

# ROCHDALE BIODIVERSITY AND DEVELOPMENT SUPPLEMENTARY PLANNING DOCUMENT

## STATEMENT OF CONSULTATION

### 1. INTRODUCTION

- 1.1 The Supplementary Planning Document (Biodiversity and Development) has been produced by the Council to highlight biodiversity and development issues in Rochdale Borough. In order to ensure that appropriate public consultation takes place, Supplementary Planning Documents (SPD) are required to be accompanied by a statement setting out how the Local Planning Authority will comply with the Council's Statement of Community Involvement (SCI). Consequently this document details the public consultation that will take place in order to meet the requirements of the SCI.
- 1.2 The new planning system introduced during 2004 includes new requirements (e.g. community involvement and the need to undertake a sustainability appraisal) governing the preparation of Supplementary Planning Documents (SPD) which replaces the old style Supplementary Planning guidance (SPG). As a result, whilst not having 'development plan' status, SPD's will be afforded greater weight in the development control process than SPG's.
- 1.3 This document sets out the public participation procedures to be undertaken by the Council, which are associated with the draft SPD. It accords with regulation 17 of the Town and Country Planning (Local Development) (England Regulations 2004).
- 1.4 Using the guidelines of the new government regulations and PPS 12 the public consultation draft SPD proposals have been prepared through a process of consultation.

### 2. PARTICIPATION AND CONSULTATION SO FAR

- 2.1 The process of producing the supplementary planning document consisted of the following stages:

Stage 1: Preparation and consultation on working draft of the document

Stage 2: The SA process

Stage 3: Consultation

Stage 3: Revision of the document

- 2.2 **Stage One: Preparation and consultation on working draft of the document**

The preparation of the SPD commenced with a scoping paper which was shared with key partners in July, 2006 to test the principles, scope and breadth of the document. The key partners invited to comment on this scoping paper through a meeting hosted by Greater Manchester Ecology Unit. The key partners were Greater Manchester Ecology Unit, Royal Society for the Protection of Birds (RSPB) Lancashire Wildlife Trust, British Waterways and Natural England and the Environment Agency. The draft was revised in the light of comments made by the key partners.

Additionally, voluntary sector interests were also advised of the intention to produce the SPD, through the Oldham and Rochdale Nature Conservation Advisory Group. The group includes representatives from the volunteer naturalists groups within the borough, including the Rochdale Field Naturalists Society, RSPB, and the voluntary sector including Groundwork Oldham and Rochdale and BTCV.

## 2.3 Stage Two: The SA Process

The first part of the Sustainability Appraisal (SA) involved collecting background information for inclusion in the Scoping Report which enabled the scope of the SA to be determined. The Scoping Report looked at other plans and programmes to identify how they influenced and impacted upon the SPD. The key aim of the scoping report was to identify the key sustainability issues for the SPD area.

The scoping report was also a consultation document which allowed organisations and individuals to comment on the proposed scope of the SA. Consultation responses received helped to ensure that the draft SA was comprehensive and robust enough to support the SPD during later stages of full public consultation and examination.

Paper copies of the Scoping Report were available for public consultation, for a period of 5 weeks during 2007, from 20<sup>th</sup> August, 2007 to 24<sup>th</sup> September, 2007. The Government has stated that the three specific bodies (as required by the Strategic Environmental Assessment Directive) should be consulted at this stage. These bodies are Natural England, English Heritage and the Environment Agency.

Although not statutorily required, the following bodies were also consulted:

- Government Office for the North West
- The North West Regional Assembly
- Greater Manchester Ecology Unit
- Greater Manchester Chamber of Commerce
- Rochdale Local Strategic Partnership
- Rochdale Civic Society
- Lancashire Wildlife Trust
- Royal Society for the Protection of Birds
- Home Builders Federation
- British Waterways
- Rochdale Field Naturalists Society

Consultation responses were received, recorded and incorporated into the Scoping Report as required. A draft SA was completed for this SPD and was subject to public consultation as a part of the SPD Consultation exercise between 7<sup>th</sup> November and 12<sup>th</sup> December, 2007. No further comments were received on the Scoping Report.

The second part of the process was to prepare SA framework against which a plan or programme can be assessed. The SA framework incorporates a range of objectives and questions adapted from national, regional, sub-regional and local sources to fit the key sustainability issues and aspirations of Rochdale Borough.

The appraisals have been undertaken using an iterative process so that the SA has informed the development of the SPD. This has ensured that the SPD has already met many of the sustainability objectives within the Councils framework. The Draft SA was also subject to public consultation. No responses were received in the draft SA.

### Stage Three: Consultation

The formal draft SPD for consultation was developed in partnership with the key stakeholders, who were offered the opportunity to provide feedback and comments on the working drafts of the document. In response to their comments, changes were made to the draft for formal consultation.

