

Milkstone, Deeplish and Newbold Supplementary Planning Document (SPD)

June 2010

Draft Sustainability Appraisal Report



**ROCHDALE
METROPOLITAN BOROUGH
COUNCIL**

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Chapter 1: Introduction

- 1.1 This document is the draft Sustainability Appraisal report (SA report) of the Milkstone, Deeplish and Newbold Supplementary Planning Document. The SA report is the key output of the SA process, documenting the work carried out during the appraisal of the SPD.
- 1.2 The purpose of Sustainability Appraisal is to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans (in this case, the proposed Supplementary Planning Document constitutes 'the plan'). SA identifies and reports on the likely significant effects of the plan and the extent to which the implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.
- 1.3 Sustainability Appraisal of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) is a requirement of the Planning and Compulsory Purchase Act 2004. The SA must also meet the requirements of the European Strategic Environmental Assessment Directive 2001/42/EC (SEA Directive).

The Milkstone, Deeplish and Newbold Supplementary Planning Document

- 1.4 The Local Development Framework (LDF) will gradually replace the Rochdale Borough Unitary Development Plan (UDP), the existing statutory land-use plan for the Borough. The LDF is a portfolio of documents which primarily consists of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The existing UDP policies will be saved until they are replaced within the LDF. The role of the Milkstone, Deeplish and Newbold SPD is to provide a planning framework to guide and support physical regeneration and housing market renewal within parts of Milkstone & Deeplish and Newbold and the Oldham Road and Rochdale Canal corridors. The area will include Canal Basin and an area extending from Rochdale railway station (close to the town centre of Rochdale) south along Oldham Road to the junction with Queensway/Kingsway long the Canal Corridor up to Kingsway Business Park.
- 1.5 The area is the focus of regeneration and Housing Market Renewal activity and there is a major opportunity to revitalise this area, taking advantage of funding opportunities and key projects, i.e. Metrolink, Rochdale station improvements, development opportunities within the Oldham Road corridor, regeneration of the Rochdale Canal, linkages with Kingsway Business Park and other development opportunities. The SPD will help in the determination of planning applications and support any future Compulsory Purchase Order (CPO) activity in the area.

- 1.6 It will take account of the Regeneration Investment Strategy (RIS) for the area, Housing Market Renewal strategies, the key themes of the Borough Renaissance Masterplan, the priorities of the Community Strategy and the Inner Rochdale Heritage Assessment. It will specifically guide and support the Oldham Rochdale Housing Market Renewal Pathfinder initiative within the area and the Oldham Rochdale Economic and Skills Alliance (Economic Corridors) initiative and assist the delivery of the Council's Sustainable Communities Programme.

The Sustainability Appraisal Process to date

- 1.7 A Sustainability Appraisal Scoping Report was produced, outlining how the scope of the SA was determined by examining the evidence base and relevant plans, policies and strategies. This was also the initial consultation document of the SA process, allowing the following range of relevant bodies and interest groups to comment:
- Natural England (statutory consultee)
 - English Heritage (statutory consultee)
 - The Environment Agency (statutory consultee)
 - Greater Manchester Ecological Unit (GMEU)
- 1.8 Comments were received from English Heritage, the Environment Agency and the GMEU. As a result, the scoping report was revised to include additional information and references; Appendix 1 shows the schedule of comments received and changes made.
- 1.9 Once the scoping had been finalised, the Sustainability Appraisal was carried out, assessing the plan against 26 SA objectives which had been selected as a result of the scoping process. This appraisal was carried out on 9th March 2010 by a Panel consisting of members of the Council's Housing, Economic Development, Conservation and Environmental Management (Sustainability Team) sections.
- 1.10 The SA identified a number of areas where the draft plan was weak in terms of the SA objectives, such as improving open spaces and making the most of heritage assets. As a result of these findings, improvements have been suggested to the draft document. More details of this are outlined in Table 2.

Commenting on this report

- 1.11 Comments on this draft SA report, as well as on the Appropriate Assessment Screening Opinion and the draft SPD itself, can be made during the six-week formal consultation period which begins 7th June for six weeks. Official comments forms are available at www.rochdale.gov.uk/yourviews

1.12 All comments must be submitted by **Monday 19th July 2010**

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Chapter 2 Context

Other Policies, plans and programmes

2.1 The following link to the Sustainability Appraisal process:

International

The Earth Summit

2.2 In June 1992 the United Nations Conference on Environment and Development called 'The Earth Summit' was held in Rio de Janeiro, Brazil. An important achievement of this summit was a set of agreements between governments to mark future international co-operation on environmental and development issues.

Kyoto Protocol

2.3 This agreement was drawn up in Kyoto, Japan. It committed industrialised nations to a reduction in greenhouse gases including carbon dioxide, methane, nitrous oxide and fluorinated gasses.

The World Summit

2.4 Held in 2002 in Johannesburg, its role was to identify new global sustainability issues that had arisen since 1992 and develop a plan to improve sustainable development in the coming decade.

European Union

The EU Sustainable Development Strategy

2.5 This strategy was approved in June 2001 at the Gothenburg European Summit. The EU SDS highlights four priority areas and outlines objectives, targets and actions in relation to each:

- combating climate change;
- ensuring sustainable transport;
- addressing threats to public health; and
- managing natural resources more responsibly.

