PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
SECTION 20

REPORT ON THE EXAMINATION INTO THE
ROCHDALE CORE STRATEGY

Document submitted for examination on 31 May 2013
Examination hearings held between 01 and 09 October 2013, and on 10 June 2015

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Abbreviations Used in this Report

AA  Appropriate Assessment
AHVA Affordable Housing Viability Assessment
AQMA Air Quality Management Area
CS  Core Strategy
CD  Core Document
DCLG Department for Communities and Local Government
Dpa Dwellings per annum
DPD Development Plan Document
DtC Duty to Co-operate
FPC Further Proposed Change
GM Greater Manchester
GMGTAA Greater Manchester Gypsy and Traveller Accommodation Assessment
GMFM Greater Manchester Forecasting Model
HMA Housing Market Area
HRA Habitats Regulations Assessment
LDS Local Development Scheme
MM Main Modification
OAN Objectively Assessed Need
PPG Planning Practice Guidance
SA Sustainability Appraisal
SAC Special Area of Conservation
SCI Statement of Community Involvement
SCS Sustainable Community Strategy
SHLAA Strategic Housing Land Availability Assessment
SHMA Strategic Housing Market Assessment
SPD Supplementary Planning Document
The Framework The National Planning Policy Framework
WMS (Written) Ministerial Statement
Non-Technical Summary

This report concludes that the Rochdale Core Strategy provides an appropriate basis for the planning of the Borough, providing a number of modifications are made to the plan. The Rochdale Metropolitan Borough Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All of the modifications to address this were proposed by the Council but where necessary I have amended detailed wording and/or added consequential modifications where necessary and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Amendments to address the protection of conservation interests in the natural environment;
- Clarifying the approach to retail development in Heywood Town Centre requiring additional units to be of an appropriate size;
- Making provision for an enhanced Castleton Station and improved links to the East Lancashire Railway, Rochdale Canal and the locality;
- Update and clarify matters regarding Rochdale Town Centre and the adopted Masterplan for it;
- Amend the housing requirement to be at least 460 dwellings per annum to reflect the latest evidence, including household projections;
- Clarifying the need for affordable homes and for empty properties to be brought back into use;
- Update and clarify the approach to meeting the needs of gypsies, travellers and travelling showpeople;
- Clarification of the approach to design issues when guidance documents are superseded;
- Clarification of the policy approach to peatlands and woodlands;
- Amending the approach to energy and new development, including a modified energy hierarchy and the removal of local requirements;
- Clarification of the approach to wind power developments;
- Clarification of the approach to sports, recreation and open space provision;
- Clarification of the policy and guidance for managing water resources and flood risk;
- Amendments to address land contamination and instability;
- Modifications to reflect changes for the provision of transport infrastructure; and,
- Amendments to address planning obligations and the consideration of viability.
Introduction

1. This report contains my assessment of the Rochdale Core Strategy (CS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan’s preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. Paragraph 182 of the National Planning Policy Framework (‘the Framework’) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.

2. The starting point for the Examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my Examination is the submitted draft plan (May 2013) which is the same as the document published for consultation in January 2013. The Council published a Schedule of Proposed Changes/Minor and Other Amendments (ref: CD2c). Other agreed amendments included those resulting from discussions with Natural England (ref: CD2d). Matters in these documents were considered during the Examination and I take them into account in my report.

3. Following the Examination hearings in October 2013, I sent an advisory letter to the Council in relation to housing matters (ref: ID009). As a consequence of this and subsequent correspondence (ref: RC017), the Examination was suspended in March 2014 (ref: ID011). A draft update of the Rochdale Strategic Housing Market Assessment (SHMA) was produced in October 2014 (ref: RC020) and following consultation on the document a final update SHMA was published in January 2015.

4. 2012-based household projections were published on 27 February 2015 that were relevant to matters within the SHMA update. The Council provided parties to the Examination with its views (ref: RC023) on the 2012-based household projections prior to the resumed Examination hearing in June 2015 to consider Matter 4 (i.e. ‘Issue 3’ below).

5. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (MM). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.

6. The MMs that are necessary for soundness and/or legal compliance all relate to matters that were discussed at the Examination hearings. Following these discussions, the MMs have been subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made additions to the detailed wording of a number of MMs. These amendments do not significantly alter the content of the modifications as published for consultation or undermine the participatory processes and
sustainability appraisal that has been undertaken. The amended MMs and the reasons for them are addressed within the report.