Prior to being made available for public consultation, the draft document was circulated to:

- Rochdale Council Informal Cabinet 11<sup>th</sup> October for comment

- Rochdale Council Cabinet 25<sup>th</sup> October approval of the draft for public consultation

### **3. PUBLIC CONSULTATION (November / December, 2007 )**

- 3.1 In accordance with the Council's Statement of Community Involvement, the consultation process included direct notification to consultees, key local stakeholders and other interested parties and publicity through the local press.
- 3.2 A public notice was published in the Rochdale Observer on 7<sup>th</sup> November, 2007 explaining the role of the SPD and where a copy of the SPD and its supporting documents could be viewed during the Public Consultation period.
- 3.3 The SPD and related documents were published for consultation on 7<sup>th</sup> November 2007, for a period of five weeks up until 12<sup>th</sup> December 2007. The following methods were used:
- The SPD and its supporting documents were available on Rochdale Council's website and at various locations identified within the accompanying Statement of Matters.
  - Letters were sent out to all parties Rochdale Council considered had an interest in the SPD (including statutory consultees, general consultees, conservation interests, voluntary sector and any other interested parties). The letter detailed the role of the SPD, the consultation times and locations and where the SPD, the Sustainability Appraisal could be viewed.
  - The SPD and its supporting documents was sent to all the members of the Oldham and Rochdale Nature Conservation Advisory group, plus other interested parties who had expressed an interest in the document. They were also invited to attend the consultation meeting on the SPD.
  - The SPD was also available for comment at the Township committee meetings during the consultation period for comment. The dates for these were:
    - 12<sup>th</sup> November, 2007 Heywood Township
    - 13<sup>th</sup> November, 2007 Pennines Township
    - 14<sup>th</sup> November, 2007 Rochdale Township
    - 15<sup>th</sup> November, 2007 Middleton Township
  - Three consultation meetings were held during this period:
    - Internal meeting 29<sup>th</sup> November, 2007 to which all councillors, and relevant officers were invited
    - 28<sup>th</sup> November, 2007 to which members of the voluntary sector, naturalists and representatives of natural history groups were invited.
    - 4<sup>th</sup> December, 2007 to which key stakeholders and consultation partners were invited including The Environment Agency, British Waterways Lancashire Wildlife Trust, RSPB, Natural England and Greater Manchester Ecology Unit.
  - A letter/questionnaire was sent out to various parties (including statutory consultees, general consultees, local businesses and any other interested parties) and all those who expressed an interest in the draft SPD. The letter detailed the role of the SPD, a summary of some of the key themes and principles from the SPD, a questionnaire, the dates of the consultation period and where and when the SPD and its supporting documents would be available to view. The questionnaire was also available at the Council offices, libraries and community centres.

## **4. OUTCOME OF PUBLIC CONSULTATION**

- 4.1 There were a total of 22 responses from members of the public, organisations and businesses. Three of the responses were from the public, with the remainder being from organisations and their representatives. Although the consultation raised a number of issues concerning the SPD, there were no in principle objections to the document, but small changes proposed to the wording, or issues around particular habitats or species. Natural England also raised a specific comment in relation to the Appropriate Assessment of the document, which was taken on board by Greater Manchester Ecology Unit.
- 4.2 The Council has carefully considered all of the representations made and has responded to every representation received; indicating whether it agrees, disagrees or notes the point, and giving a reason for this and indicating whether a change is proposed and what it is (see Appendix 1 attached). There were no significant objections in principle to the SPD, most representations raised issues that are already addressed in the document and therefore required no change. The proposed changes are therefore relatively minor and primarily cover:
- Editorial and map changes to improve clarity;
  - Improvements to the text to ensure that key words and phrases are included;
  - Revision of species lists to reflect June 2007 updated BAP species list;
  - Clarification of the design principles and what is sought in the character areas
- 4.3 Cabinet on 28<sup>th</sup> January 2008 approved the adoption of the SPD subject to the proposed changes in the schedule attached to the report to Cabinet (see Appendix 1).
- 4.4 This schedule of responses and proposed changes will be put on the Council Web site and in all libraries and Information Centres, and respondents will be notified after the 29<sup>th</sup> January 2008. There is then a 3 month period during which a legal challenge can be made to the SPD.

## **5. DOCUMENT AVAILABILITY**

- 5.1 Copies of the draft SPD and schedule of changes following adoption are available for inspection at the locations highlighted in Appendix 2
- 5.2 The draft SPD and schedule of approved changes, SA and the consultation Statement are available to view and download from the Council website [www.rochdale.gov.uk](http://www.rochdale.gov.uk) from the 29<sup>th</sup> January, 2008 .
- 5.3 Paper copies of the final adopted SPD will be available to purchase in due course. To order a copy, please contact Strategic Planning Service (See address below)
- 5.4 Those who wish to view this in large print or in Braille, or requires the translation of this document to be made in Bengali or Urdu, should contact the office below to make the necessary arrangements.

