

CHAPTER 5: THE PLAN STRATEGY

PL/00 - The Plan as a Whole

Objection: 98/1 Countryside Agency North West

Key Issue:

- **should the UDP adopt a “net gain” approach and indicate how conflict between objectives are to be addressed?**

Inspector's Reasoning:

5.1 This objection has, reasonably, been taken by the Council as one to the plan as a whole. It includes matters raised by the Agency that are also subject of other specific Chapter recommendations in my Report. The general issue raised is dealt with here. The Agency supports a “net gain” approach - albeit the detail of what that means is far from clear in the objection. Under planning legislation, I am not aware of any requirement for a developer pursuing a proposal to establish that it would result in a “net gain”. That may, however, be a material factor for the decision-maker in the assessment. Decisions on planning applications should, in my view, take into account whether a proposed development would cause demonstrable harm to interests of acknowledged importance. The Agency's requirement would be unacceptably onerous.

5.2 Development proposals frequently involve conflict between plan objectives. The development control process requires the decision-maker to undertake a balancing exercise. Further elaboration is not, therefore, necessary.

Recommendation:

5.3 **I recommend that:**

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

KO/1 - To Strengthen the Local Economy

Objection: 306/1 Moto Hospitality

Key Issue:

- **should an addition be made to paragraph 5.7 of the plan that would pursue the safety of all transport users - by relevant infrastructure, services and choice?**

Inspector's Reasoning:

5.4 As the UDP indicates at paragraph 5.4, and I agree, this objective provides part of the basis for the policies of the plan. It is consistent, broadly, with the government's own sustainability objectives. Paragraph 5.7 reasonably establishes the general means by which the objective will be met. I am not persuaded that the addition sought - generally addressing transport safety - relates to an economic objective. Chapter 18 is the most relevant part of the UDP. I also share the view of the Council that the wording suggested by the objector would require action on infrastructure by agencies other than the Council. Although the 4th bullet point to paragraph 5.7 refers to "improving the transport infrastructure" that is within the context of Part One Policy G/A/1.

Recommendation:

5.5 I recommend that:

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

KO/3 - To Enhance the Environment

Objection: 306/2 Moto Hospitality

Key Issue:

- **should the reasoned justification to Objective KO/3 be extended to include acceptable examples of development?**

Inspector's Reasoning:

5.6 As the Council argues, this objective provides part of the basis for the detailed policies of the UDP. It is consistent, broadly, with the government's own sustainability objectives. Paragraph 5.12 acceptably indicates the general means by which the objective would be met. It is not intended to be a detailed development control policy. The objector considers that development in the Green Belt and the countryside could potentially take place (subject to an assessment of all considerations) that would not result in any material impact on the surrounding countryside or views. Any development proposal would, however, need to be the subject of assessment through other specific policies of the plan - including those relating to the Green Belt and countryside. The inclusion of acceptable forms of development in this chapter at this objective, is clearly unnecessary and inappropriate - while adding an unjustified level of detail.

Recommendation:

5.7 I recommend that:

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

G/SP/1 (Part One Policy) - Urban Concentration and Regeneration

Objections:	308/1	Federal Mogul T & N Ltd
	381/203	Government Office North West
	461/203	The Wilton Estate

Key Issues:

- **should the policy reflect finalized Regional Planning Guidance (RPG)?**
- **should the policy seek to achieve amenity and environmental benefits?**
- **should the reasoned justification at paragraph 5.17 permit employment development outside allocated sites where exceptional circumstances justify it?**

Inspector's Reasoning:

- 5.8 The Council's Pre-Inquiry Change 1 has changed the priority listing of appropriate locations for development to reflect RPG Policy DP1. While I agree, the UDP before adoption should be edited to ensure that RPG references relate to its finalized version.
- 5.9 This Part One policy establishes a spatial strategy for regeneration and urban concentration. There is no need for it to refer to the achievement of amenity and environmental benefits. They, together with others, would form part of the assessment of a development proposal and their inclusion would introduce an unnecessary level of detail to a broad strategic policy.
- 5.10 The 5th and 6th bullet points to paragraph 5.17 indicate the way in which the plan promotes urban concentration and regeneration at existing employment sites and greenfield, allocated sites. They broadly reflect the sequence established by G/SP/1. As to a suggested inconsistency with G/EC/1, the second paragraph to that policy requires compliance with the plan's Part One Spatial policies - that including G/SP/1. A reference to exceptional circumstances would introduce an unsatisfactory element of uncertainty.