Assessment of Duty to Co-operate

7. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan’s preparation.

8. The Council has provided a statement to confirm how the Duty to Co-operate (DtC) has been dealt with in relation to the CS. Rochdale Borough Council is a member of the Association of Greater Manchester Authorities (AGMA), which includes Manchester Local Enterprise Partnership and the Greater Manchester Local Nature Partnership. Appended to the DtC statement is an Annual Statement of Co-operation April 2012 – March 2013 that details Greater Manchester governance arrangements and the strategic matters these seek to address. They include planning, housing and transport, along with policing, skills & employment and health & wellbeing. The Greater Manchester Gypsy and Traveller Accommodation Assessment (GMGTA) is an example of the strategic work that has informed the making of the CS and it continues to do so.

9. There is no reason to doubt that: AGMA has provided an effective means of addressing any potential need for cross boundary working within the conurbation; or, that any future administrative arrangements for the conurbation would fail to adequately address strategic matters.

10. Adjoining Council areas include: the AGMA authorities of Oldham, Bury and Manchester; and Calderdale and Rossendale. The surrounding authorities have been engaged during the plan-making process. None have suggested that there is a need for Rochdale to accommodate development for any other local planning authority area, nor is it suggested that any other authority area needs to accommodate the needs of Rochdale.

11. Local planning authorities are required to engage constructively, actively and on an ongoing basis with other prescribed organisations and have regard to their activities in the preparation of Development Plan Documents (DPDs) in so far as they relate to strategic matters. The objective is to maximise the effectiveness with which these activities are undertaken. Concerns have been raised regarding the level of consultation carried out with the residents of Heywood, which is within the Borough. However, it was confirmed that consultation was in accordance with the Council’s Statement of Community Involvement (SCI) and for the reasons above, the Council has met the DtC.

Assessment of Soundness

Preamble
12. Planning Practice Guidance (PPG) was published in March 2014 between the original hearings and the resumption of the Examination in 2015. The resumed Examination hearing in relation to Matter 4, along with the consultation of MMs, enabled parties to make comments within the context of the PPG, and PPG has been considered in the preparation of this report.

13. During the Examination, but after the hearings had been concluded, House of Commons: Written Statement (HCWS42) by the Secretary of State for Communities and Local Government, Greg Clark, was made on 18 June 2015. The Written Statement indicates that planning applications for wind energy development should only be granted planning permission if: the proposed development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and, following consultation it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing. The implications of the WMS on 18 June 2015 have been taken into account during the Examination.

Main Issues

14. Taking account of all the representations, written evidence and the discussions that took place at the Examination hearings I have identified 7 main issues upon which the soundness of the Core Strategy depends.

Issue 1 – Overall Spatial Portrait, Vision, Strategic Objectives, and Strategy

Does the plan properly identify relevant challenges and problems facing the Borough and indicate how challenges will be addressed?

15. The Core Strategy’s overall Spatial Portrait identifies the opportunities and challenges for the Borough during the plan period. These provide the foundation for the plan’s Spatial Vision, its Strategic Objectives and policies. These matters are set within the context of Policy SD1, which confirms that the Core Strategy seeks to deliver sustainable development within the Borough. MM02 is necessary to clarify the context of the strategy within the policy and justify it as being the most appropriate.

16. The plan-making process for the Core Strategy has been subject to Sustainability Appraisal (SA) and accords with paragraph 165 of the Framework. In February 2015, an Addendum to the SA was produced to address the SHMA Update.

17. The Spatial Strategy was developed from six initial options that were put forward in the Issues and Options Report 2008. The chosen Spatial Strategy set out in CS Chapter 6 recognises and differentiates between the urban concentrations in the south of the Borough, and areas to the north and east that are increasingly rural and upland.

18. The key diagram and more detailed Spatial Strategy maps explain the Spatial Strategy in diagrammatic form. It divides the Borough into the
Pennine fringe in the north (and east) and the Manchester fringe in the south.

19. Themes within the Spatial Strategy seek to, for example, focus most new employment development in close proximity to the population centres and transport links in the south of the Borough, while nonetheless maintaining and improving the number, range and quality of employment opportunities in the northern ‘Pennine’ fringe.

20. The CS does not seek to focus housing provision in the Borough in accord with the same geographic division. Instead, it recognises the opportunities and restrictions that the presumption in favour of sustainable development provides.

