

ROCHDALE METROPOLITAN BOROUGH COUNCIL

LOCAL DEVELOPMENT FRAMEWORK

**EAST CENTRAL ROCHDALE AREA FRAMEWORK
SUPPLEMENTARY PLANNING DOCUMENT**

STATEMENT OF CONSULTATION

May 2008

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1. INTRODUCTION

- 1.1 The Supplementary Planning Document (East Central Rochdale Area Framework) has been produced by the Council to guide development within this area. 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 has complied with the Council's Statement of Community Involvement (SCI). Consequently this document details the public consultation that has taken 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 East central Rochdale area Framework 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 the SPD has been prepared through a process of consultation.

2. FRONTLOADED CONSULTATION CARRIED OUT IN DEVELOPING THE SPD

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

Stage 1: Early consultation work with the public

Stage 2: The Sustainability Appraisal

Stage 3: Testing the guidance

2.2 Stage One: Early consultation work with the public

As part of the early preparation, some of the issues set out in the ECR SPD were looked at as part of the Strategic Regeneration Framework (SRF) Consultation in June/early July 2007, and co-ordinated by RDA. Some of the key land use principles and layout for the SPD development area were tested through the SRF Consultation exercise. This included a consultation questionnaire which was distributed at the various exhibitions that were held which invited the general public to ask questions and fill out a questionnaire.

2.3 Stage two: The SA Process

The first part of the Sustainability Appraisal (SA) process was to collect information on East Central Rochdale. The Scoping report also 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.

This was consulted on, through the sending out of paper copies of the Scoping Report, for a period of 5 weeks from 25th June 2007 to 30th July 2007. The Government has stated that the four consultation bodies (as required by the Strategic Environmental Assessment Directive) should be consulted at this stage. These bodies are the Countryside Agency and English Nature (which have been combined into Natural England), English Heritage and the Environment Agency.

Other consultees at the SA Scoping stage were:

- Government Office for the North West
- The North West Regional Assembly
- United Utilities
- English Partnerships
- Greater Manchester Ecology Unit
- Greater Manchester Passenger Transport Executive
- Greater Manchester Geology Unit
- Greater Manchester Archaeology Unit
- Greater Manchester Chamber of Commerce
- Rochdale Civic Society
- Rochdale Local Strategic Partnership
- Rochdale Disability Panel
- Rochdale Development Agency
- Rochdale Township Office
- Pennines Township Office

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 is also subject to public consultation.

2.4 Stage 3: Testing the guidance

In compiling the draft SPD, the detailed proposals of the draft SPD were worked up in consultation with statutory bodies and key stakeholders. The council have made a number of changes to the documents prior to statutory consultation to ensure that the feedback from key stakeholders had been taken on board as far as was possible.

2.5 Approval for public consultation by Cabinet was made on 17th December 2007.

3. DETAILS OF PUBLIC CONSULTATION (MARCH/APRIL 2008)

3.1 In accordance with the councils 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 On publication of the draft SPD a public consultation exercise was undertaken to raise awareness and interest. In accordance with Regulation 17, a public notice was published in a local newspaper which clearly states the duration of the public consultation period and the places and times at which the SPD could be inspected. Prior to the commencement of the consultation process, a summary of the role and purpose of the SPD and the proposed consultation process was presented at the Wrdleworth and Hamer and Mayfield, Cloverhall and Bellshill Panel meetings in February.

3.3 Consultation commenced on the 10th March 2008 for five weeks and the closing date for responses was the 14th April 2008. Consultation and participation involved the following:

- As set out in the Consultation Statement the Consultation Draft SPD documents and consultation documents were available on the Council's website rochdale.gov.uk/council_and_democracy/consultations.aspx (with the ability to comment on-line). Hard copies of the document were made available at the all the council offices, Borough Libraries and some community centres (See Appendix 1)
- Letters and emails were sent to all parties Rochdale Council considers having an interest in the SPD (including statutory consultees, general consultees, local businesses and any other interested parties). The letter or email detailed the role of the SPD, the consultation opportunity and the times and locations the SPD, the Sustainability Appraisal, Habitats Regulation Assessment, Equalities Impact Assessment and this conformity statement can be viewed.
- A public notice was placed in the Rochdale Observer. The advertisement explained the role of the SPD and where and where a copy of the SPD and its supporting documents can be viewed ahead of the Public Consultation period.
- Staff from the Council were available to answer any questions on the draft guidance at the exhibitions carried out during the public consultation period below:

Tuesday 11 March	2pm - 7pm	Wardleworth Community Centre
Wednesday 12 March	3.30pm – 7.30pm	Belfield Community School

- A leaflet was sent out to all the households in East Central Rochdale. The leaflet will detail the role of the SPD, a summary of some of the key themes and principles from the SPD, the dates of the consultation period and where and when the SPD and its supporting documents are available to view. These leaflets were also available at all the council offices, libraries, selected community centres and at the exhibitions.
- A questionnaire was available at the exhibition for anyone who wished to make comments. The questionnaire could also be filled in and submitted on-line.

- The SPD, SA and related documents will be available to view at the Council's offices, libraries and community centres. Moreover, anyone wishing to make comments will be able to visit the Rochdale Councils website to view the SPD and related documents and submit their response online.
- Posters were put on display at the Council Offices, Libraries and some Community Centres across Rochdale borough. There were also placed in a number of key public places within the ECR area. The poster explained the role of the SPD and where and when a copy of the SPD and its supporting documents could be viewed and commented on.
- An article was put in the ECR Newsletter which went out in March reminding people within the area of the consultation period and how they could get involved.
- Copies of the SPD and the associated documents were also made available at the first floor reception in the Council's Planning & Regulation Service, Telegraph House and Information Office, Second floor, Municipal Offices.
- Paper or electronic copies of the documents were available on request. A facility for those who wished to view the documents in large print or in Braille or for translation into Bengali or Urdu was available on request.