## **6. ADVICE AND ASSISTANCE**

For further information relating to this document please contact:

Strategic Planning Team  
Planning & Regulation Service  
Rochdale Council  
Floor 2, Telegraph House  
Baillie Street  
Rochdale  
Po Box 32  
OL161JH

Tel: 01706 924369

By email: [Strategic.planning@Rochdale.gov.uk](mailto:Strategic.planning@Rochdale.gov.uk)

Website: [www.rochdale.gov.uk/council\\_and\\_democracy/consultations.aspx](http://www.rochdale.gov.uk/council_and_democracy/consultations.aspx)

## **7. LIST OF APPENDICES**

Appendix 1 Proposed changes to the SPD in response to comments received from the public consultation

Appendix 2 Rochdale Council information points and libraries

## Appendix 1

### Rochdale Biodiversity and Development Supplementary Planning Document.

#### Summary of comments received from the formal consultation ( 7<sup>th</sup> November – 12<sup>th</sup> December, 2007)

Number	Respondent	Comment	Response	Recommendation / Action
1	RSPB	<ul style="list-style-type: none"><li>It would be helpful to include priority species from the updated UK Biodiversity Action Plan 2007 list in the Appendix 3 species lists e.g. birds such as house sparrow and starling which built development can influence.</li></ul>	<b>Agree.</b> House sparrow and starling will be added to the Appendix 3 list. The UK BAP will be signposted in the document to facilitate access to future updates of the lists.	<b>Add House sparrow and starling to UK BAP List in Appendix 3.</b>
		<ul style="list-style-type: none"><li>Add swift to list of locally significant species.</li></ul>	<b>Agree.</b> Swift will be added to the list as requested.	<b>Locally significant list to include swift.</b>
2	The National Trust	<ul style="list-style-type: none"><li>Welcomes the SPD and agrees with the overall intentions and objectives. Document provides an appropriate level of guidance.</li></ul>	<b>Noted.</b>	<b>No further action proposed.</b>

	<ul style="list-style-type: none"> <li>Suggest that final objective in paragraph 2.4 should be amended to include reference to access to the natural environment.</li> </ul>	<p><b>Agree.</b> The reference would be a useful signpost to administrative guidance for applying relevant legislation.</p>	<p><b>Amend objective in paragraph 2.4 as proposed.</b></p>
	<ul style="list-style-type: none"> <li>Require clarification that sites and designations referred to in paragraphs 5.4 to 5.11 will be included in mapped form in the final document.</li> </ul>	<p><b>Noted.</b> These maps will be included in the final printed version for reference.</p>	<p><b>No further action proposed.</b></p>
	<ul style="list-style-type: none"> <li>A reference to Circular 6/05: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact within the Planning System, would be helpful in paragraph 6.9.</li> </ul>	<p><b>Agree.</b> The reference would be a useful signpost to administrative guidance for applying relevant legislation.</p>	<p><b>Add sentence referring to Circular 6/05 in paragraph 6.9.</b></p>
	<ul style="list-style-type: none"> <li>Paragraph 6.15 and 6.16 should refer to the panel report for Regional Spatial Strategy and the detail of its recommendations for amending policy EM/1 of RSS.</li> </ul>	<p><b>Disagree.</b> The existing reference to RSS provides sufficient detail in the context of this document. It would be premature to include such detail before final wording is agreed for RSS. A signpost to the final approved RSS would be more appropriate.</p>	<p><b>Add a sentence in paragraph 6.18 to detail where the final RSS when available can be viewed.</b></p>
	<ul style="list-style-type: none"> <li>Appendix 5 should refer more clearly to when species/habitat surveys should or</li> </ul>	<p><b>Agree.</b></p>	<p><b>Add further</b></p>

		should not take place.	Text will be added to the diagram in Appendix 5 to make this clearer.	<b>details of species/habitat survey timings to diagram in Appendix 5.</b>
<b>3</b>	Yorkshire Forward	<ul style="list-style-type: none"> <li>• Welcomes opportunity to comment. No specific comments to make.</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>
<b>4</b>	Natural England	<p><u>Habitats Regulations Assessment (HRA)</u></p> <ul style="list-style-type: none"> <li>• Generally satisfied with the methodology and conclusions of the HRA screening reports. Suggestion that this is taken forward as one report for both of the Rochdale Canal and the South Pennine Moors SPA, with a location map together with the reasons for the selection of the European sites on which the Plan may have likely significant effect. An acknowledgement of the sources of information regarding the European sites should also be included.</li> <li>• The screening report(s) should be included or referenced in Appendix 5 of the Sustainability Appraisal Report.</li> </ul>	<p><b>Agree.</b> Greater Manchester Ecology Unit (GMEU) have amended the document accordingly.</p>	<b>No further action required.</b>

		<p><u>SPD main document</u></p> <ul style="list-style-type: none"> <li>• Welcomes the document as a sound basis to support policy and should provide an excellent example of good practice for other local authorities.</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>
<b>5</b>	English Heritage	<ul style="list-style-type: none"> <li>• Welcomes and supports the production of the document and the principle set in the document that “design should be based on a clear understanding and recognition of the existing landscape character and open space assets and networks”</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>
		<ul style="list-style-type: none"> <li>• As the Council is not proposing a specific SPD for the historic environment, the SPD could usefully include a section/paragraph covering issue relating to biodiversity, the historic environment and landscape.</li> </ul>	<p><b>Disagree.</b> It is important to maintain the clarity of the document as one dealing with biodiversity and development. It would however be appropriate to add selective references to the need to consider the historic environment and its character in landscape space/biodiversity design and management in appropriate sections of the design and development principles for biodiversity contained in paragraph 7.17.</p>	<b>Add references to historic character and features in design principles ( paragraph 7.17) concerning landscape character and open space networks and biodiversity opportunities in buildings and associated spaces.</b>
<b>6.</b>	Calderdale	<ul style="list-style-type: none"> <li>• The document provides a good</li> </ul>	<b>Noted.</b>	<b>No action</b>