The EU Water Framework Directive

2.6 The 2000 Directive establishes the framework for the protection of inland surface waters, transitional waters, ground waters and coastal waters. The aim is to:

- prevent deterioration to waters
- protect and enhance aquatic ecosystems

- promote sustainable water use
- reduction of pollution to ground water
- mitigating the effects of floods and droughts

United Kingdom

Securing the Future – The UK Government’s Sustainable Development Strategy

2.7 The strategy highlights the renewed international push for sustainable development from the World Summit on Sustainable Development in Johannesburg in 2002. It creates shared priorities for UK action. These are:

- Sustainable consumption and production – achieving more with less;
- Climate change and energy – seeking to secure a profound change in the way we generate and use energy
- Natural resource protection and environmental enhancement – protecting and enhancing the environment to ensure a decent environment for everyone
- Sustainable communities – creating communities which embrace the principle of sustainable development at the local level.

Sustainable Communities Plan

2.8 Launched in February 2003, the plan aims to ensure improved liveability for all communities, including cleaner streets, improved parks and better public spaces.

Planning Policy Statement 1: Delivering Sustainable Development (PPS1)

2.9 Sets out the key principles in terms of facilitating and promoting sustainable and inclusive patterns of urban and rural development. by ensuring high quality development through good and inclusive design, and the efficient use of resources. Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular they should carefully consider the interrelationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development. Planning authorities should seek to achieve outcomes which enable social, environmental and economic objectives to be achieved together.

Planning Policy Statement: Planning and Climate Change (Supplement to PPS1)

2.10 Objectives of this document include delivering patterns of urban growth and sustainable rural developments that help secure the fullest possible use of sustainable transport for moving freight, public

transport, cycling and walking. New development, its spatial distribution, location and design should be planned to limit carbon dioxide emissions.

Planning authorities should expect new development to create and secure opportunities for sustainable transport including through the preparation and submission of travel plans, providing for safe and attractive walking and cycling opportunities and an appropriate approach to the provision and management of car parking.

Planning Policy Guidance Note 13: Transport

- 2.11 Aims to promote more sustainable transport choices, increase accessibility and reduce the need to travel, especially by car. Local authorities are expected to consider setting local targets for the adoption of travel plans by local businesses and other organisations.

Regional

The Northern Way

- 2.12 The Northern Way is a multi-million pound package for urban renaissance that aims to create jobs, sustainable communities, growth in the economy across the North, and to reduce disparities between the North and South. The Northern Way is the northern element of the Sustainable Communities Plan, implementing the Sustainable Communities Plan vision across the northern region.

Rising to the Challenge: A Climate Change Action Plan for England's Northwest

- 2.13 Sets out a vision for the region and outlines outcomes to be achieved by 2020. These relate to both reducing regional greenhouse gas emissions and adapting to unavoidable effects of climate change, and the actions set out are characterized as enabling, encouraging, engaging, exemplifying and catalyzing. Of particular relevance is the enabling action of promoting best practice in personal and workplace travel planning so that individuals and organizations reduce their reliance on private cars and make more sustainable travel decisions.

The North West Plan: Submitted Draft Regional Spatial Strategy (RSS) for the North West of England

- 2.14 This outlines the importance of the increasing need for sustainable economic growth to be decoupled from resource use, which indicates the need for different and more sustainable patterns of economic activity and movement. Objectives include the active management and prudent use of natural resources, with fewer emissions of greenhouse gases and the most efficient use of infrastructure. Plans and strategies

should develop and implement policies to reduce emissions of greenhouse gases from all sources, including transport.

Local

The Community Strategy for Rochdale Borough 2007 – 2010: Pride of Place

- 2.15 Priority themes are Increasing jobs and prosperity, making sure every child matters, improving community safety, creating a cleaner greener environment and improving health and wellbeing.

Chapter 3: The Sustainability Appraisal of the Milkstone, Deeplish and Newbold Supplementary Planning Document

3.1 Options

Government guidance on sustainability appraisal requires that options are developed and considered to ensure that the identified objectives for the document can be met. In this instance, it is considered that the only viable option to producing the plan would be not to produce the plan, relying instead on the existing UDP policy. However, not producing the document would mean that there would be no planning framework to guide the regeneration of the area, helping to 'de-risk' proposed funding opportunities.

- 3.2 However, these advantages do not necessarily mean that the production of the plan will have a positive impact upon all the strands of sustainability, and it may have a negative impact on some in comparison with reliance on existing policy. What needs to be assessed is the overall impact upon sustainability, and, if this is found to be positive, mitigation measures need to be determined to strengthen those areas of the plan which are weak in sustainability terms.

- 3.3 The SPD appraisal process has been undertaken in two stages. The first stage of the appraisal process was to test the compatibility of the SPD objectives against the agreed set of SA objectives which were developed through the scoping process. The results of this testing are set out within Table 1 (for the SA objectives in full please refer to Appendix 1). The second phase of the appraisal process was to assess the impact in sustainability terms of the production of the document, relative to the other option of relying on existing policy, and this was done by setting up a panel which assessed the proposed document against the aforementioned SA objectives. A summary of the results of this testing are set out in Table 2.