4. RESPONSE TO CONSULTATION

- 4.1 A total of 15 people attended the 'drop in' sessions held on the 11th and 12th of March. Of these 53% were male with ages of all those attending ranging from 21 to 70. As people were being asked to comment on the document itself it was not considered appropriate to ask people to fill in questionnaires there and then. However, people were given questionnaires to take away and could be returned by post or left at the West Street Renewal Office.
- 4.2 A total of 17 bodies or individuals responded to the consultation on the draft document. The comments received covered a variety of issues, as can be seen in the schedule in Appendix 2. None of the comments raised questioned the purpose or main aims and objectives of the SPD. Most of the comments related to issues which needed to be covered in greater detail, the need to update some sections to take account of recent developments / information and the need to improve clarity or provide greater explanation. The schedule in Appendix 2 also shows the broad changes to the documents proposed as a result of the comments received.
- 4.3 The proposed changes include:
- Reference to how physical change and development will help to address social and economic issues within the area;
 - Expanding on the importance of linkages between the proposed Town Centre regeneration and East Central Rochdale;
 - Provide more detail regarding relationship of new development and the Roch Corridor;
 - Need to provide more clarity on requirements in relation to flood risk to reflect guidance in PPS25;

- Need to add details and update information regarding specific development sites / areas;
- Better reference and links to the Heritage Assessment work that has been undertaken in the area; and
- Potential need for a monitoring element to be included in the document as a means of measuring success.

4.4 It should be noted that the exact nature of some of these changes may require further discussion in relation to detailed wording within the document. Changes to the layout / editorial changes, none of which alter the fundamental elements of the document, will also be made to improve clarity / readability of the document.

5. ADVICE AND ASSISTANCE

For further information relating to this document please contact:

Strategic Planning Service
Planning & regulation
Rochdale Council
Floor 2, Telegraph House
Bailie Street
Rochdale
Po Box 32
OL161JH

Tel: 01706 924369

By email: Strategic.planning@Rochdale.gov.uk

Website: www.rochdale.gov.uk/council_and_democracy/consultations.aspx

APPENDIX 1

Council Information Points:

Planning and Regulation Reception, Floor 1, Telegraph House, Rochdale
Rochdale Information Centre, Floor 2, Municipal Offices, Smith Street, Rochdale
Kirkholt Information Centre, 46 The Strand, Kirkholt, 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, Hare Hill Park, Littleborough

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
Norden Library, Norden Community School, Shawfield Lane, Rochdale
Smallbridge Library, Stevenson Square, Rochdale
Spotland Library, Ings Lane, Rochdale

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

Middleton Library, Long Street, Middleton
Alkington Library, Kirkway
Langley Library, Windermere Road, Middleton
Middleton Junction Library, Jumbo Social Centre, Grimshaw Lane, Middleton

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

Community Centres / Offices within East Central Rochdale as follows:

Bangladesh Association & Community Centre
Kashmir Youth Centre
Meadowfield Community Centre
Wardle & Smallbridge Community Centre
Wardleworth Community Centre
Wardleworth Womens Welfare Association

APPENDIX 2 - SCHEDULE OF COMMENTS AND PROPOSED CHANGES

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
1.	Council for British Archaeology (CBA) NW Regional Group	<p>Role of CBA</p> <ul style="list-style-type: none"> Historic environment should be fundamental to the planning system. Local people should be involved in policies and decision-making affecting their area and environment. <p>Sustainability Appraisal</p> <ul style="list-style-type: none"> 'Protect and manage designated heritage sites' – should remove reference to designated sites, which implies a finite number – should be a requirement for all potential sites to be investigated and possibly added to list of designated sites. Should add 'enhance' to 'protect and manage'. Greater Manchester Sites and Monuments Record is a more comprehensive list of buildings and monuments at risk. <p>SPD</p> <ul style="list-style-type: none"> Welcome policy BE/11 and recognition of heritage value of areas of terraced housing. Emphasises the importance of below-ground archaeological sites as part of the historic environment. <p>• More detailed advice available from norman.redhead@manchester.ac.uk</p>	<ul style="list-style-type: none"> Agree with these two points but given that they are made with reference to the role of the CBA they are not directed directly to the SPD itself. The Sustainability Appraisal will be amended accordingly to take account of these comments. They are more points of detail that comments that will fundamentally change the Sustainability Appraisal or effect the sustainability of the SPD itself Support noted This area has been subject to a detailed Heritage Assessment. This Assessment considered potential below ground heritage as well as standing buildings. English Heritage have asked for further consideration of the Heritage Assessment. However, it is more appropriate that this is dealt with on a site by site basis which is currently the case elsewhere in the borough. Potential for additional advice from the Greater Manchester Archaeological Unit is noted. 	<ul style="list-style-type: none"> No change required Make appropriate amendments to the sustainability appraisal. No change required No change required No change required