	MBC	overview of biodiversity issues related to development.		<b>proposed.</b>
		<ul style="list-style-type: none"> <li>• Examples of how to implement the principles and case studies would be useful.</li> </ul>	<p><b>Noted.</b> Examples of good practice will be included within the revised document.</p>	<b>No further action proposed.</b>
		<ul style="list-style-type: none"> <li>• Need to emphasise that development can affect not just the development site, but impact also on the surrounding area.</li> <li>• Consider mentioning PPS9 Good Practice Guide.</li> </ul>	<p><b>Agree.</b> This point is made but could be better highlighted in the text.</p> <p><b>Noted.</b> A reference to the PPS9 good practice guide will be included in the final printed document.</p>	<p><b>Amend design principles in paragraph 7.17 to include an explicit reference to this point.</b></p> <p><b>No further action required.</b></p>
<b>7</b>	Sonia Allen	<ul style="list-style-type: none"> <li>• Paragraph 3.5 'Issues Affecting Biodiversity' does not include light pollution which is a significant problem for biodiversity caused by many new developments.</li> </ul>	<p><b>Agree.</b> The point is currently covered under disturbance to habitat through construction and land use practices. An explicit reference to highlight the issue is appropriate.</p>	<b>Amend text in paragraph 3.5 to refer to light pollution as an issue affecting biodiversity.</b>
		<ul style="list-style-type: none"> <li>• There should be a method of assessing light pollution retrospectively and for its control through the planning system.</li> </ul>	<p><b>Noted.</b> The planning system has limited retrospective control over artificial lighting. The SPD must reflect current planning powers. The SPD</p>	<b>No further action proposed.</b>

		<ul style="list-style-type: none"> <li>Paragraph 6.13 (Development and Flood Risk) refers to potential biodiversity enhancements such as removal of culverts. This should be removed from the SPD as it does not reflect the safeguarding of bat habitats (Daubenton's Bat) which use such features as habitat. Culverts should only be opened up as a last resort and only after bat surveys and mitigation measures carried out.</li> </ul>	<p>can encourage good practice in new development and will include a case study to highlight this issue. Specific problems of light pollution and its impact on biodiversity must be looked at individually to assess if any action is appropriate or any good practice can be agreed.</p> <p><b>Disagree.</b> Such measures are recognised and promoted by the Environment Agency as good practice. Ecological and specific protected species surveys will be required by the Environment Agency for any proposals affecting the habitats or likely habitats of legally protected species such as bats. The SPD makes clear reference to the need to carry out such surveys.</p>	<p><b>No further action proposed</b></p>
		<ul style="list-style-type: none"> <li>Culverts, tunnels, weirs, bridges and other water structures as well as being potentially important habitats are also part of the local landscape history. They should not be removed and should be preserved as archaeological features.</li> </ul>	<p><b>Disagree.</b> The potential historic and ecological value of such features is recognised in the SPD. A more explicit design principle to consider the effect of actions on all historic features redundant or otherwise as proposed is beyond the scope of this SPD to require such structures to be preserved. The Council and the Environment Agency in considering</p>	<p><b>No further action proposed</b></p>

		<ul style="list-style-type: none"> <li>Concern that Daubenton's bat, Whiskered bat, Noctule bat and Brown long-eared bat are not included in the list in Appendix 3 of Priority Species in Rochdale MBC.</li> </ul>	<p>specific proposals will assess redundant water structures and features through a range of planning policies and operational requirements concerning the historic environment, public safety, biodiversity, effective flood risk management and other factors, taking on board expert and local opinion.</p> <p><b>Agree.</b> The list is under regular review and the stated species can be listed as requested.</p>	<p><b>Include Daubenton's bat, Whiskered bat, Noctule bat and Brown long-eared bat in Appendix 3 list of Priority Species in Rochdale</b></p>
		<ul style="list-style-type: none"> <li>There is a steep decline in Hedgehog numbers and they should be included in the list of Priority Species in Rochdale in Appendix 3.</li> </ul>	<p><b>Disagree.</b> Whilst declining numbers are noted, there is not a sufficiently clear evidence base to include hedgehogs in this list at present. Hedgehogs are listed in Appendix 3 as a species of UK conservation concern and future reviews of the local priority list may be a more appropriate time to consider inclusion of hedgehog</p>	<p><b>No further action proposed.</b></p>

