

CHAPTER 18: ACCESSIBILITY

A/00 - Accessibility

Objection: 98/40 Countryside Agency North West

Key Issue:

- **should further consideration be given to the transport needs of rural areas with the UDP addressing rural transport issues outside the plan area; and are there other transport issues that should be considered in the plan?**

Inspector's Reasoning:

18.1 A similar objection (98/41) was made to Policy G/A/1. At Revised Deposit Draft, the Council added paragraph 18.9 to the reasoned justification to G/A/1 indicating the need to give residents of rural areas access to facilities and services by means other than the private-car, together with other initiatives underway. 98/41 was withdrawn. While, the UDP cannot include rural transport policies for areas outside the Borough boundary, transportation needs do not reflect local authority boundaries. In my opinion, this part of the objection can reasonably be met by an addition to paragraph 18.9. As fairly argued by the Council, the other issues referred to by the objector are reasonably covered by other policies of the plan.

Recommendation:

18.2 **I recommend that the plan be modified along the following lines:**

- **At the end of paragraph 18.9, delete the full stop and add: “, a number of which may cross the Borough boundary.”**

G/A/1: (Part One Policy) – Accessibility

Objection: 307/9 Tesco Stores Ltd

Key Issue:

- **should the policy/reasoned justification indicate that key developments (such as major foodstores), can contribute towards transport and sustainability objectives by reducing the need to travel?**

Inspector's Reasoning:

18.3 No. The clear intent of paragraph 3.7 to PPG 12: Development Plans is that Part One policies of a UDP should state, in broad terms, the general policies and proposals of strategic importance for the development and use of land. This, the policy fairly establishes for Chapter 18 and, together with the reasoned justification, is acceptably consistent with the government's sustainability agenda. While the objector appears, broadly, to support the Council's approach, any development proposal arising would be assessed against the other policies of the plan - including whether, or otherwise, it reduced the need to travel. I see no need for this strategic policy to refer to the stated merits of major foodstores, the same would equally apply to other so-called and undefined "key developments". It would, therefore, be unreasonable for me to recommend to the Council a reference to the alleged sustainability benefits of "major foodstores" - taking into account the tests in national planning guidance on retail development.

Recommendation:

18.4 I recommend that:

- **No modification be made to the plan in response to this objection.**

A/2 – Accessibility Hierarchy

Objection: 307/10 Tesco Stores Ltd

Key Issue:

- **does the hierarchy established in the policy reflect the needs of different uses, including major foodstores, that may reduce the need to travel?**

Inspector's Reasoning:

18.5 This Revised Deposit Draft policy is, in my opinion, generally consistent with the thrust of national planning guidance in PPG13: Transport - this that developments should reflect the need to travel by means other than the private car. Here, for example, the hierarchy gives priority to pedestrians and public transport (in varying forms). I support that as a general principle. It would facilitate development designs that - initially - have a starting point of provision for pedestrians, the disabled, cyclists and public transport. If the government's sustainability agenda is to be met, development plan policies should reflect it. Here, the objector appears to me to be pursuing "special pleading" and I see no justification for agreeing with it. "Major foodstores" should not be exempt from the principles of the policy. Any such development arising would need to be assessed against the policy itself, and others in the plan - including those in

Chapter 10. Objection 307/10 is not supported. As a development control tool, however, the policy is unsatisfactory - not indicating the type(s) of development that would be permitted. While not the subject of specific objection, the Council may wish to consider a rewording of the first paragraph of the policy. It should, perhaps, indicate that - along the following lines - development proposals will be permitted for the design and layout of new developments and highway works that reflect the following accessibility hierarchy The reasoned justification to the policy should reflect that.

Recommendation:

18.6 I recommend that:

- **No modification be made to the plan in response to this objection, but the Council is advised to consider paragraph 18.5 above.**

A/3 – New Development - Access for Pedestrians and Disabled People

Objection: 341/7 Tesco Stores Ltd

Key Issue:

- **should the policy be qualified?**

Inspector's Reasoning:

18.7 The insertion of the words “where practicable” to the policy statement would add an element of uncertainty to it - development plan policies needing to indicate the type(s) of development that would be permitted. Consistent with the thrust of the objection - it follows, therefore, that the words “as appropriate” [criterion a)], “wherever possible” [criterion b)] and “where appropriate” [criterion d)] should also be deleted. As the policy does not indicate the type(s) of development proposals that would be permitted, the Council is advised to consider that matter.