Appraisal of the SPD objectives

3.4 The SPD objectives are as follows:

- 1. Making better use of employment land and ensuring that new development attracts investment, encourages business growth and satisfies local employment needs;
- 2. Delivering high quality and sustainable housing which meets the needs of existing and emerging households and attracting people to live in the area;
- 3. Raising design quality and improving the appearance and function of key gateways (e.g. the railway station), corridors (e.g. the canal corridor and Oldham Road) and landmarks (e.g. Norwich Mill). This will include making the most of local heritage, undertaking area improvements and treating vacant sites;
- 4. Improving existing areas of open space and promoting new open spaces that are accessible, attractive and meet a range of recreational needs;
- 5. Making the area safer and more attractive to pedestrians and cyclists, particularly along the canal corridor, and ensuring good quality access to public transport;
- 6. Ensuring appropriate levels of services and infrastructure to support the new development and serve the area as a whole; and
- 7. Achieving high quality design and sustainability in new development and the public realm.

3.5 The assessments of the objectives are set out in Table 1. For a full explanation of the SA objectives please refer to Table 2.

3.6 The appraisal indicates that the SPD objectives are generally either compatible with the sustainability objectives or have little relationship with them; the SPD objectives are quite specialised and therefore they tend to have either very positive impacts or no impact. The only area of negativity relates to traffic impacts; this was a point raised in the main SA and therefore will be addressed under that. However, it is recommended that SPD objective 6 is altered to refer to 'sustainable' infrastructure rather than infrastructure per se, and this alteration will make the relationship between the SPD and sustainability objectives more acceptable.

Table 1: Milkstone Deeplish and Newbold SPD draft objectives testing

Key:

	Excellent: makes a close to optimal contribution to the objective
	Good: makes a significant direct contribution to the objective
	Fair: makes some direct or significant indirect contribution to the objective
	Weak: makes a minor, indirect contribution to the objective and is a missed opportunity
	Poor: does not contribute to the objective and is a missed opportunity
	Undermining: has potential to significantly undermine the objective
	N/A

SA Objectives

SPD Draft objectives

	1	2	3	4	5	6	7
1a							
1b							
1c							
1d							
2a							
2b							
2c							
2d							
2e							
3a							
3b							
3c							
4a							
4b							
5a							
5b							
5c							
5d							
5e							
5f							
5g							
5h							
5i							
6a							
6b							
6c							

Appraisal of the options

- 3.7 As stated earlier, the realistic options are to produce the SPD or to rely on existing policy. Which option was most acceptable in terms of sustainability considerations could be ascertained by assessing the draft SPD against the 26 SA objectives which have been selected as part of the scoping process. This appraisal was carried out by a panel consisting of members of the Council's Economic Development, Housing and Environmental Management (Sustainability Team) sections, as well as the Council's Conservation Officer. The 26 SA objectives align with the UK Sustainable Development Strategy, the Regional Spatial Strategy and the 'priority themes' in Rochdale's Community Strategy.

It is considered that this approach has provided a robust assessment methodology which provides a degree of certainty regarding the likely sustainability effects of the plan. This approach will be further enhanced by taking account of consultation responses received during consultation upon this SA Report and the SPD itself.

- 3.8 Table 2 below comprises a summary of how the proposed plan performed against the 26 SA objectives, all of which align with the priority themes.

Table 2: Appraisal of the Options

Strongly Positive (++)	Positive (+)	Neutral / not applicable	Negative (-)	Strongly Negative (--)	Unknown / not enough information
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Objective	Sub Questions	Panel Comments	Rating	Response		
1. Developing Sustainable neighbourhoods	1A	Will the plan enable the provision of decent housing?		<ul style="list-style-type: none"> • Falls short of commitment in identifying development sites; needs to be more ‘pushy’ • Doesn’t link into targets • Future proofing; doesn’t mention Lifetime Homes etc • Communal energy systems – see 5B below • On page 31, the housing sites on Elder Street are not shown – the link from canal to Crawford Street is closed. 	+	<ul style="list-style-type: none"> • Will look at other sites with a view to including them, although there is little benefit in showing small developments. Will note that this is part of a wider regeneration area which contributes towards RSS target. • Will expect Lifetime Homes. • Communal energy systems – will add as a bullet point to encourage. Where opportunities arise we will expect them to be taken.
	1B	Will the plan create an accommodation mix which reflects the needs and aspirations of local communities?	<ul style="list-style-type: none"> • Not enough in respect of what those needs and aspirations are; needs some sort of pointer • Needs to take account of SHMA findings, and incorporate these • Not enough information in respect of what is meant by ‘local’ and what about the aspirations of others we are trying to attract into the area (also review wording of sub-question) 	–	<ul style="list-style-type: none"> • The SHMA is too general for this document, and this is already mentioned. • Will reference Housing Needs study. • Too much precision is counter-productive if needs change. • 	