		<ul style="list-style-type: none"> <li>• Mature trees are irreplaceable in our lifetime and have no protection from developers who wish to fell them in advance of development proposals for large gardens etc. Mature trees need some form of protection in place before planning permission is sought.</li> </ul>	<p>subject to robust evidence.</p> <p><b>Noted.</b> Tree Preservation Orders and the felling licence regulations of the Forestry Commission are the primary means of protecting mature trees out with an actual planning application. The need for new TPOs and works requiring a felling licence will always be dependent on information being available at the right time to the Council and/or the Forestry Commission. This SPD cannot establish new protective measures but does highlight the need, from a biodiversity perspective, to engage in early pre-application discussions and to refer to good practice contained in the SPD to inform that process. The SPD also will include a specific reference to UDP Policy NE/7 'Tree Preservation Orders'.</p>	<p><b>Include reference to UDP policy NE/7 'Tree Preservation Orders' in paragraph 6.23.</b></p>
		<ul style="list-style-type: none"> <li>• There should be a policy to retain decaying trees for their biodiversity value.</li> </ul>	<p><b>Noted.</b> Whilst this may be appropriate in some instances care must be taken that trees are not diseased or dangerous. Such an approach needs to be selective and site specific and is more appropriately a woodland management issue rather than one</p>	<p><b>No further action proposed.</b></p>

		<ul style="list-style-type: none"> <li>• Mature trees or ancient trees should have preservation orders to safeguard their future.</li> </ul>	<p>for a Biodiversity and Development SPD.</p> <p><b>Noted.</b> Existing mechanisms for tree and woodland protection are referenced in the document. A statement of this nature is beyond the scope of this document.</p>	<p><b>No further action proposed.</b></p>
		<ul style="list-style-type: none"> <li>• More mention should be made of the wider moorland outside the South Pennine Moors SPA/SAC. They are remote landscapes and important habitats subject to pressure from wind farm developments and off road vehicles. Questions whether site restoration after development will return the moorlands to solitude and protect their landscape interest.</li> </ul>	<p><b>Noted.</b> The wider South Pennines i.e. the uplands surrounding the north and east of Rochdale district, are well detailed in Section 4 of the document, Landscape Character and in Section 5 in paragraph 5.6 which describes the Southern Pennines Natural Area. Priority upland habitats are also referred to and all upland designated sites are mapped in Appendix 2 of the document. Much of the survey and design good practice principles are also applicable to upland sites in general. Site restoration for wind farm developments is part of a detailed Environmental Statement which must accompany such major proposals. The Environmental Statement will also include provisions for on site management and mitigation to</p>	<p><b>No further action proposed.</b></p>

			address issues such as access controls which will inform site management plans for approved schemes.	
8	Nick Martin	<ul style="list-style-type: none"> <li>Concern over biodiversity loss as a result of the spread of Himalayan Balsam and the lack of an effective policy to control it.</li> </ul>	<p><b>Noted.</b> The SPD refers to this problem and includes good practice principles to help ensure development practices do not spread invasive plants.</p>	<b>No further action required.</b>
9	Richard Greenwood	<ul style="list-style-type: none"> <li>Landfill and other such sites when restored can have specific value for butterflies e.g. areas deliberately left without topsoil and with appropriate wildflower mix. Planning conditions should aim for this result.</li> </ul>	<p><b>Noted.</b> The point is too specific for general application but may be appropriate for particular site restorations. The SPD includes good practice survey and design principles to ensure that existing biodiversity value e.g. of bare areas or natural re-vegetation is protected and enhanced where appropriate and included in agreed restoration schemes.</p>	<b>No further action proposed.</b>
		<ul style="list-style-type: none"> <li>Tree planting should be done in a way that protects existing and potential butterfly sites. Woodland should be managed to prevent the loss of such habitat and to create potential new habitats by creating clearings and rides.</li> </ul>	<p><b>Noted.</b> The impact of tree planting on butterfly habitat is a site specific issue which will vary by location. It is not appropriate for the SPD to include such a general statement which is more appropriately and usually a detailed woodland management issue. The SPD does refer to the need in general terms to consider the impact of landscaping proposals on existing species</p>	<b>No further action proposed.</b>

			interest specifically referencing butterflies and this should be informed by site survey and consultation.	
		<ul style="list-style-type: none"> <li>There should be a more vigorous policy to check the spread of Himalayan Balsam. Legislation is needed for it to be scheduled as a noxious weed under the Weeds Act.</li> </ul>	<p><b>Noted.</b> The SPD advocates an approach of restricting the spread of such invasive plants through development. It is beyond the scope of the SPD to consider approaches to invasive species management in detail although it should be noted that the Council has adopted an active approach to controlling and eradicating invasive species.</p>	<b>No further action proposed.</b>
		<ul style="list-style-type: none"> <li>Creeping Thistle needs to be recognised for its importance to biodiversity.</li> </ul>	<p><b>Noted.</b> This is not possible as it is a notifiable weed under the Weeds Act.</p>	<b>No further action proposed.</b>
		<ul style="list-style-type: none"> <li>Ragwort should not be pulled up on butterfly sites until flowering has finished.</li> </ul>	<p><b>Noted.</b> This is not possible as it is a notifiable weed under the Weeds Act</p>	<b>No further action proposed.</b>
		<ul style="list-style-type: none"> <li>Indiscriminate application of weed-killer on rough grassland should be curbed.</li> </ul>	<p><b>Noted.</b> This is a land management issue beyond the scope of this document.</p>	<b>No further action proposed.</b>
		<ul style="list-style-type: none"> <li>Urban sites even in town centres can support butterfly colonies.</li> </ul>	<p><b>Noted.</b> This general point for a range of habitat value in urban open spaces is</p>	<b>No further action proposed.</b>