Recommendation:

18.8 I recommend that the plan be modified along the following lines:

- **At criteria a), b) and d): delete the words “as appropriate”, “wherever possible” and “where appropriate”, respectively, and re-punctuate. The Council should also consider the last sentence of paragraph 18.7 above.**

A/4 – New Development - Access For Cyclists

Objections:	30711	Tesco Stores Ltd
	341/8	Tesco Stores Ltd

Key Issue:

- **is the policy too detailed, requiring deletion of the criteria, and should it be qualified at the end of the first paragraph of the policy?**

Inspector's Reasoning:

18.9 As recorded at other policies of my Report, this policy does not indicate - again - the type(s) of development that would be permitted. Nonetheless, the policy criteria establish reasonable principles on access provision for cyclists. PPG13 advises on the important contribution that cycling can make to an integrated transport system (paragraph 78). The bullet points to paragraph 79 give guidance on the type of provision that local planning authorities should make in preparing their development plans. The policy generally reflects that - the form of the replacement wording required by 307/11 providing limited, relevant assistance. If the clear requirement of national planning guidance in PPG13 is to be implemented, that needs to be through a development plan policy. Objector 307/11 has not recommended any specific changes to the criteria. I come to a similar view (341/8) on the insertion of "where practicable" at the end of the first line of the policy. This would add an element of uncertainty to it.

Recommendation:

18.10 I recommend that:

- **No modification be made to the plan in response to these objections, though the Council is advised to consider the first sentence of paragraph 18.9 above.**

A/5 – New Development - Access For Bus Services

Objection:	307/12	Tesco Stores Ltd
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Key Issue:

- **should the policy indicate the circumstances in which contributions to public transport services would be required?**

Inspector's Reasoning:

18.11 National planning guidance in PPG13 aims to reduce the need to travel, especially by car, and promotes accessibility by public transport (paragraph 4). The policy seeks to reflect that through provision for bus services, consistent with the broad intent of paragraph 74 of the guidance. Further, the likely availability and use of public transport is an important ingredient in determining locational policies designed to reduce the need for travel by car (paragraph 72). Legal agreements, including contributions to public transport services, would be consistent with that. In my view, the second sentence of the second paragraph of the policy statement - together with its amplification in the reasoned justification - acceptably meets this objector's requirements. As elsewhere in the UDP, however, the policy does not indicate the type(s) of development that would be permitted. Yet again, and while not the subject of specific objection, the Council may wish to consider modifying the first paragraph of the policy to, perhaps, indicate that development proposals will be permitted that make provision for access and servicing by public transport.

Recommendation:

18.12 I recommend that:

- **No modification be made to the plan in response to this objection.**

A/6 – New Development - Access by Taxi

Objections:	341/9	Tesco Stores Ltd
	341/10	Tesco Stores Ltd

Key Issue:

- **is the policy requirement for taxi access reasonable?**

Inspector's Reasoning:

18.13 Policy A/6 does not indicate the type(s) of development proposals that would be permitted, referring to "required". Nonetheless, the intention of the policy is to make provision for access by taxis and I support the plan's paragraph 18.37. Notwithstanding the substandard wording of the policy, the criteria represent reasonable planning considerations. At Revised Deposit Draft, the Council changed the reasoned justification at paragraph 18.36 to delete the requirement for a taxi rank - while still retaining provision for taxi access. Reasonable. Objector suggested use of the words "where practicable" would add uncertainty to the UDP.

Recommendation:

18.14 I recommend that:

- **No modification be made to the plan in response to these objections.**

A/8 – New Development - Capacity of the Highway Network

Objections:	69/5	Biwater PLC
	308/11	Federal Mogul T & N Limited
	311/24	Highways Agency
	341/11	Tesco Stores Ltd
	341/12	Tesco Stores Ltd

Key Issues:

- **the accepted time for required highway improvement works to be completed.**
- **should the policy acknowledge other benefits arising from a proposal - that may not meet the policy criteria - that should be “weighed” in the assessment of such a proposal?**
- **the role of the Highways Agency and DfT policy on the control of development near trunk roads.**
- **the policy requirement for highway improvements.**
- **the policy requirement for a 15 year capacity at major junctions.**

Inspector's Reasoning:

18.15 I support this Deposit Draft objection (69/5). It would, generally, be unreasonable for the policy to include a requirement for improvement works to be brought into use before development commences. This has been recognized by the Council at Revised Deposit Draft through a change to the policy providing for completion before a development is brought into use.

