Calder Valley line at Castleton.	Support noted.
SP3 - The Spatial Strategy for the townships	DCS113	TCS Holdings Limited	Mr David Donkin		<p>TCS object to:</p> <ol style="list-style-type: none"> 1. the Rochdale Town Centre Masterplan in relation to the site specific details for Central Retail Park and the proposed form of development. 2. the proposed road through CRP. 3. Central Retail Park (CRP) not being recognised in policy E1 as a retail destination and seek the modification of the town centre boundaries through the Allocations DPD and consider that the Rochdale Town Centre Boundary (RTCB) should be extended to include CRP for a number of reasons. 4. Policy C2 sets out specific corridors where the delivery of new homes will be focussed upon. Map 6 shows that this area includes CRP Policy C2 and Map 6 should be clear that the regeneration of CRP should be in accordance with its existing use. 	<ol style="list-style-type: none"> 1. & 2. Rochdale Town Centre - Noted. This has been subject to ongoing discussion with TCS and the ring road has been accepted as part of the plan for that area. 3. Support and objection noted - Disagree. It is not necessary for E3 to list all the sites as specific Allocations will be dealt with through the Allocations DPD. 4. Objection noted - Disagree. Policy C2 is principally focussed on the delivery of new housing and therefore it is not appropriate to include reference to sites which may have potential for retail development.
SP3 - The Spatial Strategy for	DCS122		Mr Gary Loudon		Objection to removing the policy support for a new J19 link road to service Heywood and Pilsworth	Objection noted - disagree. The justification and business case to provide the link road to protect

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Chapter 6 – Spatial Strategy						
the townships					Distribution Centres.	surrounding communities and savings in transport emissions is not sufficiently strong without the land allocation element and the previous inspector was not convinced with this argument.
SP3 - The Spatial Strategy for the townships	DCS135	Rail Future	Mr Mike Breslin		Support the inclusion of delivering high quality station gateway as a priority for policy SP3R.	Support noted.
SP3 - The Spatial Strategy for the townships	DCS143	EFL Consulting Ltd	Mr Eric Larnett		The strategy for Middleton does not reflect its green/rural surroundings and concentrates development.	Comment noted. Disagree. The Spatial Strategy does recognise the green/rural surroundings under 'improve open space and access to the countryside' and makes specific reference to landscape and countryside.
SP3 - The Spatial Strategy for the townships	DCS149	Russell Homes (UK) Limited	Mr Daniel Kershaw		Rochdale Council should re consider its position regarding development in South Heywood and amend the Core Strategy either by: <ul style="list-style-type: none"> - Re instating the South Heywood economic growth corridor proposal in policy E3, - Reinstating the link road proposals in policy T1 but with significant amendments and - A proposed local Green Belt review examining a possible Green Belt swap (in policy G4) with protected open land to the north of Middleton 	Comments noted. Disagree. The approach now included in the Core Strategy seeks to take an approach which does not identify a specific site at the stage (given the Inspectors concerns regarding recent take up) but sets out a mechanism for the identification of a site / sites to meet a need for additional employment land is set out. It remains as an aspiration in the Draft Transport Strategy to include the link road. A Green Belt review may be considered if it is appropriate in the future, this will be clarified in the reasoned justification.

Title	Comment ID	Consultee Company / Organisation	Consultee Full Name	Agent	Summary of Comments	Summary of Officer Response
Chapter 6 – Spatial Strategy						
SP3 - The Spatial Strategy for the townships	DCS182	Taylor Wimpey UK Limited	Mr Andrew Thorley	GVA	Support for SP2 and Broad Lane. Propose that land north of Langley Lane/Hollin, Middleton should be identified for new housing.	SP2 - support noted. The site at Langley / Hollin is not considered appropriate or necessary for residential development. The current SHLAA also demonstrates that there is sufficient land to meet the housing target without the release of the site at Langley / Hollin
SP3 - The Spatial Strategy for the townships	DCS184	Peel Energy Limited	Mark Flaherty		Some amendments required for Policy SP3/R – Strategy for Rochdale (Enhancing the North Pennine Gateway) and Map 6 – Rochdale Strategy.	Comments noted - disagree. It would be misleading to describe renewable energy generation as a 'priority' in the sense of the general improvements indicated in this policy.
SP3 - The Spatial Strategy for the townships	DCS218	Environment Agency	Mrs Sylvia Whittingham		The Environment Agency have recommended for SP3/H (Strategy for Heywood) that the River Roch and Ashworth Valleys are identified as important wildlife corridors and that there needs to be reference to policy G7 i.e., ensure the ecological network and it's functioning is fully integrated and protected as part of future development, and look to enhance it's biodiversity value and current failing waterbody status under WFD; SP3/P (Strategy for Pennines) it is recommended that a priority be included which promotes and/or facilitates environmental improvements to enhance the ecological value of the River Beal valley (Policy G6, 7 and 8). SP3/R (Strategy for Rochdale) - for the Stanney Brook corridor identified as	Partly agree - SP3/H reference to the value of the Roch Valley in Heywood as a wildlife corridor should be included in the appropriate section of text. In respect of SP3/P Stanney Brook corridor is already subject to appropriate management recognising its SBI status. The River Beal corridor is not as clearly defined as a strategic priority as the Roch Valley and opportunities for development led or other improvements would be appropriately covered through appropriate plan policies, development briefs and associated strategies e.g. for Green Infrastructure. SP3/R includes appropriate detail for this section of the plan and should be read with other policies.

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Chapter 6 – Spatial Strategy						
					<p>a local wildlife site (SBI) it is sought that this key wildlife corridor's biodiversity value is protected and enhanced where feasible (Policy G7) as well as promoting this as open space resource. It is also sought that for the objective to improve the Roch Valley and canal corridor in Rochdale that as part of any new riparian development that is no deterioration of waterbody, and look to improve ecological value of any failing WFD waterbody, where feasible.</p>	

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Chapter 7 – Delivering a more prosperous economy (SO1)						
E1 - Establishing thriving town, district and local centres	DCS23	Sainsburys Supermarkets Ltd			Sainsbury agree with the general thrust of policy E1. However, consideration should be given for the potential in extending the primary retail frontage and boundary of Littleborough town centre to ensure a sufficient supply of sites.	Support noted. Any changes to town centre boundaries will be done through the Allocations DPD.
E1 - Establishing thriving town, district and local centres	DCS41	English Heritage - North West Region	Ms Judith Nelson		The Town Hall is a significant building and should be identified under the section heading 'key challenge' in the Spatial Strategy for Rochdale, particularly in helping to deliver the regeneration of Rochdale town centre.	Support noted. Agree that Rochdale Townhall should be referred to under 'key challenges' in Spatial Strategy and more specifically under E1/R.
E1 - Establishing thriving town, district and local centres	DCS74	Campaign to Protect Rural England	Jackie Copley		Changes in planning permission for allowing more residential above shops should be reflected and assessed under policy E1.	Comment noted. Agree the new changes should be reflected in policy E1.
E1 - Establishing thriving town, district and local centres	DCS114	TCS Holdings Limited	Mr David Donkin		TCS object to: 1. Central Retail Park (CRP) not being recognised in policy E1 as a retail destination and seek the modification of the town centre boundaries through the Allocations DPD and consider that the Rochdale Town Centre Boundary (RTCB) should be extended to include CRP for a number of reasons. 2. The inclusion of retail capacity figures for each of the town centres as they consider they are unduly prescriptive and that these should	Comment noted. 1. Disagree. The UDP (2006) does not include CRP within Rochdale town centre boundary and as such has not been recognised in this Local Plan. All the town centre, district and local centres boundaries shown in the UDP proposals map will be reviewed through the Allocations DPD. 2. Agree that the current retail capacity figures attributed to each town centre could change by future updated retail capacity assessments and the inclusion of these figures

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Chapter 7 – Delivering a more prosperous economy (SO1)						
					be removed from policy E1. 3. The policy, in terms of delivering the redevelopment, refurbishment and improvement the centre and its public realm in line with the Draft Town Centre Masterplan in relation to Central Retail Park (CRP), particularly the ring road and the proposed mixed use development of the site. They seek that policy E1/R deletes reference to the ring road and reconsider the mixed use scheme.	could become inflexible and these will be reviewed. 3. Disagree as this has been subject to ongoing discussion with TCS and the ring road has been accepted as part of the plan for that area.
E1 - Establishing thriving town, district and local centres	DCS115	Rochdale Development Agency	Mr Peter Hill		Superfast broadband should be explored for Kingsway and Rochdale town centre. Other comments included car parking spaces and public realm.	Comments noted. Broadband is best dealt with under infrastructure/CIL.
E1 - Establishing thriving town, district and local centres	DCS219	Environment Agency	Mrs Sylvia Whittingham		Support for reopening the River Roch through Rochdale town centre	Support noted
E2 - Increasing jobs and prosperity	DCS5	Yeagate Limited	Mr William Ullathorne		Consider the inclusion of Birch Business Park as one of the South Heywood employment sites.	Comments noted - Partially Agree. It will be appropriate to refer to Birch Business Park but this would be most appropriate under the reasoned justification to policy E3 and its wider role within South Heywood in terms of economic growth.
E2 - Increasing jobs and prosperity	DCS9		Ms Jean Barlow		This draft of the Core Strategy appears unchanged from the previously withdrawn Core Strategy, particularly for South Heywood.	Comments noted - disagree. The South Heywood proposal has been removed from this Core Strategy. However, if additional land is required for employment then Policy

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Chapter 7 – Delivering a more prosperous economy (SO1)						
						E4 will help identify the site.
E2 - Increasing jobs and prosperity	DCS24	Sainsburys Supermarkets Ltd			Sainsbury's recommend that Policy E2 should specify that retail uses are also acceptable on allocated employment sites where there is no reasonable prospect of the site being used for that purpose.	Comment noted - disagree. Policy E2 sufficiently reflects the need to be flexible in allocated employment sites by allowing non employment and mixed use development.
E2 - Increasing jobs and prosperity	DCS27		robert haughton		Where exactly is the balance of 80 ha of land that is to be identified in the Allocations DPD and why is this land only in the south of the borough and such land is not being sought for allocation in the north of the borough?	The Allocations DPD will help identify employment sites. The south of the borough is better positioned to accommodate growth and has more sites available than the North.
E2 - Increasing jobs and prosperity	DCS83	Lancashire County Council	Miss Niamh O'Sullivan		Congestion and journey times will be reduced between Lancashire and Rochdale by restricting development in the north of the Borough.	Support noted.
E2 - Increasing jobs and prosperity	DCS150	Russell Homes (UK) Limited	Mr Daniel Kershaw		Rochdale Council should reconsider its positions regarding development in South Heywood by re instating the economic growth corridor proposal with other significant changes.	Comments noted - Disagree. Given the views of the previous Inspector it is not considered appropriate to re-instate this proposal within E3. This has been replaced by policy E4 which sets out an approach to identify additional employment land if there is evidence of need.
E2 - Increasing jobs and prosperity	DCS186	Taylor Wimpey UK Limited	Mr Andrew Thorley	GVA	Object to policy E2 regarding permitting uses other than employment in existing employment zones and employment sites outside employment zones as it opens up the prospect of sites being brought forward for other uses.	Objection noted - Disagree. The policy intends to be flexible and responsive to current economic challenges and still only allows non-employment uses when certain criteria are met.

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Chapter 7 – Delivering a more prosperous economy (SO1)						
E2 - Increasing jobs and prosperity	DCS227	United Utilities	David Sherratt	CBRE Ltd	United Utilities wishes to highlight that for various locations identified for employment development and there may be infrastructure deficiencies which would need to be addressed with development in a co-ordinated way. Additional text is proposed.	Comments noted. Water and wastewater can be added to examples of the infrastructure which should be provided in support of new development where required. Additional text as to how this will be delivered is not appropriate to this policy and is covered elsewhere in the plan.
E3 - Focusing on economic growth corridors and areas	DCS16		Mr Neil Longsdon		There is no need to build on Protected Open Land at Broad Lane as there is enough space on Kingsway Business Park to build additional houses.	Objection noted - Disagree. It is considered that Broad lane represents a sustainable location for new housing and is well related to an economic growth corridor.
E3 - Focusing on economic growth corridors and areas	DCS30		robert haughton		Bury and Rochdale would benefit from a link road which would improve access to M66 at J3. What plans are there to improve the M62 given the link road proposal has been taken out?	Comments noted. A satisfactory business case to attract funding would be required to improve the link at M66. Many objectors to M62 junction 19 link road indicated that this should be the main route for commercial traffic to the area.
E3 - Focusing on economic growth corridors and areas	DCS116	Rochdale Development Agency	Mr Peter Hill		Discussions are taking place to investigate the provision of superfast broadband to Kingsway and its intention to see how this can be extended to Rochdale Town Centre.	Comments noted. Policy E2 makes general reference to the importance of infrastructure, including super fast broadband, to support economic growth.
E3 - Focusing on economic growth corridors and areas	DCS117	TCS Holdings Limited	Mr David Donkin		TCS object to the policy wording, TCS seek policy recognition for retail use on CRP.	Support and objection noted - Disagree. The purpose of policy E3 is to set the principle of economic growth corridors as a focus for development.
E3 - Focusing on economic growth corridors	DCS123		Mr Gary Loudon		A new M62 link would have alleviated problems of traffic and congestion in Heywood and not	Comments noted. The Core Strategy is still committed to trying to deal with the issue of HGV traffic in

