

## CHAPTER 8: EMPLOYMENT AND THE ECONOMY

### Chapter 8: General

**Objection:** 307/2 Tesco Stores Ltd

#### Key Issue:

- should retailing be recognized as a major employment generating activity?

#### Inspector's Reasoning:

8.1 The Council added, at Revised Deposit Draft, a reference to retailing at the reasoned justification to Policy G/EC/1.

#### Recommendation:

#### 8.2 I recommend that:

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

## G/EC/1 (Part One Policy) - Employment Land Supply

<b>Objections:</b>	24/1	Hartle Estates
	24/201	Hartle Estates
	98/10	Countryside Agency North West
	156/1	Hopwood Community Association
	248/7	Peel Investments (North) Ltd
	248/202	Peel Investments (North) Ltd
	255/2	Fortymas Developments Ltd
	301/1	FKI Plc
	308/2	Federal Mogul T & N Limited
	310/201	Redrow Homes (Lancashire) Ltd
	311/1	Highways Agency
	311/203	Highways Agency
	340/3	Mr D Tongue
	359/204	Healey Dell Properties & David McLean Homes
	442/6	Redrow Homes (Lancashire) Ltd & Bellway Homes North West

#### Key Issues:

- is the provision of employment land within the Borough acceptable in terms of quantity, variety and quality of land?
- should the UDP more clearly distinguish commitments and allocations?

- should further B8 development within Heywood, and outside Pilsworth, be curtailed?
- should the policy and its reasoned justification refer to rural employment issues?
- should the phrase “environmental impact” be replaced by “sustainable development” in the policy?
- is the policy and reasoned justification consistent?
- is the policy sufficiently flexible, so that it reflects PPG 3: Housing on the conversion of employment land to housing?
- should the policy refer to the effect of employment development on the strategic highway network, road safety and accidents?
- should land to the north of Hareshill Road be allocated for industrial use, if not required for housing?
- should land to the south of the Stakehill Industrial Estate be allocated for industrial use?
- should land at Hollin Lane, Middleton be allocated for employment use?

#### Inspector's Reasoning:

##### Land Supply Issues

8.3 Objectors are concerned at the provision of employment land within the Borough - both as an over and under-supply. National planning guidance in PPG4 does not set out a specific methodology for the assessment of employment land to be followed, but stresses the importance of providing developable land with suitable infrastructure to meet business needs. (Paragraph 6). A recent change to PPG3, “PPG3 Housing: Supporting the Delivery of New Housing” (ODPM 2005) supports the use of employment land reviews as set out in the study commissioned by the ODPM, “Employment Land Reviews”: (2004). That indicates both a quantitative and qualitative approach to the assessment of employment land, with particular regard to assessing the suitability for the release of existing or allocated employment sites for housing. I consider that, broadly, the steps undertaken by the Council - as set out in parts 4 and 5 of its Employment Land Topic Paper - complies with this approach. Table 1 (page 15) of the Council's Paper identifies the contribution to Employment Land Supply made in the first two years of the Plan (2001 and 2002) - a total of about 13.7 hectares. The UDP assumes a take-up rate of 12 hectares a year - the level established in the adopted plan - and consistent with past rates. In the period, 2003-2016 this equates to 156 hectares. The Revised Deposit Draft version of the plan provides for a total land supply of 172.6 hectares (Employment Topic Paper, Table 3, page 21) from April 2003. If the take-up assessment is reasonable, some limited over-supply would result. I have had, however, to consider the specific circumstances of 3 significant sites - land to the north of Cripplegate Lane, Castleton; that at Middleton West Business Park; as well as land at Trub Farm, Castleton. I have recommended accordingly. The first would add land to employment supply, the other 2 reducing it. My estimation is that these 3 sites would confirm a limited over-supply based on the Council's approach - around 159 hectares over the remaining plan period. In my view, local

planning authorities should not allocate excessive areas of employment land where they have not been justified, including greenfield sites. Here, I see that there has been a decline, recently, in the uptake of employment land.

- 8.4 I recognize Hartle Estates' concern that there has been a decrease in the uptake of employment land. The objector suggests, in its evidence to the Employment Round Table Session (cancelled) that either, a more appropriate figure would be 9.4 hectares over a 15 year period between 1988-02 or, that an alternative 5 year rolling approach to land take-up should be followed - suggesting a rate of 9.55 hectares between 1998-02. However, I do not find that this is conclusive evidence that employment land up-take rates will remain low for the remaining plan period as it is clear that there have been significant fluctuations in take-up rates in recent years. It is clear that, although the local economy is underperforming, it still has grown over the last decade. It is reasonable, therefore, to suggest alternative explanations as to why this rate has been reduced in the short term that would not point to a lack of demand in the Borough, including the development of suitable sites allocated in the adopted Plan. The development of the Kingsway Business Park, which is an employment location of regional significance, would certainly stimulate demand - both in the Business Park itself and in wider locations. I do recognize that a significant over-supply of employment land would not help to meet other plan objectives, not least those concerned with making the best use of land, but the UDP has robust mechanisms for monitoring to address any issues of over-supply in the future, should they occur. I consider it unlikely that there would be a significant over-supply of employment land in the Borough. Given this, together with the reasons I set out in my response to objections to Policy EC/7, there is insufficient justification to require the deletion of Kingsway Business Park, as suggested by the objector.
- 8.5 In terms of an under-supply of land, objectors are also concerned about the role played by Kingsway Business Park. Peel Holdings' (North) concern is that the business park is a site identified in Regional Planning Guidance as a regional investment site and as such is likely to attract significant employment investment from outside the Borough. Although possible that take-up rates may increase, particularly when land at the business park becomes available, as take up rates are currently relatively low, I come to the view that the 12 hectares take-up appears a robust assessment of need across the whole UDP period. It is also likely that Kingsway Business Park would, to a considerable extent, help meet local needs as the intention is to provide a wide variety of units and opportunities on this large site. Furthermore, there remains a significant amount of other employment land identified outside the business park which amounts to just under 60 hectares - about 5 years supply at the UDP's estimated take up rate, together with the possibility of further windfall sites coming forward. Any potential shortfall of employment land would not be so significant that it could not be adequately addressed in a review of the UDP, particularly given the increased flexibility soon to be introduced under changes to the development plan system.

- 8.6 As to the view that there is a limited mix of tenure in the Borough, I have seen no strong evidence from either the objector or the Council on the nature of tenures on available sites. Paragraph 6 of PPG4 requires that a wide variety of sites is provided that meets the needs of business, but there is no specific reference to tenure. I consider that the Council has established a relatively broad portfolio of sites, as set out in Annex A of the Council's Employment Land Topic documentation, reflecting the advice in PPG4.
- 8.7 In terms of Redrow Homes' concerns over the timing of development at Kingsway Business Park, for the reasons I set out below at E/C7, this site would be likely to be developed within the time scale of the UDP. The Council has clarified that the proposed number of hectares in Policy EC/7 at the site refers to land that will be developed for employment use and does not include land currently in employment use.
- 8.8 To conclude my considerations of land supply issues, I find that the plan has a largely robust monitoring methodology and is sufficiently flexible to address both issues of significant under or over-supply, should they occur. Whilst I have recommended modifications with respect to sites at Cowm Top, Middleton West Business Park and Trub Farm, outside these locations I do not consider there is any necessity to allocate additional land for employment use or remove any other sites. Similarly, while I recognize that there is some uncertainty about the development potential of particular sites, the plan is sufficiently flexible to address any changes to the level of supply that may occur over its period.

### **Other Issues**

- 8.9 In response to Objections 24/1 and 24/2, the total hectareage of sites given in Policy EC/9 (both in terms of large and small sites) does not correspond with the table of employment land supply on page 46 that forms part of the reasoned justification to EC/1. It also appears that the reasoned justification to Policy EC/9 refers to an inaccurate total hectares figure (68.8 hectares) of employment land allocated under this policy. Otherwise, both policies are acceptably consistent with the justification. More generally, however, I find that the status of the specific sites that make up the employment land supply is not altogether clear. Both policies should refer to consistent figures through a table either, in the reasoned justification to Policy G/EC/1 or, in the plan's appendices. The planning status of the sites would then be confirmed. Further, my conclusions below on land at Cowm Top, Middleton West Business Park and also Trub Farm - should be reflected in this table.
- 8.10 The Council has recorded objection 156/1 under G/EC/1. During the course of this UDP Inquiry, I spent some time in - and around - Heywood. To the south of Heywood in the Pilsworth area, there has been a substantial growth in B8 uses. This no doubt reflects, as the Council argues, the proximity of the motorway network. The plan does not, however, allocate any sites for B8 uses on the south side of Heywood - outside the Defined Urban Area and within the Green Belt as

proposed, this latter reflecting the adopted plan. National planning guidance in PPG4: Industrial and Commercial Development and Small Firms indicates that planning authorities should ensure that there is a variety of sites available to meet differing needs (paragraph 6). That, the plan generally seeks to achieve. B8 uses are clearly an important element of the economy. While this 1992 guidance indicates that some types of modern distribution facilities have a low density of employment and are served by a large number of lorries, my view is that some B8 uses can generate fewer vehicles than B1/B2 uses and can employ more people. The objector has not submitted any meaningful evidence to justify its view that B8 development in, and around, Heywood has been detrimental to the town in social, employment, economic and environmental terms - or that B8 uses bring less skilled or lower paid jobs. As to traffic generation arising from such a proposal, sufficient control would be established by Policies EC/2, EC/8 and A/8. For the plan to restrict, as a matter of principle, the further development of existing B8 uses within Primary Employment Zones and Mixed Employment Zones would be unreasonable. Any development proposal would be considered in the light of them, and all material considerations.