			<ul style="list-style-type: none"> Needs more guidance for developers on what we want to see in the area 		
	1C	Will the Plan encourage harmonious communities?	<ul style="list-style-type: none"> No. The document does not recognise the different groups. Eastern European and non-Asian communities are a significant factor. Doesn't mention sectarian nature of some of the community groups within the community, which do not interact. Lack of open space does not help in this matter. 	–	<ul style="list-style-type: none"> There is recognition in the vision about different cultures / communities. Document aims to meet the needs of <u>all</u> communities. We recognise the limitations of planning in dealing with cohesion issues. Open spaces – it is intended to improve the open space around the canal, and we will explore opportunities in relation to new developments. It is also intended to expand the open space on Pioneer Street. However, the document, and particularly the plan showing open spaces, will be revised to bring out the opportunities more.
	1D	Will the plan ensure that new development is easily accessible and well connected to public transport, community facilities and services, and quality open space?	<ul style="list-style-type: none"> Not sure it will. Specifically, should be a reference to Connect 2 in para. 4.5 		<ul style="list-style-type: none"> Will make reference to Connect 2
2. increasing jobs and prosperity	2A	Will the plan support and retain the Borough's local	<ul style="list-style-type: none"> We will lose those businesses that have to relocate because of some of the redevelopments proposed 	–	<ul style="list-style-type: none"> The document does mention small to medium sized units. However, it will be revised to

		businesses, promoting a competitive and dynamic business environment?	<ul style="list-style-type: none"> • Document does not reflect the entrepreneurial nature of the local community, e.g. it could encourage the provision of low-cost workspace • This section of the document is too specific, e.g. encourages ‘vitality’ of Milkstone Road area but doesn’t recognise the issue of the impact of late-night takeaways on residential properties in the area; the proposed retail development on Wellfield surgery site could have a negative impact on local businesses • This is really two questions (review sub-question), first part negative, second part the document has potential to do this 		<p>make more of the entrepreneurial nature of the community, and will emphasise better quality, good value small workspace units.</p> <ul style="list-style-type: none"> • In terms of Milkstone Road, it is important not to strangle the vibrancy, but at the same time residential amenity needs to be protected. How this is done is more of a management issue. • Wellfield site – it is felt that this, together with the new health centre, will create something of a community focus (especially with the loss of the Queensway centre). The idea was to let Queensway local centre be redeveloped for housing and strengthen Oldham Road. Additionally, this site <u>is</u> in a designated local centre, so retail has to be acceptable in principle.
	2B	Will the plan enable the provision of more jobs?	<ul style="list-style-type: none"> • There will be a net loss of employment land, but the Central Retail park development will provide new jobs, but is this going to happen anyway, regardless of this document? 	Unknown	<ul style="list-style-type: none"> • More effective use will be made of the employment space that remains. • Agreed.

			<ul style="list-style-type: none"> • Environmental improvements, etc, may encourage more inward investment and jobs into the area 		
	2C	Will the plan enable the provision of better paid jobs?	<ul style="list-style-type: none"> • There's a logic that says new units will command higher rentals and attract businesses which pay better, although this is not a guarantee • No specific jobs initiative in the document 	Neutral	<ul style="list-style-type: none"> • Agreed. Training is mentioned in the document, but planning cannot really control who uses the units.
	2D	Will the Plan attract new retail investment to town centres?	<ul style="list-style-type: none"> • Yes, because of the retail park and knock-on effect on the town centre, although this would probably happen regardless of this document 	+	<ul style="list-style-type: none"> • Agreed.
	2E	Will the Plan raise the profile of the Borough within the North West region, attracting more investment and opportunities for local people?	<ul style="list-style-type: none"> • No. If the Plan really wanted to do this, it should encourage the opportunity for opening up the line of the canal to the town centre; there is little in terms of a coherent 'push' on this issue. This is an opportunity being thrown away. • If the document were to make a stronger case for CPOs, then this would help. • Another way in which this area could achieve a regional profile would be if it was promoted as a hub for environmental technologies, specifically in the canal basin area • The document does not make enough reference to the background work which has been done, such as in respect of the canal basin. Investment in past decades has just maintained the status quo (Milkstone Road and Tweedale Street Enterprise Study was very poor) 	--	<ul style="list-style-type: none"> • The canal opening idea has never been mentioned before, which is one reason why it hasn't been picked up in this document. This issue needs to be discussed further at a higher level before coming to a view in terms of the SPD. It may be possible to include some reference to recognising the line of the canal and working with developers where appropriate to consider it as part of the design or landscaping of proposals. • The document supports CPOs by its nature but it will be useful to mention this in the introduction. • The idea of marketing the

					<p>area in terms of a ‘niche’ is valid, and this is mentioned under marketing in the document. We will investigate the idea of the environmental industries ‘niche’ concept.</p> <ul style="list-style-type: none"> • Too much reference to background documents will ‘overload’ the document and could quickly date it. More detailed site briefs will pick up on study recommendations.
3.Making sure every child matters	3A	Will the Plan help to tackle obesity and poor health in children and adults?	<ul style="list-style-type: none"> • The Plan doesn’t address the lack of open space in the area. • However, improved housing, etc may help. • As well as more open space, there needs to be better use of what we’ve got, e.g. encouragement of local food growing. • The Plan does not say anything about play streets, closing of roads etc, or much about cycle routes 	–	<ul style="list-style-type: none"> • For open space comments, see response to 1C. The map on page 20 will be revised to include opportunities for new open space. It will have two keys: existing with potential and potential new. • Agreed. • Local food growing – there is reference to improving open space in terms of quality / function; uneasy about specifying this as a use as other uses may be more of a priority. Priorities should be driven by consultation with the community. • There will be more clear