Recommendation:

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

- **Modify the plan in accordance with Pre-Inquiry Change 1.**

G/SP/2 (Part One Policy) - Rural Protection and Regeneration

Objections:	98/5	Countryside Agency North West
	306/3	Moto Hospitality
	381/8	Government Office North west

Key Issues:

- **should the reasoned justification refer to existing “major” developed sites in the Green Belt?**
- **is, firstly, the wording of sub-paragraph A) acceptable and, secondly, should an additional criteria be added to the policy that would, generally, permit development within the Green Belt and open countryside - and within existing developed sites - provided that it does not affect land outside those site boundaries?**
- **should the policy refer to the Agency’s net gain approach, include more references to sustainability, facilitate development of land outside the urban area, and refer to landscape character areas?**

Inspector’s Reasoning:

5.12 I have dealt with the requirements of 381/8 in Chapter 7 of my Report. There, I support the objection.

5.13 At G/SP/2 A), 306/3 has suggested a form of words that is broadly similar to that in the Revised Deposit Draft version. Its evidence supports, for example, the modernization, conversion and redevelopment of existing Green Belt sites. Yet, its use of the words “preserve or enhance the environment” imply to me a more rigorous test than that of the Council that I find acceptable. The objector also supports a more flexible approach. Policy G/SP/2 and the Green Belt policies at Chapter 7 generally reflect national planning guidance. I come to a similar view on the countryside outside the Green Belt. Within an approved Green Belt, development proposals would need to meet the test of appropriateness and, if inappropriate, very special circumstances would need to be established. Setting aside my view that the suggested additional criteria would add a detailed development control consideration to a strategic Part One policy, it also appears to me to seek to extend national policy on the control of development within a Green Belt. The relevant control has been established by the plan as a whole, subject to my recommendations on specific policies.

5.14 As to the Agency’s “net gain” approach, I have dealt with that at paragraph 5.1 above. Overall, the plan - including this policy - has a sustainable approach and I see no convincing justification to add further references to it in the policy. Here, as the plan seeks to concentrate development within the urban area - it is

reasonable for there to be control on development outside, including the link in the policy to G/SP/3. If a developer has to undertake a comparative site search as part of a justification for a proposal, then so be it. Finally, there is no need for this strategic policy to refer specifically to landscape character areas, excessive detail resulting.

Recommendation:

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

- **At paragraph 5.21, 4th bullet point, before the word “existing”, add the word “major”.**

G/SP/3 (Part One Policy) - Meeting the Needs of Local Communities

Objections:	307/1	Tesco Stores Ltd
	343/11	English Nature
	343/221	English Nature

Key Issues:

- **should the reasoned justification include additional cross-references to Policies NE/2 and NE/4?**
- **should an additional criterion be added to the policy giving weight to development that contributes to the regeneration of key areas and local employment?**

Inspector's Reasoning:

5.16 I do not support, generally, cross-referencing to policies - that would need to be done comprehensively throughout the plan with an overly-detailed document resulting. The UDP would need to be considered as a whole. Nonetheless, the Council's Pre-Inquiry Changes 2 and 3 would add added further cross-references to NE/2 and NE/4, variously at paragraph 5.24 - but in the context of the Rochdale Canal. While limited in their extent, I see no need for any further.

5.17 Objector 307/1 has not specified the “key areas” to which the objection relates. It is not for me to attempt to interpret the objection on an area basis. As the objection appears to me to support regeneration and local employment, I consider that this strategic policy would achieve that, notably through criterion D). Similarly, it would be reasonable for criterion A), in relevant circumstances, to involve an assessment of a contribution to local employment.

Recommendation:

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

- **Modify the plan in accordance with Pre-Inquiry Changes 2 and 3.**

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