- 8.11 Next, to the Countryside Agency. The Council suggests uncertainty over the part(s) of the objection withdrawn. I agree that there is some lack of clarity. Nonetheless, changes have been made to the policy's reasoned justification at Revised Deposit Draft that further recognize the importance of the rural economy. I consider that this aspect of the objector's concern has been met. It is not necessary for the policy to refer to "sustainable development" rather than "environmental impact". The Council's approach is generally consistent throughout the UDP with sustainable development as a major principle. It should be read as a whole.
- 8.12 As to the concerns of 255/2 on the consistency of the policy with plan objectives, these have been addressed by the Council through Inquiry Change 41. Similarly, the Council has addressed 301/1 and 308/2's concerns relating to the policy's consistency with PPG 3, in terms of the release of employment land for housing and its inflexible nature have been acceptably dealt with through the insertion of a test of appropriateness to the policy at Revised Deposit Draft. 301/1 and 308/2 support this. Further, the concerns of 359/204 over the policy's flexibility are unfounded given this qualification. I do not consider, however, that this approach reflects the necessary degree of certainty that a plan policy should have. The phrase "where appropriate" should be removed from the plan. It would be preferable for any qualification of the policy, concerning the review of employment land and allocations, to be set out in the reasoned justification.
- 8.13 Turning to the Highways Agency, bullet point 6 of paragraph 8.5 of the plan has been changed at Revised Deposit Draft to refer to the effect of employment development on the highway network. To properly meet its objection, however, there should also be a reference to road safety.

8.14 I have dealt with the allocation of land to the north of Hareshill Road; to the south of the Stakehill Industrial Estate; and at Hollin Lane Middleton at Policies EC/9 and EC/10.

**Recommendations:**

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

- **Modify the plan in accordance with Inquiry Change 41.**
- **The table showing Employment Land Supply at the top of page 46 and the sites listed under Policy EC/9 should be modified so that both parts are consistent. Similarly, paragraph 8.47 should reflect the allocation of employment land set out in policies G/EC/1 and EC/9.**
- **The UDP should include a table of future employment land supply that differentiates between the planning status of sites - either, at an appropriate place in Chapter 8 or, in the plan's appendices.**
- **The phrase "where appropriate" should be removed from the policy. The policy's reasoned justification should clarify how the protection of employment sites and allocations will be applied to ensure that that, where justified, the release of previously-developed employment land or land allocated for employment purposes for alternative uses is acceptable.**
- **Insert the word "safely" before "accommodate" in bullet point 6 of paragraph 8.5**

**EC/2 – Primary Employment Zones (PEZs)**

<b>Objections:</b>	156/2	Hopwood Community Association
	282/1	DRPH Ltd
	311/2	Highways Agency
	386/1	Morley Fund Management Ltd

**Key Issues:**

- **should further B8 development within Heywood, and outside Pilsworth, be curtailed - primarily due to traffic congestion and other environmental damage?**
- **should land be added to, or deleted from, the PEZs?**
- **does the policy at EC/2 c) adequately protect the operation of the trunk road network?**
- **should the policy include criteria that may already be covered by other policies; and is criterion b) reasonable - taking into account the adopted UDP?**

**Inspector's Reasoning:**

- 8.16 I have dealt, primarily, with the employment issues relating to the land north of Cripplegate Lane at EC/9 c). There, I recommend the reinstatement of the allocation as a PEZ. It follows, therefore, that the Proposals Map should be modified accordingly. I have dealt above with objections concerning the amount of employment land available in the plan.
- 8.17 Policy EC/2 c) is one of 3 criteria that establish control over development and a change of use within PEZs. No unacceptable traffic problems should result. Some proposals would, in my opinion, be likely to have an effect on the trunk road network - the responsibility of the Agency. All relevant policies of the plan would need to be taken into account in the assessment of a development proposal. Here, Policy A/8 to Chapter 18 is, in my view, the main policy of the plan for the assessment of proposals that may affect the capacity of the highway network. It would need to be taken into account in the assessment of proposals under this policy. At Revised Deposit Draft, the Council added acceptable references there - to both the policy and its reasoned justification. They have met this objection (311/2) that has been conditionally withdrawn.
- 8.18 All policies of an adopted plan would need to be taken into account in the assessment of development proposals. The policy relates, however, to PEZs (generally, I saw, substantial in size) where a policy lacking any criteria - would be likely to send the "wrong message" to developers. A proposal arising within a PEZ would, in my opinion, have the potential to adversely affect existing uses within a PEZ, as well as those without - unless criteria are applied. Concern has not been expressed on their principle - rather that they are repeated elsewhere. In the specific circumstances of the objections, I consider that little harm, if any, would result from their inclusion - rather, resulting in assisting plan clarity. As to criterion b), I have read Policy EN/48 of the adopted plan. The suggested addition of the words "clearly lead" would add little to it. The decision-maker on any proposal would, reasonably, be expected to come to a view if any proposal was unacceptable, if necessary taking expert advice. Here, the Council, through Inquiry Change 41 intends to add an addition to paragraph 1.3 generally explaining that - in judging planning applications - all relevant policies of the plan should be taken into account. It is supported.
- 8.19 Objection 156/2 is similar to 156/1 made to G/EC/1. I have come to a similar conclusion.

**Recommendations:**

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

- **At adoption, the Proposals Map should define land north of Cripplegate Lane, Cowm Top as a Primary Employment Zone**

- **Modify the plan in accordance with Inquiry Change 41.**

#### **EC/2 - Primary Employment Zones- Cowm Top, Castleton**

**Objection:** 111/201 Bevamodus

#### **Key Issue:**

- **should the site be defined as a PEZ?**

#### **Inspector's reasoning:**

8.21 I have dealt with this issue below. For the reasons given there, the plan should be modified to define this land as a PEZ.

#### **Recommendation:**

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

- **At adoption, the Proposals Map should define land north of Cripplegate Lane, Cowm Top as a Primary Employment Zone.**

#### **EC/2 - Primary Employment Zones - GNG Foam: Todmorden Road, Littleborough**

**Objection:** 159/1 Fairclough Homes

#### **Key Issue:**

- **should the designation of the site as a PEZ be deleted, the land allocated for residential development?**

#### **Inspector's Reasoning:**

8.23 The site is located to the north-east of Littleborough town centre. The current occupiers are seeking, apparently, a new and more suitable location within the Borough - closer to a motorway connection. The land is within a Mixed Employment Zone (MEZ), rather than a PEZ as indicated by the objector. The MEZ extends to the north of the site and contains largely industrial and other commercial uses. Although there are differences in the range of uses that would be acceptable under the 2 designations (a MEZ being less restrictive), the issue before me remains the suitability of the objection site for continued employment use.

8.24 On the employment implications of the objection, my site observations suggest that it is only partly occupied. While the objector tells me about difficulties in finding another occupier, there was little evidence before me of a sustained marketing exercise in that respect. Having carefully considered all the evidence before me, I give substantial weight to the views of the Council and the Rochdale Development Agency that the site is necessary to meet an employment requirement over the period of the UDP, not least in this part of the Borough. The site would represent an attractive location for business. While I note the location of the Kingsway Business Park, some distance away and of regional importance, that would not detract from the contribution that this objection site would make to the employment needs of this part of the Borough.

8.25 As to a residential allocation at the site, I have noted the objector's view on the suitability of it for that purpose, including sustainability considerations. My conclusions, however, on housing land supply are set out in Chapter 8.

**Recommendation:**

**8.26 I recommend that:**

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

**EC/2 - Primary Employment Zones - Dob Wheel Mill, Dye House Lane Industrial Area, Smallbridge**

<b>Objection</b>	284/1	Warmco Properties Ltd
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**Key Issue:**

- **should the mill complex be deleted from the PEZ and reallocated for appropriate uses?**

**Inspector's Reasoning:**

8.27 The site is to the south of the A58 - off Dye House Lane - and around 2 kilometres to the north-east of Rochdale Town Centre. At Revised Deposit Draft, the Council changed the allocation of the Dye House Lane area from a PEZ to a Mixed Employment Zone (MEZ) - to reflect the mix of uses present in the area. This would allow a wider range of uses. The Council considers that to further modify the allocation to include land within the urban area would be inappropriate. I agree. The Dye House Lane area, although separate from Smallbridge Industrial Estate and having a broad mix of uses, retains a clear industrial character. I note that the site has access difficulties. Nonetheless, I come to the view that there would be likely to be a demand for employment space at the site; that structural problems there would reasonably apply to most potential re-uses; and that any flooding potential

would not represent any major and/or insurmountable problem. The Council's position is supported.

**Recommendation:**

**8.28 I recommend that:**

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

**EC/2 - Primary Employment Zones – Roach Vale Mill, Dye House Lane Industrial Area, Smallbridge**

Objection	296/1	PVC Group Ltd
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**Key Issue:**

- **should the mill complex be deleted from the PEZ and reallocated for appropriate uses?**

**Inspector's Reasoning:**

8.29 The site is within the Dye House Lane Industrial Area. It has been redefined as a MEZ at Revised Deposit Draft - that would permit a more flexible range of uses. When I visited the site, it was in productive use. The objector argues that the site be removed from the PEZ allocation under Policy EC/2 and be allocated for more appropriate uses. In my view, it should continue as an employment area. Given the change made at Revised Deposit Draft, no further modification is justified.