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2.	Additional Internal Officer Comments	<ul style="list-style-type: none"> • Now that T.C. developer has been chosen, there should be more thought about the interface between ECR and TC, with regard to complementary land use and design issues as well as links across major roads. • Need to consider links to station/Drake Street/Metrolink • Major importance of improvements to John Street/Entwisle Road frontage • Consideration of relocating the proposed leisure use adjacent to TC • Consider possibility of consolidating and expanding employment uses in parts of the area to compensate for proposals to reduce 	<ul style="list-style-type: none"> • It is important that the SPD reflects the most up to date position and so reference to the interface between ECR and the Town Centre should be updated to take account of this. • The importance of links to the Town Centre and wider area is included within the document. It is appropriate to consider the importance of the station and Metrolink and the benefits of the proximity of this part of ECR to accessing Metrolink. In terms of Drake Street, clearly ECR does not abut Drake Street and if Phase 3b of Metrolink is successful then the links into the town centre along Smith Street are perhaps more important. • The physical interface between ECR and John Street and the town centre regeneration is important. This should be reiterated as strong as possible within the SPD. • This is more likely to be phrased within the SPD as allowing possible leisure uses as opposed to being too specific at this stage. However, it may be appropriate to identify leisure uses as being appropriate in those parts of ECR adjacent to the Town Centre. Particularly the George St / John Street area as this currently has no reference to leisure. • The SPD supports the Belfield Business Neighbourhood as a focus for new quality employment development. 	<ul style="list-style-type: none"> • Make reference to latest position with regard to the Town Centre East redevelopment process / proposals. • Make reference to links to Metrolink and subsequent improved links to the station. • Add point regarding the importance of the John Street frontage and the need for high quality in terms of design to reflect improvements on the other side of John Street as part of the town centre regeneration • Incorporate 'leisure' as an appropriate use within the George Street / John Street neighbourhood. • No change required

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		employment allocations.	Whilst in other areas there is some potential shrinkage of land in employment use this is more about maximising the use of land and the removal of poor employment uses next to residential area. A number of the areas where mixed uses are appropriate would allow for new employment / commercial uses.	
3.	GONW	<ul style="list-style-type: none"> Affordable housing. LA's may apply the indicative National threshold (para. 29 of PPS3) which should be justified having regard to evidence of local need and circumstances relevant to particular planning applications. Explain briefly how the conclusions of the Council's housing need study support the use of the threshold. 	<ul style="list-style-type: none"> Reference to the 15 dwelling threshold is made within the SPD and this also reflects the approach within Affordable Housing SPD. May be useful to include reference although this detail may be better reserved for the printed version of the Affordable Housing SPD. 	<ul style="list-style-type: none"> No change required. Add sentence to explain that evidence within the Housing Needs Study supports the use of the 15 dwelling threshold.
4.	GMPTE	<ul style="list-style-type: none"> Generally supportive of the overall aims. Particular support policies aimed at reducing car use and encouraging sustainable modes such as public transport, walking and cycling ie. Higher density development along public transport corridors and around public transport links and interchanges; use of accessibility hierarchy, requirement for travel plans to have measurable outputs and targets and a requirement for developers to fund improvements and measures to achieve modal shift. P.47 – para. 4.69 (Employment Development) ‘...important that new development has good access by a choice of sustainable transport modes’ 	<ul style="list-style-type: none"> Noted Support is noted. The reference to access within this context was perhaps aimed more at the need for good access by vehicles as one of the issues within the area is conflict 	<ul style="list-style-type: none"> No change required No change required In para. 4.69 make reference to access ‘<i>by a choice of sustainable transport modes</i>’.

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
		<ul style="list-style-type: none"> P.62 - para. 4.114 (Community Facilities)'...This seeks to ensure that the facility is easily accessible by a choice of sustainable transport modes.' <p>P.60 – 4.106 (Neighbourhood Green Travel Plan).</p> <ul style="list-style-type: none"> Individual developments within ECR need to produce Travel Plans that feed into overall NGTP. Need to make clear distinction between work-based travel plans for employment development and residential travel plans because of implications for the type of journeys generated by the differing land use. 	<p>between industrial traffic and residential areas. However, it may also be worth making the point that new employment development should be able to be reached by employees via sustainable modes of transport</p> <ul style="list-style-type: none"> Agreed it should refer to choice of sustainable transport modes. Whilst the role of individual Green Travel Plans is recognised they do need to be related to the scale of development proposed. However, it may be helpful in this instance to set this out more clearly within the SPD and relate it to the emerging Travel Plans and New Development SPD. This also applies to the second point regarding the distinction between employment and residential travel plans which will again be covered in more detail within the dedicated Travel Plans and new development SPD. 	<ul style="list-style-type: none"> Para 4.114 amend wording to read <i>'This seeks to ensure that the facility is easily accessible by a choice of sustainable transport modes.'</i> Amend para. 4.106 to improve clarity and to make reference to the emerging Travel Plans and New Development SPD.
5.	United Utilities	<p>Sustainable Development P. 65.</p> <ul style="list-style-type: none"> para.4.120) Support proposals for potable water efficiency. <p>Flood Risk p.66</p> <ul style="list-style-type: none"> (para. 4.123) – Responsibility for 2 types – sewer flooding and reservoir inundation – not in the public domain because of risk of property blight. Most of sewer flooding in this area not in fluvial flood risk areas. Issues at the west and south of the site. Developments of 1ha and 	<ul style="list-style-type: none"> Noted The role of UU informing Flood Risk Assessments in relation to these two types of flooding is noted. It is however perhaps not appropriate to refer to them within the SPD as it adds unnecessary detail. 	<ul style="list-style-type: none"> No change required No change required