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Chapter 7 – Delivering a more prosperous economy (SO1)						
and areas					including this in this draft core strategy is a missed opportunity.	this area.
E3 - Focusing on economic growth corridors and areas	DCS146	Russell Homes (UK) Limited	Mr Daniel Kershaw		Rochdale Council should re consider its position regarding development in South Heywood and amend the Core Strategy either by: - Re instating the South Heywood economic growth corridor proposal in policy E3, - Reinstating the link road proposals in policy T1 but with significant amendments and - A proposed local Green Belt review examining a possible Green Belt swap (in policy G4) with protected open land to the north of Middleton	Comments noted. The approach now included in the Core Strategy seeks to take an approach which does not identify a specific site at the stage (given the Inspectors concerns regarding recent take up) but sets out a mechanism for the identification of a site / sites to meet a need for additional employment land. It remains as an aspiration in the Draft Transport Strategy to include the link road. A Green Belt review may be considered if it is appropriate in the future, this will be clarified in the reasoned justification.
E3 - Focusing on economic growth corridors and areas	DCS201	Wainhomes (Development) Ltd	Mr Richard Chamberlain	Emery Planning Partnership	We support the allocation of the land east of Broad Lane, north of the M62, within the Kingsway Business Park employment allocation in Policy E3	Support noted
E4 - Managing the release of land to meet future employment needs	DCS8		Ms Jean Barlow		Concern that the E4 will not protect the greenbelt from development any more than the original South Heywood proposal.	Comment noted - Disagree. The purpose of policy E4 is to ensure a clear process in the identification of future site/s if required for additional employment land.
E4 - Managing the release of land to meet future	DCS31		robert haughton		Concern that Policy E4 will not protect the development of Green Belt in the future.	Comments noted. The identification of any future land would be undertaken through a process based on need and would consider all

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Chapter 7 – Delivering a more prosperous economy (SO1)						
employment needs						potential sites across the borough.
E4 - Managing the release of land to meet future employment needs	DCS34		Mr Louis Henry		Concern that Policy E4 will not protect the development of Green Belt in the future, particularly South Heywood. Although, the E.I.A. demonstrates that no policies have negative impacts on equality reference to the Green Belt is a telling sign that it will be used for development	Comments noted - Disagree. Policy E4 is clear about the types of site that may be included depending on availability and this includes reference to greenfield and Green Belt sites. In terms of the EIA/Sustainability Appraisal it is not appropriate to particularly reference the impact of the loss of Green Belt as the policy does not necessarily cause this to happen.
E4 - Managing the release of land to meet future employment needs	DCS65	Campaign to Protect Rural England	Jackie Copley		CPRE would like to see the Local Plan encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.	Comment noted - It is considered that the Core Strategy does follow this guidance.
E4 - Managing the release of land to meet future employment needs	DCS151	Russell Homes (UK) Limited	Mr Daniel Kershaw		Rochdale Council should re consider its position regarding development in South Heywood and amend the Core Strategy either by: - Re instating the South Heywood economic growth corridor proposal in policy E3, - Reinstating the link road proposals in policy T1 but with significant amendments and - A proposed local Green Belt review examining a possible Green Belt swap (in policy G4) with protected open land to the north of	Comments noted. The approach now included in the Core Strategy seeks to take an approach which does not identify a specific site at the stage (given the Inspectors concerns regarding recent take up) but sets out a mechanism for the identification of a site / sites to meet a need for additional employment land. It remains as an aspiration in the Draft Transport Strategy to include the link road. A Green Belt review may be considered if it is appropriate in the

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Chapter 7 – Delivering a more prosperous economy (SO1)						
					Middleton	future, this will be clarified in the reasoned justification.
E5 - Encouraging the visitor economy	DCS97		Mrs Anne Storah		Partnership working between Rossendale and Rochdale should be referred to in respect of Healey Dell.	Support noted. Agree reference to cross boundary working but this is more appropriate in the RJ.
E6 - Supporting and diversifying the rural economy	DCS17		Mr Neil Longsdon		The new cycle ways cross Broad Lane on a dangerous bend and poses a threat to cyclists.	Comment noted.
E6 - Supporting and diversifying the rural economy	DCS187	Peel Energy Limited	Mark Flaherty		Peel Energy supports the reference to renewable energy projects.	Support noted.

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Chapter 8 – Creating successful and healthy communities (SO2)						
Introduction	DCS47		Eileen Shepherd		Objection to the development of protected open land at Broad Lane. There is a link between health problems and the proximity of housing to major roads in relation to noise and pollution. Loss of open space will also have a negative impact on health. Also raises concerns about a shortage of school places and that parents are sending their children to school in Oldham for better facilities.	Comments noted. Issues of noise and pollution would be considered and mitigated through design process with any detailed proposal demonstrating how it has taken account of residents' amenity. School places are monitored and the impact of any development would be considered.
C1 - Delivering the right amount of housing in the right places	DCS10		Mrs Gillian Taylor		Objection to the development of protected open land at Broad Lane. There is currently already a large amount of employment and housing development plus a new school in the local area. Issues raised relating to floodrisk, school places and road safety and capacity. Proposal is against the views expressed by councillors.	*Comments noted. However, It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. Issues in respect of traffic, flood risk and other issues are dealt with appropriately through considering specific proposals.
C1 - Delivering the right amount	DCS48		Eileen Shepherd		Objection to the development of protected open land at Broad Lane. There is poor access to local	Comments noted. How highway safety will be addressed and implemented will be dealt with

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Chapter 8 – Creating successful and healthy communities (SO2)						
of housing in the right places					facilities and the road network in the area is already congested, there are safety issues and infrequent bus services. There is a shortage of places in schools, particularly primary. Broad Lane is poorly connected to Kingsway, as much as we want people to walk and cycle most people still use their cars and existing junctions are over capacity already.	through any detailed proposal or planning application. It is not possible to prevent people from using their car, creating sustainable patterns of development where new homes are close to jobs can help to reduce the number of trips made.
C1 - Delivering the right amount of housing in the right places	DCS66	Campaign to Protect Rural England	Jackie Copley		National planning policy encourages the effective re-use of previously developed land provided that it is not of high environmental value.	Comments noted. The Core Strategy focuses on regeneration as set in policy C1's target for 80% of all residential development to take place on previously developed land.
C1 - Delivering the right amount of housing in the right places	DCS69	Campaign to Protect Rural England	Jackie Copley		There is sufficient brownfield land to provide 1.5 million new homes in England along with sufficient land for commercial development. Completions on previously developed land (PDL) and the density of development has increased nationally in recent years. The Rochdale Strategic Housing Land Availability Assessment has identified sufficient land for housing in the borough without including Broad Lane as a potential development site. The potential capacity of PDL is underestimated by Local Authorities. Strong density policy helps increase development on PDL while	Comments noted - Disagree. The Core Strategy retains a focus on regeneration and brownfield sites. To achieve sufficient housing (and a good mix of it) there needs to be flexibility on density and type. The Core Strategy aims to achieve a balance between regeneration and widening choice, supporting higher densities in appropriate locations.

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Chapter 8 – Creating successful and healthy communities (SO2)						
					protecting environmental quality and stimulating sustainable urban renaissance. Rigorous monitoring is key to accurate assessment of the supply of PDL.	
C1 - Delivering the right amount of housing in the right places	DCS75	Campaign to Protect Rural England	Jackie Copley		<p>The amount of available brownfield land for housing should be reviewed to determine the full potential of sites (including those currently omitted from the Strategic Housing Land Availability Assessment (SHLAA)) investing resources in comprehensive site assessments. Densities should be reviewed: 40dph is low. Rochdale has in previous years exceeded this target. More efficient use of land with good design reduces the need for greenfield land and delivers higher value. Assumed density of 40dph should be raised to reduce need to develop greenfield land. A higher brownfield target of at least 90% should be set. The 80% target is out of date and does not reflect the previously developed land available for housing. The published Annual Monitoring Reports since 2008 showed that in excess of 97.0% housing development on brownfield land was achieved. Rochdale, should be able to achieve 90% of housing development on brownfield land. Windfall sites should be fully</p>	<p>Objection noted - Disagree. The SHLAA assesses land currently available for housing with no minimum site threshold. The SHLAA refers to the potential to include a small site windfall allowance but it is considered that most available small sites available have already been identified. The RSS target of 80% still represents an appropriate target whilst allowing a higher percentage to be achieved - in recent years completions on brownfield have been nearly 100%. 80% is a regularly achieved target that ensures a regeneration focus. It is not considered appropriate to include a windfall allowance as they compensate for identified sites that do not come forward. The Core Strategy will only support sustainable greenfield sites as not allowing them to come forward would conflict with national guidance. Broad Lane, Rochdale represents a sustainable greenfield site.</p>

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Chapter 8 – Creating successful and healthy communities (SO2)						
					<p>accounted for. The extent to which windfalls have delivered housing in the past should be clarified and a future allowance made.</p> <p>New greenfield allocations should be phased for release late in the plan period stating that they will not be released if more suitable/sustainable land becomes available. Brownfield land, unless of high environmental quality, should always be preferred to greenfield for development.</p>	
C1 - Delivering the right amount of housing in the right places	DCS94	The Co-operative Estates	Katie Wray		<p>Representations in relation to land owned by the TCG at Whitelees Road, Littleborough, which is currently Green Belt and could be released to meet future development needs. The site is in a sustainable location and should not be defined as Green Belt at it is not suitable for being permanently open as defined by national policy. The triggers for the Draft Core Strategy approach to review Green Belt land are not clear. The Draft Core Strategy confirms the potential to increase the buffer for the housing requirement to be increased by 20% but it is unclear if this increase can be accommodated without a review of Green Belt boundaries. The Core Strategy needs to provide further guidance on review of the Green Belt boundary to give certainty to</p>	<p>Comment noted - Disagree. SHLAA demonstrates sufficient capacity to meet targets Green Belt release to meet the need for additional homes is not necessary. The site is in the north of the borough - its release would be contrary to the Spatial Strategy. The need for a Green Belt review and how this is currently dealt with in the Core Strategy will be considered with further clarification given if required.</p>

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Chapter 8 – Creating successful and healthy communities (SO2)						
					residents and developers ensuring development is directed to the most sustainable and suitable locations. Ensuring an adequate supply of housing land is available and deliverable is line with national policy. The site was not included in the 2012 Strategic Housing Land Availability Assessment but is suitable for consideration as it is available and deliverable in the immediate term. The release of land at Whitelees Road from the Green Belt would ensure flexibility in meeting housing targets. Policy CS1 states housing will be delivered in the north of borough at an overall scale and density of development that reflects the accessibility and character of the Pennine fringe and the site identified will not compromise these objectives.	
C1 - Delivering the right amount of housing in the right places	DCS98		Mrs Anne Storah		Previously Rochdale's Core Strategy had a target setting out the number of new homes to be provided on previously developed land. This seems to have been omitted from the policy, although the supporting text on p.69 refers to 80%.	Comment noted - Disagree. The second bullet of policy C1 states that we will 'maximise the potential of previously developed sites, including empty homes and buildings, within the urban area to achieve a target of 80% of new housing on previously developed land.'
C1 - Delivering the right amount of housing in the right	DCS127		Mr Peter Vernon		The Core Strategy concentrates development on brownfield sites which is an appropriate and sound methodology. Rochdale has persistently under-delivered against	Objection noted - Disagree. The SHLAA identifies sufficient land for additional homes to meet the target over the plan period. The Core Strategy identifies one protected open

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places					<p>its housing targets in the last 5 years except for one. The need for non-brownfield sites should be closely monitored, and Protected Open Land's suitability for development may increase. An example is the attached site at the edge of the built up area approximately 1km from Littleborough town centre. Rochdale's Unitary Development allocates the majority of site as protected open land. The NPPF encourages effective re-use of land, with a stronger emphasis on deliverability of new housing in sustainable locations. Green Belt designations remain in the NPPF but the designation of 'protected open land' is not referred to and therefore should be afforded less weight. The Littleborough site is discounted within the SHLAA (April 2012) as it is protected open space. NPPF places less emphasis on the sequential approach and more on site sustainability, which should be considered more in any updated SHLAA. During EiP exploratory meeting, the Inspector criticised the justification for rejecting the release of protected open land in favour of releasing land from the Green Belt. The NPPF support's sustainable sites, an updated SHLAA would</p>	<p>land site at Broad Lane, which has been identified for providing new homes and supporting the wider employment growth corridor in accordance with the Spatial Strategy. The site in Littleborough, currently designated as protected open land, is also identified as part of a greenspace corridor as the site plays a role in the River Roch corridor. The site has landscape and green infrastructure value and flood risk/mangement issues as it is greenfield land in a river valley. There is currently an identified supply for new housing over the plan period so it is not necessary to consider this site.</p>

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Chapter 8 – Creating successful and healthy communities (SO2)						
					show Rochdale cannot rely on brownfield sites to meet its 5 year supply.	
C1 - Delivering the right amount of housing in the right places	DCS144	EFL Consulting Ltd	Mr Eric Larmett		An acknowledgement of rural needs particularly in the south of the borough. Creation of policy that recognises and encourages the use of windfall sites	Comments noted - Disagree. The south of the borough has important and attractive areas of countryside, but there is no need for a specific policy approach to address rural needs. Green belt settlements are not sufficiently isolated to require flexibility to meet local housing needs which can be accommodated on adjacent sustainable urban sites. Specific reference to windfalls is not necessary as there is no reference to windfalls in the SHLAA. Any windfall allowance will be evidenced in the SHLAA and included in the Allocations DPD.
C1 - Delivering the right amount of housing in the right places	DCS152	Russell Homes (UK) Limited	Mr Daniel Kershaw		Reconsider development in South Heywood. Either 1) Re-instate the South Heywood economic growth corridor proposal in policy E3 and link road proposals in policy T1, and both in SP3/H, but amended to include - Clarification on criteria being subject to need; • Amended scale of employment and housing development based on up to date evidence; • Amended indicative boundaries to address local residents concerns; • Evidence on potential funding for the link road; and • A proposed local Green Belt review. Or 2) Amend policy E4 by	Comments noted - Disagree. In relation to policy C1 the current SHLAA demonstrates that there is sufficient sites to meet housing needs over the plan period.