					reference to cycle routes and opportunities. Connect 2 will be referenced.
	3B	Will the Plan promote and enhance opportunities for safe and sustainable travel to and from schools?	<ul style="list-style-type: none"> The Plan does not address this at all. Another missed opportunity. 	–	<ul style="list-style-type: none"> This is not the level of detail which it is intended this document will cover.
	3C	Will the Plan protect and enhance local play facilities?	<ul style="list-style-type: none"> There is nothing about enhancement. There needs to be something about assessing the existing play areas and their quality. The Plan actually says that it does not expect the standards in the Open Space in Residential Developments SPD to be met – this is unacceptable. 	--	<ul style="list-style-type: none"> It is agreed that there is a need to indicate where existing play is located. The statement in respect of the Open Space SPD will be reviewed.
4. improving community safety	4A	Will the Plan reduce crime and the fear of crime?	<ul style="list-style-type: none"> Improvements around the railway station will help, but no mention about tackling specific issues such as drug taking and prostitution. There was specific mention about the proposed link to Oldham Road to the area at the back of the railway station; this is canyon-like and unsafe feeling. This link should not be encouraged. 	+	<ul style="list-style-type: none"> Issues such as drugs and prostitution are out of the remit of a planning document such as this. The route to Oldham Road is linked to the Park and Ride development which will open the area up and help make the route safer. Also the increased amount of housing in the area should make the area to feel safer.
	4B	Will the Plan promote 'Home zone' schemes, reducing car access and limiting speeds,	<ul style="list-style-type: none"> There is no mention of these things. 	–	<ul style="list-style-type: none"> It is agreed that there should be a reference to the potential for Home Zones where appropriate

		creating safer and more attractive street environments?			
5. Creating a Cleaner, Greener Environment	5A	Will the Plan reduce traffic?	<ul style="list-style-type: none"> • The tram and railway station improvements would lead to more traffic in the area. • Needs to say more about priority bus routes, cycling and pedestrian – at the moment there is too much emphasis on cars. • Park and ride opportunity is not big enough. 	–	<ul style="list-style-type: none"> • Traffic may increase around the station area, but overall the public transport improvements should reduce traffic. • We feel that the balance and order of section 4.5 (‘Movement’) is correct. • Park and ride opportunity is actually much bigger than the area shown on the map, and this will be corrected.
	5B	‘Will the plan reduce local carbon emissions and energy use, contributing to national and global targets’?	<ul style="list-style-type: none"> • There is an issue of embodied energy of new buildings. The Plan should specify that development has to be of natural materials. • If the aims to increase business investment in the area are successful, then overall CO2 emissions will probably increase. The correct measure is per-capita emissions, which should reduce 	–	<ul style="list-style-type: none"> • The ‘sustainability’ section will be revised to promote the re-use of buildings and materials where appropriate. • Agreed.
	5C	Will the Plan create and protect ample and high quality green space and green infrastructure?	<ul style="list-style-type: none"> • The Plan does not do enough in terms of creating new green space / green infrastructure and improving the quality of existing. 	--	<ul style="list-style-type: none"> • See responses to 1C and 3A above.
	5D	Will the Plan protect and enhance the historical, cultural and archaeological heritage	<ul style="list-style-type: none"> • The Plan does not address this at all. There is no mention of an historic assets survey which could protect buildings such as the tobacco factory. 	–	<ul style="list-style-type: none"> • Will seek views on putting an extract from the heritage study in the appendix. • The heritage assessment map

	of the Borough?	<ul style="list-style-type: none"> • There should be a list of historic assets somewhere in the document, possibly mapped. • The point is made about not wanting Norwich Mill to be unoccupied, but it is already almost unoccupied. It would be better to say that improvements to Norwich Mill should be sought in association with the owners, and that there may be potential for space for small community businesses. • The opportunity to encourage the opening up of the canal to the town centre is one that should be taken. • Potential for more Conservation Areas, e.g. around Norwich Mill. The Plan should mention this. 		<p>will be included in the document.</p> <ul style="list-style-type: none"> • The document will be revised to give clear reference to the need to work with the owners of Norwich Mill. • For response in respect of opening up the canal, please see 2E. • The ‘design’ section of the document will be revised to refer to the potential for more Conservation Areas.
5E	Will the Plan protect and enhance landscape (and townscape) character, quality and local distinctiveness?	<ul style="list-style-type: none"> • There is not enough on this in the document. • Query over the concept of ‘flexibility’ of shopfronts on Milkstone Road. • Again there is a lack of an underlying survey. There should be more information about the heritage assessment findings, and then relate a policy to these. 	–	<ul style="list-style-type: none"> • Adequately covered in ‘design’ section. • Milkstone Road – flexibility will help the vibrancy of the area, but this flexibility refers to Milkstone Road only and should therefore not have a negative impact on residential amenity. • The heritage assessment map will be included as an Appendix in the document.
5F	Will the Plan protect and enhance biodiversity and provide opportunities	<ul style="list-style-type: none"> • No. There needs to be more about quality of urban greenspace / green roofs etc. • Re-opening of canal to town centre would be beneficial for biodiversity. 	–	<ul style="list-style-type: none"> • The document encourages this to be taken into account, but cannot be overly specific because the use of specific