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		<p>greater and all in flood zones 2 and 3 require Flood Risk Assessments involving consultation with Environment Agency. U.U. will inform a Flood Risk Assessment in relation to two forms of flooding as they need to investigate effects of development on foul flood risk in the area.</p> <ul style="list-style-type: none"> • Para. 4.128. Support for SUDS but issues with adoption of balancing ponds within development. 	<ul style="list-style-type: none"> • This again is perhaps better addressed on a site by site basis as it seems that approach to balancing ponds could vary. However, the issues in relation to these are noted. 	<ul style="list-style-type: none"> • No change required
6.	Environment Agency	<p>Residential development (p.39)</p> <ul style="list-style-type: none"> • Para. 4.40. Would also ask that new residential development also reflect other guidelines in PPS3, namely complementing and integrating with neighbouring buildings and the area in terms of scale, density, layout and access, by ensuring that it creates or enhances a distinctive character that relates well to the surroundings and that provides for the retention or re-establishment of biodiversity within the development. <p>Natural Environment and Open Space (p. 53)</p> <ul style="list-style-type: none"> • Para. 4.83. Significant opportunity to open up and enhance existing culverted or channelised watercourse. <p>Assessment of options for future riparian developments :-</p> <ol style="list-style-type: none"> 1. Create continuous and much enlarged public open space areas adjacent to River Roch water course and tributaries; removal where possible of buildings currently encroaching and detracting from the river corridor, preventing access and reducing 	<ul style="list-style-type: none"> • Para. 4.40 specifically relates to density of new residential development. The other comments here relate more to general design considerations and biodiversity. Design is covered in detail elsewhere in the SPD and there is also cross-referencing to the Design Guide SPD and Biodiversity and New Development SPD. • In relation to this bullet point and points 1-8 below, much of it is covered in greater detail within the Biodiversity and New Development SPD. Therefore whilst it is not considered appropriate to repeat much of this here, it may be helpful to point out that detailed biodiversity issues relating to the River Roch and other watercourses within the area would come under the provisions of the Biodiversity and New Development SPD. Points 3 & 4 are not covered in 	<ul style="list-style-type: none"> • No change required • Make additional reference to development in the Riverside area guide (page 75) to address the issue of height and massing along the corridor and the impact on recreation / amenity.

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		<p>habitat value.</p> <ol style="list-style-type: none"> 2. Integrate flood storage/ attenuation requirements of PPS25 with biodiversity and landscape enhancement measures. 3. Ensure riparian development schemes uses natural materials or soft (geotextile) engineering and removal of existing redundant walled structures in preference to hard bankside engineering, promoting a safer and more aesthetically pleasing riverine features 4. Ensure a high quality recreation/amenity area by considering height and massing along the river corridor in order to avoid long term shading and ensuring good daytime light provision along the river corridor and public realm. 5. Open up culverted 'skylighting' water courses to benefit from biodiversity, flood risk reduction and improved maintenance. 6. De-canalise and restore open sections of channelised river. 7. Create new fish passes at existing large weirs, creating new and interesting features for amenity and biodiversity value. 8. Eradication programmes for invasive weeds, incorporating long-term conservation management/monitoring of the landscape and biodiversity within the site and adjoining areas. <p>Transport and Access (p. 59)</p> <ul style="list-style-type: none"> • Para. 4.101. Recommend that parking areas are located away from main greenspace corridors but if this not feasible, it should be set back from the corridor to ensure a safe and aesthetically pleasing public realm. 	<p>the Biodiversity SPD. Whilst point 3 is noted it may be not always be the case that this is appropriate and therefore may be better dealt with on a site by site basis following detailed sites comments from EA. The same may apply to point 4 and the issue of shading is less of an issue given that development will only be taking place on the northern bank of the River Roch. However it may be appropriate to briefly cover this under the design guidance for the Riverside neighbourhood.</p> <ul style="list-style-type: none"> • Would be useful to add comment within para. 4.102 that where parking is necessary adjacent to greenspace corridors then good quality landscaping and boundary treatment is required. 	<ul style="list-style-type: none"> • At end of para. 4.102 add '<i>Where parking is necessary adjacent to a green corridor then a good quality landscaping and boundary treatment will be required.</i>'

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
		<p>Other Development Considerations (p. 65)</p> <ul style="list-style-type: none"> (para.4.121) Recommend stronger emphasis on ensuring all new developments meet Code for Sustainable Homes level 3 as a minimum with a more favourable consideration of developments meeting level 4 or above. This would emphasise the Council's desire to provide sustainable development and make a major contribution to addressing climate change. <p>NOTE: Many of the points below relate to the issue of flood risk. This is an important issue in the area and therefore final wording relating to this within the SPD may be discussed with the Environment Agency if considered appropriate.</p> <ul style="list-style-type: none"> (para. 4.123-4.128) Although PPS25 accepts that there may be occasions where development in a flood risk area is acceptable, it must be stressed that this is only applicable where application of the sequential test shows no other available sites in lower risk areas. Compliance with the sequential test should be determined before detail of flood risk mitigation is assessed on individual sites. <ul style="list-style-type: none"> Recommend that the documents makes reference to the use of SUDS where feasible. <p>Riverside Area (page 75)</p>	<ul style="list-style-type: none"> This is covered in greater detail in the emerging Energy and New Development SPD. However, it is agreed that the paragraph should refer to this document and also make it clear that BREEAM standards relate to non-domestic developments. This is noted. The SPD does refer to the Sequential and Exception tests set out in PPS25. Clearly there is a need to consider this against the regeneration of the ECR and this is covered to some extent with the exception tests. However, the SPD makes the issue of flood risk clear and the requirements within PPS25. It is agreed that there should be specific reference to compliance with the sequential test being determined before detail of flood risk mitigation is assessed on individual sites. This is referred to in para. 4.128 	<ul style="list-style-type: none"> Amend para. 4.121 to refer to emerging energy and New Development SPD and make it clear that BREEAM standards relate to non-domestic developments. Within the Section that deals with Flood Risk (page 66) ensure that the need for compliance with the Sequential and Exception tests as set out in PPS25 is made clear. No change required