18.16 As to 308/11, A/8 has a clear policy intent - the safe and efficient operation of the highway system as well as residential amenity. In that context, criteria a) to e) are reasonable. In assessing any development proposal, the UDP would need to be considered as a whole. A proposal that did not meet the policy criteria, but from which benefits would be likely to result, would be assessed accordingly against other plan policies. - as well as all material considerations. That is the normal development control process. The aspirations of the objector would not be prejudiced.

18.17 In response to the concern of the Agency, the Council has changed the reasoned justification at Revised Deposit Draft at paragraph 18.42. That acceptably meets

the objection. Similarly, at that paragraph, reference has been added to a 15 year capacity at major junctions reflecting Circular 04/2001.

18.18 Clearly, many developments would be likely to result in an increase in traffic on the highway network. Not all would, however, require a highway improvement. At Revised Deposit Draft, the second paragraph of the policy was changed in an attempt to reflect that. While I am told that the objection has been conditionally withdrawn, its present wording is still unclear as to the Council's intention. Here, for example, a new dwelling to the rear of an existing frontage dwelling (using a shared and acceptable access) would, indeed, result in "additional traffic movements directly generated" by the development. They would place a demand "on the existing highway infrastructure", albeit in many cases likely to be acceptable. Yet, the policy implies to me that, that development, would require funding of works by the developer. Clearly, unreasonable and onerous. The second paragraph of the policy should be modified.

Recommendation:

18.19 I recommend that the plan be modified along the following lines:

- **The second paragraph of the policy should be modified as follows: "Where additional traffic movements directly generated by a development proposal would adversely affect the existing highway infrastructure, the developer of the following".**

A/10 – New Development - Provision of Parking (Including Appendix B)

Objections:	97/2	McCarthy & Stone (Developments)
	285/7	Sainsbury Supermarkets Ltd
	307/13	Tesco Stores Ltd
	341/13	Tesco Stores Ltd
	358/201	Bryant Homes
	371/201	Dixons Group Retail Properties
	371/202	Dixons Group Retail Properties
	381/201	Government Office North West
	446/1	Lancashire County Council
	474/202	Joint Lancashire Structure Plan Group
	474/203	Joint Lancashire Structure Plan Group

Key Issues:

- **should the policy reflect developments that require greater, or lesser, levels of parking - including cycling?**

- **should parking provision as part of new development be consistent with national planning guidance?**
- **is the policy too strict, the Council's starting point being the maximum standard?**
- **the wording of criteria i. and ii. .**
- **are the maximum parking standards in Appendix B acceptable?**

Inspector's Reasoning:

- 18.20 There are related objections to A/10 arising from Appendix B: Schedule of Parking Standards, that are dealt with here. At Revised Deposit Draft, a standard is established for sheltered housing schemes (97/2) and the objection has been conditionally withdrawn. I agree. Similarly, the appendix, together with Inquiry Changes 34 to 40 broadly reflect the approach of PPG13 and 285/7 has also been conditionally withdrawn. Also, at Revised Deposit Draft, A/10 ii. was added to the policy reasonably reflecting the acceptability of additional parking that would have a dual use role in town centre and edge-of-centre locations - reflecting the general intention of paragraph 56 of PPG13 (341/13: conditionally withdrawn). As the plan now includes parking standards, the objection by Lancashire County Council has been reasonably met.
- 18.21 307/13 was made at Deposit Draft, prior to the introduction of Appendix B at Revised Deposit stage. That for food retailing is acceptable in terms of national planning guidance. As to the general point it raised, I am not persuaded that a greater level of car parking is justified for food retailing due to transportation and sustainability benefits. That would not necessarily be the case. Reasonably, some development proposals, potentially, being likely to reduce transport choice and increasing the need to travel by car.
- 18.22 Next, maximum parking standards (317/201). I do not accept that, generally, the starting point on a development proposal should be compliance with the maximum standard of parking, certain circumstances requiring less. PPG13 indicates that reducing the amount of parking in new development promotes sustainable travel choices (paragraph 49). Levels of parking should promote sustainable transport choices (51), as should maximum parking standards (52). Local planning authorities should adopt more rigorous standards, if appropriate (53). The standards in Annex C should apply as a maximum, unless need for higher provision has been established (54). Meeting the maximum standard is not a level that developments are required to achieve. It is simply that, the level beyond which provision should not proceed unless justified. Lower than maximum provision should clearly form part of an assessment, as reflected by the second paragraph to the policy. The third paragraph addresses provision above the maximum. The structure of the policy is therefore acceptable. I do not accept the objector's view that all development proposals should provide parking in accordance with maximum standards. That, in my opinion, would conflict with the intent of PPG13.