**Recommendation:**

**8.30 I recommend that:**

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

**EC/2 - Primary Employment Zones - Telephone Engineering Centre, Queen Victoria Street/Greenfield Street Rochdale**

Objection	297/1	BT Group Plc
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**Key Issue:**

- **should land at the Telephone Engineering Centre, Rochdale be deleted from the PEZs?**

### Inspector's Reasoning

8.31 At Revised Deposit Draft, the Council - through Proposed Map Change No 8/3 - has redesignated the PEZ that includes the Telephone Engineering Centre as a Mixed Employment Zone. That is supported - taking into account recent planning permissions and changes of use within it. The objection has been conditionally withdrawn.

### Recommendation:

8.32 I recommend that:

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

### EC/2 - Primary Employment Zones (Omission) (Land at Kenyon Farm, off Burshaw Lane, Middleton)

Objection                      340/4                      Mr D Tongue

### Key Issue:

- should land to the south of the Stakehill Industrial Estate (SIE) be allocated for industrial use?

### Inspector's Reasoning:

8.33 The site is to the south of the SIE and is part of the approved Green Belt in the adopted plan and carried forward into the UDP. The objector argues that development of the site would assist in the provision of employment land. Given, however, my comments at paragraphs 8.3 to 8.8 (on the amount of employment land), that view is not supported. No exceptional circumstances have been demonstrated that would justify the removal of this land from the approved Green Belt.

### Recommendation:

8.34 I recommend that:

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

### EC/3 – Mixed Employment Zones (MEZs)

Objections:                      156/3                      Hopwood Community Association

## Rochdale Unitary Development Plan Review: 2001-2016: Inspector's Report

207/7	Heywood Environment Group
273/1	Timbmet Rochdale Limited
297/2	BT Group Plc
311/3	Highways Agency
301/3	FKI Group

### Key Issues:

- **does the policy at EC/3 iii. adequately protect the operation of the trunk road network?**
- **should further B8 development within Heywood, and outside Pilsworth locations, be curtailed - primarily due to traffic congestion and other environmental damage?**
- **should B8 uses be excluded from the MEZ about Green Lane?**
- **is criterion f) of the policy overly-restrictive?**
- **should land at Manchester Road be allocated as a MEZ?**

### Inspector's Reasoning:

- 8.35 Policy EC/3 iii) is one of 3 criteria that establish control over development and change of use within MEZs. No unacceptable traffic problems should result. Reasonable. Some proposals would be likely to have an effect on the trunk road network, the responsibility of the Agency. All relevant policies of the plan would need to be taken into account in the assessment of development proposals. Here, Policy A/8 to Chapter 18 is, in my view, the main policy of the plan for the assessment of proposals that may affect the capacity of the highway network. It would need to be taken into account in the assessment of proposals under this policy. At Revised Deposit Draft, the Council added references to it, both in the policy and its reasoned justification. The objection (311/3) has been conditionally withdrawn.
- 8.36 Objection 156/3 is effectively the same as 156/1 made to G/EC/1 and I come to a similar conclusion on this policy.
- 8.37 I have dealt with the plan's general intentions for B8 uses above. They apply to this objection (207/7). While I noted on my visit the presence of substantial residential development at either end of Green Lane, I saw no reason why the uses set out in EC/3 c) would - as a matter of principle - be unacceptable within this MEZ, but subject to any other relevant policies of the plan. The range of uses would be likely to include some "smaller scale operations" as supported by the Group.
- 8.38 While Policy EC/3 provides a degree of flexibility in the type of uses that would be permitted on MEZs (including some limited retail use), it should not include unrestrained retail use. National planning guidance does not indicate that retail use should be permitted on land that is allocated for some of the defined purposes identified in Policy EC/3. I accept, however, that where MEZs and regeneration

priority areas defined in Policy G/R/1 overlap, it would be reasonable to allow other uses in a MEZ to support other plan priorities - particularly on housing renewal. This has been fairly addressed by the Council through Pre-Inquiry Changes 5 and 6. Beyond that, I do not consider that the provision of criterion f) should be extended to allow a broader range of development either, for housing or, retail. This would adversely affect the protective nature of the policy. I see 273/1's site at Milnrow Road has planning permission (subject to the completion of a legal agreement) for uses that include retail. I need, however, to address the merits of the policy that applies to all MEZs within the Borough. It should retain its protective element.

8.39 I have dealt with the main issues at the proposed Trub Farm Area of Opportunity at Chapter 12.

**Recommendation:**

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

- **Modify the plan in accordance with Pre-Inquiry Changes 5 and 6.**

**EC/3 - Mixed Employment Zones (Omission) - Telephone Engineering Centre, Queen Victoria Street/Greenfield Street, Rochdale**

**Objection:** 297/2 BT Group PLC

**Key Issue:**

- **should the Rochdale Telephone Engineering Centre be reallocated as a MEZ rather than a PEZ?**

**Inspector's Reasoning;**

8.41 I have dealt with a similar objection (297/1) to Policy EC/2 above. The site has been reallocated as a MEZ. The objection has been conditionally withdrawn.

**Recommendation:**

**8.42 I recommend that:**

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

**EC/4 - Change of Use of Employment Land outside Designated Employment Areas**

<b>Objections:</b>	24/202	Hartle Estates
	99/1	William Tatham Ltd
	297/3	BT Group Plc
	301/201	FKI Plc
	308/3	Federal Mogul T & N Limited
	310/202	Redrow Homes (Lancashire) Ltd
	359/203	Healey Dell Properties & David McLean Homes
	461/201	The Wilton Estate

**Key Issues:**

- **is clarification of criterion a) necessary - is it overly-restrictive?**
- **is the requirement for business to relocate with the Borough inflexible and overly-restrictive?**
- **should criterion b) be clarified?**
- **should the policy give increased support to the regeneration of contaminated industrial land for other uses?**

**Inspector's Reasoning:**

8.43 The Council sought to change the policy at Revised Deposit Draft to meet objector concern over criterion a). Unfortunately, one of these changes was not incorporated at Revised Deposit Draft. The Council attempted to rectify this by introducing this change as Inquiry Change 50, but the Council concedes that another change has also been listed under this number. The Council still wishes to carry this amendment forward. This is confirmed in the note following Inquiry Change 51 in the Council's Schedule of Changes. For clarity, the Council intended to delete the phrase "current or likely" from criterion a) in the policy. This change has not been assigned any reference number by the Council.

8.44 Whilst all the Council's suggested changes, including this unlisted change, to criterion a) have gone some way to addressing concerns, some objectors still consider that the criterion, and indeed the whole policy, is overly-restrictive in terms of the reuse of employment land for other purposes, especially housing. The policy's later criteria do allow for changes of use in a variety of circumstances where employment uses are no longer suitable. As the policy should be read as a whole, I find this approach acceptable and that, in this respect, it is not overly-restrictive. Similarly, although the definition of what constitutes a shortage of employment land/sites will vary over the plan period and also between sectors of industry, I do not believe that this is such a subjective term that a reasonable assessment of employment land could not be made when applying for a change of use, and do not consider that the UDP should be amended in response to 24/202. I support the Council's intentions for criterion a), but otherwise do not consider that

criterion b) should be modified. Given this, I find that there is little in the policy that is contrary to the aims of PPG 3 (paragraph 2).

- 8.45 Currently, the policy requires that operational business uses should relocate in the Borough where they seek a change of use to their current premises. Where a business decides to relocate is effected by a large number of factors, many of which are outside the remit of the land-use planning system. It would be unreasonable for the policy to unduly restrict this choice. I recognize that the Borough underperforms economically and it wishes to retain employment land-uses within its boundaries for reasons of sustainable development. This is not sufficient justification to impose onerous requirements. Furthermore, if an attempt was made to attach such conditions to a permission, it may well be that these conditions would not meet the tests set out in Circular 11/95. I do not consider that the policy's requirements have been sufficiently relaxed by Inquiry Changes 50 and 51. They are not accepted.
- 8.46 As regards objector concern over the policy's support for the regeneration of contaminated land, this has satisfactorily been addressed at Revised Deposit Draft stage.

**Recommendations:**

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

- **Delete the phrase "current or likely" from criterion a) of the policy.**
- **Delete the last sentence to the second paragraph of Policy EC/4.**
- **Delete paragraph 8.28.**

**EC/5 – Employment Developments and Extensions Outside Allocated Areas**

**Objection:** 69/2 Biwater PLC

**Key Issue:**

- **is criterion e) reasonable and necessary?**

**Inspector's Reasoning:**

8.48 In my opinion, the criteria to the policy represent reasonable development control considerations in the assessment of development proposals for employment and extensions outside allocated areas. That includes criterion e). The policy would represent the starting point in the consideration of a proposal. Other relevant policies of the UDP would also need to be taken into account. That would include

A/8 - generally requiring, in part, funding works by a developer to leave the highway network in a no worse state. I generally share the view of the Council that the UDP should avoid excessive detail. Nonetheless, in the specific circumstances of this objection, certainty would be encouraged by a rewording of the disputed criterion along the lines suggested by the objector. No material harm would result to the policy's general intent. While I note the view of the Council that other measures may be capable of accommodating additional vehicle traffic, including delivery times, they would be taken in to account in any assessment of a development proposal. Criterion e) would fairly address, by modification, the highway network and additional traffic.