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
		<ul style="list-style-type: none"> • Para. 5.7. Development proposals definitely constrained for Entwisle Road sites 1-4. Significant parts of the area are at risk of flooding and any proposals to introduce 'more vulnerable' residential developments would need to satisfy the Sequential and Exception tests. • Para. 5.8. British Millerrain site is known to have flooded in the past and flood risk is likely to impact on development proposals. Again, need to satisfy the Sequential and Exception tests. • Wardleworth (3) – opportunity to open up and enhance canalised Hey Brook to improve amenity and wildlife value and possibly reduce flood risk in the area. • Allotment area 6 – a flood plain and should remain as such. Suggest area should be identified in own section of the SPD and proposals for it should be recreational or leisure based. • EA have already questioned the proposed health facility on Croft Mill site. Current designs provide poor linkage between the development and the river corridor with a 1.8 m fence separating the two. Would seek clear pedestrian connectivity between the development and adjoining green space and river corridor. • Trafalgar Centre (area 9). As area is wholly within flood zone 3 (although protected to some extent by defences) they are surprised that residential options are being suggested. If proposed, will need to satisfy Sequential and Exception tests. • Recommend relocating poorly sited employment areas at key access points along the 	<ul style="list-style-type: none"> • Although this is covered elsewhere it may be appropriate to reiterate the issue more clearly within this section. • As above • In section that deals with potential improvement to this areas it may help to make reference to possible opening up of the brook to improve amenity and wildlife value and possibly reduce flood risk. • Agree that this section should perhaps be separated out to recognise its specific function. • This site has now gained planning permission. There has been some improvement to ensure that a riverside link can be provided in the any development of the Millerraine site. However, it has been acknowledged that the fencing is required for reasons of security. • The issue of flooding as a constraint on this site is noted and this should be made clearer. This should also be made particularly in relation to any potential residential redevelopment of the site. 	<ul style="list-style-type: none"> • Ensure that issue of flooding is reiterated and that more vulnerable development would need to satisfy the Sequential and Exception tests. • As above • Add to second bullet on top of page 88 reference to the potential to open up the brook to improve amenity and wildlife value and possibly reduce flood risk. • Create separate section for the Kellet Street allotments. • No change required. • Make reference to flood risk as a constraint on this site, particularly in relation to residential development.

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		<p>greenspace corridors eg. Stanney Road, to less sensitive areas to provide an opportunity to transform and enhance these key recreations and landscape corridors.</p> <ul style="list-style-type: none"> • Planning applications must include evidence of compliance with the sequential and exception tests of PPS25 where appropriate • Pleased that policies within the document seem to support the principles of Green Infrastructure. 	<ul style="list-style-type: none"> • Whilst the value of this is recognised, the financial costs involved often make it unviable. The overall approach within ECR is seeking to relocate poorly sited employment uses and this is referred to elsewhere in the document. • This is noted and reference to evidence of compliance with PPS25 tests will be added to last bullet under para. 6.7. • Noted. 	<ul style="list-style-type: none"> • No change required. • Amend last bullet under para.6.7 to include reference to evidence of compliance with PPS25. • No change required.
7.	Yorkshire Forward	<ul style="list-style-type: none"> • No comments at present 	<ul style="list-style-type: none"> • Noted 	<ul style="list-style-type: none"> • No change required
8.	Oldham & Rochdale HMR Pathfinder (Len Harris)	<ul style="list-style-type: none"> • Supports aims and objectives in paras. 2.1 and 2.2. Need means of monitoring and measuring success which should be set out in final section of document. Should include reference on how the physical development impacts on the local community. • Need to consider some phraseology ie. What is a successful community or a viable housing market? 	<ul style="list-style-type: none"> • The issue of monitoring is noted but it is unclear as to whether detailed monitoring within the SPD is appropriate. The implementation of the SPD itself will be monitored through the Local development Framework Annual Monitoring Report (AMR). Monitoring against specific target is difficult as the SPD is aimed at guiding appropriate development and does not require specific outcomes. This issue may require some further discussion. Agree that there could be increased reference to how physical development impacts on local community. • Whilst it is acknowledged that some terms are open to interpretation it may not be appropriate to explain all phrases within the document. Issues such as this can be considered along with other editorial changes to improve readability of the document. 	<ul style="list-style-type: none"> • No change required at this stage but may require some further discussion. • Will be addressed as considered appropriate through editorial changes to improve readability.