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Chapter 8 – Creating successful and healthy communities (SO2)						
					<p>re-wording point (a) to link the land requirement in policy E2 and point (b) in policy E4.</p> <p>Policy G4 should indicate a local green belt review may be required in order to deliver the borough's employment land requirements - any review of the Rochdale Green Belt is not required to be part of a GM review. Policy E3 should indicate that as part of the allocations plan major employment sites will be identified to support economic growth corridors and areas. Policy SP3/H should indicate the possibility for maximising economic growth potential in South Heywood. Policy C1 should indicate housing sites will be identified through allocations plan using sequential approach similar to that set out in policy E4. Policy T1 should that the possibility and potential benefits of a Hareshill Road and J19 link road will be explored.</p>	
C1 - Delivering the right amount of housing in the right places	DCS153	Broad Lane Action Group	Tracy Wilson		<p>Objection to the development of protected open land at Broad Lane. The Draft Core Strategy indicates the right type of housing in the right area is essential. Community infrastructure is essential to support housing growth. The area's roads are already over capacity prior to the opening of Kingsway Park High</p>	<p>*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt</p>

Title	Comment ID	Consultee Company / Organisation	Consultee Full Name	Agent	Summary of Comments	Summary of Officer Response
Chapter 8 – Creating successful and healthy communities (SO2)						
					<p>School. The road, hospital and school networks will be unable to cope. We are told a greater amount of housing particularly of high value is required. Bring empty properties in Rochdale into use, clear those unfit for habitation and redevelop sites. Development should take place on brownfield sites. Releasing Broad Lane for development would delay building on brownfield sites which have planning permission. SO2 focuses on delivering sufficient housing to meet demand but people of Rochdale are unable to sell their homes. Building when there is an oversupply of homes reduces value, negative equity and increases repossessions.</p> <p>There are historical flood issues at Broad Lane/Spring Hill - development in this area will exacerbate the problems. Sites with planning permission have not been developed and some not been completed due to lack of demand. Broad Lane is unsustainable. SO2 - new housing is to be concentrated in the south of the Borough - no account is taken of the traffic problems at Broad Lane. Housing land available at Kingsway remains undeveloped.</p> <p>C6 - Make use of compulsory purchase where necessary to</p>	<p>boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.</p> <p>Any specific proposal would need to demonstrate safe access, impact on local highway network and consideration of the amenity of existing and future residents and appropriate flood risk management.</p>

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					<p>reduce the number of empty homes.</p> <p>SO4 - Endorse all of these objectives. Allowing further development at Broad Lane will be contrary to all these.</p> <p>G4 - Green Belt management will ensure its vital role in separating towns - precisely what Broad Lane does. The land should remain protected if not upgraded to Green Belt. For health reasons, residential building in the immediate vicinity of the M62 motorway would be negligent in the extreme.</p> <p>The Core Strategy states that culverting should be avoided as it exacerbates the risk of flooding. Flooding is a real problem in this area. Prevent further development because of the particular problems this area faces.</p>	
C1 - Delivering the right amount of housing in the right places	DCS166	Peel Holdings (Land & Property) Limited	Gillian Chiltern		<p>Concerns over the housing land supply and the reliability of identified sites in the SHLAA 2012. Previously identified housing sites with permission in the UDP (2006) have not been developed due to viability and other constraints, are relied on for the five year supply. They cannot be relied upon to deliver 400 dwellings a year. A recent appeal decision (which is accepted by Council officers) identifies persistent under delivery of housing and no demonstration of a five year supply</p>	<p>Objection noted - Disagree. The latest SHLAA demonstrates sufficient land to meet the Core Strategy requirement. The SHLAA shows sufficient supply within the first five years to meet the requirement, including a 20% buffer and sufficient overall supply to meet the plan period requirement. The recession has had an impact on viability but current completions show sites are coming forward to meet target.</p>

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					<p>plus an additional buffer of 20% as required by national policy. Without a five year supply, the housing policies of the Local Plan are out of date. The Core Strategy does not identify additional land sufficient for a five year deliverable supply, it should identify other land that is suitable and immediately available and viable for development. SHLAA sites identified for development in years 6-10 and 11-15 have not been considered appropriately in terms of their availability and viability, a large proportion of the sites located are in weak market areas, in current use or heavily constrained. There is no evidence of a reasonable prospect of such sites being developed at the point envisaged. There is, therefore, a requirement for the Council to identify other suitable, deliverable and achievable sites, including sites outside of the current urban boundary to deliver the level of housing proposed both within the plan period as a whole and specifically to boost supply in the short term (0-5 years).</p>	
C1 - Delivering the right amount of housing in the right places	DCS190	Taylor Wimpey UK Limited	Mr Andrew Thorley	GVA	<p>Object to the Core Strategy target for 400 net additional dwellings per year up to 2028 under policy C1. This housing requirement figure is not based on the latest available evidence or wider housing market</p>	<p>*Objection noted - Disagree. The evidence in terms of households is the latest available. The representation cites the latest Census information, it is important to note that household growth in this period averaged around</p>

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Chapter 8 – Creating successful and healthy communities (SO2)						
					<p>dynamics. National policy requires authorities to clearly understand housing needs in their area by preparing a Strategic Housing Market Assessment. 400 additional dwellings a year is inappropriate. The level of growth is not aspirational. A growth of only 400 dwellings a year would lead to an even lower level of job growth. The target of 400 falls short of that identified in the SHMA (524 dwellings per annum with this made up of 396 units of open market housing and 128 units of affordable housing) which considers the range of tenure required to meet local needs.</p> <p>In order to meet the needs of households requiring affordable housing there is a need for a larger supply supply of housing overall. 400 houses per annum does not take account of the levels of projected growth in the authorities within the functional housing market area (Oldham and Tameside) and does not support the wider growth forecasts of the regional centre and in particular Manchester. In line with the NPPF the assessment of the housing needs should be considered alongside these authorities in order to comply with the duty-to-co-operate.</p>	<p>415 per annum.</p> <p>Achiving 400 new homes a year is aspirational given previous targets, recent completion rates and ongoing need for regeneration. The Council is keen to deliver housing well related to areas of employment growth and that is why the site at Broad Lane, Rochdale has been identified. A proposal to deliver additional housing in the Green Belt to support economic growth in South Heywood was not considered necessary or appropriate by the Inspector.</p> <p>In terms of the SHMA, the reasons for not adopting this figure as the long term target are set out in the Background Paper.</p> <p>The Council acknowledges the importance of cross boundary working and particularly the consideration of wider housing markets. It is important to note that the RSS target for Rochdale was 400 dwellings per annum. This means that in terms of going forward the continued use of this figure does not have a negative impact on the aspirations of the wider sub-region.</p> <p>There is no need to release additional land outside the urban area other than that at Broad Lane, Rochdale to meet the requirement set out in the Core Strategy. The SHLAA identifies an adequate supply of land for housing</p>

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					<p>Taylor Wimpey objects to the policy on the basis that the policy does not include a specific reference to supporting high quality housing development on land north of Langley / Hollin, Middleton. There is not a robust Deliverable Five Year Supply. Taylor Wimpey would expect the Council to undertake a more thorough assessment of the deliverability of their supply of sites. The identified supply overall, is not aligned with the Core Strategy's objectives to underpin economic growth, increased prosperity and a more diverse housing market, through the development of more higher value housing. The supply of sites must be aligned with the objective and take in to account market realities. The land north of Langley / Hollin, Middleton represents an appropriate allocation to meet those deficiencies. Taylor Wimpey considers that there isn't either the right amount or right type / location of supply to meet the appropriate housing requirements for the Borough. Accordingly, the Core Strategy should identify additional housing land that responds positively to the objectives of the Core Strategy and provides for sustainable development.</p>	<p>providing a mix of sites across the borough.</p>

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					Development focus should include areas that complement the economic growth corridors, not just close to those corridors. Greenfield housing development should not be limited to the urban area. The development of sites outside the urban area should not be ruled out. Taylor Wimpey supports the identification of land at Broad Lane, Rochdale for high quality housing development. The Council considers the site will provide flexibility in the Borough's housing supply and will help meet the needs for higher value housing in the Borough. We also consider the site is necessary in order to meet the Borough's housing requirements. We consider the site should actually be identified as a Strategic Site for housing development.	
C1 - Delivering the right amount of housing in the right places	DCS197	Wainhomes (Development) Ltd	Mr Richard Chamberlain	Emery Planning Partnership	With a specific land interest in the land west of Broad Lane, Rochdale, respondent is in favour of Policy C1 (1)(d). We consider that Broad Lane should come forward earlier than the Core Strategy proposes. The council has placed great reliance on a significant increase in completions in years 2017 to 2022 which is highly ambitious and in reality unachievable, therefore delaying the implementation of sites such as Broad Lane is not appropriate.	*The rationale for the figures are set out in the background paper and the SHLAA will continue to be updated annually to ensure sufficient land is met for housing requirement. There is no need to release additional land outside the urban area other than that at Broad Lane, Rochdale to meet the requirement set out in the Core Strategy. The SHLAA identifies an adequate supply of land for housing providing a mix of sites across the borough.

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					<p>We consider that the Core Strategy should plan for a higher number of dwellings due to concerns over low clearance allowance, an over reliance on windfall sites and the deliverability of the housing trajectory. The council will have a serious shortfall in its five year supply. The council can address this through the Core Strategy by identifying sites bringing them forward now - such as Broad Lane. We support Part 3 of Policy C1 which allows for greenfield sites within the urban areas.</p>	
C1 - Delivering the right amount of housing in the right places	DCS202	Persimmon Homes	Mr Bobby Williams		<p>The scale of development proposed in the Council's Core Strategy is not in conformity with the National Planning Policy Framework (NPPF), which requires local planning authorities to 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing'.</p> <p>The 400 dwellings per annum planned for through the Core Strategy, will not fully meet the identified need. The Core Strategy must adopt a housing target higher than the stated 400 dwellings per annum, which will ensure the housing requirements not successfully met in recent years are met within the prospective Core</p>	<p>The rationale for the figures are set out in the background paper and the SHLAA will continue to be updated annually to ensure sufficient land is met for housing requirement.</p>

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					<p>Strategy plan period. If the Borough's housing needs are to be met, consideration should be given to pursuing a higher housing delivery rate.</p> <p>Many of the development scenarios proposed within the viability and housing land supply evidence supporting the Core Strategy are based on densities that are too high to realistically come forward at present. The implications of overestimating densities and a predominantly previously developed housing land supply are that the Council must adopt a flexible approach to the implementation of policy.</p> <p>The Council should positively consider flexible implementation of policy requirements where it may facilitate the viable development of previously developed land within the Borough, or when considering proposals for the development of greenfield land in sustainable locations.</p> <p>There is a strong argument for an increased housing target in Rochdale, if the totality of identified market and affordable housing needs of the Borough are to be met. Affordable housing requirement policy within the Draft Core Strategy should be refined to reflect more</p>	

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					realistic viability information and the advice of the development industry	
C1 - Delivering the right amount of housing in the right places	DCS220	Environment Agency	Mrs Sylvia Whittingham		We support any development that retains or enhances existing green infrastructure assets and their function. In regard to greenfield sites within urban areas we would seek a greater emphasis on not only protecting the amenity value of a site, but also their other green infrastructure elements i.e., flood risk, biodiversity as well, and look to enhance these where feasible.	Comments noted. It is considered that the second paragraph of the reasoned justification taken with relevant specific policies of the Core Strategy provides sufficient emphasis in terms of the importance of protecting and enhancing all the elements of green infrastructure when considering development proposals.
C2 - Focusing on regeneration areas and economic growth corridors / areas	DCS18		Mr Neil Longsdon		Reinstate Broad Lane to Protected Open Land status. There is sufficient land available without Broad Lane. Over 700 local residents have objected to housing on this site and request it retains its Protected Open Land Status.	*Objection noted - disagree. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
C2 - Focusing on regeneration areas and economic growth	DCS52		Eileen Shepherd		Objection to development at Broad Lane. Development of the site will not improve existing housing or open space. There are issues with flooding in the area. Public transport in the area is poor and connections	Objection noted - Disagree. The need for additional housing means that sustainable greenfield sites may be appropriate for development. Any proposal for new residential development will have to demonstrate

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corridors / areas					to nearby Kingsway Business Park are unsatisfactory.	how it has taken account of issues such as open space, flooding and sustainable urban drainage systems (SUDS) at a more detailed stage through an allocation or a planning application.
C2 - Focusing on regeneration areas and economic growth corridors / areas	DCS106	Sport England	Mr Paul Daly		Sport England has concerns in relation to the references to maximising development opportunities on sites including vacant / surplus school sites and underused, poor quality open space. They are protected from development by paragraph 74 of the National Planning Policy Framework (NPPF) and also Sport England's playing field policy. Saved policy G/3 of the UDP also protects them. Policy C2 appears to accept the principle of developing a vacant school site. The policy encourages development of underused, poor quality open space. However, poor quality or under-used recreational land and buildings should not be taken to indicate an absence of need. Assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. The policy should make clear that whilst school sites / poor quality open spaces could represent development opportunities, any proposals would	Comments noted. Reference to the development of such sites is linked to wider masterplanning work. The Council still looks to retain the playing fields with development concentrated on the footprint of the school buildings themselves and to identify opportunities to invest in, improve and create open spaces. In all cases consideration is given to the provision of open space in the vicinity. Proposals will be informed by the Township Green Infrastructure (GI) Strategies and other relevant open space and environmental evidence and strategies.