**Recommendation:**

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

- **Delete criterion e) and substitute: “e) The surrounding highway network is capable - either, as existing or, as proposed to be upgraded (including by the developer as a result of a proposal) - of accommodating any additional vehicular traffic generated by a proposal without damage to amenity or road safety; and”**

**EC/7 – Kingsway Business Park (KBP)**

<b>Objections:</b>	9/1	Mrs M Harley
	24/2	Hartle Estates
	24/203	Hartle Estates
	165/1	Deanbank Investments Ltd
	183/4	Lancashire Wildlife Trust
	311/4	Highways Agency

**Key Issues:**

- **should EC/7 be deleted for nature conservation and amenity reasons, taking into account an apparent threat to a SSSI?**
- **should land at Fern Abattoir be deleted from the KBP allocation?**
- **does the long time-scale for development of the KBP cause blight?**
- **should the policy reflect that land is a commitment, not an allocation?**
- **is the requirement for development to accord with a masterplan, set out in criterion p), reasonable?**
- **is the limited residential development proposed in criterion o) acceptable and should it reflect the sequential test set out in PPG 3?**
- **should criterion j) of the policy refer to the necessity of obtaining the agreement of the Highways Agency for proposed works on the strategic highway network?**

**Inspector's Reasoning:**

**Background and General Principles**

- 8.50 Proposals for the development of the KBP have had a long and complex history and there have been several “false starts” in bringing this development forward. It is likely, however, that the development will commence shortly. There is an extant and unchallenged outline planning permission for the comprehensive redevelopment of the site, together with a more detailed permission for infrastructure and other works. The recent Inspector's Report into the Compulsory Purchase Order (CPO) application, together with the accompanying letter from the Secretary of State for Trade and Industry (who is minded to approve the CPO, together with recent acquisitions by the NWRDA), indicates that land ownership constraints are likely to be overcome. Objectors' concerns have been previously discussed in several forums and, given the above, the broad principle of the development of the KBP has been clearly established. Policy EC/7 is a reasonable starting point.

**Nature Conservation and Amenity Concerns**

- 8.51 The concerns of the Lancashire Wildlife Trust and Mrs M Harley, relate to the nature conservation and amenity implications of the development of the KBP. In terms of designated sites, the policy would protect both, the Stanney Brook Corridor and Park (an attractive area of greenspace that is important for both recreation and nature conservation) and, the Rochdale Canal - a SSSI and candidate SAC. Further, the policy also promotes the preservation, enhancement and creation of wildlife habitats over the broader site. Similarly, the policy seeks to protect local amenity - both in terms of traffic impact and more general amenity considerations. The site would, indeed, have an urban appearance but any detrimental visual effect would be mitigated both by landscaping and, the overall contours of the land. Development of the site would not constitute “severe environmental damage”. That is not to say that the development of the KBP would not have some adverse effect on these interests, but I consider that the established regeneration benefits would outweigh these concerns. As the general principle of the KBP has already been established, there is no compelling evidence before me why I should come to a different view on this UDP allocation that reflects Regional Planning Guidance.

**Land at Fern Abattoir**

- 8.52 Hartle Estates has objected to the inclusion of land at the former Fern Abattoir within the KBP site. The objector argues that the site should be retained in its current use and that part of it could be used for housing. The site lies within the area set out in the approved planning permission for the KBP and is subject to part of the CPO application, which the Secretary of State for Trade and Industry is minded to approve. The objector's concerns were largely dealt with by the Inspector's Report into the CPO and I have no reason to differ from his conclusions.

What has changed, subsequently, is that Hartle Estates argue that a new tenant intends to take over the site and return it to operational use as an abattoir. I also see that planning permission for the extension to the abattoir has been renewed, although the Council considers this to be, largely, for convenience. Although the CPO Inspector did not have this matter before him, he was clear in his conclusions that, regardless of the future viability of the abattoir, this land should remain the subject of a CPO as it was essential for the comprehensive development of the business park. Given this, it would be unreasonable for me to delete the land from the allocation. I do not consider that this would result in blight on the Fern Abattoir site, as all key partners in the development are keen to proceed. If, in the unlikely event that the development does not proceed or, the land at Fern Abattoir becomes surplus to requirements, this can be addressed promptly through the Local Development Framework process and, thus, dealing with concern on blight.

- 8.53 The Revised Deposit Draft version of the plan now indicates that the KBP has outline planning permission. There is no need to modify the plan further.

#### **Flexibility of the Policy**

- 8.54 Deanbank Investments Ltd is concerned that the policy is inflexible. Essentially, criterion p) requires developers to strictly follow an agreed masterplan. I acknowledge that this requirement may restrict the degree to which some individual developers could bring forward sections of the site but, given the importance of the comprehensive development of it (and in its specific circumstances), I consider it to be reasonable. The need for the site to be developed comprehensively has been clearly demonstrated by the Council and its development partners, in a number of forums. The provisions of the adopted plan are less stringent and would not provide the degree of certainty that is required for the comprehensive development of Kingsway Business Park. I do not consider that the main paragraph of criterion p) would place an embargo on individual developments. Furthermore, the use of a masterplan would still allow for a reasonable degree of market choice. However, I consider that these are considerations that are most best addressed in the UDP's reasoned justification.
- 8.55 I do, however, have some sympathy with the objector's criticisms of the sub-criteria of criterion p). All the matters addressed in these sub-criteria are largely administrative considerations and can be addressed either, in the reasoned justification (i. and v.) or, by the use of a masterplan (ii, iii and iv). To include these sub-criteria in the policy is, therefore, unnecessary and repetitious.
- 8.56 Next, to criterion o) and whether limited residential development would restrict the flexible use of the site. The objector considers that this would also be contrary to the requirements of the sequential test set out in PPG 3 (paragraph 21). KBP is a greenfield site, although the areas identified in the masterplan for housing are reasonably well located in terms of their connections to local services and public transport links. I can see that limited housing may well be necessary as enabling

development, particularly in terms of the significant infrastructure cost that the development of the site may accrue. It may also assist the vitality of mixed-use areas on the Park. However, beyond this fairly limited contribution, the development of extensive housing would be inappropriate under PPG 3 and would restrict the flexible use of the site. The wording of criterion o) is clear in that extensive redevelopment would not be acceptable and that the design and siting of limited residential development must be such that it would not compromise the overall objectives of the Business Park.

### **Other Issues**

8.57 The Highways Agency has conditionally withdrawn its objection as it has already reached agreement on the layout of the new junction for Junction 21 of the M62. Given this, an additional reference to the need to obtain Highways Agency approval in criterion j) would be unnecessary.

### **Recommendations:**

**8.58 I recommend that the plan be modified on the following lines:**

- **Delete criterion p) from the policy. The requirements of the criterion's main paragraph and sub-criteria i. and v. should be included at an appropriate point in the policy's reasoned justification.**
- **The Council should state in the policy's reasoned justification the objectives of the Kingsway Business Park development.**

### **EC/8 - Middleton West Business Park**

<b>Objections:</b>	2/1	Mrs I Ritchie	6/1	Mrs M Power
	3/1	Ms E Cilitis	7/1	Mr B Caraher
	4/1	Ms K Beddows	8/1	Mrs J Caraher
	5/1	Mr P Thompson	10/1	R Richardson
	12/1	Ms Y Baxendale	72/2	Z Kepczyk
	13/1	Mrs H Lees	73/1	Mrs R Richardson
	14/1	Ms S Halson	74/2	Mrs E Pye
	15/1	Mr & Mrs Fisher	76/1	Miss K Smith
	16/1	Mr V Corns	77/1	Mr W Rydeheard
	17/1	Mrs S Young	78/1	Mrs A Rydeheard
	18/1	Mrs J Franks	79/1	Mr R Thorpe
	19/1	Ms A Ingham	80/2	Ms C Keane
	20/1	Mr Barnes	84/1	Middleton Environment Group
	21/1	P Barlow	85/2	Mr J Lappin

## Rochdale Unitary Development Plan Review: 2001-2016: Inspector's Report

22/1	Mr M Dodsworth	94/1	Mr I Pye
23/1	Mrs D Thomson	100/1	Mr T Hammond
25/1	Ms J Rostron	101/1	Mr J Smethurst
26/1	Mr K Rostron	106/1	Ms P Wood
27/1	Ms N Welsh	112/1	Mrs B Greenwood
28/1	D Bevan	113/1	Ms P Berry
30/1	Rev F Thomson	114/1	Mr J Jackson
31/1	E Sinacola	115/1	Mr R Vernon
32/1	Mr T Copp	116/1	Bowlee Com'tee
33/1	Mrs I Copp	117/1	Mr M Finnerty
34/1	Mr J Glynn	119/1	Mr Daly
35/1	Mr E Nugent	120/1	Mrs D Hill
38/1	Mr D Smith	121/1	A Kennedy
39/1	Mr G Ernest	122/1	Mr A Iddon
40/1	Mrs F Nichol	123/1	Mr P Davey
41/1	B Manley	124/1	Mrs M Davey
42/1	Mr G Morrissey	125/1	Mr A Lord
43/1	Mr E Larmett	126/1	Mr A King
44/1	E Halliwell	127/1	B Kershaw
45/1	Ms R Judge	128/1	Mr D Kershaw
46/1	Ms D Clough	129/1	Ms J Bolton
48/1	Mr P Judge	130/1	Mr F Brooks
49/1	Ms S Judge	131/1	Mr S Dennis
50/1	Ms V Clough	132/1	Mrs N Dennis
51/1	Mr J Clough	133/1	Mrs A Lynch
54/1	Mr P Carden-Jones	134/1	Mr A Broxton
56/1	Mr R Taaffe	135/1	Mrs J Broxton
57/1	Mr Didyk	136/1	Mrs D McNicoll
58/1	Mr N Mills	137/1	Mr F Gribbin
61/1	Mr P Oliver	138/1	H Holt
70/1	Mrs J Mort	139/1	R Holt
140/1	Mr R Pearson	226/1	Mr R Lowe
141/1	Mrs L Pearson	227/1	M Barber
142/1	Mr R Pearson	228/2	H Rydings
143/1	Mrs S Radcliffe	229/1	Mr B Lomax
144/2	Mr M Radcliffe	230/1	Mr A McGovern
145/2	Mr D Ball	231/1	Mrs C Lomax
146/2	Mrs M Cox	232/1	Ms J Tennant
147/2	Mrs M Wardley	233/2	Mr C Woods
148/1	F Eckersley	234/1	Mr A Lowe
149/1	L Johnson	239/1	Mr L Henry