		for new habitat creation.			<p>sites has to be subject to further consultation.</p> <ul style="list-style-type: none"> • For comments in respect of re-opening the canal, please see 2E above.
	5G	Will the plan tackle the effects of climate change?	<ul style="list-style-type: none"> • No mention of climate change. • This could link to the idea of making the area an exemplar in terms of environmental industries / sustainability as mentioned previously. In particular, this is a densely built up inner urban area which means tackling the urban heat island effect is a particular priority. 	–	<ul style="list-style-type: none"> • Under section 4.7, the document outlines expectations in respect of mitigating against climate change, although more will be said in respect of adaptation. • Marketing the area as described will be investigated. The importance of tackling the urban heat island effect will be specifically referred to.
	5H	Will the Plan encourage the efficient use of natural resources in the location, construction and use of developments?	<ul style="list-style-type: none"> • Does not do this. 		<ul style="list-style-type: none"> • The document specifically refers to sustainable design and construction.
	5I	Will the Plan ensure that flood risk is minimised?	<ul style="list-style-type: none"> • The Well'ith Lane site is in flood zone 3, therefore a significant constraint on development. • Mention should also be made of drainage capacity. 	–	<ul style="list-style-type: none"> • It is noted that the Environment Agency raised no objections to the planning application for the site. Concerns were raised by British Waterways, however the planning application was granted with a condition. • There will be more explicit

					reference to sustainable drainage systems.
6. Improving health and wellbeing	6A	Will the Plan lead to better access to healthcare services?	<ul style="list-style-type: none"> To a certain extent, access across railway etc helps. 	+	<ul style="list-style-type: none"> Agreed.
	6B	Will the Plan reduce health inequalities?	<ul style="list-style-type: none"> Better quality housing will help. 	+	<ul style="list-style-type: none"> Agreed.
	6C	Will the Plan Increase sport and leisure activities to help promote healthier lifestyles?	<ul style="list-style-type: none"> No. Green space issues already discussed. 	-	<ul style="list-style-type: none"> See responses to 1C and 3A above.

3.9 Summary of sustainability appraisal

Option 1

To rely on existing policy would mean that there would be no planning framework in place for the area. The objectives relating to the regeneration of the area need to be addressed collectively in order to create a more sustainable 'place' for existing and future residents and employees. Otherwise there is a danger that there will be no co-ordinated vision for the area, there would be no interpretation of planning policies for the area, no document which will promote the area and, crucially, there would be no framework to help decision making by funding agencies about bids and schemes which may come forward. Whilst interpretation of generic planning policies would hopefully encourage regeneration, the lack of a particular planning framework for the area would mean opportunities could be missed.

Option 2

Option 2, producing the proposed SPD, is clearly not without difficulty looking at the results of the Appraisal. Indeed, it was clearly felt that the draft document lacked a suitably proactive and visionary approach, was deficient in the way it addressed a number of key elements of regeneration (e.g. open spaces) and could even worsen some negatives such as traffic in certain areas. In particular, the opportunity to promote the area as a model of sustainability for others to follow was being missed. However, it is proposed to make a significant number of changes to the document to address these deficiencies, as outlined in Table 2 above.

Conclusion

The draft document has now been revised significantly in line with the actions outlined in the 'responses' column above. It is hoped that the document is now much more environmentally focused and a number of key misjudgements have been addressed. It is believed that the revised document is now a significantly more sustainable option than the option of relying on existing policy. Having said this, it is important to point out that some of the actions proposed by the appraisal are felt to be out of the scope of a planning document.

Mitigation measures

Key mitigation measures proposed to make the document and its impacts more sustainable include: greater emphasis on the need to seek out opportunities for new and improved open space, more emphasis on the entrepreneurial nature of the community, more emphasis on climate change adaptation, reference to future opportunities in respect of the canal heritage and exploration of the concept of the area as somewhere where cutting-edge environmental sustainability concepts are particularly promoted.

Chapter 4: Next steps and monitoring framework

Next steps

- 4.1 Following consultation upon this document and the SPD the documents will be reviewed in the light of comments made and, where appropriate, changes will be made to the documents prior to adoption by the Council. If there are significant changes to the SPD that have not already been the subject of this SA it will be necessary to assess these changes against the SA framework to ensure that the significant social, environmental and economic effects are appraised.

Location of documentation and comments forms

The consultation period for the SPD and the Draft Sustainability Appraisal is between **7th June 2010 and 19th July 2010**. Comments on the documents can be made by:

- Using the on-line response form www.rochdale.gov.uk/yourviews
- E-mailing wayne.poole@rochdale.gov.uk giving your name and address
- Writing to Strategic Planning, Floor 2, Telegraph House, Baillie Street, Rochdale, OL16 1JH

The draft Supplementary Planning Document, and the draft Sustainability Appraisal and other documents are available for inspection:

- On the Council's website
www.rochdale.gov.uk/yourviews
- All the Rochdale Borough Libraries
- At some of the Community Centres
- All Council Information Points
- Planning Reception, Floor 1, Telegraph House, Baillie Street, Rochdale (8.45am-4.45pm)

For more information or a Freepost response form phone Strategic Planning on Tel: 01706 924371 or email wayne.poole@rochdale.gov.uk

Comments need to reach us by 19th July 2010

Appendix 1: Milkstone, Deeplish and Newbold Supplementary Planning Document draft SA scoping report: schedule of comments and responses