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					need to accord with the provisions of paragraph 74 of the NPPF.	
C2 - Focusing on regeneration areas and economic growth corridors / areas	DCS118	TCS Holdings Limited	Mr David Donkin		Policy C2 sets out specific corridors / areas where regeneration and the delivery of new homes will be focused upon, TCS object to Policy C2 as further clarification in relation to the wording is sought. TCS support the regeneration of the Milkstone, Deeplish and Newbold area. CRP is located within the boundaries of Milkstone, Deeplish and Newbold area which is an established retail destination, and should be redeveloped for such uses.	Objection noted - Disagree. Policy C2 is principally focussed on the delivery of new housing and therefore it is not appropriate to include reference to sites which may have potential for retail development.
C2 - Focusing on regeneration areas and economic growth corridors / areas	DCS193	Taylor Wimpey UK Limited	Mr Andrew Thorley	GVA	Support Broad Lane for higher value housing. Object to lack of specific reference to Langley/Hollin, Middleton which should be specified as being released for higher value housing, as a Strategic Site for housing.	Objection noted - Disagree. Langley / Hollin is not considered appropriate or necessary for residential development. Significant regeneration is underway in nearby Langely with an identified capacity for around 600 additional homes. The current SHLAA also demonstrates that there is sufficient land to meet the housing target without the release of the site at Langley / Hollin
C2 - Focusing on regeneration areas and economic growth corridors / areas	DCS199	Wainhomes (Development) Ltd	Mr Richard Chamberlain	Emery Planning Partnership	We support policy C2 and SP2. Removing the figure of 75% of development in the south of the borough provides a greater element of flexibility. With the exception of Broad Lane, there is no reference to further greenfield releases the Core Strategy should make provision for	Support noted. In terms of the need to release additional greenfield sites this is not considered necessary given the evidence in the SHLAA.

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					its greenfield site delivery. We support the provision of new development in the north of the borough and the removal of the 25% maximum which adds an element of flexibility if delivery in the southern part of the Borough does not come forward as the Council expects.	
C3 - Delivering the right type of housing	DCS73	Campaign to Protect Rural England	Jackie Copley		Policy C1 assumes a density of 40dph in achieving 400 dwellings per annum equal to 160 hectares over the plan period. The Annual Monitoring Report 2011 to 2012 recorded that housing completions had been built at an average density of 45dph and that planning permissions for housing averaged out at 61dph. If Policy C1 average density was raised to 50dph this would equate to 128 hectares over the plan period, thus reduce the total amount of land required for housing by 32 hectares. Rochdale MBC should be examining whether opportunities have been missed to deliver more town centre dwellings in support of Rochdale's Core Strategy Policy E1.	Comments noted - Disagree. The SHLAA adopts what is considered to be a realistic long terms assumption in terms of density based on the nature of recent proposals within the borough as well as reflecting the need to boost the number of larger family homes and higher value properties.
C3 - Delivering the right type of housing	DCS125		Mr Gary Loudon		Very few 'high-end' alternatives exist within the Manchester City commuter belt as residential locations.	Comments noted.
C3 - Delivering the right type of	DCS169	Peel Holdings (Land & Property)	Gillian Chiltern		New development should provide housing types that take account of local needs and aspirations	Comments noted - Disagree. The SHMAA has a date of 2010 and was not actually finalised until early in

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housing		Limited			<p>ensuring the supply of larger, higher value housing in the borough, promoting densities that make efficient use of land and delivering a range of housing to widen choice reflecting local character.</p> <p>We object to the absence of an up to date SHMA in light of paragraph 159 of NPPF which states that local planning authorities should have a clear understanding of housing needs in their area.</p> <p>Peel agree with the need for larger, aspirational homes, land west of Norden Road, Bamford should also be embraced within this policy, which can provide an attractive site for quality family housing in a sustainable location.</p>	2011. The need for larger, higher value homes identified through the SHMAA can be met without the need to release the Green Belt site off Norden Road, Bamford
C3 - Delivering the right type of housing	DCS194	Taylor Wimpey UK Limited	Mr Andrew Thorley	GVA	We wholly support the policy particularly its emphasis upon ensuring that the supply of larger and higher value housing in the borough is improved, and that elsewhere in Heywood, Middleton and Rochdale lower density housing will be supported where it delivers higher value dwellings.	Support noted
C4 - Providing affordable homes	DCS207	Persimmon Homes	Mr Bobby Williams		Affordable housing policy is not informed by viability evidence. The level of provision is in conflict with the NPPF - much of the Borough's housing land supply being rendered unviable. It is important the Council adopt a flexible approach to the	Objection noted - Disagree. An economic viability study has been undertaken in line with guidance and it is considered to be achievable and appropriate.

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					<p>implementation of this policy. Where the viability of a proposed development is eased by providing 15% of dwellings in the form of affordable housing, as opposed to 7.5% of the development sales value, the Council must be amendable to this. Viability appraisals for individual proposals is an expensive and time consuming. Flexibility is not a substitute for robustly evidenced and deliverable policies. Persimmon consider the 15% developer's margin used as part of the Economic Viability of Affordable Housing Requirements report as inappropriate. In the current economic climate it is important there are full commercial incentives available to developers, who are investing in the redevelopment of often difficult previously developed land. The land values and densities informing the evidence base viability scenarios are unrealistic. As mentioned previously, the economic and policy context that consistently delivered high density residential development have come to an end. There is a strong argument for an increased housing target in Rochdale. Evidence supporting the Core Strategy in terms of the economic viability of residential development</p>	

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					is based on misassumptions and unrealistic scenarios. Affordable housing requirement policy within the Draft Core Strategy should be refined to reflect more realistic viability information and the advice of the development industry.	
C5 - Meeting the needs of gypsies, travellers and travelling showpeople	DCS99		Mrs Anne Storah		Similarly to a number of authorities within the Greater Manchester sub-region, there is no reference to the actual scale of provision that is required over the plan-period.	Comment noted. Given that it is not proposed to include sites within the Core Strategy it is considered that a target would be better set within the Allocations DPD as this would be based on the most up to date evidence and, if required, could identify specific sites to meet that need.
C6 - Improving health and well being	DCS50	The Theatres Trust	Miss Rose Freeman		Support C6 and C8.	Support noted.
C6 - Improving health and well being	DCS55		Eileen Shepherd		Allowing residential development at Broad Lane will be contrary to the aims of C6. Emissions and flooding will increase. Road junctions and infrastructure are over capacity and cannot take any additional traffic.	*Objection noted - disagree. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. Issues such as flood risk impacts are appropriately considered in the context of detailed

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Chapter 8 – Creating successful and healthy communities (SO2)						
						proposals. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
C6 - Improving health and well being	DCS107	Sport England	Mr Paul Daly		C6 is supported to ensure good provision of sport facilities and to maintain and enhance outdoor sport and recreational areas. It is important that provision relates to need. In the absence of an open space, sport and recreation assessment it is not clear how 'good provision' could be achieved. Point h seeks to maintain open spaces and outdoor sports and recreational areas and C2 seeks to develop surplus school sites and poor quality open spaces which is contradictory. The policy is not considered to be justified and as a result it is unclear as to how it could be fully effective. The text supporting the policy should be amended to recognise the gap in the evidence base and prioritise the addressing of it.	Support noted. We have a robust evidence base including the Open Space Survey (2008), all the Townships have a Green Infrastructure (GI) Strategy which identify issues and opportunities with regards to access and provision of open space. A higher level GI strategy for the borough will be carried out which will set out the strategic priorities and sites. A Provision of Recreational Open Space in New Housing SPD provides more practical and technical guidance.
C6 - Improving health and well being	DCS159	Broad Lane Action Group	Tracy Wilson		Address empty homes make use of compulsory purchase where necessary. Broad Lane has a lack of availability of education provision, risk of flooding and loss of green infrastructure.	Comment noted. Empty homes is dealt with under policy C1. Any discussions around off site provisions will be looked at and negotiated by the developer, applicant and the Council as part of the planning application and on the individual merits of the case.
C6 - Improving health and	DCS188	Peel Energy Limited	Mark Flaherty		Peel Energy supports encouraging development that promotes active living by making places more	Support noted.

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well being					accessible by walking, cycling and public transport.	
C7 - Delivering education facilities	DCS19		Mr Neil Longsden		Objection to Broad Lane development particularly in relation to health issues and access to open space for health purposes.	*Objection noted - disagree. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. Issues such as flood risk impacts are appropriately considered in the context of detailed proposals. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
C7 - Delivering education facilities	DCS56		Eileen Shepherd		Recently built schools are not high quality designed educational buildings.	Comment noted.
C8 - Improving community, sport, leisure and cultural facilities	DCS20		Mr Neil Longsden		Objection to Broad Lane development in relation to insufficient education facilities.	Comment noted. Policy C7 adequately deals with this issue and support the need for new schools where the need should arise.
C8 - Improving community, sport, leisure	DCS51	The Theatres Trust	Miss Rose Freeman		Support policies C6 and C8 but disappointed that no policy includes the protection and enhancement of existing community and cultural	Support noted. Policy C8 does include under g, protecting existing facilities which includes cultural and community uses.

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and cultural facilities					buildings to reflect item 70 in the NPPF on page 17. Ensure that established facilities and services are retained and able to develop for the benefit of the community.	
C8 - Improving community, sport, leisure and cultural facilities	DCS108	Sport England	Mr Paul Daly		The broad objective of this policy in terms of seeking to improve facilities is supported. Providing a minimum of 6000 net additional dwellings will create additional demand for sports facilities. It is also appropriate, therefore, for the core strategy to take a proactive approach to addressing the additional need for sport and recreation which would arise from development, and any deficiencies / gaps in provision which already exist. The core strategy does not do this and appears to largely rely on capturing financial contributions. There is no open space, sport and recreation audit / assessment of need, or a playing pitch strategy. The text supporting the policy needs to identify the gap in the evidence base, and also identify the addressing of the gap as a priority.	Support noted. Work will be carried out to identify locations of sports and recreational facilities and investment opportunities through the Allocations DPD which will be produced at a later date.

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Chapter 9 – Improving design, image and quality of place (SO3)						
P1 - Improving image	DCS21		Mr Neil Longsdon		Mr Longsdon proposes that green land at the borough's boundaries should not be built on as they provide visual and physical relief. Specific reference is made to retaining Broad Lane as protected open land.	Comment noted. It is agreed that green spaces are an important part of improving image and greening of the environment is a key element of this policy. However, overall protection of green belt or other countryside is covered in the relevant policies and visual impact is a consideration for all developments including those referred to.
P1 - Improving image	DCS42	English Heritage - North West Region	Ms Judith Nelson		Support is given to Policies P1 and the importance it gives to the protection of heritage assets.	Support noted.
P1 - Improving image	DCS221	Environment Agency	Mrs Sylvia Whittingham		The Environment Agency recommend that where proposed, sustainable urban drainage schemes are designed to form part of existing green infrastructure networks rather than be isolated measures. A series of measures that can be used to add further biodiversity and landscape benefits are proposed.	Agreed. The suggestions made reflect the relevant policies of the core strategy and other Council plans and strategies either approved or in development for green infrastructure and flood risk management.
P2 - Protecting and enhancing character, landscape and heritage	DCS22		Mr Neil Longsdon		Mr Longsdon questions opportunities for public art in respect of Broad Lane and related development proposals.	Comment noted.
P2 - Protecting and enhancing character, landscape and heritage	DCS44	English Heritage - North West Region	Ms Judith Nelson		Policy P2 is supported with a suggestion that supporting text provide further information about how the future for buildings at risk is to be handled and reference is made to maintaining an up to date set of Conservation Area appraisals for use	Support noted. It is felt there should not be references to specific buildings at risk in the policy, however it is agreed that reference be made to maintaining an up to date set of conservation area appraisals.

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Chapter 9 – Improving design, image and quality of place (SO3)						
					by prospective developers when considering proposals.	
P2 - Protecting and enhancing character, landscape and heritage	DCS222	Environment Agency	Mrs Sylvia Whittingham		The Environment Agency suggest that opportunities to enhance heavily modified watercourses as part of new riparian development to help achieve good ecological potential under Water Framework Directive requirements are recognised where appropriate.	Agreed. It is considered that the third bullet point of the policy addresses this issue. Minor amendment to the reasoned justification to amplify the opportunities for achieving good ecological status will be made.
P3 - Improving design of new development	DCS228	United Utilities	David Sherratt	CBRE Ltd	Wording changes are suggested, particularly making reference to the surface water drainage hierarchy and the importance of dealing with surface water on site rather than through the sewer system.	Comment noted - disagree. It is felt that this would constitute a repetition of other policies.