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
		<ul style="list-style-type: none"> • The issues section should make reference to social issues in the area eg. Worsening indicators of crime, health, employment and income. SDP should explain how physical development can help to address these issues and support other funding streams, some of which may be non-physical. <p>Background and evidence base (page 9)</p> <ul style="list-style-type: none"> • 3.7 How does SPD inform LDF process (does this mean the core strategy?) • 3.25 Clarify ‘inspection programme’ or use a different phrase • 3.30 Update for 2008-2011 settlement • 3.32 As above – should be updated to refer to Business Plan • 3.33 current position? • 3.46 June/July 2007 • 3.47 Wants an indication of the strength of feeling between different issues. • 4.67 How does Employment land study feed into LDF process. • 4.121 Needs clarity on how different standards will be used – possibly cross reference to Design section? • 4.126 Would like further discussion to clarify 	<ul style="list-style-type: none"> • This is agreed and reference to latest Index of Multiple Deprivation (IMD) should be included in the document either within the issues or background. May be helpful to make reference to how physical development can help to address social issues. • I think this is a general point that the process of seeing how policies can be applied to a specific area may inform future changes in policy to reduce conflict or support regeneration more positively. It may be helpful to refer to Core Strategy. • To be considered as part of general editorial changes • Will be updated accordingly • As above • As above • Change noted • This is often difficult to gauge given how comments are received. Will consider if anything meaningful can be added to this section. • Agreed that it may be helpful to briefly state how the Employment Land Study informs the LDF process. • This paragraph is likely to be amended in response to comments above and will refer to Energy and New Development SPD. • The issue of flood risk is covered in detail 	<ul style="list-style-type: none"> • Revisit the issues and background section and include appropriate reference to latest IMD information. • Make reference to Core Strategy as an example. • This point and those below will be addressed through general updating / editorial changes. • No change required. • Make brief reference to how the Employment land Study informs the LDF process. • Amend para. 4.121 to refer to emerging energy and New Development SPD and make it clear that BREEAM standards relate to non domestic

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		<p>position regarding flood risk and the need for a Roch Corridor flood risk strategy. Reference in paragraph refers to 'further strategic work' but doesn't specify what.</p> <p>Delivery and Implementation</p> <ul style="list-style-type: none"> As above – needs monitoring element. Would be happy to discuss. Para. 6.10. HMR have produced 'The Guide – Communication and Engagement Toolkit' hoping developer partners will use it to inform their consultation and engagement activities. It will be launched on 5th June and it would be useful to mention it in this section. 	<p>and set out the requirements and process. Given that it does do this it is difficult to see how adding more detail is helpful as it needs to be dealt with depending upon the site and type of development proposed. Some minor changes are proposed as a result of comments by the Environment Agency. May refer to the fact that as an example the further strategic work may include strategic flood risk assessment.</p> <ul style="list-style-type: none"> Issue of monitoring is addresses above. This is noted and reference may be appropriate. 	<p>developments.</p> <ul style="list-style-type: none"> No change required at this stage but may require some further discussion. Make reference to this Communication and Engagement Toolkit within paragraph 6.10.
9.	Northwest Regional Development Agency	<ul style="list-style-type: none"> Given the location of ECR within the Oldham – Rochdale Pathfinder Area the documents aim of seeking to create a 'sustainable, high quality, mixed use neighbourhood'. In particular support the objective of improving the housing offer. Also support objective to retain good quality employment areas and to create new employment sites in easily accessible areas. SPD refers preparation of a draft detailed planning brief for the Belfield Business Neighbourhood and the NWDA would welcome consultation on this document. 	<ul style="list-style-type: none"> Support is noted There is currently no timetable for wider consultation on this draft brief but NWDA's wish to be consulted is noted. 	<ul style="list-style-type: none"> No change required. No change required.
10.	English Heritage	<ul style="list-style-type: none"> As a general point state that although a Heritage Assessment exists for this area, EH are not convinced that the best use has been made of 	<ul style="list-style-type: none"> Noted, however it is considered inappropriate to reiterate significant details from the Heritage assessment 	<ul style="list-style-type: none"> No change required.

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		<p>this evidence in drafting this SPD and in carrying out the Sustainability Appraisal.</p> <ul style="list-style-type: none"> • Draft SPD refers to Heritage Assessment at para. 4.7 and urges developers to consider it. In Chapter 5 there is some confusion in the SPD regarding boundaries given that there is reference to Character Areas and Neighbourhood Areas. The Heritage Assessment has 7 Character Areas whereas the SPD has 6 Neighbourhood Areas – the boundaries of which are different and the names are not the same. Given that trying to read the two documents together is difficult suggest that would be helpful if the SPD contained a section covering the main elements of the HA and include a plan. • The area development guides include some but not all of the landmark buildings identified in the HA and also uses different notations which adds to confusion. • In view of the detailed information in the HA it would be helpful if, for example, the older terraced housing of ‘high heritage value’ was shown on the plan and information on the character area included in the text. This would help in securing new development that “enhances the character and appearance of the area”. • At several points the document refers to new landmark or gateway buildings in general terms. It would be helpful to include further information on what the parameters might be for such buildings and how the site and its context would inform such development. The SPD should highlight the particular care needed when 	<p>within this SPD. See responses to individual points below.</p> <ul style="list-style-type: none"> • The SPD has set out neighbourhood areas which are more appropriate in terms of dealing with planning issues. The issue of heritage is only one issue and whilst its importance is recognised it is inappropriate to base the SPD solely on Heritage Areas. Further discussion is required but it may be appropriate to include some additional detail from the Heritage Assessment. It this adds significantly to what is already a lengthy SPD then it may be better to deal with this through clearer cross-referencing. • It was considered appropriate to try and pick out the main landmark buildings. This will be revisited to see if there are any major omissions but again it will not be appropriate to put all the Heritage assessment information on these plans. • Reference is made to the terraced areas of high heritage value within the guides. It is considered that the level of information given and associated guidance is appropriate within the SPD. • Given the potential variety of gateway / landmark features / buildings it is difficult to see how setting out parameters would be helpful. However, some additional information of what they are intended to add to the area may be helpful although the level of detail in the design section 	<ul style="list-style-type: none"> • Will need further internal discussion and consideration of the Heritage Assessment. Any changes as a result of this will not fundamentally change the SPD as they are more points of detail. It is likely that the main changes will simply be clearer referencing of the Heritage Assessment in the SPD and ensuring that correct and appropriate information from the Heritage Assessment is included where appropriate. • See above. • No change required. • See points above regarding further internal discussion and consideration of the Heritage Assessment.