21. The overall strategy within the CS would focus development in the Borough’s most accessible and connected locations, while enabling appropriate levels and types of development to occur elsewhere.

22. Included within the Pennine fringe are two areas demarcated by ellipses as Pennine fringe visitor economy and heritage areas. Evidence that would support the perceived importance of the Pennine fringe to the visitor economy and heritage is apparent in the physical circumstances of the Borough, including the landscape and built environment within it, and the characteristics that these contribute to. While it was suggested that the ellipses should be more precisely defined, they are strategic areas and their definition on the key diagram reflects that, and mirrors the approach to identifying Economic growth corridors and areas.

23. Adding the words ‘housing and’ to the first bullet point, and ‘including employment, housing and retail’ to the second bullet point, of policy SP3/R in relation to Regenerate Castleton and Sudden would clearly signal that mixed use development at Trub would be expected to include residential and other elements (MM06 and MM06A). This would support the aim for enhancement along the canal corridor and ensure that the plan is justified by being the most appropriate strategy for Trub.

24. I conclude that the Spatial Portrait of the Borough, defined key challenges and Spatial Strategy are evidenced-based, set the scene and provide a suitable, justified, basis for the plan’s Strategic Objectives.

**Issue 2 – Whether the Core Strategy would deliver a more prosperous economy**

25. Issue 2 addresses the subject of CS Chapter 7 – Delivering a more prosperous economy (SO1), and accordingly, the first of the CS’s Strategic Objectives. National policy is clear that the planning system should do everything that it can to support sustainable economic growth. In addition and in relation to using a proportionate evidence base, paragraph 160 of the Framework indicates that local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. This understanding should be informed through work with neighbouring authorities, Local Enterprise
Partnerships and the business community. The economic strategy within the CS sits within the context of the city region,\textsuperscript{1} and CS Strategic Objective SO1 and policy SP1. MM03 would clarify the strategy within policy SP1 to ensure that it would be the most appropriate and therefore, justified.

26. Evidence indicates that Rochdale’s economic performance has not been as strong as that in the remainder of the conurbation, and there has been an emphasis on manufacturing industries with low wage and skill levels.\textsuperscript{2} Employment levels have been below the national average, with manufacturing declining and the Borough providing fewer jobs in financial and business services than might otherwise be expected. The Council seeks to address the decline in manufacturing through policies that should facilitate the development of well-connected sites that can meet contemporary business needs, such as the Kingsway Business Park, to complement the existing industrial and distribution sector activity.

27. During Examination hearing sessions, reference was made to areas of the Borough with high unemployment rates that the CS’s intended levels of economic growth would seek to address. As such, the CS objective for high levels of economic growth and job creation within the Borough would, to a certain extent, support existing households in the plan area by providing employment opportunities to people who are out of work, or who would otherwise commute out of the Borough.

\textit{Town, district and local centres}

28. CS policy E1 addresses the establishment of thriving town, district and local centres. It is positively framed to maintain the existing hierarchy of town centres within the Borough, and includes criteria that would inform the determination of proposals for main town centre uses in all locations. Rochdale town centre is at the top of the hierarchy of six centres and the evidence supports this. While residents in some parts of the Borough may use town centres in neighbouring areas, it is apparent that the CS is the most appropriate strategy for the Borough as a whole and to strengthen the town, district and local centres within it.

29. CS policy E1/H would enable the development of medium sized retail units in Heywood town centre. This may create additional competition for established stores within the town centre. However, the strategy in policies E1 and E1/H is supported by the evidence base for the CS,\textsuperscript{3} and only promotes a scale of retail and leisure development that would be appropriate to the size, catchment and role of the centre concerned, including Heywood Town Centre.\textsuperscript{4} MM04 would ensure that policy SP3/H provides clear justification of the strategy by only enabling appropriate sized retail units within Heywood town centre.

\begin{itemize}
\item \textsuperscript{1} Various relevant documents including CD28 – MIER Reviewer’s Report
\item \textsuperscript{2} Pages 34-35 of CD3 - Rochdale CS Background Paper
\item \textsuperscript{3} Rochdale Retail and Town Centres Study 2010
\item \textsuperscript{4} CS policy E1
\item \textsuperscript{5} CS policy P2 would address the possible effect of scale on a town centre’s character and appearance
\end{itemize}
30. CS policy E1 criterion b. would require an impact assessment for retail, leisure and office development, with locally set thresholds within the reasoned justification due to the projected impact of retail developments of less than 2,500m². Framework paragraph 26 indicates that the default threshold of 2,500m² would apply where there is no locally set threshold. In this instance, CS policy E1 provides a scale of thresholds that is a response to local circumstances. The approach has been justified by proportionate evidence, which has not been shown to be deficient.⁶