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Chapter 10 – Promoting a greener environment (SO4)						
Introduction	DCS57		Eileen Shepherd		The change of status of the land between Broad Lane and Oldham Road with the potential to build 200 houses plus completely goes against policy G1 in respect of 'the incorporation of appropriate water conservation such as SUDS and ensuring the rate of 'run off on green field sites is not increased. The run off from the existing storm relief pond into Springhill playing fields has caused problems ie water entering the foundations of houses on Craiglands. This has not been tackled or managed. Additional buildings with further storage ponds with seep aways can only exacerbate the current problem. The ground is sodden for a major part of the year, further housing will increase the risk of flooding.	Comment noted. References made are to a specific proposal and drainage and flood risk concerns specific to the proposal rather than the policy wording or purpose.
Introduction	DCS189	Peel Energy Limited	Mark Flaherty		Peel supports the inclusion of the introductory text to the policies contained in Chapter 10 of the Core Strategy, specifically references to renewable energy and the role of the natural environment as the prime location for renewable development through accomodating renewable energy schemes in appropriate locations.	Support noted.
G1 - Tackling and adapting to climate change	DCS61	Campaign to Protect Rural England	Jackie Copley		CPRE draw attention to the Core Planning Principles from the National Planning Policy Framework in respect of the transition to a low carbon future in a changing climate, flood risk and coastal change, encouraging the reuse of existing resources, including conversion of	Comment noted. All of the matters referred to are addressed by other relevant policies in the Core Strategy.

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					existing buildings, and encouragement of the use of renewable resources which should “underpin both plan-making and decision-taking”:-	
G1 - Tackling and adapting to climate change	DCS191	Peel Energy Limited	Mark Flaherty		Peel Energy consider that as presently drafted the fifth bullet point could be interpreted as imposing a preclusion of development on existing peatlands. Alternative wording is proposed. They also suggest that further clarification of bullet point eight referring to securing planning obligations is required and of criterion d(iv) in respect of requirements for protecting and providing trees and other vegetation on development sites. A strict interpretation of the policy as drafted would suggest that all developments will be the subject of negotiations to secure planning obligations for energy infrastructure and climate change adaptation measures. In the context of a proposal for a renewable energy scheme such as a commercial scale wind farm, application of this element of policy G1 may prove counter-productive and Peel Energy consider that a wind farm itself is a climate-change mitigation measure and energy infrastructure. Enforcing the planting of trees on site (criteria (d) (iv) may have the perverse impact of reducing the efficacy of the wind farm by disrupting wind flows over the site, thereby reducing the level of CO2 off-set by the installation of the turbines as electricity generators.	Comment noted. Partially agree. It is agreed that bullet point five should be amended as suggested for clarity. It is not considered that bullet point nine (assumed to be that referred to rather than point eight) suggests that all development would be subject to such obligations and that the type of development would clearly be taken into account. Criterion d(iv) refers to a general approach rather than a rigid requirement and clearly refers to opportunities being taken where possible and as appropriate to the site.
G1 - Tackling	DCS223	Environment	Mrs Sylvia		In addition to tree planting, there may be	Comment noted - agree. Bullet point

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and adapting to climate change		Agency	Whittingham		significant opportunity in the borough to restore any degraded peatlands and provide positive land management to these important carbon stores. It is fundamental that these ecological and green infrastructure elements, and priority habitats are actively protected and preferably expanded and or restored where these have been degraded or isolated by poor or inappropriate management or development	five could make reference to restoration and responsible management as well as protection from harmful development.
G1 - Tackling and adapting to climate change	DCS229	United Utilities	David Sherratt	CBRE Ltd	A number of wording amendments have been suggested. Proposed wording changes include: additional bullet point relating to the co-ordinated delivery of key infrastructure, and wording ensuring growth is located in areas accessible to services and infrastructure with capacity.	Comment noted. Partly agree. References to the co-ordination of development through a phased approach will depend on detailed discussion in respect of specific schemes and is not appropriate detail for the policy but a reference can be made to seeking this where possible in the reasoned justification.
G2 - Energy and new development	DCS25	Sainsburys Supermarkets Ltd			Sainsbury's support the strategic objectives of draft Policy G2 but request that the draft policy is reviewed given that the National Planning Policy Framework clearly states in Paragraph 95 that "when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards". The recent changes to the Governments Zero Carbon building policy and the consultation into Part L 2013 of the Building Regulations, are proposing to reduce the further level of carbon	Disagree. It is considered that the proposed wording change would include no requirement which would render the policy too weak. In terms of the proposed 2013 Part L regulations, these are, at the moment, at consultation stage only and if amended as suggested this would still leave our requirement for micro generation areas 4% above, which is considered reasonable, bearing in mind the NPPF allows local targets above Building Regulations and the viability study which supports our energy target

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					<p>emission reductions imposed under Part L 2013 from an expected 25% improvement to potentially as little as an 11% in recognition of the challenges in meeting the current 2010 Part L regulations. Sainsbury's request the policy is amended to recognise the continuing evolution of national policy and allow for much greater flexibility within the Core Strategy to ensure that the Council's sustainability policies can function and respond to further changes to the Governments Zero Carbon buildings policy and the Building Regulations. The installation or connection of decentralised energy networks to new development in the UK must be carefully considered with regard to the technical and commercial feasibility and suitability of connection in particular circumstances, not only with regard to distribution efficiency and capital cost but also long term energy costs, security of supply and freedom of choice for consumers. Sainsbury's request specific wording changes and that the set of minimum requirements is removed and the policy be revised in order that it is consistent with the Government's Zero Carbon buildings policy.</p>	<p>framework supports the proposed requirements.</p>
G2 - Energy and new development	DCS62	Campaign to Protect Rural England	Jackie Copley		<p>CPRE draw attention to the Core Planning Principles from the National Planning Policy Framework in respect of the transition to a low carbon future in a changing climate, flood risk and coastal</p>	<p>Comments noted. It is considered that all of these points are covered in policies P1, G1, G2, and G8.</p>

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					change, encouraging the reuse of existing resources, including conversion of existing buildings, and encouragement of the use of renewable resources which should “underpin both plan-making and decision-taking”: -	
G2 - Energy and new development	DCS162	Wilson Bowden Developments Ltd	Mr David Ward		Wilson Bowden Ltd support references to the energy hierarchy but consider there are elements of the Policy which are unclear and some parts which need reconsideration, specifically - reference to developer contributions in Section 3 in terms of how they will be assessed and what levels of contribution will be required;reference to minimum targets based on Part L of the 2010 Building regulations which have the potential to be an onerous requirement;clarity as to how the Council will apply the policy with future changes to the Building regulations; clarity as to how the policy relates to existing SPD's relating to energy and climate change;clarity and/or removal of references in respect of 'network opportunity areas and how they are defined.	Partially agree. In respect of section 3, it is agreed that the concept of allowable solutions could be more clearly defined, and it should be noted that this could include developer contributions as an example or other measures. In respect of the energy target framework, this relates to the Greater Manchester Decentralised Energy Study recommendations, which are underpinned by a viability study and we are satisfied with these figures. It is considered that the word 'betterment' may be an alternative to 'increase'. In respect of the building regulations, these will of course take precedence in the event of them requiring greater decreases than this policy. The climate change SPD relates to climate change adaptation rather than energy reduction, and the relationship between the Energy SPD and this policy is explained in the policy.
G3 - Renewable and low carbon energy	DCS63	Campaign to Protect Rural England	Jackie Copley		CPRE draw attention to the Core Planning Principles from the National Planning Policy Framework in respect of the transition to a low carbon future in a	Comment noted. It is considered that all of these points are covered in policies P1, G1, G2, and G8.

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developments					changing climate, flood risk and coastal change, encouraging the reuse of existing resources, including conversion of existing buildings, and encouragement of the use of renewable resources which should “underpin both plan-making and decision-taking”: -	
G3 - Renewable and low carbon energy developments	DCS84	Lancashire County Council	Miss Niamh O'Sullivan		In the supporting text it states "Where developments can successfully minimise and fully mitigate significant harm they will be promoted and encouraged". If this is applied to wind turbine/farm developments the requirement to "fully mitigate" is 'problematic' given that wind turbines are tall vertical structures. It is suggested that the sentence is amended by removal of the word "fully". A degree of harm to visual amenity may be acceptable in the planning balance. When Lancashire's highway network is required for construction access to wind farm developments, this will need to be discussed and agreed beforehand.	Partially agree in respect of mitigation of impacts. Procedures in respect of highways matters are noted but not appropriate for this policy.
G3 - Renewable and low carbon energy developments	DCS192	Peel Energy Limited	Mark Flaherty		Peel Energy contend that paragraph 1, second sentence where policy seeks to ensure that harm is “minimised and fully mitigated” wherever possible is inconsistent with the NPPF which advises local authorities to design policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are “addressed satisfactorily”. Accordingly, Peel request that the second sentence of the first paragraph of Policy G3 be amended and	Partially agree - the word 'mitigate' is considered appropriate in this context. It is agreed that the policy could be rewording to reflect the fact that harm may take place and can be mitigated; however, any harm to health and safety of the public is unacceptable and the policy must be clear about that.

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					<p>provide proposed revised text. A range of receptors (to which harm should be avoided) is thereafter specified (criteria A-D). The requirement to “avoid harm” is inconsistent with and sets a higher planning policy test than the provisions of the NPPF. It is unrealistic to expect commercial scale renewable energy developments to be accommodated within the environment without resulting in some harm / impact and provide proposed revised text . Criteria G is also requested to be amended to delete the reference to “quiet” as opportunities for relaxation and recreation can encompass a wide variety of activities and not just quiet activities. Further contended inconsistencies with NPPF are noted at paragraph three and it is considered that the first sentence of paragraph 3 which seeks to “minimise” visual impact should be amended. The final sentence in paragraph 3 which seeks to avoid any impact on television reception and specialist radio communications is similarly considered inconsistent with the NPPF.</p>	
G3 - Renewable and low carbon energy developments	DCS224	Environment Agency	Mrs Sylvia Whittingham		<p>The Environment Agency refer to criterion h of the policy and seek to ensure that there be no deterioration in waterbody status, rather than just water quality. The Water Framework Directive requires that all inland and coastal waters within defined river basin districts must reach at least good status by 2015 and defines</p>	Agree

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					how this should be achieved through the establishment of environmental objectives and ecological targets for surface waters. One of the key aims for us is that new and existing developments have a reduced environmental impact and well-planned environmental infrastructure. The natural environment or 'green infrastructure' is specifically recognised as key element of this.	
G3 - Renewable and low carbon energy developments	DCS230	United Utilities	David Sherratt	CBRE Ltd	A number of wording amendments have been suggested. Wording changes proposed include: additional bullet point relating to the avoidance of harm to land which is used for water catchment purposes and detailed policy in respect of development on land which has a peat layer of greater than 50 cm deep where water is currently used or planned to be used for drinking water.	Partially agree. It is proposed to include the additional bullet point as suggested, but rather than more detail in the policy text in respect of impact on land with a peat layer it would be more appropriate to give greater detail in the reasoned justification in respect of this.
G4 - Protecting Green Belt	DCS29		robert haughton		Notes the Council commitment to protect the Green Belt unless evidence becomes available that requires the release of Green belt and considers that land at Collop Gate Farm should not be the exception . Question is raised of when some details on the current and projected levels of CO2 along major road corridors within the Borough (A58 and M62 motorway) which is an AQM area will be available and what will be included in the Core Strategy?	Comments noted. There are no specific proposals in the Core Strategy to consider the release of Green Belt land for development. The final Core Strategy will include appropriate references to air quality management and the Background Paper will refer to best available data or evidence available to the Council at that time. Further guidance and evidence on areas where air quality issues exist will be used to inform how policy is implemented and development is assessed will emerge through the life of the plan period.

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G4 - Protecting Green Belt	DCS60	Campaign to Protect Rural England	Jackie Copley		The plan must take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.	Comments noted. These issues are fully taken on board in the relevant policies of the Core Strategy.
G4 - Protecting Green Belt	DCS71	Campaign to Protect Rural England	Jackie Copley		Releasing greenfield (including Green Belt) land for development can undermine urban regeneration. Reference is made to Broad Lane as potentially worsening the prospects for urban regeneration and in encouraging development in less sustainable locations.	*Comments noted. Disagree - The Core Strategy includes a clear approach to promoting brownfield development and enabling sustainable greenfield development where that is sustainable. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park and it is considered that its development would provide a sustainable urban extension, supporting the Rochdale Town Centre / Kingsway Business Park economic growth corridor. The site also offers the potential to deliver higher value housing in a popular location within the borough and can utilise the M62 to provide a clear and defensible boundary without further extension into the Green Belt beyond the motorway. Therefore, taking account of national guidance, it is considered that the benefits of this proposal outweigh the need to retain

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						it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. In order to achieve this policy C1 retains a target of at least 80% of all new housing over the plan period to be on previously developed land.
G4 - Protecting Green Belt	DCS76	Campaign to Protect Rural England	Jackie Copley		Green Belt land should not be released for development while reasonable and relatively more sustainable alternatives exist.	Comments noted. There are no specific proposals in the Core Strategy to consider the release of Green Belt land for development.
G4 - Protecting Green Belt	DCS92	The Co-operative Estates	Katie Wray		TCG seek the removal of land at Whitelees Road from the Green Belt on the basis of: 1. Land fronting Whitelees Road will be natural infill development and secure an immediate land release to facilitate the economic recovery and meet short term housing needs without any significant adverse impacts; and 2. The remainder of the site should be removed from the Green Belt to ensure Rochdale can meet its future housing needs and not undermine the purpose of the Green Belt by including land that is not suitable for being permanently open.	Comment noted - Disagree. Evidence within the latest SHLAA demonstrates that there is sufficient capacity to meet housing targets. Therefore it is not considered necessary at this stage to release Green Belt land solely to meet the need for additional homes. In addition the site referred to is in the north of the borough and its release outside the context of a wider Green Belt review would be contrary to the Spatial Strategy.
G4 - Protecting Green Belt	DCS141	EFL Consulting Ltd	Mr Eric Larmett		Flexibility in allowing limited infilling in the Green Belt should be allowed for smaller sites and rural affordable housing exceptions.	In terms of windfalls it is not considered appropriate to make specific reference to these within the policy since there is currently no reference to windfalls in the SHLAA. If at some point a windfall allowance can be justified this would be evidenced within the SHLAA and