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		<p>development affects the setting of listed or locally important buildings and townscape.</p> <ul style="list-style-type: none"> In summary, suggest that a further section is included on the Heritage Assessment including a plan, that the area maps are supplemented by heritage information, that the area development guides highlight information on the character of the area and how this might influence development. In addition the SPD could cover how specific issues relating to the care and maintenance of the historic environment in the area should be dealt with and might address the suggestions for the designation of Conservation areas made in the HA. 	<p>and associated Design SPD may be sufficient. The UDP already contains a strong policy that protects the setting of a listed building.</p> <ul style="list-style-type: none"> Whilst it is recognised that referring between documents can be challenging it is not appropriate to include a detailed section on heritage within this SPD. As noted above some more detail could be included in an Appendix although even this may not be required if editorial changes provide a clearer link to the Heritage Assessment. Further internal discussion and updating may be required, particularly with regard to possible future Conservation Areas. 	<ul style="list-style-type: none"> See above.
11.	NHS	<ul style="list-style-type: none"> No comments at this stage 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> No change required
12.	Natural England	<p><u>Comments on SPD</u></p> <ul style="list-style-type: none"> Biodiversity Duty – Biodiversity is a core component of sustainable development, underpinning economic development and prosperity and has an important role to play in developing locally distinctive and sustainable communities. From 1st October 2006 all local authorities have a Duty to have regard to biodiversity in exercising their functions. The Duty aims to raise the profile and visibility of biodiversity and national guidance has been published. Natural England would expect to see reference to the Duty in relevant planning documents but it does not appear in the SPD. <i>Comment made in letter relating to Habitats Regulations Screening Report</i> – The SPD would benefit from additional and clearer details on the time scales, size, scale area and land take/cover. 	<ul style="list-style-type: none"> This is noted but is covered within the Biodiversity and New Development SPD. Issue of Screening report is covered below. It is not the purpose of the SPD to prescribe the scale of new development or when it comes forward. It simply seeks to provide additional 	<ul style="list-style-type: none"> No change required. No change required.

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		<p><u>Sustainability Appraisal Report</u></p> <ul style="list-style-type: none"> No further comments to make in relation to this report. <p><u>Habitats Regulations Assessment – Screening Report</u></p> <p><i>Note: This document is produced by the Greater Manchester Ecology Unit (GMEU) and therefore the comments will be forwarded to the GMEU and any necessary amendments made. For information their comments are summarised below.</i></p> <ul style="list-style-type: none"> Purpose and objectives of the SPD are not fully explained. It would be useful to include a full summary of the SPD. The screening report would benefit from the inclusion of three maps, one to show Rochdale borough in a north west context, a second to show the location of the SPD coverage and a third to show the designated sites in relation to the SPD. The criteria used to identify European sites should be related to the pathways / impacts of the plan e.g. new major housing development could have impacts outside the borough through water abstraction, run-off into watercourses air pollution etc Happy with description of the European sites but would be useful to include the physical area covered by the sites and a little more detail on the conservation objectives. Support the inclusion of operations that may damage the special interest of the site as is useful when identifying possible impacts of the SPD. 	<p>guidance for new development and support emerging regeneration proposals.</p> <ul style="list-style-type: none"> Noted. Comments will be forwarded to GMEU but any changes will be a matter for discussion between the GMEU and English Nature. 	<ul style="list-style-type: none"> No change required. No change required

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		<ul style="list-style-type: none"> Consider including more detail on the existing baseline conditions including species and habitat dynamics etc. Possible impact of the SPD on the European sites has not fully been addressed in the Screening Report. Advise considering any likely effect, direct, indirect or secondary impacts of the plan on the designated sites Do not necessarily disagree with the conclusion but feel that there is insufficient evidence to justify the conclusions made. Recommend that the tables used to consider the possible impacts are much more detailed and include clear reasons for each finding 		
13.	Rochdale Development Agency	<p><u>Regeneration</u></p> <ul style="list-style-type: none"> General support for the purpose, objectives and content of the SPD Need to note that detailed planning briefs have been written for the Nile Street site, Belfield Business Neighbourhood site and Gower Street / Millerain Also the Area Business Plan to be produced by the development partner in ECR may require a review of these development briefs in the future. <p><u>General Guidance on Development – Design</u></p> <ul style="list-style-type: none"> Compatible with the overall aims and objectives of the regeneration of the ECR Area. Design principles are also compatible with the aims of the HMR programme to raise the standard within ECR to a higher quality. <p><u>Housing Development</u></p> <ul style="list-style-type: none"> Only concern is p.39 section 4.36 where there is a very prescriptive mix described for new housing in the area. Since this Kwest Study 	<ul style="list-style-type: none"> Support is noted Noted these are referred to in the SPD Noted but does not appear to require specific reference with the SPD. Noted Agreed this reference to a specific mix should be deleted in light of more recent evidence. Still important to retain 	<ul style="list-style-type: none"> No change required. No change required. No change required. No change required. Delete reference to the specific mix of units on page 39.