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- 18.23 I have also considered the objector's suggested rewording of the second paragraph to the policy (provision less than the maximum standard). More certainty is, however, provided by the Revised Deposit Draft version approach - albeit its first 2 lines should be modified to ensure clarity. I come to a similar general conclusion on the third paragraph of the policy (provision above the maximum). Its suggested amendment to the first paragraph would add little to that existing.
- 18.24 Finally, A/10 i. and ii.. The plan requirements suitably address relevant considerations.
- 18.25 I deal next with objections relating to Appendix B: Schedule of Parking Standards and the Council's Inquiry Changes 34 - 40. Appendix B was introduced at Revised Deposit Draft and the Council has outlined the reasons for it and the changes it now proposes. I have taken into account all the references to national planning guidance before me. Overall, I have some sympathy with the Council's approach. Firstly, they would reflect emerging conurbation standards for Greater Manchester and the intent of the Partial Review of RPG that metropolitan areas should consider adopting urban conurbation parking standards. Here, none of the objectors have argued convincingly that Rochdale does not fall within a metropolitan area context. While it contains rural areas - as in my view do other Greater Manchester authorities - they (taking into account the regeneration and urban concentration approach of the UDP) would not be the focus of a substantial level of development.
- 18.26 Turning to specific objections and, firstly, the standards for B1, B2 and B8 uses and whether a minimum size threshold should be introduced - at, and above which, the standards would apply, particularly for B1 uses. Reflecting emerging Greater Manchester standards, including urban conurbation levels, the Council brings forward Inquiry Change 37 for B1 uses - in 2 parts. I am satisfied that this change reflects the needs of this conurbation of which Rochdale is a part, consistent with the advice in PPG13 that local authorities should adopt more relevant standards, where appropriate. On this UDP, there would be support for more sustainable transport choices. There is no convincing evidence before me that the approach of the Council would be likely to deter employment location in the Borough. While the emerging Greater Manchester standards are in Draft form, to which I would normally give limited weight, they are a reasonable attempt by the Council to reflect the RPG urban conurbation approach. Further, neither RPG nor, the Draft Greater Manchester standards require a threshold, a main thrust of PPG13 being that flexibility should be accorded to local authorities in establishing provision. On B2, Inquiry Change 38 would reflect the Greater Manchester position, that I support - as, generally, would the requirement for B8 uses.
- 18.27 Now, the C3 provision - this primarily relating to an, argued, excessive requirement of 2 parking spaces (excluding garages) for smaller 2 bedroom

dwellings. Having read all the evidence before me, the current position of Bryant Homes appears to be support for a standard of 1.5 spaces per smaller dwelling, including visitor spaces but not garages. The latter would be additional, where appropriate. The Council's position is a maximum, A/10 indicating the circumstances where provision would be below the maximum. If the objector standard was to be applied, it appears to me that 1.5 spaces would be required for every smaller dwelling - whether needed or not. I, further, consider that practical difficulties would arise in its implementation - as argued by the Council, not least on a 2 dwelling development and also a development of a single dwelling. The Council's approach, together with A/10, would establish sufficient control and reasonable flexibility.

18.28 Related to this is Government Office concern. The intent of Inquiry Change 40 would be that parking standards for C3 developments would result in an average over the UDP period of 1.5 off-street spaces per dwelling. Acceptable. Next, whether garages should be included in an assessment of parking provision. A balancing judgement is necessary here. Clearly, a garage space provides off-street parking space. The reality of domestic occupation needs, however, to be taken into account - as argued by the Council. In my experience, garage space is increasingly occupied for ancillary domestic uses over which the Council would have little enforceable control. Similarly, garage space is frequently converted to living accommodation, not necessarily requiring planning permission. Both increase on-street parking on the highway or on verges, with major implications for highway users including - in residential areas - young children playing in the road. On my travels about Rochdale, I have no reason to doubt the merits of the Council's view in these respects. Again, the standard is a maximum and, while the Council has available to it powers to control on-street parking, they would not be appropriate in every case. My balance of judgement is that the Council's approach is correct.