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						<p>included within the Allocations DPD to identify how the housing target would be met.</p> <p>It remains as an aspiration in the Draft Transport Strategy to include the link road.</p> <p>A Green Belt review may be considered if it is appropriate in the future, this will be clarified in the reasoned justification.</p>
G4 - Protecting Green Belt	DCS145	Chorlton Planning Ltd	Mr Alan Chorlton		<p>It is noted that a future review of Green Belt policy may be necessary if long-term needs cannot be accommodated on Protected Open Land not in the Green Belt and that Green Belt boundaries will be defined within a future Sites Allocation DPD. The Green Belt around Wardle village is particularly tight and does not allow for any expansion of the village.</p>	<p>Evidence within the latest SHLAA demonstrates that there is sufficient capacity to meet housing targets. Therefore it is not considered necessary at this stage to release Green Belt land solely to meet the need for additional homes. Specific issue with Wardle will be considered as part of any review when, and if, required. In addition the site referred to is in the north of the borough and its release outside the context of a wider Green Belt review would be contrary to the Spatial Strategy.</p>
G4 - Protecting Green Belt	DCS147	Russell Homes (UK) Limited	Mr Daniel Kershaw		<p>Rochdale Council should re consider its position regarding development in South Heywood and amend the Core Strategy either by:</p> <ul style="list-style-type: none"> - Re instating the South Heywood economic growth corridor proposal in policy E3, - Reinstating the link road proposals in policy T1 but with significant amendments and - A proposed local Green Belt review 	<p>In terms of windfalls it is not considered appropriate to make specific reference to these within the policy since there is currently no reference to windfalls in the SHLAA. If at some point a windfall allowance can be justified this would be evidenced within the SHLAA and included within the Allocations DPD to identify how the housing target would be met.</p>

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					examining a possible Green Belt swap (in policy G4) with protected open land to the north of Middleton	It remains as an aspiration in the Draft Transport Strategy to include the link road. A Green Belt review may be considered if it is appropriate in the future, this will be clarified in the reasoned justification.
G4 - Protecting Green Belt	DCS160	Broad Lane Action Group	Tracy Wilson		Green Belt ensures its vital role in separating towns and the POL off Broad Lane does this precisely.	*Comment noted. Disagree - It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park and it is considered that its development would provide a sustainable urban extension, supporting the Rochdale Town Centre / Kingsway Business Park economic growth corridor. The site also offers the potential to deliver higher value housing in a popular location within the borough and can utilise the M62 to provide a clear and defensible boundary without further extension into the Green Belt beyond the motorway.
G4 - Protecting Green Belt	DCS170	Peel Holdings (Land & Property) Limited	Gillian Chiltern		Peel considers that a Borough wide Green Belt review would be a more appropriate way of responding to housing delivery issues. The exceptional circumstances underpinning the release of land from the Green Belt would be in summary: • Amount of housing needed in the borough as a whole; • Type and quality of housing, in particular the lack of	Comment noted - Disagree. Evidence within the latest SHLAA demonstrates that there is sufficient capacity to meet housing targets. Therefore it is not considered necessary at this stage to review or release Green Belt land solely to meet the need for additional homes. In addition the site referred to is in the

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					larger, aspirational family housing; and • Constraints to supply within the urban area.	north of the borough and its release outside the context of a wider Green Belt review would be contrary to the Spatial Strategy. However, the point regarding the need for a Green Belt review and how this is currently dealt with in the Core Strategy will be considered with further clarification give if required.
G5 - Managing protected open land	DCS35		J M Chivers		Objection to Broad Lane on the grounds of: removing the fields protected status is against the wishes of local residents; flooding issues; loss of wildlife habitat; increase in traffic; strain on school places; strain on healthcare facilities. Questioning the need to build on brownfield sites.	*Comments noted.Disagree - It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. Impacts on flood risk, biodiversity etc are assessed on the basis of specific proposals and there are appropriate policies in the Core Strategy to facilitate this.
G5 - Managing protected open land	DCS37		M Wilson		Objection to Broad Lane on the grounds of: congested road network; lack of road capacity; increased traffic; flood risk; proximity to motorway; health issues; loss of wildlife.	*Comments noted.Disagree - It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is

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						well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. Impacts on flood risk, biodiversity etc are assessed on the basis of specific proposals and there are appropriate policies in the Core Strategy to facilitate this.
G5 - Managing protected open land	DCS40		Eileen Shepherd		Objection to Broad Lane on the grounds of: being contrary to Core Strategy aspirations.	*Comments noted. Disagree - the development of the site would not be contrary to Core Strategy aspirations. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term.
G5 - Managing protected open land	DCS58		Eileen Shepherd		Objection to Broad Lane on the grounds of: the infrastructure required cannot be delivered; current infrastructure cannot cope; flood risk issues; congestion; road	*Comments noted. However, It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for

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					safety.	additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The specific impacts of a proposal on infrastructure, flood risk and other factors are provided for in the policies of the Core Strategy and are most appropriately assessed in the context of specific proposals.
G5 - Managing protected open land	DCS59	Campaign to Protect Rural England	Jackie Copley		Welcomes maintaining the Greenbelt in its current form. Objection to Broad Lane on the grounds of: sufficient brownfield land for housing over the plan period.	*Comments noted. However, It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
G5 - Managing protected open land	DCS72	Campaign to Protect Rural England	Jackie Copley		Releasing greenfield (including Green Belt) land for development can undermine urban regeneration. Local authorities should not opt for short term solutions which would undermine longer term	*Comments noted. Disagree - The Core Strategy includes a clear approach to promoting brownfield development and enabling sustainable greenfield development

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					strategies such as crucial urban regeneration aspirations. Releasing greenfield sites, such as at Broad Lane, could worsen the prospects of unlocking brownfield sites, leading not to more development but simply development in less sustainable locations which are not in the public interest.	where that is sustainable. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park and it is considered that its development would provide a sustainable urban extension, supporting the Rochdale Town Centre / Kingsway Business Park economic growth corridor. The site also offers the potential to deliver higher value housing in a popular location within the borough and can utilise the M62 to provide a clear and defensible boundary without further extension into the Green Belt beyond the motorway. Therefore, taking account of national guidance, it is considered that the benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. In order to achieve this policy C1 retains a target of at least 80% of all new housing over the plan period to be on previously developed land.
G5 - Managing protected open land	DCS87		Mr Tony Ford		Objection to Broad Lane on the grounds of loss of wildlife.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional

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						housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. The impact of development on wildlife and opportunities to mitigate them are appropriately considered in the context of a specific proposal and policies of the plan for biodiversity facilitate this.
G5 - Managing protected open land	DCS88		Mr Ged Sweeney		Objection to Broad Lane on the grounds of: erosion of green belt; creating an eyesore, loss of beautiful area.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary and would not erode Green Belt. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term.
G5 - Managing protected open land	DCS89		Mr George Hardy		Objection to Broad Lane development.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that

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						the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
G5 - Managing protected open land	DCS91		Janet Ashfield		Objection to Broad Lane on the grounds of: how is this greenfield site distinguished from others as being safeguarded for residential development; lack of market for new housing within existing population; proximity to motorway; lack of school places.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
G5 - Managing protected open land	DCS93	The Co-operative Estates	Katie Wray		Representations in relation to land owned by the TCG at Whitelees Road, Littleborough, which is currently Green Belt and could be released to meet future development needs. The site is in a sustainable location and should not be	Comment noted - Disagree. SHLAA demonstrates sufficient capacity to meet targets Green Belt release to meet the need for additional homes is not necessary. The site is in the north of the borough - its release

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					<p>defined as Green Belt at it is not suitable for being permanently open as defined by national policy. The triggers for the Draft Core Strategy approach to review Green Belt land are not clear. The Draft Core Strategy confirms the potential to increase the buffer for the housing requirement to be increased by 20% but it is unclear if this increase can be accommodated without a review of Green Belt boundaries. The Core Strategy needs to provide further guidance on review of the Green Belt boundary to give certainty to residents and developers ensuring development is directed to the most sustainable and suitable locations. Ensuring an adequate supply of housing land is available and deliverable is line with national policy. The site was not included in the 2012 Strategic Housing Land Availability Assessment but is suitable for consideration as it is available and deliverable in the immediate term. The release of land at Whitelees Road from the Green Belt would ensure flexibility in meeting housing targets. Policy CS1 states housing will be delivered in the north of borough at an overall scale and density of development that reflects the accessibility and character of the Pennine fringe and the site identified will not compromise these objectives.</p>	<p>would be contrary to the Spatial Strategy. The need for a Green Belt review and how this is currently dealt with in the Core Strategy will be considered with further clarification give if required.</p>
G5 - Managing protected open	DCS95		Mr John Chadwick		Objection to Broad Lane development.	*Comments noted. It is considered important to retain this site within the

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land						Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
G5 - Managing protected open land	DCS101		Mr John Ball		Objection to Broad Lane development and change to protected open land status.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
G5 - Managing protected open land	DCS102		Cllr Richard Farnell		Objection to Broad Lane development and removal of protected open land status on the grounds of: over development of the area; flood risk problems; inappropriate infrastructure;	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well

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					insufficient school places; loss of wildlife; loss of recreational amenity.	related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. Specific issues in terms of flood risk management, impact on biodiversity and other potential affects of development are appropriately considered in the context of specific proposals and policies of the Core Strategy facilitate such assessment.
G5 - Managing protected open land	DCS105		Cllr Dale Mulgrew		Objection to Broad Lane development and removal of protected open land status.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
G5 - Managing	DCS111		Mr A Taylor		Objection to Broad Lane on the grounds	*Comments noted. The impact of

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protected open land					of increased flooding issues.	development on flood risk and any mitigation required is most appropriately dealt with in respect of specific proposals. Policies in the Core Strategy provide specific guidance to facilitate this. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term.
G5 - Managing protected open land	DCS112		Valerie Chadwick		Objection to Broad Lane and removal of protected open land status.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term.
G5 - Managing protected open land	DCS129		Mr Peter Vernon		The Core Strategy (CS) seeks to concentrate development on brownfield sites and away from green belt sites, which is clearly the appropriate	*Objection noted - Disagree. The SHLAA identifies sufficient land for additional homes to meet the target over the plan period. The Core

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					<p>methodology and is a sound basis upon which to proceed. Given that, with the exception of one year in the last 5, Rochdale has not met its housing targets, and it could therefore be argued to be in 'persistent under-delivery', the potential need for sites other brownfield sites should be closely monitored, because Protected Open Land's suitability and importance for development may increase. An example referred to is a site in the Roch Valley approximately 1km from Littleborough Town Centre. The NPPF does encourage the effective re-use of land, it places a stronger emphasis on ensuring the deliverability of new housing in sustainable locations. Additionally, whilst Green Belt designations are upheld and Local Green Space designations are defined within the NPPF, it does not make reference to the designation of 'protected open land' and it should therefore be afforded less weight in light of the NPPF. The site is discounted within the most recent SHLAA (April 2012) due to its allocation as protected open space. The site could contribute to SUDS and other green infrastructure functions.</p>	<p>Strategy identifies one protected open land site at Broad Lane, which has been identified for providing new homes and supporting the wider employment growth corridor in accordance with the Spatial Strategy. The site in Littleborough, currently designated as protected open land, is also identified as part of a greenspace corridor as the site plays a role in the River Roch corridor. The site has landscape and green infrastructure value and flood risk/mangement issues as it is greenfield land in a river valley. There is currently an identified supply for new housing over the plan period so it is not necessary to consider this site.</p>
G5 - Managing protected open land	DCS139		Mr Jeremy Haigh		<p>Objection to Broad Lane on the grounds of: traffic issues; dangerous roads; flood risk issues; lack of school places; lack of health facilities; inappropriate infrastructure.</p>	<p>*Comment noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park,</p>

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						M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. Issues in terms of affects on infrastructure are given appropriate recognition in the Core Strategy and its policies and such issues are more appropriately dealt with in the context of assessing specific proposals.
G5 - Managing protected open land	DCS154	Broad Lane Action Group	Tracy Wilson		Objection to Broad Lane on the grounds of: roads already over capacity which will get worse with new developments taking place in area; (Broad Lane Action Group); a lack of school places; lack of hospital provision; empty homes should be brought in to use first; rownfield sites should be developed first; flood risk issues; sites with outstanding permission should be developed first; remaining sites at Kingsway should be developed first; loss of amenity open space; loss off buffer between urban areas.	*Comment noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. Issues in terms of affects on infrastructure are given appropriate recognition in the Core Strategy and its policies and such issues are more appropriately dealt with in the context of assessing specific proposals.
G5 - Managing	DCS195	Taylor	Mr Andrew	GVA	Support for Broad Lane for housing	*The Council considers that there is