## Rochdale Unitary Development Plan Review: 2001-2016: Inspector's Report

150/1	Mrs B Lashwood	240/1	Mrs L Bagshaws
151/1	L Bothwell	241/1	Mr S and Mrs D Longbottom
152/1	V Parr	243/1	Mr A Tennant
153/1	Ms C Holt	244/1	M Wagner
154/1	Mr N Turner	245/1	J Wagner
158/1	B Shenton	246/1	Ms G Claric
163/1`	Mr D Lamb	249/1	Mr D Casewell
164/1	Mrs S Lamb	250/1	Ms V Heywood
184/1	Ms K Peel	251/1	Mr A Hall
185/1	Mr D Richardson	252/1	Mr D Hill
186/1	Mr P Wild	253/1	Mrs G Hill
187/1	Mr L Walsh	260/1	Mr J Sutcliffe
188/1	Mrs E D'arcy	261/1	Mr S Harper
190/1	Mr R Hughes	262/1	J Brokenbrow
192/1	Mr J Stewardson	263/1	Mrs B McCormick
193/1	Mrs M Stewardson	264/1	Ms B Nuttall
196/1	Mr G Koyrdis	265/1	Miss J Hardicre
197/1	L Armstrong	266/1	M Moulding
198/1	M Johnson	267/1	Ms D Hallett
199/1	Mr A Johnson	268/1	Mr G Holt
200/1	Ms T Hill	269/1	Mrs S Goodman
204/1	Mr M Kitson	270/1	Mr S Worsley
206/1	S McAinsh	271/1	Ms S Mills
209/1	Miss C Peel	278/1	Mr R Portman
214/1	Mrs B Aberdeen	280/1	Ms S Portman
216/1	Mrs M Hughes	281/1	Mr Wild
218/1	Mr J Greenwood	311/5	Highways Agency
221/2	Mrs A Ollerhead	314/1	Mr P Mildenhall
223/1	Ms J Radcliffe	315/1	Ms P Mildenhall
224/1	Mrs B Shaw	316/1	Mrs G Anderson
225/1	Mr J Shaw	332/1	Ms M Duffin
333/1	Mr K O'Leary	392/2	Mr P Coster
334/1	Mr H Hill	393/1	Ms P Hickey
335/1	Mrs R Kitson	394/1	Ms L Hickey
336/1	Mrs V Loftus	399/1	Miss S Lyons
337/1	Mr J Adamson	402/1	Mrs N Hughes
338/1	C & E Greenfield	403/1	Mr R Hughes
345/1	Mr B Molloy	406/1	Mrs J Evans
350/2	Mr D Hardwick	407/1	Ms B Foley
354/1	Mr J Adamson	417/1	Mr R Wood
355/1	Mr N Kosylo	421/1	Ms S Humphries

## Rochdale Unitary Development Plan Review: 2001-2016: Inspector's Report

363/1	Mr J Fishwick	422/1	P Warne
372/1	Mr G Levine	423/1	Mr P Cowie
377/1	Ms L Woolfall	424/1	Mrs V Cowie
379/1	E Rogers	425/1	Ms L Shaw
380/1	Mrs P Finnerty	427/1	Mrs N Bowden
381/15	Government Office	428/1	Mr J Bowden
384/1	Mr M Wilkinson	442/4	Redrow Homes (Lancashire) Ltd & Bellway Homes NW Ltd
385/2	Mrs M Davies	452/1	Mr N & Mrs C Mills
389/1	Mr G McIntosh	451/1	Mrs C Smethurst
390/1	R Fallon	453/1	Mr & Mrs R Holt
391/1	Mr J Emsley	455/1	Ms S Gilfillan
		456/1	Ms T Ballan

### Key Issue:

- **should this allocation at the Middleton West Business Park (MWBP) be deleted from the UDP?**

### Inspector's Reasoning:

- 8.59 **My conclusion on these objections, set out in my recommendations, is that this allocation in the UDP should be deleted from the plan.** This results from the balance of my reasoning set out below. In essence, this is that it has not been justified - albeit that I have not identified any detailed highway/traffic objections to the allocation. Those matters are dealt with in Chapter 12 of my Report at Policy R/2.
- 8.60 I shall deal with these objections in, generally, descending order - from strategic to local. **I begin** with an assessment as to whether the MWBP is necessary to meet an identified need in Rochdale and in the Middleton area. At Policy G/EC/1, I have reviewed employment land supply. Taking into account the recommendations below and those at G/EC/1, this EC/8 allocation is not necessary. As a greenfield site, it does not rest comfortably with the Council's approach to urban concentration and regeneration.
- 8.61 **Now**, to the potential effect of the proposal on the character and appearance of the area. EC/8 indicates a total site area of 36 hectares, albeit that a completed employment use would be around 15 hectares net - not least taking into account landscape zones. Nonetheless, the documentation before me indicates a major development as an extension to the urban area. It would be seen as such. Although not approved Green Belt, it forms part of a wider and extensive area of open countryside to the south-west of Rochdale. This, together with land to the west of Heywood Old Road (HOR), and in Bury Metropolitan Borough including approved

Green Belt I am told, comprises an attractive area of open countryside bringing open space close to nearby residents. The MWBP would adversely affect that, truncating - within Rochdale - its presence. The character and appearance of this part of the Metropolitan Borough would be substantially harmed. Here, I give weight to national planning guidance in Planning Policy Statement 7: Sustainable Development in Rural Areas at paragraph 1 (iv). That indicates the aim to protect the countryside for the sake of its intrinsic character.

- 8.62 **Then**, to the potential effect on the character and appearance of Simister village, Bowlee and Rhodes Green. **Simister** is to the east of the M60. It is within Bury Metropolitan Borough Council (that has not objected to the proposed allocation), the boundary with Rochdale in this area following, generally, Heywood Old Road (HOR). There is a substantial area of open countryside between Simister and HOR - the MWBP being to the east of HOR with a likely landscaping buffer between. The allocation would not result in any significant harm to the character and appearance of this village. I come to a different assessment on **Bowlee**, this I take to be a ribbon of mainly residential development along HOR, from about its junction with Blue Ball Lane to around its junction with Ellis Lane. This section is set in open countryside, part of HOR's general passage from Heywood to the M60. The MWBP would, in my opinion, adversely affect the character and appearance of this village. It follows, therefore, that I should come to a similar conclusion on **Rhodes Green**, an attractive grouping of rural buildings, generally to one side of what I take to be a small village green.
- 8.63 **Turning to sustainability matters**, discussed at the Hearing session, the site is on the edge of the urban area. The Council acknowledged that public transport on HOR is not ideal. I consider that they have limited origins and destinations for a development that, the Council tells me, would provide a major number of jobs. The Council argues that the potential for a controlled Langley Link Road would increase public transport services and it is active in pursuing Green Travel Plans. Yet, even accepting that, my assessment is that the MWBP would still have unsatisfactory bus access to large areas to the south of Rochdale and the northern part of the Greater Manchester conurbation. Access to the site by rail is, minimal, to say the least. There are no national railway stations in Middleton or Heywood (the latter excluding the intended terminus of the East Lancashire Railway) - the closest appearing to me to be in Chadderton (Mills Hill Station) and Whitefield, Besses o' th' Barn and Prestwich (Metrolink within Bury MBC), none of which (on the basis of the evidence before me) would have reasonable onward links to the MWBP. My concern is compounded by the evidence given to the Inquiry by the Rochdale Development Agency (RDA), in support of the Council. I, here, begin by acknowledging its sincerity in attempting to ensure that Langley Estate residents should have access to jobs at the MWBP, and I have carefully considered the regeneration documents relating to Langley before me. But, however, these jobs would - in my assessment - only represent a limited proportion of jobs occupied at the MWBP, notwithstanding the experience gained by the Kingsway Access to

Employment Group and the Local Strategic Partnership, as well as the Council's intentions/measures to secure job access by Langley residents.