31. CS policy E1, along with town centre specific policies E1/R, E1/M, E1/H and E1/L, strike an appropriate balance between restriction and flexibility to ensure the vitality of town centres is protected within the Borough. This would enable active street frontages to be created and reinforced elsewhere within the context of a sequential test, which is currently set out within paragraph 24 of the Framework and reflects the themes within the CS evidence base.⁷

32. The Examination clarified the Council’s approach to the regeneration of Rochdale Town Centre. Amendments (MM05, MM08 and MM09) to CS policy SP3/R in relation to the final bullet point of Transform Rochdale Town Centre, and CS policy E1/R and its supporting text, are necessary to ensure these CS policies are justified and sound. So too is MM07, which provides clarification of the retail strategy to ensure that CS policy E1 is justified.⁸

Jobs and prosperity

33. Both the Rochdale Employment Land Study (2008) and GM Employment Land Position Statement (2009) indicated a potential demand for 210-215ha of employment land between 2007 and 2026.⁹ This includes a 20% flexibility factor which would provide additional land to address special circumstances. While the flexibility factor was originally within the Regional Spatial Strategy, it was subsequently the subject of key stakeholder consultation.

34. A 2013 review of the 2008 study considered the effect of the economic downturn and concluded that if the observed strong trends continue the forecast potential demand for employment land would be correct.¹⁰ The Council has confirmed its view that for a revised CS period of 2012-2028 the employment land target projection would be 210ha.

35. The Council is clear that the strategy within CS policy E2 is based on three objectives: firstly, ensuring an adequate supply of employment land during the plan period; secondly, protecting employment sites that are most suited to continued employment use, while providing flexibility for non-employment uses on appropriate sites; and thirdly, promoting the necessary infrastructure to support employment areas and economic growth.

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⁶ The context of which is within Section 11 of CD21 – Rochdale Retail and Town Centres Study 2010
⁷ Paragraph 3.12 of CD21 – Rochdale Retail and Town Centres Study 2010
⁸ Paragraphs 5.22 and 5.6 of the documents respectively
¹⁰ Paragraph 4.5 of the Council’s response to CS Examination Matter 3
36. These objectives are the subject of the first three bullet points in CS policy E2. In addition to protecting existing employment zones and sites, the second point would be permissive of other uses where these are demonstrated to be more appropriate. This flexibility is read within the context of the remainder of policy E2, which seeks to provide a clear strategy for the provision and protection of employment land within the Borough that recognises the importance and advantages of the Borough’s population centres, their infrastructural links, and the associated accessibility.

37. An additional objective/bullet point (MM10) at the start of CS policy E2 would confirm support for other (non-B Use Class) employment generating uses. This would be set within the context of, and would be necessary to give effect to, CS and Framework policies for the delivery of sustainable development. As such, MM10 would complete and justify the strategy provided by CS policy E2.

38. CS policy E2 1. is unambiguous that most new employment development and jobs will be delivered in the south of the Borough with five economic growth corridors / areas listed. Policy E2 1.g. is also specific that, apart from Heywood Distribution Park and Stakehill Business Park, the policy is permissive of non-employment uses in employment zones that meet certain criteria. Excluding these two locations from the flexibility within CS policy E2 1.g. is justified due to their identification as established key industrial/distribution employment locations within the Borough.\footnote{As described in CD26, including for example paragraphs 2.26, 2.61 3.54 and 4.99}

39. The connected nature of the conurbation, along with the Rochdale’s links with other administrative areas to the north and east, cause some people to commute out of the Borough. There are also employment sites, such as Kingsway with its Metrolink connection, that draw commuters into the Borough. New employment opportunities, that would be expected to result from the CS policies described above, are aimed at increasing levels of employment within the Borough and addressing its higher levels of unemployment.\footnote{This context is noted to be distinct from that of the Kingsway Business Park scheme, which includes non-employment uses}

40. In common with the approach to CS policy E1, the reasoned justification for policy E2 is clear that employment zone allocations will be reviewed through the Allocations DPD that would follow after the adoption of the CS.\footnote{For example, CS pages 8, 9, 15, 58 and 59}

**Economic growth corridors and areas**

41. Given the scope of policy E2 and other policies within the CS to support appropriate change in employment areas, it is not apparent that there is a need to identify any particular development sites within these broad areas in addition to those already within CS policy E3.