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		<p>further work has illustrated that the percentage of apartments may be inappropriate. However, it is still important to retain the ability to be flexible regarding the house types to be developed as long as there is a mix</p> <p><u>Riverside Area</u></p> <ul style="list-style-type: none"> • Mention of leisure uses is not now appropriate for the Croft Mill site. • Mention of possible gateway feature on the Croft Mill site in the SPD at the corner of the site adjacent to the bridge. Riverside walk should be part of development rather than just there will be potential for it. • Millerraine site also needs to take account of the river corridor with the potential for a riverside walk that should link up with the one in the Croft Mill site. <p><u>George Street Area</u></p> <ul style="list-style-type: none"> • This area has yet to have any detailed feasibility work carried out and it is important not to be too prescriptive in the possible uses in the area. • Could be a mention of the narrowness of George Street from the junction with Ball Street and the importance of the design of the junction with Yorkshire St and George St as part of the redesigned Townhead junction. • <p><u>Wardleworth Neighbourhood</u></p> <ul style="list-style-type: none"> • Site 4 – Should this be coloured green on the plan as it is a car park? SPD states that residential use is the preferred use for this site, however may be better not to preclude other uses. Would current wording prevent other 	<p>requirement for new development to provide an appropriate mix of property types</p> <ul style="list-style-type: none"> • Agreed. Given recent permission and land take of new development • The application for this site has been determined prior to the adoption of this SPD. This has included a contribution towards a possible future walkway. • The contribution referred to above would assist in providing a walkway that should link up with the Millerraine site and therefore potentially provide a continuous walkway. • Noted. That's why not too prescriptive at this stage but may require further internal discussion check uses referred to in SPD are appropriate. E.g. could add reference to leisure • Agreed. This additional consideration should be added to guidance on design and layout. • Current guidance relates to fact that site has permission for housing. Stating that housing is 'most appropriate' is perhaps too strong for a SPD. However, even this would not preclude other appropriate 	<ul style="list-style-type: none"> • Delete reference to leisure uses in relation to this site. • No change required. • No change required. • Further internal discussion to ensure appropriate uses. Will be necessary to add reference to leisure uses. • Amend guidance on design and layout to ensure that development takes account of the narrowness of George Street and Ball Street and the redesigned Townhead Junction. • Re-word the relevant bullet point to state that <i>'Residential development would be appropriate on the vacant site off Entwisle Road (site has planning</i>

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		<p>uses?</p> <ul style="list-style-type: none"> Phase 2 & 3 of the Trafalgar Street development have not been shown on the plan. Do these areas need marking up as yellow? Later possible phases also cover the area surrounding the Carcraft site on Ramsay Street and this is also not highlighted. In design and layout section, 4th bullet point should read ‘...to ensure consistency with the terraced frontage...’ <p><u>Townhead</u></p> <ul style="list-style-type: none"> Cannot be too prescriptive in this area as no detailed feasibility work has been carried out. <p><u>Hamer Neighbourhood</u></p> <ul style="list-style-type: none"> Belfield Business Neighbourhood – any potential development should take account of the Market Study completed in March 2008 regarding the business types and demand. Dale Mill site – The site now has permission for 74 dwellings and the retail unit has been taken out of the scheme. <p><u>Mayfield, Cloverhall and Bellshill</u></p> <ul style="list-style-type: none"> Compatible with SRF and PRF 	<p>uses on the site.</p> <ul style="list-style-type: none"> This is simply an issue of different colours that are evident on the base map. In relation to the Trafalgar Street development it may be worthwhile identifying this on the map to avoid confusion. This could be dealt with above response although should only include boundary of development as known / agreed at this stage. Agreed. Agreed. However, consider that SPD is currently not too prescriptive in relation to this area. Has been agreed that this is more for information and does not necessarily require change to SPD. May be better to be less specific regarding number of units given that has changed. Noted 	<p><i>permission for residential use).</i>’</p> <ul style="list-style-type: none"> Need to ensure that the plan for Wardleworth does not confuse people regarding the Trafalgar Street development. May be appropriate to specifically show this on the plan. See above. Amend wording of 4th bullet point to read ‘...to ensure consistency with the terraced frontage...’ No change required. No change required. Simply refer to the Dale Mill site being developed for residential use. No change required.
14.	Lancashire County Council	<ul style="list-style-type: none"> No observations 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> No change required
15.	Yorkshire and	<ul style="list-style-type: none"> No comments to make on the document 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> No change required

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	Humber Assembly			
16.	Rochdale Castlemere Congregation of Jehovah's Witnesses	<ul style="list-style-type: none"> • Para. 4.113. Good that this paragraph highlights the importance of the adequacy of the community infrastructure to support the population and that 'places of worship' are specifically featured. • It could be strengthened by a link to paragraph 4.64 of the SPD which describes the flexible use of 'employment' land. An additional note at the end of paragraph 4.113 could read thus: <i>'To achieve this objective, consideration will be given to proposals for places of worship and other community premises whenever commercial / industrial premises fall vacant. Reuse of land will be subject to satisfying requirements set out in other policies'</i>. 	<ul style="list-style-type: none"> • Support for this paragraph is noted. • At this stage it is considered that such a reference may be too specific as the same would have to be stated for other non-employment uses. Since such opportunities would still have to be considered on a site by site basis the inclusion of a specific reference may not be appropriate. 	<ul style="list-style-type: none"> • No change required. • No change required.
17.	North West Regional Assembly	<ul style="list-style-type: none"> • The adopted Regional Spatial Strategy (RPG13) now forms an integral part of the development plan and should be given due consideration when assessing planning documents. Since the Submitted Draft Regional Spatial for the NW is now at such an advanced stage it should be given consideration when preparing LDF documents. • As well as RSS the NWRA has produced a number of other documents that may be of some assistance. 	<ul style="list-style-type: none"> • The stage that RSS is noted and this may require some updating to reflect latest position. • Noted 	<ul style="list-style-type: none"> • Update section relating to RSS to reflect the latest timetable for adoption of RSS. • No change required.