- 8.64 The Council (RDA) partly justifies the MWBP on the basis of an assessment of market demand. This appears to relate, however, to the North Manchester market, this - therefore - within a conurbation context. The site occupies an attractive location close to the M60. The intended provision at the site would meet, I am told, a particularly strong market for such premises in North Manchester and would be commercially viable. While the attractions for employers are evident, this would not be to meet a mainly employment need in Rochdale but a market demand in a conurbation context. Here, I have not been told of the specific level of provision that is being made by other authorities - either, existing or, through emerging plans. The site has not been defined in Regional Planning Guidance. Taking into account the proximity of the M60 and M62, it would be reasonable of me to conclude that potential employees at the site would be drawn from a much wider area than south Rochdale. A substantial proportion, for the reasons set out above, would be likely to travel by private car from within the conurbation - in conflict with national planning guidance to reduce the opportunity to travel by this means of transport. Here, I was told that regeneration at Langley would include employment opportunities within and that would be likely to provide job creation. Clearly, a MWBP would be likely to increase the profile of the Middleton/Langley area and I accept the analysis of the Council that the Langley estate has high levels of deprivation. The renewal programme there will be extensive, involving substantial clearance. That would include new employment opportunities while the Council would, reasonably, seek to improve public transport services to other employment locations about Langley.
- 8.65 Drawing together the Council's evidence (including that by the RDA) - I am not persuaded, firstly, that its approach is consistent with the Council's overall intention to regenerate the Borough - consistently I am told within the UDP to be "urban" rather than "greenfield" based. It is often easier to identify "greenfield" land, at the expense of "brownfield". Secondly, the Council, through its RDA evidence, is pursuing a site that is "market-related" with easy access to the motorway network (M60 and M62) and not, primarily, to meet the needs of Rochdale residents. The MWBP has not been identified in Regional Planning Guidance. The implications of it would clearly be that the majority of jobs would be filled by those that access the site by car, in my view from a variety of locations in Greater Manchester, with limited options for other travel. This would conflict with the general intention of PPG13: Transport, and also PPS 7 at paragraph 1 (iii) - this that accessibility should be a key consideration in all development decisions.
- 8.66 **Other matters add weight** to my views on need, character and appearance and sustainability. This site is crossed by The Rochdale Way, the only apparent Public Right of Way through the site from south to north and particularly sensitive in that respect. In a clockwise direction from near the centre of Middleton and out to Rhodes, the passage of the Way is generally urban in character before entering open

countryside to the north of Rhodes, then adjacent to the site before passing through it and onwards - in a generally northerly direction - through the Bowlee Community Park. This western section of the Way provides a pleasant contrast to the urban nature of that which precedes it. EC/8 k) requires the retention of existing "rights of way" while the intention of RE/6 is to secure the "protection, development and improvement" of those routes shown on the Proposals Map - including The Rochdale Way. While a design for the development would be likely to protect the line of the Way, or re-route it through the site, the character of the Way would be likely to be permanently lost, notwithstanding landscaping within the proposed allocation. Certainly, I do not see how this allocation would develop and improve the Rochdale Way. In my opinion, the Council's evidence on these 2 policies does not stand close scrutiny.

8.67 I come to a similar view on Policy UG/8: Greenspace Corridors - that notation on the Proposals Map overlaying that under EC/8. This Greenspace Corridor extends around the edge of the urban area from Rhodes in the south to the northern side of Langley Lane. It has been appropriately defined, fairly meeting the intentions and requirements of Greenspace Corridors. As a result, I find it surprising that the Council should effectively argue no inconsistency between the 2 policies - this apparently on the basis of extensive landscape buffer zones yet to be defined. On these objections, EC/8 unacceptably conflicts with UG/8.

8.68 **Other matters of objections have been made**, extensive in their coverage. As to some objectors' view that there is no support for the allocation, I have a number of expressions of support for the MWBP before me, all of which I have read. Notwithstanding the nature of the topography - rising then falling from north to south - a plateau construction approach would be clearly feasible at this site. I give limited weight to concern that this allocation would be the beginning of a much larger development. I have to consider the UDP proposal before me. Any further proposal arising would need to be considered within the context of an adopted plan and all material considerations. Sufficient control would be available. Included within the site would be the Council's plant nursery. Here, objectors have not disputed the Council's view that that the retail sale of plants there is ancillary to its main purpose of supplying Council parks and gardens. There is no material evidence before me that a MWBP would prejudice the retail availability of garden plants in this part of Rochdale. Objector 442/4 promotes an alternative site on Langley Lane, close to Hollin Lane. As I do not support the need for a MWBP for the reasons set out above, it follows - therefore - that this objector site would also be unacceptable. As to the Highways Agency, the Council has acknowledged that a statement of support, in principle, for the MWBP through this Report would require a further Transport Assessment (TA). That support is not forthcoming. Nonetheless, Policy A/11 of the UDP would establish sufficient control - including a TA.

8.69 **Moving on**, therefore, to the nature conservation implications of the site of the MWBP - this having no international, national or local designation - objectors

record a variety of species present, many I suspect transitory. It would be reasonable of me to conclude that a detailed design for the MWBP, including landscape buffer zones and treatment of pond(s) that I saw on my visit, would be able to mitigate any adverse effect. Here, the objectors have not significantly disputed the evidence of the Council that the Greater Manchester Ecology Unit has no ecological reason why development should not take place - subject to design surveys. Similarly, the agricultural land classification of the site (primarily Grade 4 with a limited area of 3b) does not represent an objection in principle to the UDP proposal. Concern over the potential effect of the proposal on property values in the area does not represent, in my view, a material land-use planning consideration. A design process, reflecting Policy BE/2, would reasonably be expected to address any potential increase in crime.

8.70 I have carefully weighed all these matters, and those dealt with at Policy R/2 c), against my concerns on the proposal set out above. In the balancing exercise I have undertaken, I come to the clear view that the substantial harm arising from the latter outweigh the former. I do not support, therefore, Policy EC/8. It should be deleted from the UDP. As to objections to R/2 c), the highway/traffic implications of it are acceptable but it would follow acceptance of the principle, by me, of EC/8. That will not be supported. It follows, therefore, that this part of R/2 should also be deleted from the UDP. Further, the UDP should be edited to remove any references to the MWBP allocation and R/2 c).

#### **Recommendations:**

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

- **Delete Policy EC/8 and paragraphs 8.41 to 8.45, with renumbering.**
- **Edit the entire plan accordingly.**

#### **EC/9 – Development Sites In Employment Zones**

<b>Objections:</b>	24/204	Hartle Estates
	155/301	Environment Agency

#### **Key Issues:**

- **is the policy unclear on the way it deals with commitments and allocations?**
- **does the policy require additional clarification on flood risk?**

#### **Inspector's Reasoning:**

8.72 At Policy G/EC/1 above, I have concluded that the plan is unclear in its differentiation of committed and allocated sites and have made recommendations to

address this concern. Further, the reasoned justification to the policy at paragraph 8.47 does not reflect changes made at Revised Deposit Draft on the availability of sites within Employment Zones. The figures in this paragraph, concerning the total yield, brownfield and greenfield split and Primary/Mixed Employment Zone split should be modified with up-to-date information.

8.73 The Environment Agency's concern over the flooding and surface water run-off implications of development have been met by Pre-Inquiry Change 7 and Inquiry Change 45, the latter appearing to me to replace Pre-Inquiry Change 8. The Council should clarify this.

**Recommendations:**

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

- **Modify the UDP in accordance with Pre-Inquiry Change 7 and Inquiry Change 45.**
- **Paragraph 8.47 should be modified to reflect, accurately, the total employment land supply provided by these sites.**

**EC/9 a) – Waterfold Farm, Heap Bridge, Heywood**

**Objection:** 311/10 Highways Agency

**Key Issue:**

- **would the UDP establish sufficient control on any proposal that may materially affect Junction 20 of the M62.**

**Inspector's Reasoning:**

8.75 The policy lists sites included within Employment Zones, together with (where appropriate) any specific design requirements. To include all material considerations relating to a site would result in an excessively detailed plan. All relevant policies of the UDP would need to be taken into account. Here, the Revised Deposit Draft version of the plan, at Policy A/8, reflects the need, generally, to protect the safe and efficient operation of the trunk road network. That would include Junction 20. The objection has been conditionally withdrawn.