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protected open land		Wimpey UK Limited	Thorley		development. The site should be clearly identified as a Strategic Site. We object to the continued designation of land north of Langley/Hollin, Middleton as protected open land. The identified housing supply does not provide the opportunity to deliver high quality housing this and therefore additional land should be allocated. The land north of Langley/Hollin, Middleton would address this deficiency.	no need to release additional land outside the urban area other than that at Broad Lane, Rochdale to meet the requirement set out in the Core Strategy. The SHLAA currently identifies an adequate supply of land for housing and this also provides amix of sites across the borough. The SHLAA and AMR will continue to monitor the supply and delivery of new housing and these are updated on an annual basis. The site referred to by the objector is currently Protected Open Land. Policy G4 of the Core Strategy deals with this policy and sets criteria which does allow for the release of these sites if there is evidence of need and it is in accordance with other elements of the strategy. Langley / Hollin is not considered appropriate or necessary for residential development. Significant regeneration is underway in nearby Langely wth an identified capacity for around 600 additional homes. The current SHLAA also demonstrates that there is sufficient land to meet the housing target without the release of the site at Langley / Hollin
G5 - Managing protected open land	DCS198	Wainhomes (Development) Ltd	Mr Richard Chamberlain	Emery Planning Partners hip	Broad Lane should be designated as Reserved Land and designation as Protected Open Land should be deleted. It is unnecessary for the site to be held back until the Site Allocations DPD	The purpose of the Core Strategy is not to allocate land and not appropriate to reallocate. However, if it does come forward as part of the redeisgubation through allocations

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					because the site is self contained and as the key aim of NPPF is to permit sustainable development.	and not core strategy.
G5 - Managing protected open land	DCS203		Susan Sanderson		Objection to Broad Lane on the grounds of: safety issues with existing roads; loss of green space; poor road capacity.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. Impacts relating to traffic and the safety of other road users are more appropriately considered in the context of assessing specific proposals.
G5 - Managing protected open land	DCS204		Mr Paul Brannan		Objection to Broad Lane on the grounds of: damage to the environmental; road safety.	*Comments noted. However, It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. Issues in respect of traffic and environmental impacts are most appropriately considered in the context of specific proposals.
G5 - Managing protected open	DCS205		Mr Ian Duckworth		Objection to Broad Lane being redesignated.	*Comments noted. It is considered important to retain this site within the

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land						Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
G5 - Managing protected open land	DCS206		Mr Eugene Wilson		Objection to Broad Lane on the grounds of: retaining green spaces for health; recreational value of open space; sufficient existing housing; road capacity issues.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
G5 - Managing protected open land	DCS208		Mr Michael Howard		Objection to Broad Lane on the grounds of: brownfield sites should be developed first; town centres and derelict neighbourhoods should be developed first; flood issues.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well

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						related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. Flooding and other impacts are most appropriately considered in the context of assessing a specific proposal.
G5 - Managing protected open land	DCS209		Mr Neil Longsdon		Objection to Broad Lane on the grounds of: green spaces health benefits; road capacity; sufficient housing in the area.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land.
G5 - Managing protected open land	DCS210		Mr Philip Brown		Objection to Broad Lane on the grounds of: flood risk issues; land is a green corridor; site prevents urban sprawl; wildlife habitat.	*Comments noted. It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional

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						housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. Issues such as the effect of development on flood risk and wildlife are most appropriately considered in the context of a specific detailed proposal.
G6 - Enhancing green infrastructure	DCS109	Sport England	Mr Paul Daly		Sport England broadly support Policy G6 and welcome how the policy seeks developer contributions to the provision and maintenance of open space. However, Sport England suggest the evidence base needs to include an up-to-date-assessment of the needs for open space, sports and recreation facilities which complies with the requirements of the NPPF.	Comment noted - agree. We are currently formulating an evidence base in conjunction with the Council's Environmental Management Service.
G6 - Enhancing green infrastructure	DCS130		Mr Peter Vernon		Land close to Littleborough town centre in the Roch Valley/Canal Corridor has not been appropriately considered for development which could retain and enhance green infrastructure assets and functions.	Comment noted - disagree. This policy is not the appropriate place to consider allocations of specific areas of land for development
G6 - Enhancing	DCS168	Natural England	Janet Baguley		Natural England support the inclusion of Policy G6 and recognition of a link with	Comment noted - agreed. C1 has been altered following comments

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green infrastructure					healthy lifestyles. However, would welcome and link between this Policy and Policy C1. Under bullet point e they would like to see specific reference to 'Accessible Natural Greenspace Standards'.	made at the last stage.
G6 - Enhancing green infrastructure	DCS225	Environment Agency	Mrs Sylvia Whittingham		The Environment Agency seek the inclusion of reference to the Water Framework Directive in Policy G6.	Comment noted - agree. Revise the wording of the policy.
G7 - Increasing the value of biodiversity and geodiversity	DCS131		Mr Peter Vernon		This representation refers to a particular site, i.e.land in the vicinity of Stubley, Littleborough. It is argued that development of the land could enhance green infrastructure and the potential of the canal corridor.	Comment noted - disagree. This policy is not the appropriate place to consider allocations of specific areas of land for development.
G7 - Increasing the value of biodiversity and geodiversity	DCS165	Natural England	Janet Baguley		We refer you to our previous comments made at the Publication stage: “We welcome and support this policy as it provides strong protection for biodiversity and geodiversity features as well as supporting opportunities for enhancing these features and creating new sites of interest. We note the particular priorities listed in points 1 to 6, but would welcome a further seventh point to refer specifically to protected species. We do not consider it appropriate to include this issue in point 6, as protected species are not only found within designated sites.” In addition we have the following comments to make: We are pleased to see that you have included bullet point 7 on protected species. We welcome the supporting text relating to the protection of designated	Support noted.

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					sites, the value of non designated sites, BAP species and opportunities to enhance biodiversity.	
G7 - Increasing the value of biodiversity and geodiversity	DCS215	Environment Agency	Mrs Sylvia Whittingham		<p>It is recommended not only new developments with conditions are monitored, but also applications where there has been an objection from any statutory environmental bodies (Environment Agency, Natural England, Forestry Commission) on biodiversity/ecological grounds. It is recommended the draft core strategy in regard to environment and biodiversity is updated to reflect the overarching national environmental policy The Natural Environment White Paper (http://www.defra.gov.uk/environment/natural/whitepaper/), Making Space for Nature report (http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf), and new NPPF. It is recommended based on national objectives, the core strategy reflect these changes, by ensuring overall development in the borough provide a net gain in biodiversity, and aim to establish a coherent and resilient ecological network, with partner organisations, based on criteria set out in Lawton Report, • improve the quality of current wildlife sites by better habitat management; • increase the size of existing wildlife sites; • enhance connections between sites, either through physical corridors or</p>	Partially agree - monitoring of applications is a matter for planning enforcement. The core Strategy policy is in line with the latest national policy as outlined, however it is agreed that the policy wording should be altered to make reference to there being a net gain wherever possible.

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					<p>through ‘stepping stones’; • create new sites; and • reduce the pressure on wildlife by improving the wider environment. and be reflected in the borough’s emerging green infrastructure framework, and preferably update the 2008 Biodiversity and Development SPD to reflect this overall landscape approach. It is highly recommended where any prospective development may impact an existing wildlife corridor or Site of Biological importance that an environmental assessment is carried out, pre development; and that it be proportional to the size and nature of the development. This should identify the opportunities for improving wildlife and both highlight and avoid any potential ecological impacts. There may also be the opportunity for the Borough to adopt the new biodiversity offsetting process which is presently being trialled in other boroughs. Biodiversity offsetting should be pursued in line with guiding principles, based on those set out in Making Space for Nature. Offsetting may be the opportunity to protect and expand existing high quality habitats, or to expand and restore the ecological network in borough. Used in a strategically it could help to deliver more, better, bigger and joined up networks of quality habitat.</p>	
G8 - Managing water resources and	DCS78		Eileen Shepherd		The development of Broad Lane would have implications in the application of Policy G8 in terms of managing flood risk.	Noted. This policy sets out a broad policy approach and outside of assessing specific proposals, it is not

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flood risk						for this policy to refer to specific sites and impacts.
G8 - Managing water resources and flood risk	DCS216	Environment Agency	Mrs Sylvia Whittingham		Current evidence included within background paper document is incorrect, and refers to now outdated General Quality Assessment (GQA) which has now been superceded by more stringent Water Framework Directive monitoring programme, where currently 100% of river waterbodies in the borough are failing to reach their Good Ecological Potential status. It is recommended the current status of all waterbodies in the borough is reflected in the core strategy and effectiveness of policy (G8), by additionally ensuring there is no deterioration of any waterbodies associated with any new development, and undertake appropriate WFD assessment, as and when required. With regard to Policy G8 "Managing Water Resources & Flood Risk" we welcome the main points outlined in the policy. The council should be demonstrating a commitment to identify areas where they can contribute to these improvements by working in partnership with us and other organisations.	Agree - references to more up to date evidence will be made as needed. Rereferences to joint working, which reflects actual joint working underway can be made in the reasoned justification. "
G8 - Managing water resources and flood risk	DCS231	United Utilities	David Sherratt	CBRE Ltd	References are sought to the advice of United Utilities for flood risk management issues; that development should not cause direct or indirect pollution to watercourses and groundwater: that development should be co-ordinated and phased to allow wastewater	Partly agree. Specific reference to United Utilities is necessary in criterion b) of the policy and is sufficiently dealt with in existing consultation and joint working arrangements. Agreed that references to development and

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					improvements in particular in areas identified by United Utilities as being at risk of flooding or increased environmental impact.	pollution impacts should refer to both direct and indirect impacts. References to the co-ordination of development through a phased approach will depend on detailed discussion in respect of specific schemes and is not appropriate detail for the policy. However a reference to the importance of considering wastewater infrastructure in advance of preparing proposals could be made in the reasoned justification.
G9 - Reducing the impact of pollution	DCS64	Campaign to Protect Rural England	Jackie Copley		CPRE would like to draw attention to the following Core Planning Principles from the National planning Policy Framework, which should “underpin both plan-making and decision-taking”: - contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework	Noted - relevant policies of the plan already provide an appropriate policy framework. It would not be appropriate to refer to allocations of land in this policy.
G9 - Reducing the impact of pollution	DCS79		Eileen Shepherd		Comment refers to development at Broad Lane. Whatever a developer proposes as a barrier between the motorway and the new development the addition of 200plus houses with an additional circa 500 vehicles plus service vehicles can only add to the poor quality air around the motorway on which traffic regularly is at a standstill due to accidents or weather conditions. It is now known that there is a link between diesel fumes and Cancer. How is this going to improve the health of	Comment noted - Issues around air quality, noise and flooding are considered in respect of specific proposals and how they might be mitigated.

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					the people in this part of Rochdale, especially so when the local road network is often congested. Additional vehicles also mean additional noise. Both Air and noise pollution will increase further once the Kingsway Park Asda Depot becomes fully operational. The operations from this are twenty four seven. The water run off will increase and will increase the water issues/flooding which already exist.	
G9 - Reducing the impact of pollution	DCS161	The Coal Authority	Miss Rachael Bust		Our records indicate that Rochdale MBC has a significant legacy of past coal mining activity, and it is important that this is fully considered as part of development proposals to ensure that resulting schemes are safe and stable, as required by the NPPF. The Coal Authority therefore considers it appropriate to add the following text: “In addition, the borough has been subjected to past coal mining activity, which has left a legacy. It is therefore important that ground conditions are fully considered by developers as part of new development proposals and, where necessary, appropriate remedial measures are set out to address any issues of unstable land and ensure safety and stability of new development.”	Comment noted - agreed.
G9 - Reducing the impact of pollution	DCS232	United Utilities	David Sherratt	CBRE Ltd	A number of wording amendments have been suggested. Proposed wording changes include: stating that sensitive uses should be located an acceptable distance away from existing sources of pollution, and additional supporting text	Comment noted - partially agree. The suggested changes to the first part of the policy are felt to be repetition. However, it is considered that it would be appropriate to make greater reference to odour pollution as

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					relating to developments in the vicinity of wastewater treatment plants.	suggested, in the reasoned justification.
G10 - Managing mineral resources	DCS85	Lancashire County Council	Miss Niamh O'Sullivan		It should be noted that where Lancashire's Highway Network is required for mineral extraction delivery routes, this will need to be discussed and agreed beforehand with Lancashire County Council Highways Network Management Team in order to agree suitable and acceptable routes for abnormal vehicle loads.	Comment noted - agree. However, this is a procedural matter not appropriate for the LDF.
G10 - Managing mineral resources	DCS157	The Coal Authority	Miss Rachael Bust		The Coal Authority supports Policy G10, as it provides a policy 'hook' to the emerging Greater Manchester Joint Minerals Plan and commits to defining Minerals Safeguarding Areas (MSA), we also support reference in the supporting text to the surface coal resource present across the borough.	Support noted.
G10 - Managing mineral resources	DCS171	Natural England	Janet Baguley		At the Issues and Options stage we recommended that the minerals policy should require restoration to contribute to the conservation and enhancement of the natural environment. Although the policy touches on this issue, requiring proposals to „ensure the effective restoration and aftercare of sites”, we are very disappointed that no specific reference to the potential to achieve conservation and enhancement of biodiversity has been included within the policy. We would add that the value of minerals sites for conservation and enhancement of geodiversity in their restoration and aftercare is also particularly relevant and	Comment noted - partially agree. Wording in respect of taking opportunities to increase nature conservation value has been included in the policy.

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					appropriate and would welcome this being considered for inclusion within the policy wording.	