18.29 As to the Joint Lancashire Structure Plan Group, I consider that Inquiry Changes 34, 35 and 37 reflect its objection in these respects. C3 provision has been dealt with above (including garages) while, on accessibility corridors, Inquiry Change 40 would be part of any assessment. Lancashire is outside Greater Manchester. I consider that Rochdale has made relevant provision for cycling in the UDP.

Recommendations:

18.30 I recommend that the plan be modified along the following lines:

- **Delete the first 2 lines of the second paragraph and substitute:**

“Based on an assessment of the following criteria, the Council will require car parking provision as part of new development at less than the maximum standard:”.

- **Modify the plan in accordance with Inquiry Changes 34 to 40.**

A/11 – New Development - Transport Assessments

Objection: 311/25 Highways Agency

Key Issue:

- **should the policy and reasoned justification refer variously to a Transport Assessment and discussions with the Agency when a development proposal would be likely to impact on the trunk road network?**

Inspector's Reasoning:

18.31 At Revised Deposit Draft, the Council has made an acceptable addition to paragraph 18.57, that links to a Transport Assessment.

Recommendation:

18.32 I recommend that:

- **No modification be made to the plan in response to this objection.**

A/12 – New Development - Travel Plans and School Travel Plans

Objection: 474/204 Joint Lancashire Structure Plan Group

Key Issue:

- **has the Revised Deposit Draft version weakened the policy in respect of School Travel Plans?**

Inspector's Reasoning:

18.33 The policy does not indicate the type(s) of development proposals that would be permitted. It should. Nonetheless, the Council changed the policy at Revised Deposit Draft by an addition to the second paragraph of the policy itself and the deletion of the first sentence of paragraph 18.62 - that now covered by the former. The application of the policy has been clarified and, rather than weaken the policy, it - in my view - strengthens it. It gives emphasis to new school facilities that may change the number or nature of trips to a site, or accessibility arrangements to/from the site. That would include an additional classroom (the first sentence of 18.62 at Deposit Draft). It is not my role to ensure compatibility

between the policies of adjoining authorities - not least as limited information on the basis of the practice at Lancashire County Council is before me.

Recommendation:

18.34 I recommend that:

- **No modification be made to the plan in response to this objection.**

A/14 – A Strategic Cycling Route Network

Objections:	98/45	Countryside Agency North West
	446/03	Lancashire County Council

Key Issue:

- **should the policy refer to the Agency's Greenways Initiative and also address cross-border cycling links?**

Inspector's Reasoning:

18.35 In this Borough, there are clearly a number of initiatives underway between the Council and agencies that relate to varying policies of the plan. To include them all would result in an excessively detailed development plan. Paragraph 18.70 refers to the work that the Council is undertaking with Objector 98/45. No further addition is necessary. PPG13 does, however, indicate that local authorities should, in preparing their development plans, identify cycling networks and routes (first bullet point to paragraph 79). Cycle routes and networks do not respect local authority boundaries. In response, the Council has reasonably acknowledged this in the Revised Deposit Draft version of the plan (paragraphs 18.67 and 18.70).

Recommendation:

18.36 I recommend that:

- **No modification be made to the plan in response to these objections.**

A/15 – Facilities for Buses

Objections:	311/26	Highways Agency
	418/10	Littleborough Civic Trust

Key Issues:

- **should the plan indicate that the Agency should be consulted where there may be an impact on the trunk road network?**
- **should the plan specify the bus priority measures on the A58 Quality Bus Corridor?**

Inspector's Reasoning:

18.37 A local planning authority is required to undertake consultations on proposals. That would include The Highways Agency on matters that may affect its interests. Any reasonable local planning authority would do so when a relevant development proposal arises. Here, I see that the Agency is one of a number of Greater Manchester partners involved in the Quality Bus Corridor Programme. There is no need for me to recommend such a consultation in the UDP.

18.38 The general intention of the policy is not to specify specific measures - rather to establish a development control policy that seeks to ensure that bus facilities and priority measures are not adversely affected by development proposals. Again, however, the policy statement overall does not indicate the type(s) of development that would be permitted. The routes to which the policy applies are identified in paragraph 18.71 a) to d), including the A58 - sufficient guidance in this UDP being given. Further, to identify specific measures would require this to be done for all 4 routes. An unacceptably detailed UDP would result.