**Recommendation:**

**8.76 I recommend that:**

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

**EC/9 c) (Deposit Draft) – Land North of Cripplegate Lane, Cowm Top, Castleton**

<b>Objections:</b>	47/1	Ms P Williams
	63/1	Castleton Branch Labour Party
	82/1	H Taylor
	90/1	Cllr Flynn JP
	91/1	Cllr T Flynn
	92/1	Cllr P Davison
	102/1	Mr D Tarr
	111/202	Bevamodus
	155/203	Environment Agency
	160/1	Mr H Ellwood MBE
	166/1	Mrs T Jones
	167/1	Mr D Gorman
	168/1	Mr J Keeling
	169/1	Mrs B Wilmore
	170/1	Castleton (EC) Residents Assoc
	189/1	Mr W Hilton
	205/1	Mr W Sheerin
	275/1	Mr D Brigden
	276/1	Mr P Knott
	292/1	Mr R Bell
	293/1	M Bell
	311/11	Highways Agency
	361/1	Mrs M Ball
	402/2	Mrs N Hughes
	403/2	Mr R Hughes
	404/1	Mr A Kershaw
	405/1	Ms J Devonald
	420/1	K Donbarand
	429/1	Ms J Hornby
	439/1	Castleton (EC) Residents Association

**Key Issues:**

- **should the Deposit Draft provision for the site be reinstated - a development site in an employment zone?**
- **does the UDP establish sufficient control on any development that may materially affect Junction 20 of the M62?**
- **should the policy reflect the proximity of the site to the River Irk?**

**Inspector's Reasoning:**

- 8.77 Land at Cowm Top is allocated for employment purposes in the adopted plan. Subsequently, however, the Council - against officer advice - registered land at Cowm Top as a Village Green. The land is shown, diagrammatically, at Revised Deposit Draft as a Village Green on the map following page 132, but for information only. Nonetheless, the Council - in April 2002 - approved the Deposit Draft UDP that included an allocation for employment purposes at Cowm Top under EC/9 c) - consistent with the adopted plan. This indicated that the site had full planning permission. After considering objections to the Deposit Draft plan, the Council deleted the allocation at EC/9 c) - and also the related allocation under EC/2 as part of a Primary Employment Zone. Some Deposit Draft objectors have not withdrawn their objections.
- 8.78 The existence of the Village Green designation on land at Cowm Top is not in dispute, although it is the subject of a High Court challenge that has yet to be determined. Similarly, the planning history at the site is not in dispute. After 2 Development Plan Inquiries, the site was allocated for employment purposes in the adopted plan. Following a Section 78 appeal in 1997, detailed planning permission was granted, mainly for industrial/warehouse units with ancillary offices. In 2003, the commencement of that development was extended by the Council to 2005. At the Hearing session for the Castleton (EC) Residents Association (CRA), it was clear to me that the Council did not dispute - on land-use planning grounds, the appropriateness of the site for employment purposes. It is within the Defined Urban Area and the Council considered that employment development would comply with Policy EC/5. Its position at Revised Deposit Draft reflected the ongoing consideration of Village Green designation.
- 8.79 In my view, that matter proceeds on the basis of a different statutory regime to that on the preparation of development plans - primarily through the 1990 Act. While aware of the former, I can only come to a view on the planning merits of the UDP and the objections - albeit within a context of some uncertainty. Setting aside the Village Green designation, the site has no statutory public access - albeit there are a number of tracks across it that indicate that it used by the public, including access to a motorway bridge. Much of the site is fenced, gaps in my opinion largely the result of unauthorized public access - pre-dating Village Green designation. That is not unusual in an urban-fringe location where a landowner, frequently, has difficulty excluding the public from its land.
- 8.80 I have carefully read the Development Plan Inquiry documentation, together with the Decision on the Section 78 appeal. I see little in the objections before me in this UDP to persuade me to come to a different view to my colleague Inspectors. As such, there is no need for me to repeat them in detail here. Suffice to say that the site would have an acceptable access to Queensway, forming part of the Strategic Highway Network, with a motorway nearby. Unacceptable congestion would not result. At the CRA site visit, I went to the highest point of the site that is above

Castleton - land within generally falling about. While that point does offer panoramic views, I am satisfied that a tiered development as intended, with appropriate and substantial landscaping, would not result in any unacceptable harm to the wider area. In the specific circumstances of this major site, a development would contribute to the employment needs of the Borough. Here, I have taken into account objector concern at the number of vacant units in Castleton and area. As I have to assess the planning merits of these objections, I come to the clear view that the Deposit Draft allocation at land north of Cripplegate Lane, Castleton should be reinstated into the UDP. Whether, or not, that would be able to be implemented may depend on the eventual outcome of the Village Green deliberations, considered in another place. I have, however, discharged my responsibilities on the UDP. Finally, objectors' wish to see the land designated as open space. I deal with these at Chapter 14.

- 8.81 Turning to the Highways Agency, all relevant policies of the UDP would need to be taken into account. Here, the Revised Deposit Draft version of the plan at Policy A/8 reflects the need, generally, to protect the safe and efficient operation of the trunk road network. That would include Junction 20. As to the Environment Agency (155/203), the Council acknowledges that most EC/9 sites should be the subject of an addition to the policy and reasoned justification to reflect Agency concern - this through Inquiry Change 45. That intention applies to this site.

**Recommendations:**

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

- **After EC/9 b) (Hareshill Road, Heywood) add the following and renumber afterwards:**
  - “c) **Land north of Cripplegate Lane, Castleton (7.3 ha) (Greenfield site allocated in the adopted UDP with full planning permission):**  
  
**Access to be via Queensway/Cowm Top Lane**
    - **boundary landscape screening will be required between the development and adjoining residential properties.”**
- **The policy be modified in accordance with Inquiry Change 45, this for the avoidance of doubt to include land north of Cripplegate Lane, Castleton.**
- **At adoption, the Proposals Map should be modified accordingly.**

**EC/9 d) – Site at Buckley Road, Rochdale**

<b>Objections:</b>	155/2	Environment Agency
	311/6	Highways Agency

**Key Issues:**

- **should the policy reflect the proximity of the site to the Buckley Brook?**
- **would the UDP establish sufficient control on any proposal that may materially affect Junction 21 of the M62?**

**Inspector's Reasoning:**

8.83 I consider that Inquiry Change 45 addresses the objector's concerns over flood risk at this site, while Inquiry Change 46 refers to the current position at Buckley Road.

8.84 The site is listed under Policy EC/9. For the reasons I have set out above, there is no necessity to make a specific reference to the implications of development for Junction 21. The objection has been conditionally withdrawn.

**Recommendation:**

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

- **Modify the plan in accordance with Inquiry Changes 45 and 46 (part).**

**EC/9 e) – (Mainly Deposit Draft): Land at Trub Farm, Manchester Road, Castleton**

<b>Objections:</b>	82/2	H Taylor
	160/2	Mr H Ellwood MBE
	205/2	Mr W Sheerin
	219/1	Mr P Atkinson
	276/2	Mr P Knott
	290/1	Castleton (EC) Residents Association
	291/1	Mrs B Willmore
	311/12	Highways Agency
	343/2	English Nature
	439/3	Ms C Huxley

**Key Issues:**

- **would the UDP establish sufficient control on any proposal that may materially affect Junction 21 of the M62?**

- **should land at Trub Farm, Castleton be deleted from the plan under this policy, particularly given its location next to the Rochdale cSAC?**

**Inspector's Reasoning:**

- 8.86 The policy lists sites available for employment development within Employment Zones, together with (where relevant) any design requirements. For the reasons I have set out above, there is no need to make a specific reference to the implications of development for Junction 21. The objection has been conditionally withdrawn.
- 8.87 At Revised Deposit Draft, the EC/2 and EC/9 e) designations at Trub Farm were deleted from the plan - this through Proposed Map Change 12/2, an Area of Opportunity being defined. I have dealt, primarily, with the employment implications of the Trub Farm Area of Opportunity [Policy R/4(i)] at Chapter 12.

**Recommendation:**

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

- **the adopted plan should be based on my recommendations at Chapter 12 of my Report.**

**EC/9 (f) (Deposit Draft) & EC/9 (e) - Land North of Oldham Road, Middleton**

**Objection:** 442/5 Redrow Homes (Lancashire) Ltd and Bellway Homes NW Ltd

**Key Issue:**

- **should the site be deleted as an employment allocation?**

**Inspector's Reasoning:**

- 8.89 The site is an irregularly shaped parcel of land, about 5.5 hectares. Oldham Road is to the south with playing field and housing to the north. A large industrial area lies to the west, mainly occupied by British Vita Plc, with a railway line to the east. Apart from, both, a small fenced area to the south of the river used for the parking of trailers and an area of hardstanding in the north-west corner of the site, the site largely consists of rough grassland - much of which is marshy due to the River Irk that bisects the site
- 8.90 As part of its case in support of the allocation of land at Hollin Lane for employment use, the objectors support the removal of this site from the list of allocations as they consider there to be considerable doubt on site delivery. It was identified as an employment site in the adopted UDP and has not come forward for development subsequently. The land has a long and complex history and the

Council concedes that the site has a number of constraints, particularly in relation to flooding, public rights of way and the traffic implications of development of the site. That said, the site is adjacent to a significant area of industrial land and it would be reasonable to conclude that, at least, part of the land would be able to be used as expansion space for British Vita or another related use. The railway line to the east may also have some benefits in attracting employment uses. The site is not included in the immediate five year supply, which is reasonable given these constraints and its planning history. However, the identified constraints could be overcome, particularly if the Borough's economic circumstances improve. Although the entire site may not be available for development, there remains a strong likelihood that it would contribute to employment land supply in the Borough during the Plan period. Given this, I do not think that the allocation should be deleted.

**Recommendation:**

**8.91 I recommend that:**

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

**EC/9 g): (Deposit Draft) - Sites on Heywood Distribution Park, Pilsworth Road, Heywood**

**Objection:** 208/2 Ropemaker Properties Ltd

**Key Issue:**

- **within the Heywood Distribution Park, should the plan take into account other areas and sites that are likely to come forward for development?**

**Inspector's Reasoning:**

8.92 After consideration of this Deposit Draft objection, the Council (through Proposed Map Change 8/9) has appropriately identified those undeveloped sites likely to come forward during the plan period - and consistent with the policy, reflected in Inquiry Change 46 (part). This has not been disputed by the objector.

**Recommendation:**

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

- **Modify the plan in accordance with Inquiry Change 46 (part) and Map Change 8/9.**

**EC/9 h) (Deposit Draft) & EC/9 p) (Revised Deposit Draft) - Land adjoining Eagle Technology Park Queensway, Rochdale.**

**Objection:** 311/13 Highways Agency

**Key Issue:**

- would the UDP establish sufficient control on any proposal that may materially affect Junction 20 of the M62?