\footnote{CS page 55}
42. One of the sites identified under policy E3 2.f. in the Sandbrook Park / Crown Business Park / Castleton corridor is the former Woolworths site. **MM11** takes into consideration the flexibility suggested and sought for the site, and would ensure that the strategy within policy E3 2.f is justified within the context of the CS and other MMs.

43. Concerns have been raised regarding the potential for CS policy E3 part 4. d. (and SP3/H and T1) to allow the creation of a link road to Heywood Distribution Park from junction 19 of the M62. CS policy E3 would provide a positive strategy to develop ‘key sites’, while addressing infrastructure improvements and traffic management for new and existing development.

44. While such infrastructure could include a new route to and from Heywood Distribution Park, any proposal that comes forward under policy E3 4.d., or similar policies, would be considered on its own merits and local people would have the opportunity to comment on the proposal at that stage. If policy E3 4.d. (or other policies with a similar scope) sought to prevent specific infrastructure coming forward, it would prejudice the ability of a particular proposal, or alternative schemes, to satisfactorily address possible impacts associated with it. It has not been shown that such an approach would be justified. Therefore, CS policy E3 4.d. is the most appropriate strategy to enable infrastructure needs in the South Heywood employment area to be addressed.

45. CS policy E3 is positively prepared and the supporting text reflects this, although a change (**MM12**) would ensure that it provides an objective basis for considering development proposals. As the most appropriate and therefore justified strategy, it requires no further modification to meet this or the other tests of soundness. In this respect and for these reasons so are the equivalent parts of CS policies SP3/H and T1.

46. CS policy E4 is entitled *managing the release of land to meet future employment needs*. It includes a sequential approach that first seeks proposed or identified sites to be on brownfield and then greenfield land in the urban area, then Protected Open Land, and lastly, Green Belt land.

47. Paragraph 83 of the Framework is unambiguous that “…Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period…”.

48. The existence of an existing industrial/employment site could indicate that an identified need may be met in that location. However, any planning application for an employment use in the Green Belt would fall to be considered against the other policies in the CS, and national planning policy and practice guidance. Relevant CS policies include CS policy G4 which is clear that “…Development will be restricted to those limited types of development which are deemed appropriate by national planning policies unless very special circumstances can be
"demonstrated...". Nevertheless, the Council may consider a Green Belt review in a further Local Plan on the basis of need.

49. Matters above indicate that MM12A is necessary to clarify CS policy E4 strategy within the context of CS and national planning policy on the Green Belt.

Encouraging the visitor economy

50. Natural England, British Waterways and Greater Manchester Ecology Unit have previously raised concerns regarding the establishment of a marina at Trub Farm. MM13 addresses Natural England’s concerns and is dealt with in the Introduction to Issue 5 below. Any proposal for a marina development under policy E5 5.b. would have to go through the planning process to determine its suitability. MM14 is necessary to clarify the strategy within CS policy E5 5.b and ensure that it is justified and sound.

Conclusion on Issue 2

51. With the MMs set out above, it is evident that the Core Strategy would support sustainable economic growth. This would include developing the sectors and areas that are specifically planned for within the Core Strategy. The relevant CS policies would be expected to result in a more balanced economy that provides employment opportunities for people living in the Borough. Accordingly, the evidence confirms these policies, with the MMs, to be sound.

Issue 3 – Would the Core Strategy deliver sufficient housing of the right types to support the creation of successful and healthy communities?

The housing market area

52. The Greater Manchester SHMA – December 2008 (CD32) identifies four housing market areas (HMAs) within the conurbation. Rochdale is in the north eastern HMA with Tameside, Oldham and parts of Manchester. Evidence indicates that people moving out of the Borough do so to areas that include parts of Greater Manchester.