Recommendation:

18.39 I recommend that:

- **No modification be made to the plan in response to these objections.**

A/16 – Middleton and Rochdale Bus Stations

Objection: 279/2 Consignia PLC

Key Issue:

- **would the policy adversely affect Royal Mail facilities at Middleton?**

Inspector's Reasoning:

18.40 The Revised Deposit Draft policy provides a context for the redevelopment of 2 bus stations, incorporating design criteria. In considering any proposal that may arise, the Council would reasonably consult with any interest that may potentially

be affected. If relevant, that would include the objector. It has not disputed the Council's evidence that redevelopment of the Middleton Bus Station is underway, the objector not having objected to the development. To reflect the current position, the Council brings forward Inquiry Change 28 that removes reference to Middleton. I agree, the reasoned justification amplifying the Council's intent.

Recommendation:

18.41 I recommend that the plan be modified along the following lines:

- **Modify the plan in accordance with Inquiry Change 28.**

A/19 – New Railway Stations

Objection: 485/203 Network Rail

Key Issue:

- **the merits, or otherwise, of criterion a) at Deposit Draft and paragraph 18.89 at Revised Deposit Draft.**

Inspector's Reasoning:

18.42 Network Rail has not objected to the principle of the new railway stations identified in the policy. They are consistent with the intentions of national planning guidance in PPG13 to reduce the need to travel by private car. The Council, itself, may not be the agency responsible for their implementation. Criterion a), at Deposit Draft and properly deleted at Revised Deposit Draft, addressed matters that would reasonably be the subject of assessment prior to the consideration of any planning application. As part of the policy statement they are not necessary, paragraph 18.87 giving background information of the work on viability being undertaken by the Passenger Transport Executive.

18.43 Paragraph 18.89 at Revised Deposit Draft, subject of objection, does not appear to me to be directly related to this policy for specific new stations - not least as, at Deposit Draft, it formed part of a now deleted policy (A/20). It represents the aspirations of the Council for what it considers to be improvement of rail services within, and about, its area. Fairly, the objector argues that operational and capacity matters are not the responsibility of the Council. While raising significant transport matters, a more appropriate location for a discussion of these matters would be a Local Transport Plan.

Recommendation:

18.44 I recommend that the plan be modified along the following lines:

- delete paragraph 18.89 with subsequent renumbering.

A/22 – Accessibility for Freight to Rail

Objections:	107/3	Railtrack PLC
	107/4	Railtrack PLC
	311/27	Highways Agency
	439/302	Castleton (EC) Residents Association
	463/302	Mrs M Metcalfe

Key Issue:

- the merits of the policy.

Inspector's Reasoning:

18.45 Accessibility for freight to rail is supported by PPG13 and the policy is a fair interpretation of that, indicating the types of development that would be permitted. The Revised Deposit Draft version of the policy acceptably accommodates the interests of the Agency. There would be no justification for an additional criterion requiring an assessment of the wider implications on the impacts of the rail network. This would be likely to be outside the Council's control. The amendment to the last paragraph of the reasoned justification at Revised Deposit Draft, this generally relating to developer contributions, is acceptable. Thereafter, difficulties arise. Local, Castleton, objection relates to the implication there - not least 18.92 c). The Council places before me Pre-Inquiry Change 20, where I proceed on the basis that 18.92 d) to j) are not affected by Pre-Inquiry Change 20. While, perhaps, a nuance - the Change implies a commitment to a rail-freight facility at the Trub Farm Area of Opportunity that I do not support. My view on that, is set out in Chapter 12. I do not, therefore, accept Pre-Inquiry Change 20. On this policy, 18.92 c) should be deleted from the plan and any potential there for a rail-freight facility should proceed, if at all, on the basis of my conclusions at Chapter 12 on Trub Farm.

Recommendation:

18.46 I recommend that the plan be modified along the following lines:

- Delete paragraph 18.92 c), as amended by Pre-Inquiry Change 20.