Organisation	Response	Comments	Actions
Greater Manchester Ecological Unit (GMEU)			
	Table 2 should include the European and domestic legislation which underpins the Habitats regulations Assessment	Best practice indicates that this stage of the scoping report should not be a comprehensive list of those documents of relevance, rather a select list. It has been decided therefore to limit the list largely to those documents which have clear key objectives and targets relevant to the plan, rather than legislation which must be adhered to in any case	No change
	The report should recognise that the South Pennine moors are also designated as a Special Protection Area (SPA) for its important bird assemblages. SPAs should also be included in Habitats Regulation Assessment	It is agreed that this is an omission. The SPA is included, however, in the Habitats regulation Assessment	The relevant paragraphs have been amended
	The assessment undertaken under the Habitats Directive should be termed a Habitats Regulations Assessment (HRA) not an Appropriate Assessment (AA). An AA is just one stage of the HRA process, which should be undertaken after the HRA has scoped in European sites which may be subject to a significant effect from the project or proposal	Agreed	The relevant sections have been altered to reflect this comment
	The report correctly identifies the need to undertake an HRA for both the Rochdale Canal and the South Pennine Moors which are both within the administrative boundary. However, the report should also identify that other European sites, which fall outside Rochdale MBC, will also need to be considered at the scoping stage of the HRA document	Agreed	The relevant section has been altered to reflect this comment
English Heritage			

	English Heritage guidance on SEA / SA and the historic environment should be referred to, in particular Table 2 needs to reflect the guidance.	A number of the documents suggested for scoping by the guidance are already included, and some, such as PPG2, are not considered to be relevant to this particular Plan. It is also noted that best practice indicates that this stage of the scoping report should not be a comprehensive list of those documents of relevance, rather a select list. However, it appears there has been a significant omission in respect of PPG15.	PPG15 included in Table 2.
	The baseline data should cover the historic environment, the area includes listed buildings (and locally important buildings and other heritage assets?) and consideration should be given to the preparation of a heritage assessment (similar to the Oldham Rochdale HMR Pathfinder Heritage Assessment) to inform the development of the SPD and its appraisal.	The baseline information does cover the historic environment, including % of listed buildings at risk and number / extent of Conservation Areas. The consideration of a heritage assessment is a matter which cannot be addressed by the scoping report but could be part of the appraisal process.	Consideration of heritage assessment to be raised at appraisal stage.
	Evidence should back up statements about image and low design quality. This evidence may reveal further key issues and problems and potential strengths relating to the historic environment. This may lead to additional SPD objectives.	Agreed.	Document to be amended to reflect this comment.
	The SA framework should include an objective relating to the historic environment and you should refer to the attached guidance.	Agreed. The SA framework contains 5D: "Will the Plan protect and enhance the historical, cultural and archaeological heritage of the Borough?"	Reference will be made to the guidance before finalisation of the scoping report and Framework.
	It is suggested that your conservation officer is engaged in the preparation of this SPD and its appraisal as they are best placed to provide information on the historic environment and advise on key issues and opportunities relating to the historic environment of the area.	Agreed.	The Conservation Officer is confirmed as a member of the appraisal Panel.

Environment Agency	We would like to see the SPD document define more clearly what future water resource pressures the borough may face, i.e., water supply, demand, drainage and flooding, and how it will adapt to this, to ensure the sustainable delivery of secure water supplies and an improved and protected water environment as outlined in the guidance 'Future Water', the Government's water strategy for England.	This appears to be more of a request of the SPD document itself as opposed to the SA scoping report.	Assess possibility of addressing these issues in the SPD.
	We would recommend clearer details as to how the core strategy will link with the new NW River Basin Management Plan and the objectives within it.	This appears to be more of a request of the SPD document itself as opposed to the SA scoping report.	Assess possibility of addressing these issues in the SPD.
	As the SPD area encompasses some the catchment areas of the River Roch and Sudden Brook catchments, there may be opportunities to actively enhance these river corridors, and remove past poor riparian development that has encroached or even covered these watercourses, which could have multiple benefits, such as biodiversity, amenity, flood risk and water quality.	This appears to be more of a request of the SPD document itself as opposed to the SA scoping report.	Assess possibility of addressing these issues in the SPD.
	As can be seen from Map 1 of the Milkstone, Deelish and Newbold areas there is a distinct lack of greenspace. Open spaces, sport and recreation all underpin people's quality of life. Well designed and implemented planning policies for open space, sport and recreation will be key in delivering broader Government objectives under PPG17. Local networks of high quality and well managed and maintained open spaces, sports and recreational facilities help create urban environments that are attractive, clean and safe. Green spaces in urban areas also perform vital functions as areas for nature conservation and biodiversity and by acting as 'green lungs' can assist in meeting objectives to improve air quality and adapting to climate change. It is recommended the summary report by TEP, 'Towards a Green Infrastructure Framework for Greater Manchester' (September 2008) http://www.greeninfrastructurenw.co.uk/resources/1547.055B_Summary_report.pdf is referred to.	This appears to be more of a request of the SPD document itself as opposed to the SA scoping report. The Greater Manchester report mentioned is included in the scoping report Table 2.	Assess possibility of addressing these issues in the SPD.
	Table 2 of the scoping document refers to the Greater Manchester level 1 Strategic Flood Risk Assessment. Rochdale MBC has recently completed the Level 2 SFRA for Bury, Rochdale & Oldham. This document looks at development and flood risk in more detail within Rochdale. It should be referred to in the production of the SA document and covers matters relating to all sources of flood risk.	Agreed that the Level 2 SFRA should be included in Table 2.	Level 2 SFRA to be included in Table 2.
	We have a database of information that may be of assistance during the sustainability appraisal process. This can be found on our website, via the following hyperlink: http://www.environment-agency.gov.uk/regions/northwest/850243/1130689/?version=1&lang=_e	Noted	Database to be used to contribute to evidence base.