**Inspector's Reasoning:**

8.94 This site was listed as EC/9 h) at Deposit Draft. For the reasons I have set out above, there is no necessity to make a specific reference to the implications of development for Junction 20. The objection has been conditionally withdrawn.

**Recommendation:**

**8.95 I recommend that:**

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

**EC/9 ( i ) – Sites on Smallbridge Business Park, Rochdale**

**Objection:** 311/7 Highways Agency

**Key Issue:**

- would the UDP establish sufficient control on any proposal that may materially affect Junction 21 of the M62?

**Inspector's Reasoning:**

8.96 For the reasons set out above, there is no need to make a specific reference to the implications of any development for Junction 21. The objection has been conditionally withdrawn.

**Recommendation:**

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

- Modify the plan in accordance with Inquiry Change 46 (part).

**EC/9 k) – Land at Sparthbottoms, Rochdale**

**Objection:** 311/14 Highways Agency

**Key Issue:**

- would the UDP establish sufficient control on any proposal that may materially affect Junction 20 of the M62?

**Inspector's Reasoning:**

8.98 For the reasons set out above, there is no necessity to make a specific reference to the implications of any development for Junction 20. The objection has been conditionally withdrawn.

**Recommendation:**

**8.99 I recommend that:**

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

**EC/9 m) – Site on Belfield Road, Rochdale**

**Objections:** 155/5 Environment Agency  
311/8 Highways Agency

**Key Issues:**

- should the policy reflect the proximity of the site to the Buckley Brook?
- would the UDP establish sufficient control on any proposal that may materially affect Junction 21 of the M62?

**Inspector's Reasoning:**

8.100 Inquiry Change 45 addresses the objector's concern on flood risk.

8.101 For the reasons I have set out above, there is no necessity to make a specific reference to the implications of any development for Junction 21. The objection has been conditionally withdrawn.

**Recommendation:**

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

- Modify the plan in accordance with Inquiry Change 45.

**EC/9 n) – Site on Belfield Road/Mayfield Street, Rochdale**

**Objection:** 311/9 Highways Agency

**Key Issue:**

- would the UDP establish sufficient control on any proposal that may materially affect Junction 21 of the M62?

**Inspector's Reasoning:**

8.103 For the reasons set out above, there is no necessity to make a specific reference to the implications of any development for Junction 21. The objection has been conditionally withdrawn.

**Recommendation:**

**8.104 I recommend that:**

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

**EC/9 o) – Site of Former Rex Mill, North of Middleton Road, Middleton**

**Objection:** 155/204 Environment Agency  
460/201 Middleton Traffic Initiative

**Key Issues:**

- should the policy reflect the proximity of the site to the River Irk?
- should this site be included within the policy?

**Inspector's Reasoning:**

8.105 I consider that Inquiry Change 45 addresses the objector's concern (155/204) over flood risk. No further modification is necessary.

8.106 This land is within a Mixed Employment Zone (MEZ) defined under Policy EC/3. Objector 460/201 has not disputed the principle of the MEZ. The land appears to be mainly unused. It is reasonable for the Council to include the site within Policy EC/9. Sufficient control on the nature of any development proposed would be established by Policies EC/3 and A/8 of the UDP. This would include a B8 use. Here, the decision-maker would need to take into account the relationship of the site to other uses. I have carefully considered the requirements of the objector. They are either, inappropriate for inclusion within a UDP or, do not reflect the

acceptability of this MEZ for employment use. In the light of the plan as a whole, the objector has not submitted any convincing evidence that the traffic implications of EC/9 o) would be unacceptable.

**Recommendation:**

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

- **Modify the plan in accordance with Inquiry Change 45.**

**EC/9 - Development Sites in Employment Zones (Omission Site) - Land North of Bentley Avenue Stakehill**

<b>Objections</b>	210/3	Exors of J Milne
	213/7	Mr F Thomas

**Key Issue:**

- **should this site be allocated as a development site in an employment zone?**

**Inspector's Reasoning**

8.108 The site is to the north and north-east of the Stakehill Industrial Estate (SIE), within the approved Green Belt defined in the adopted plan and carried forward into the UDP. The objectors argue, generally together, that development of the site would provide additional employment land and would result in a logical and comprehensive extension to the SIE. It would have good access to the motorway. Given my conclusions on Policy G/EC/1, no convincing reason is before me to justify this allocation, taking into account objector evidence. More importantly, and as reported in Chapter 7, this site reflects the purpose(s) of including land within a Green Belt. No exceptional circumstances have been established that would justify a change to approved Green Belt boundaries.

**Recommendation:**

**8.109 I recommend that:**

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

**EC/9 – Development Site in Employment Zones (Omission Site)  
Land North of Hareshill Road, Heywood**

**Objection:** 248/8 Peel Investments (North) Ltd

**Key Issue:**

- **should this site be allocated as a development site in an employment zone?**

**Inspector's Reasoning:**

8.110 The site comprises several fields in agricultural use within the approved Green Belt defined in the adopted plan and carried forward into the UDP. To the north-west of the land is a developed industrial estate, part of Heywood Industrial Park, together with several parcels of land allocated for further industrial development. These lie within a Primary Employment Zone (PEZ). Given my conclusions on Policy G/EC/1 there is no justification for the allocation of additional industrial land. The development of the site - as an extension to the existing estate - would conflict with the purpose(s) of including land within a Green Belt, as reported in Chapter 7. The land is not a Regional Investment Site - that within the Borough being at the Kingsway Business Park that would be likely to support Rochdale's economic recovery. No exceptional circumstances have been demonstrated sufficient to justify a change to approved Green Belt boundaries

**Recommendation:**

**8.111 I recommend that:**

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

**EC/10 a) Deposit Draft - Other Employment Sites – Manchester Old Road, Rhodes, Middleton**

<b>Objections</b>	221/1	Mr A Ollerhead
	311/15	Highways Agency
	353/1	Ms W Hall
	442/3	Redrow Homes and Bellway Homes

**Key Issues:**

- **should the employment allocation for the site be deleted?**
- **is the site more suitable for housing, particularly sheltered housing for the elderly?**

- would the UDP establish sufficient control on any proposal that may materially affect Junction 19 of the M62?

**Inspector's Reasoning:**

8.112 As this site has now been developed, it has been deleted from the UDP at Revised Deposit Draft. The Agency has conditionally withdrawn its objection.

**Recommendation:**

**8.113 I recommend that:**

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

**EC/10 – Other Employment Sites, Sandbrook Park**

<b>Objections:</b>	311/16	Highways Agency
	311/17	Highways Agency
	311/18	Highways Agency
	311/202	Highways Agency

**Key Issues:**

- would the UDP establish sufficient control on any proposal that may materially affect Junction 21 of the M62?
- is the Revised Deposit Draft policy sufficiently clear on the need for a transport assessment of the site?

**Inspector's reasoning:**

8.114 The Council has changed this policy - both at Revised Deposit Draft and through Pre-Inquiry Change 9. Only one site remains, the 3.1 hectare land at Sandbrook Park. On the Highways Agency's concerns over this site, I consider that this has been addressed by Pre-Inquiry Change 10, albeit more appropriately located in the reasoned justification. As the 1.7 ha site at Sandbrook Park has now been developed, it has been deleted from the UDP by Pre-Inquiry Change 9. The Highways Agency supports these changes. As to its concern over Junction 21, there is - for the reasons I have set out above - no necessity to make a specific reference to the implications of development for Junction 21. The objection has been conditionally withdrawn

**Recommendation:**

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

- **Modify the plan in accordance with Pre-Inquiry Change 9.**
- **As to Pre-Inquiry Change 10, add a new paragraph to the reasoned justification to read “ A Transport Assessment, and consultation with the Highways Agency, will be required for any major office development on this site because of its potential impact on the trunk road network”**

**EC/10 – Other Employment Sites (Omission) - Land North of Langley Lane/West of Hollin Lane and land East of Hollin Lane Middleton**

**Objection:**

442/1

Redrow Homes and Bellway Homes

**Key Issue:**

- **should this land be allocated for employment development?**

**Inspector's Reasoning**

8.116 The site is 2 areas of land to the north of Middleton - generally in agricultural use. Given my conclusions on Policy G/EC/1, I do not consider that there is any justified requirement for the allocation of additional employment land. This relates to the Borough as a whole and the Middleton area generally - notwithstanding my recommendation to delete the Middleton West Business Park. The site is largely undeveloped. Employment use there would represent a substantial incursion into open countryside. Sufficient land would be available in the Borough.

**Recommendation:**

**8.117 I recommend that:**

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

**EC/10 - Other Employment Sites (Omission) - Redcross Street Mill and adjoining land at Redcross Street, Rochdale**

**Objection:** 445/1 Mr J Murphy

**Key Issue:**

- **should land at Redcross Street Mill, and adjoining land, be allocated for employment development?**

**Inspector's Reasoning:**

8.118 The site is to the north of Rochdale Town Centre. Given the limited area of the site, and its potential difficulty for renovation to one sole use, I do not consider that an allocation under Policy EC/10 would be justified. While the site is already in employment use, its redevelopment for other employment uses would be more properly addressed under Policy EC/5. This, subject to its provisions as they may apply to the site, would allow for a degree of flexibility in how any site is redeveloped - whilst protecting local amenity.

**Recommendation:**

**8.119 I recommend that:**

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

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