A/25 – Strategic Highway Network

Objections:	311/28	Highways Agency
	297/6	BT Group Plc

Key Issues:

- **should the motorway network within the Metropolitan Borough be included as part of the strategic highway network defined in the policy - and should the role of the Agency be more clearly stated?**
- **should the policy safeguard operations adjacent to Town Head junction?**

Inspector's Reasoning:

18.47 The Proposals Map defines the strategic highway network within the Metropolitan Borough, its management being the responsibility of the Council. That does not include the existing motorways that pass through it. These are, however, included on the Map and shown as being "(For information)". That is reasonable. The motorways are managed by the Highways Agency. The plan does reflect, therefore, the existence of a motorway network. At Revised Deposit Draft, the Council has added a sentence to the reasoned justification at paragraph 18.103 that reflects the need for the Council to consult the Agency on any development proposal that may impact upon the trunk road network. That is clearly a "joined-up" approach to a policy that generally addresses matters that are within the responsibilities of the Council. The objectives of the Agency would not be prejudiced by this policy.

18.48 The scheme at Town Head junction is carried forward from the adopted plan and 297/6 does not represent an objection in principle. It controls land adjacent to the junction. No details of any scheme are before me. As they emerge, any reasonable local planning authority would consult with adjacent interests on them. This would include the objector and I see no reason to recommend an addition to the reasoned justification requiring either, specific consultation or, an undertaking that its operations would be safeguarded.

Recommendation:

18.49 I recommend that:

- **No modification be made to the plan in response to these objections.**

Chapter 18 - (Omissions)

Objections:	306/8	Moto Hospitality
	388/5	Mrs S Hill (Queen's Park Restoration Group)

Key Issues:

- **the plan's approach to Motorway Service Areas (MSAs), and its specific intentions for the Birch MSA.**
- **should a policy be included within the UDP providing for additional car parking at Queen's Park?**
- **should a general, aviation related policy, be included within the plan?**

Inspector's Reasoning:

18.50 The context for Objection 306/8 is the M62/M60 to the north of Manchester, passing across the Borough from the Bury boundary to the west to that with an adjoining authority - the latter as the M62 approaches its summit on Saddleworth Moor. There is an existing MSA at Birch, close to the Borough's boundary with Bury. Further, short sections of the A627(M) link Rochdale with the M62 and onwards to Oldham and Manchester. My reading of the objection (with its supporting appendices) is that it contains a number of elements. As to additional MSA/roadside facilities, I have no reason to doubt its evidence that, generally, there is a link between motorist fatigue and accidents. It submits no convincing evidence, however, that there is a need for additional roadside facilities within the Borough, not least a specific site to meet it. As such, I am not persuaded of the need to recommend the inclusion of a specific policy for their provision. At Revised Deposit Draft, the Council has included the Birch MSA as an existing, and major, developed site within the Green Belt (Chapter 7, dealt with there). That would, acknowledge the site as a motorway facility, where development would be permitted subject to the criteria therein. Again, subject to my recommendations there, future development would not be precluded. I am referred to a policy of the Cherwell Local Plan Review at Second Deposit but I support the Rochdale evidence that the specific circumstances of that case are not directly comparable to this objection. Further, the wording of the policy suggested by the objector represents an aim/objective rather than a statement of the type of development that would be permitted. Proposals for the various facilities supported by Moto Hospitality would need to be assessed against the requirements of D/5 and all material considerations.

18.51 It is not in dispute between Council and objector (388/5) that, on occasion, car parking is of substantial concern, not least due to recent improvements at Queen's Park. Having visited the park, I share the view of the Council that the objector's suggestions for an increase in provision would be likely to adversely affect other features of the park. Reasonably, the Council should approach this matter through a management assessment, involving more sustainable options than merely increasing permanent car parking provision. That would include the management of buses. Here, I note that land at the cricket club has been used to provide

parking at a major event. In advance of that assessment, it would be inappropriate to recommend the policy suggested by the objector.

18.52 I have taken into account Annex B to PPG13. Objector 449/1 has not disputed the evidence of the Council that there are no significant flying sites within the Borough; no need for them has been identified during the plan process; or that demand from an operator exists. The Awareness Council does not convincingly argue a requirement for a specific facility. A proposal may, however, arise - including a helipad. It would not be precluded, in principle, by the plan - that being assessed against all its relevant policies, as well as the advice in the last sentence to the second bullet point to paragraph 5 of Annex B. In all these circumstances, I do not support the objection.

Recommendations:

18.53 I recommend that:

- **No modification be made to the plan in response to these objections.**

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