Appendix 2: The Rochdale Sustainability Framework

Objective	Sub-Questions	Indicators
1. Developing Sustainable Neighbourhoods	1A: Will the Plan create decent, energy efficient housing with a choice of location, size and tenure?	Affordable dwellings completed as a % of all new housing completions
		Overcrowding and under-occupation by house type (Housing Needs Survey) <u>OR</u>
		% of housing stock empty (awaiting confirmation of the availability of overcrowding and under-occupation data)
	1B: Will the Plan encourage active citizenship from all sectors of the community, ensuring relevant stakeholders and active organisations are involved in the development and implementation of decisions?	% of people who feel they can influence decisions in their local area (LAA)
		Number of consultation replies and correlation between comments and outcomes
	1C: Will the Plan encourage harmonious communities?	% of people who believe people from different backgrounds get on well together in their local area
	1D: Will the Plan improve accessibility for everyone?	Amount of new residential development within 30 minutes public transport time of: a GP; a hospital; a primary school; a secondary school; areas of employment; and a major retail centre
1E: Will the Plan promote the value of the Borough's built heritage?	Number of listed buildings at risk	
2. Increasing Jobs and Prosperity	2A: Will the Plan support and retain the Borough's local businesses, promoting a competitive and dynamic business environment, providing local people with more and better paid jobs?	Total number of jobs in the Borough
		Employment Rate
		Loss of employment land
		Supply of employment land and premises
	2B: Will the Plan attract new retail investment to town centres?	New retail floorspace in town centres (Retail Health Checks)
2C: Will the Plan raise the profile of the Borough	Visitor numbers	

		Business start - ups
3. Making Sure Every Child Matters	3A: Will the Plan help to tackle obesity and poor health in children and adults?	Year on year change in childhood obesity
	3B: Will the Plan promote and enhance opportunities for safe and sustainable travel to and from schools?	Implementation of school travel plans
	3C: Will the Plan protect and enhance local play facilities?	Homes within 400 metres of quality play facilities, which can be reached safely
4. Improving Community Safety	4A: Will the Plan further reduce crime and the fear of crime?	% of residents who feel that the Borough is a safe place to live
		Domestic burglaries per 1000 population
5. Creating a Cleaner, Greener Environment	5A: Will the Plan promote high quality, viable alternatives to using the car, including public transport, walking and cycling?	Percentage of people travelling to work by car, public transport and foot / bicycle
	5B: Will the Plan promote 'Homezone' schemes, reducing car access and limiting speeds, creating safer and more attractive street environments?	Number of 'HomeZone' schemes
	5C: Will the Plan reduce traffic?	Percentage of people travelling to work by car, public transport and foot / bicycle
	5D: Will the Plan provide and maintain high quality open spaces and sensitive access to green infrastructure and the countryside, including a good quality rights of way network?	% of residential properties within 400 metres of a good quality natural greenspace, woodland, greenspace corridor or national cycle network / national trail
		ANGSt standards for access to green space
	5E: Will the Plan protect and enhance the historical, cultural and archaeological heritage of the Borough?	Number of listed buildings at risk (Grade 2 and grade 2*), number of Conservation Areas with appraisal, number of Conservation Areas designated, number of Conservation Statements for Listed Buildings, archaeological reports produced each year through Development Control
	5F: Will the Plan conserve and enhance landscape (and townscape) character and quality, and local distinctiveness?	New homes built on previously developed land
5G: Will the Plan protect and enhance biodiversity, including both species and habitats?	woodland cover	
	Change in areas and populations of biodiversity importance	

		% of rivers of good or fair quality
		Conformity with GM Biodiversity Action Plan
	5H: Will the Plan conserve soil resources and quality and geodiversity?	Loss of greenfield land Loss of agricultural land
	5I: Will the Plan ensure a reduced impact upon the local and global environment, tackling climate change and its effects?	NI 188 – adapting to climate change % of household waste recycled
	5J: Will the Plan encourage sustainable land use and development practices, making more efficient use of natural resources?	% of development on brownfield land Housing density
	5K: Will the Plan reduce local carbon emissions and energy use, contributing to national and global targets?	Per capita CO2 emissions in the LA area Incidence and capacity of on-site renewable energy installations
	5L: Will the Plan encourage good quality sustainable design and construction techniques?	Energy efficiency of the housing stock
	5M: Will the Plan ensure that flood risk is minimised, with management practices intrinsically linked to issues of biodiversity, water quality and urban drainage?	Number of planning applications granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality Compliance with SFRA and level 2 SFRA
6. Improving Health and Wellbeing	6A: Will the Plan lead to better access to healthcare services, reducing health inequalities, promoting health and well-being throughout the Borough's neighbourhoods and communities?	% of developments with travel plans Amount of new residential development within 30 minutes public transport time of: a GP and a hospital
	6B: Will the Plan Increase sport and leisure activities and greater access to the countryside to help promote healthier lifestyles?	% of the population that are within 20 minutes travel time (urban - walking; rural - driving) of a range of 3 different sports facility types, at least one of which has achieved a quality mark
		% of residential properties within 400 metres of a good quality natural greenspace, woodland, greenspace corridor or national cycle network / national trail