		<ul style="list-style-type: none"> <li>Land perceived as derelict or neglected can have developed wildlife value which should be recognised. This can also include abandoned quarries and spoil heaps.</li> </ul>	<p>made in the SPD.</p> <p><b>Noted.</b> The point is explicitly made in the good practice survey and design principles contained in the SPD.</p>	<p><b>No further action proposed.</b></p>
		<ul style="list-style-type: none"> <li>Questions whether the river valley wooded landscape is as important for biodiversity as claimed.</li> <li>Wildflower rich hay meadow may now be non existent in the Borough and it should be brought back into the landscape.</li> </ul>	<p><b>Disagree.</b> The river valley network is one of the most significant biodiversity assets in the borough containing ancient woodland, designated SBIs and which is also highly accessible for public enjoyment. Quality may vary in specific locations due to the extent of specific woodland management but detailing the general improvement of woodland management is beyond the scope of the SPD.</p> <p><b>Noted.</b> Opportunities to reintroduce such habitat through development would be very site specific and limited. The SPD highlights priority grasslands which would not preclude the establishment of such habitat where opportunities arose.</p>	<p><b>No further action proposed.</b></p> <p><b>No further action proposed</b></p>
		<ul style="list-style-type: none"> <li>The Council's Local Nature Reserves are badly affected by invasive plants and a higher level of management is needed.</li> </ul>	<p><b>Noted.</b> Specific site management is outside the scope of this document.</p>	<p><b>No further action proposed</b></p>

	<ul style="list-style-type: none"> <li>Greenspace Corridors in Rochdale are badly affected by invasive plants which has affected their effectiveness as corridors.</li> </ul>	<p><b>Noted.</b> The SPD advocates that development should not contribute to the spread of such invasive plant species. Detailed land management issues in specific parts of greenspace corridors are</p>	<p><b>No further action proposed.</b></p>
	<ul style="list-style-type: none"> <li>In paragraph 6.9 which sets out the objectives of PPS9, it is suggested that enhancing and restoring biodiversity may mean removal of certain trees to enhance biodiversity.</li> </ul>	<p>acknowledged but beyond the scope of this document.</p> <p><b>Noted.</b> It is not the intention of the PPS to be so specific but as general good practice for biodiversity and landscape management it can be appropriate for the removal of trees or other habitat features where a greater ecological benefit would result. This can only be judged in</p>	<p><b>No further action proposed</b></p>
	<ul style="list-style-type: none"> <li>The old CORUS site at Castleton should be protected for biodiversity purposes.</li> </ul>	<p>specific instances. The SPD acknowledges this point.</p> <p><b>Noted.</b> Greater Manchester Ecology Unit will assess whether the site contains areas of ecological interest that should be formally recognised but it</p>	<p><b>No further action proposed</b></p>
	<ul style="list-style-type: none"> <li>Beech and Sycamore canopies have limited landscape and biodiversity value.</li> </ul>	<p>is beyond the scope of the current consultation for the SPD.</p>	

			<p><b>Noted.</b> It is not the role of the SPD to include general opinions about specific species out of a site context.</p>	<p><b>No further action proposed.</b></p>
		<ul style="list-style-type: none"> <li>• Redundant or inappropriately sized water features such as bridges and weirs have an archaeological value which would be lost with their removal.</li> </ul>	<p><b>Noted.</b> The potential historic and ecological value of such features is recognised in the SPD. A more explicit design principle to consider the effect of actions on all historic features redundant or otherwise has been proposed but it is beyond the scope of this SPD to require such structures to be preserved. The Council and the Environment Agency in considering specific proposals will assess redundant water structures and features through a range of planning policies and operational requirements concerning the historic environment, public safety, biodiversity, effective flood risk management and other factors, taking on board expert and local opinion.</p>	<p><b>No further action proposed.</b></p>
		<p>Suggested additional species to be added to Appendix 3 of the SPD including: Common Lizard, Minnow, Stoneloach, Grass vetchling, Annual balsam, Blue sow thistle, Common fleabane, Henbane, Alder buckthorn, Fringed bramble, Ivy leaved toadflax, Common toadflax, Pale toadflax, Wall (butterfly), Common blue, Gatekeeper, Small copper,</p>	<p><b>Partly Agree.</b> The list is under regular review. The following species can be added to the list at this current time: Common lizard, grass vetchling, Wall butterfly,</p>	<p><b>Additional species to be added Appendix 3 species lists as significant</b></p>