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T1 - Delivering sustainable transport	DCS3		Ms Julie Entwistle		Put South Heywood Relief Road back into the Core Strategy	No justification for the link road unless the development comes forward. Its delivery relies on private sector finance. No change but retaining scheme in Borough Transport Strategy. No Change.
T1 - Delivering sustainable transport	DCS67	Campaign to Protect Rural England	Jackie Copley		CPRE is seeking active management of growth patterns to maximise use of sustainable travel modes and located development in places to achieve this.	Agree and is one of the fundamentals of the Core Strategy exemplified by the Accessibility Hierarchy in Policy T2. Almost all the proposals in Policy T1 will include a sustainable transport element. Issues already addressed in Policy T2.
T1 - Delivering sustainable transport	DCS80		Eileen Shepherd		Asserts that allocating development on Broad Lane will cause more accidents and this contradicts Policy T2 4C.	*The policy cannot guarantee all locations of the network will become safer. The Core Strategy commits to continued local safety improvement of the overall network. Broad Lane safety issues have been addressed in the TA for the proposed developments.
T1 - Delivering sustainable transport	DCS86	Lancashire County Council	Miss Niamh O'Sullivan		Asserts the Core Strategy to be Manchester facing concentrating development in the south of the borough and not sufficiently addressing access to locations outside GM. RMBC needs to acknowledge the benefits to it of Todmorden Curve and to address congestion on A671 and A680 north of Rochdale Town Centre. It needs to recognise the commuter links and access to jobs and amenities for people in Rossendale, particularly Whitworth, and promote a cycle link using the former railway line, north. Lancs CC support an extension of Metrolink to Whitworth and the extension of ELR and seek consultation on all proposals that	Disagreed that the Core Strategy was too Manchester facing but it is the regional centre where many of the future higher income jobs will be created. Development is concentrated in the south of the borough because it has the most sustainable access being served by Metrolink, the rail line and high quality bus services. The Council supports Todmorden Curve and recognises the benefit it brings, and aspires to deliver an extension to ELR, and a coherent strategic sustainable transport network with neighbouring centres with in the long term metrolink extensions including to / from Whitworth. The Council will continue to work with adjacent local authorities. No

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					may affect the county.	change.
T1 - Delivering sustainable transport	DCS104		Mr Nigel Milligan		Concerned about HGV's heading to and from South Heywood Distribution Parks using A6045 through Birch Village to avoid congestion on the M60 around Simister Island Interchange and the nuisance, severance and vibration damage the cause to adjacent properties. Seeking the A6045 Heywood Old Road to be made into 2 cul-de-sacs between Whittle Lane and Langley Lane to address this.	Disagree - While aware of the issues of HGV's diverting through Birch, the option proposed is drastic and the "knock on" impacts of closing A6045 to through traffic on the surrounding network and communities has not been assessed. The Heywood Southern Relief Road proposal may have offered an improvement but all options need to be considered and their impacts assessed.
T1 - Delivering sustainable transport	DCS119	TCS Holdings Limited	Mr David Donkin		TCS object to Policy T1 in relation to the proposed option for a section of the Town Centre Relief Road (Wood Street to Drake Street) through Central Retail Park. The scheme could cost taxpayers an additional £10 million and sacrifice 200 new jobs that would be provided by re-developing the northern part of the Retail Park. TCS indicate they have end users ready to occupy the site whom have all raised concerns regarding a road through the site. This would make it difficult to attract new users to the remaining smaller parcel of land to the north of the road .	Objection noted. No Change. Policy T1 identifies the principle of a route from Wood Street to Drake Street not a specific proposal as there are 4 options still being considered. The preferred route will be decided through the modelling of the options and the planning application process. The proposal is a linch pin as a means to get "rat running" & unnecessary through traffic out of the town centre to provide a more attractive shopping / visitor environment in Rochdale Town Centre. It is noted that there has been no sign of re-development on the northern part of Central Retail Park. TCS also refer to the scheme in the Transport Strategy which is an aspirational and lobbying document which suggests possible funding sources to be explored not committed funding.
T1 - Delivering sustainable	DCS121	Network Rail	Ms Diane Clarke		Comment outlines Network Rail's Statutory responsibilities which include level crossing safety (there are 3 live	Comments noted. Impact on level crossings is too detailed an issue for the Core Strategy (if it was included we would

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transport					level crossings in Rochdale MBC). Network Rail seeking more information on P&R or future development proposals that have traffic impacts on level crossings in Castleton & Smithybridge and seek a specific policy on this in T2 to elevate the importance of level crossing safety. The Council / developers will be required to contribute to / finance any mitigation works to level crossing to address the impacts. The economic potential of extending ELR from Heywood to Castleton is recognised and it is suggested "and access Manchester Airport" should be added to Policy T1 bullet point on the Northern Hub.	have to recognise all major junctions on th highway) and impacts on them are required to be addressed through the Transport Assessment process. The Council will meet all its statutory obligations to Network Rail and will add "and access to Manchester Airport" followed by "and destinations further south" in paragraph 5 of the reasoned justification for T1 and T2 where the Northern Hub issues are discussed.
T1 - Delivering sustainable transport	DCS124		Mr Gary Loudon		Comment asserts that Heywood and Pilsworth Distribution Centres do not have sufficient access to the motorway network and it is accepted that some HGV's attempting to access to it using local road cause disturbance and damage to properties. This conflicts with the core strategy delivering "Quality of life improvements". The new link road from M62 J19 is supported and help to resolve impacts of HGV traffic on local roads (in Birch) and would like to see it reinstated.	Objection noted - No Change. Aware of the issues but the new link road from M62 J19 was not supported by a planning inspector and threatened the approval of the core strategy so has therefore been with drawn. Extent of the issue and impact of alternatives need to be properly assessed to establish their wider impacts on local communities and the wider transport network. The link road scheme will directly service new development so would not attract public funding and needing substantial private sector contributions to present a satisfactory business case to deliver it.
T1 - Delivering sustainable	DCS128	Highways Agency	Sion Owen-Ellis		The Highways Agency is satisfied with the comments it has already made to previous stages of the LDF process and	Comments noted and the Council will work within the GM LDF Core Strategy Protocol to mitigate the impacts of the

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transport					those remain applicable. Identification of mitigation measures can be addressed at the site allocations stage as set out in the GM LDF Core Strategy Protocol which sets out the process by which all interested parties will mitigate the transport impacts of their LDF's.	LDF. No Change.
T1 - Delivering sustainable transport	DCS136	Rail Future	Mr Mike Breslin		Broad support for policy T1 but seeking statements "protecting land for rail improvements from future development". More detail than mere "rail improvements" at Rochdale Station is required referring specifically to re-instating platforms giving clarity to Network Rail that genuine expansion is sought. There is support for transferring freight from road to rail but it should be explicitly "serve Heywood Distribution Park and other areas close to existing railway lines". This should be provided ahead of road- building alternatives.	The support is noted and the issue of protecting land will be dealt with as part of the allocations process. By including the proposals in Policy T1 they are already offered a degree of protection and the Northern Hub proposals for Rochdale Station are committed in the first phase of the project so will be delivered by 2015. The need to protect land for future transport schemes from other development will be included in the reasoned justification.
T1 - Delivering sustainable transport	DCS148	Russell Homes (UK) Limited	Mr Daniel Kershaw		The Council is asked to re-consider its position regarding development in South Heywood by re-instating the South Heywood Economic Growth corridor and link road proposals, but amend clarifying release / timing criteria subject to need, scale of development based on up to date evidence and indicative boundaries to address local concern. Examine a possible Green Belt swap with protected open land to the north of Middleton citing an example suggested by the planning inspector of Barnsley MBC's Core Strategy EIP. Policy T1 should indicate a	Objection noted. Delivery of the link road is reliant on private sector investment and the land use allocations. The benefits to Heywood are accepted and the scheme will offer relief from HGV's for other nearby areas. The scheme will need to satisfy any concerns of the Highways Agency. Delivering the relief road remains a council aspiration in the Borough Transport Strategy to be progressed if a future sequential test for the allocation of additional commercial land in the Borough prioritises South Heywood as a preferred location. No Change.

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					possibility and potential benefits of a link road from M62 J19 to Hareshill Road to relieve traffic in Heywood will be explored.	
T2 - Improving accessibility	DCS81		Eileen Shepherd		Expect the development of land off Broad Lane / Oldham Road will exceed the thresholds in Policy T2(c) bearing in mind the potential increase in traffic on this route. Comment asserts Broad Lane is already operating at over capacity and additional development traffic will move this route towards gridlock.	*Objection noted - Disagree - No Change. Both development proposals affecting Broad Lane met the criteria referred to and full Transport Assessments were carried out on both sites. there was no evidence that the route was operating at capacity and no insurmountable traffic issues were identified that would justify refusal of either proposal. Any mitigation measures to address transport impacts would be conditioned and if necessary a S106 agreement sought.
T2 - Improving accessibility	DCS100		Mrs Anne Storah		Support improving sustainable transport links to Kingsway Business Park from adjoining authorities and reference to exploring the feasibility to examine a Rochdale to Whitworth Metrolink Extension.	Support noted.
T2 - Improving accessibility	DCS126	Network Rail	Ms Diane Clarke		Where growth areas / significant housing allocations are close to existing railway infrastructure generating increases in patronage that require local improvements, Network Rail will expect developer / CIL contributions to fund these. Will also require contributions for rail improvements from development which depends on them being implemented to make it acceptable. Comment outlines the NPPF requirements on the Council to work with Network Rail on its strategies to support	Agree with much of the comment reminding the Council of its NPPF requirements to address the impacts of development of the rail network and work with Network Rail to secure developer contributions towards justifiable and proportionate improvements to the rail network. The recommendation is covered by the final sentence in Policy T2 and more detailed guidance will be provided in the allocations DPD and in the Travel Planning and New Development SPD. The Council is already working with

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					growth and that Transport Assessments must quantify in detail the impacts of developments on the rail network. It recommends that the Core Strategy include provisions stating a requirement for developer contributions to deliver improvements to the rail network. Expected to be reasonable and at local level.	Network Rail on the Northern Hub and other local rail issues. No Change but this issue will be strengthened in supporting documents including the Travel Planning SPD.
T2 - Improving accessibility	DCS137	Rail Future	Mr Mike Breslin		Comment supports the thrust of Policy T2 but seeking all types of commercial and residential development be designed to maximise accessibility for pedestrians to nearby public transport nodes with frontages facing streets and clear pedestrian / disabled routes. Circuitous routes should be avoided. Reference to exploring the feasibility of potential new railway stations and metrolink routes is welcomed but their lines need to be protected from other development if they are to be progressed, particularly any route to Whitworth.	Comments noted. With regard to commercial and housing proposals developers there is already guidance to follow including the Council's design guides. The Accessibility Hierarchy in Policy T2 also prioritises access need of pedestrians and people with impaired mobility as being of highest priority when designing developments. With regard to new stations and PT routes, part of the feasibility work is to establish a potential route and until that time land cannot be formally protected. A statement will be include in the reasoned justification about protecting land / routes for future transport proposals.

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Chapter 12 – Managing delivery and monitoring progress						
DM1 - General development requirements	DCS82		Eileen Shepherd		Objection to the development of protected open land at Broad Lane for the following reasons: Flooding; pollution; traffic congestion; health; sufficient employment land already; loss of open space; views; nature conservation.	*Comments noted. However, It is considered important to retain this site within the Core Strategy in order to ensure that the requirement for additional housing is met. This site is well related to Kingsway Business Park, M62 and would provide a sustainable urban extension. The M62 will provide a clear and defensible Green Belt boundary. The benefits of this proposal outweigh the need to retain it as a greenfield site in the longer term. The Core Strategy still seeks to ensure that there is a focus on regeneration and the use of previously developed land. Specific issues of flood risk, pollution, biodiversity etc are most appropriately considered against policy and guidance in the context of specific proposals.
DM1 - General development requirements	DCS233	United Utilities	David Sherratt	CBRE Ltd	Amendments suggested. Requires that new development should be located an acceptable distance from existing operation with potential for noise, odour and traffic generation.	The suggested change is considered an un-necessary repetition. However, it is agreed that reference should be made to odour pollution in point d)
DM2 - Delivering planning contributions and infrastructure	DCS110	Sport England	Mr Paul Daly		Support for the inclusion of open space, sport and recreation in the infrastructure plan, however, an up to date evidence base is required in relation to sports and recreation.	Support noted. Work will be carried out to identify locations of sports and recreational facilities and investment opportunities through the Allocations DPD which will be produced at a later date.
DM2 - Delivering planning contributions and infrastructure	DCS213	Canal & River Trust	Ms Alison Truman		Planning Contributions and Infrastructure is key in terms of delivering the improvements to the canal corridor.	Comment noted. Agree.
Infrastructure Delivery Plan	DCS138	Transport for Greater	Mr Richard Clowes		The reference to Chorlton should be explicit to mean Chorlton-on-	Comment noted. Agree.

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Chapter 12 – Managing delivery and monitoring progress						
		Manchester			Medlock and amended in the Infrastructure Delivery Plan.	

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Appendices						
Delivery	DCS212	Canal & River Trust	Ms Alison Truman		Canal and River Trust is keen to be recognised as a key delivery partner and any reference to British Waterways should be replaced with Canal and River Trust.	Comments noted - Agree.
Schedule of parking standards	DCS53	The Theatres Trust	Miss Rose Freeman		Parking Standards on page 153 has theatres listed as D2 Assembly and Leisure which is incorrect – they are sui generis and should appear in the Miscellaneous section below. We suggest for theatres: 1 cycle stand per 40 seats – 1 parking space per 5 fixed seats – adequate turning and loading facilities inc. space for one coach or 16.5m lorry.	Comment noted - Agree