		Ringlet, White letter hairstreak, Wall brown, Small heath and Cinnabar moth.	White letter hairstreak and Small heath to be included in Appendix 3. Subject to future robust evidence being available, future revisions of the list may be able to consider the inclusion of further species as suggested.	<b>species for Rochdale.</b>
<b>10</b>	NHS North West	<ul style="list-style-type: none"> <li>No specific comments to make.</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>
<b>11</b>	Rochdale Borough wide Housing	<ul style="list-style-type: none"> <li>No specific comments to make.</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>
<b>12</b>	Disability Rights Commission	<ul style="list-style-type: none"> <li>No specific comments to make.</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>
<b>13</b>	Lancashire Wildlife Trust	<ul style="list-style-type: none"> <li>Support the principle and general content of the document</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>
		<ul style="list-style-type: none"> <li>To provide adequate opportunity for the passage of wildlife, greenspace corridors should be as continuous as possible and a width of at least 15 metres.</li> </ul>	<p><b>Noted.</b></p> <p>The identification of greenspace corridors is an issue properly dealt with through the development planning process. The SPD is a guidance document to help implement policy effectively and whilst it identifies the importance of maintaining and extending corridors, networks and stepping stones and reducing fragmentation, it is beyond the scope of the document to require a 15m width of all corridors. In some cases corridors will be much more narrow than this but may still perform</p>	<b>No further action proposed.</b>

		<ul style="list-style-type: none"> <li>The SPD recognises the importance of the upland moors but more should be done to protect the ecology of the area especially through grazing controls. The issue of wind farm development is also a concern.</li> </ul>	<p>a valuable function within an heavily constrained space.</p> <p><b>Noted.</b> Grazing controls are beyond the scope of this SPD. Wind power developments are subject to robust planning and ecological assessment and will normally be accompanied by a comprehensive Environmental Statement including biodiversity impacts and proposed mitigation and compensatory measures. This SPD and other published good practice guidance for example through the British Wind Energy Association and conservation agencies will provide a significant body of good practice. References will be included in the final printed document.</p>	<p><b>No further action proposed</b></p>
		<ul style="list-style-type: none"> <li>In order to protect the integrity of the Rochdale Canal as a SAC a 15 metre buffer is recommended between the banks and any development in particular those which could cause pollution.</li> </ul> <p>The Government White Paper seems to propose changes in planning law that could</p>	<p><b>Noted.</b> All development proposals which could potentially affect the Rochdale Canal are subject to consultation with Natural England and may require Appropriate Assessment. A 15 metre buffer would be a policy approach more appropriately considered in the development planning process and is beyond the scope of the SPD.</p> <p><b>Noted.</b></p>	<p><b>No further action proposed</b></p> <p><b>No further action</b></p>

		have a detrimental effect on biodiversity e.g. through the speeding up of the planning process.	The SPD contains general principles to support existing and developing planning policy and the formulation and assessment of development proposals. It would not be appropriate to speculate on the possible effects of future legislation. The general principle of conserving and enhancing biodiversity remains an important feature of Government policy and the principles of the SPD will continue to apply.	<b>proposed</b>
<b>14</b>	The Environment Agency	<ul style="list-style-type: none"> <li>Support the document and its recognition of the contribution that biodiversity makes to sustainable development.</li> </ul>	<b>Noted.</b>	<b>No further action proposed</b>
		<ul style="list-style-type: none"> <li>Paragraph 3.5 (issues affecting biodiversity) should refer to poor construction practices as an impact on biodiversity.</li> </ul>	<b>Agree.</b>	<b>Amend paragraph 3.5 to include a reference to 'poor' construction practice.</b>
		<ul style="list-style-type: none"> <li>Paragraph 3.5 (Issues affecting biodiversity) should include an additional bullet point to read "Poor landscape design and maintenance which is not based on the current site's ecology"</li> </ul>	<b>Agree.</b>	<b>Add bullet point to paragraph 3.5 as requested.</b>

		<ul style="list-style-type: none"> <li>In paragraph 6.4 it could be emphasised that not all watercourses may be able to meet a 'good' ecological status by 2015 in line with the objective of the Water Framework Directive. This is due to long term issues which need to be resolved such as heavily modified watercourses, chemical or biological water issues etc.</li> </ul>	<p><b>Agree.</b> The SPD makes this point but a clearer reference may be helpful.</p>	<p><b>Amend reference to the requirements of the Water Framework Directive as requested in paragraph 6.4.</b></p>
		<ul style="list-style-type: none"> <li>The reference to PPS9 in paragraph 6.9 should refer to planning decisions preventing 'harm' rather than 'significant harm' to biodiversity. The reference should emphasis issues of satisfactory alternative site assessment in respect of compensation and mitigation.</li> <li>Paragraph 7.8 – The Environment Agency would recommend some guidance in respect of compensation measures – that compensation should be a last resort and not an afterthought. Compensation packages should not compromise other biodiversity assets.</li> </ul>	<p><b>Partly Agree.</b> A reference to 'harm' rather than 'significant harm' is appropriate. References to alternative site assessment are too detailed for a general description of the features of PPS9 and are more appropriate as guidance in the survey and design section where clear references are already included.</p> <p><b>Agree.</b> A reference to compensation measures being a last resort would be a helpful addition. The issue of new biodiversity measures not compromising other biodiversity interests is included in the design principles later in the document.</p>	<p><b>Amend paragraph 6.6 to refer to planning decisions preventing 'harm'.</b></p> <p><b>Amend paragraph 7.8 to refer to compensation measures being a last resort as requested.</b></p>
		<ul style="list-style-type: none"> <li>Suggested minor rewording of design principles (paragraph 7.17) for</li> </ul>		

		<p>biodiversity and flood risk management relating to development in the natural flood plain, opening up of culverts and removal of inappropriate/redundant structures.</p>	<p><b>Agree.</b> The proposed wording of these points by the Environment Agency adds further clarity to the design principles.</p>	<p><b>Amend design principles in paragraph 7.17 as requested by the Environment Agency.</b></p>
		<ul style="list-style-type: none"> <li>All new management plans should be simple, clear and concise.</li> </ul>	<p><b>Agree.</b> The need for simple, clear and concise management plans will be included within management and monitoring as requested.</p>	<p><b>Amend management and monitoring to include a reference for management plans to be simple, clear and concise.</b></p>
15	North West Regional Assembly	<ul style="list-style-type: none"> <li>Draws attention to the status of the Submitted Draft Regional Spatial Strategy for the North West and its policies for biodiversity.</li> </ul>	<p><b>Noted.</b> The SPD includes a reference to both the adopted RPG 13 and the Draft Submitted RSS.</p>	<p><b>No further action proposed.</b></p>
		<ul style="list-style-type: none"> <li>Mention should be made of the NWRA North West Best Practice Design Guide which includes guidance on sustainable design topics such as biodiversity.</li> </ul>	<p><b>Noted.</b> References to the North West Best Practice Design Guide and the draft Green Infrastructure Guide will be included in the SPD.</p>	<p><b>No further action proposed.</b></p>
16	United Utilities	<ul style="list-style-type: none"> <li>Welcomes and supports the document</li> </ul>	<p><b>Noted</b></p>	<p><b>No further action proposed.</b></p>

17	The Theatres Trust	<ul style="list-style-type: none"> <li>No specific comments to make.</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>
18	Government Office for the North West.	<ul style="list-style-type: none"> <li>No specific comments to make.</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>
19	Highways Agency	<ul style="list-style-type: none"> <li>No specific comments to make. Satisfied with document.</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>
20	British Waterways	<ul style="list-style-type: none"> <li>Welcomes the document and the emphasis on pre-application consultation</li> </ul>	<b>Noted</b>	<b>No further action proposed.</b>
21	Rochdale Castlemere Congregation of Jehovah's Witnesses	<ul style="list-style-type: none"> <li>Suggest that Paragraph 6.9 which outlines the key objectives of PPS9 should refer to the reuse of industrial and commercial land as the preferred option for community facilities such as places of worship.</li> </ul>	<p><b>Disagree.</b> The paragraph is a summary of the key objectives of PPS9 and the requested issue is not part of that document or its content. The issue is not relevant to this SPD.</p>	<b>No further action proposed.</b>
22	Greater Manchester Ecology Unit	<ul style="list-style-type: none"> <li>Welcomes the production of the SPD as a forward thinking and exemplary document especially the emphasis on early pre-application consultation and ecological surveys and enhancing biodiversity interest.</li> </ul>	<b>Noted.</b>	<b>No further action proposed.</b>

## **Appendix 2**

### **Council Information Points:**

Planning and Regulation Reception, Floor 1, Telegraph House, Baillie Street, Rochdale  
Rochdale Information Centre, Floor 2, Municipal Offices, Smith Street, Rochdale  
Heywood Information Centre, 44-46 Market Street, Heywood  
Middleton Information Centre, Sadler Street, Middleton  
Milnrow Information centre, 82 Dale Street, Milnrow  
Littleborough Information Centre, Council Offices, Harehill Park, Littleborough  
Kirkholt Information Centre, 46 The Strand, Kirkholt, Rochdale

### **Libraries**

Wheatsheaf Library, Baillie Street, Rochdale  
Balderstone Library, Balderstone Park, Rochdale  
Belfield Library, Belfield Community School, Samson Street, Rochdale  
Castleton Library, 881 Manchester Road, Rochdale  
Smallbridge Library, Stevenson Square, Rochdale  
Spotland Library, Ings Lane, Rochdale  
Norden Library, Norden Community School, Shawfield Lane. Rochdale

Heywood Library, Church Street, Heywood  
Darnhill Library, Argyle Parade, Heywood

Middleton Library, Long Street, Middleton  
Alkrington Library, Kirkway, Middleton  
Langley Library, Windermere Road, Middleton

Littleborough Library, Hare Hill Park, Littleborough  
Milnrow Library, Newhey Road, Milnrow  
Smithybridge Library, 121/3 Smithybridge Road, Littleborough  
Wardle Library, 448 Birch Road, Wardle, Rochdale