53. However, the Rochdale Borough 2010 SHMA (CD30) confirmed that 79% of households move within the Borough, and indicated that 70% is taken to be the threshold for a self-contained HMA. The SHMA 2015 Update refers to the 2011 Census in which the level of households moving within the Borough has dropped to 71.9%, but this is still above 70%. This is set within the context of travel-to-work patterns that indicate 48% of Rochdale residents in employment travel to jobs outside the Borough. In this regard, the SHMA 2015 Update concludes that the Borough is not

\[\text{Paragraph B.79 of the 2010 SHMA (CD30) indicates this to be the threshold used by DCLG for defining a housing market area.}\]

\[\text{SHMA 2015 Update paragraphs that include 7.4 and 7.5}\]

\[\text{MM38 ensures that policy G4 is amended for consistency with the Framework}\]
self-contained and is part of a wider functional economic area that extends into neighbouring parts of Greater Manchester.\textsuperscript{18} Given the Borough’s location on the edge of the conurbation, along with the travel options available to local people, such movements are likely to be sustainable, as would be the reverse travel-to-work patterns of people commuting into the Borough by the same means.

54. PPG notes that market areas can be defined by: house prices and rates of change in house prices; household migration and search patterns; and, contextual data such as travel to work areas.\textsuperscript{19} The SHMA 2015 Update relies on one of these factors. While HMAs may cut across local authority boundaries, in this instance and with the identified levels of internal migration, it was reasonable to conclude that the Borough is the relevant HMA for the CS, and in being so, it sits within the context of the larger Greater Manchester North East HMA.

Housing Need

55. The suspension of the Examination between March 2014 and June 2015 enabled parties to consider the evidence base for the CS within the context of the SHMA 2015 Update and the ONS 2012-based household projections in England, 2012 to 2037 published on 27 February 2015.

56. The SHMA 2015 Update reviewed core outputs of the 2010 SHMA and the background to them, and in doing so took into account the 2011 census data. However, the SHMA 2015 Update recognises that while the 2011-based DCLG household projections provided a starting point for OAN with an estimated 322 additional households per year between 2011 and 2021, they were likely to underestimate household growth potential in the Borough due to the economic downturn at the time.\textsuperscript{20}

57. The SHMA 2015 Update also notes that the Greater Manchester Forecasting Model (GMFM) brings together economic and employment changes, including migration, with household formation. These scenarios are based on past trends and are reported to forecast an average annual dwelling requirement of 242, which is a considerably lower rate of household growth than the 2011-based DCLG household projections.\textsuperscript{21}

58. This annual average increase in dwelling requirement fell to 196 households for 2012-2028 in the 2014 update of the GMFM. Objectors have questioned the input to the GMFM, but have referred to a jobs-led GMFM 2014 forecast with an adjusted headship rate that indicates a forecast of 686 additional dwellings per year.

59. Both the SHMA 2015 Update and objectors to the CS have used Edge Analytics POPGROUP modelling to derive forecasts for the CS period. The SHMA 2015 Update blended together 2008-based and 2011-based

\textsuperscript{18} SHMA 2015 Update paragraphs that include 7.4 and 7.5
\textsuperscript{19} PPG reference ID: 2a-011-20140306
\textsuperscript{20} SHMA 2015 Update paragraphs 4.9 and 4.10
\textsuperscript{21} SHMA 2015 Update paragraph 4.13 and Table 4.2
headship rates to address uncertainties regarding future rates of household formation. The POPGROUP modelling produced a range of housing requirement between 460 and 750 per year of the CS. This range is across six modelled scenarios from **Official Projections** that begin with **2012-based Sub-National Population Projections** (‘2012-based SNPP’), then **Alternative trend-based scenarios** and finally, a GMFM Jobs-led scenario.  

60. The forecast figure ranged between 196 and 750. Consequently, the lowest POPGROUP modelled figure of 460 dwellings per annum (dpa), which the SHMA 2015 Update identifies as the objectively assessed need (OAN) for the Borough, was reasonable being set toward the middle of the range.

61. At the resumed hearing parties confirmed that out-migration still occurred and it tended to be by younger people. CS policy C3 seeks to address this by **Delivering the right type of housing** to retain young people within the Borough, and the policy would also ensure that housing densities are appropriate within the context of the strategic objectives of the Core Strategy.

62. The SHMA 2015 Update’s conclusion that the full OAN for housing in the Borough is 460 dpa was based on the 2012-based SNPP. The 2012-based SNPP informed the production of the **2012-based household projections in England, 2012 to 2037**, which were released following publication of the SHMA 2015 Update. Both of these national projections have taken into account the 2011 Census data and the population level that it records.

63. The SHMA assumes that it addresses any backlog in demand as it uses a baseline figure derived from the current demographic situation in the Borough.  

64. It has been highlighted that 2011 Census data appears to show the 2001 Census under-counted the population of the Borough, with an additional 5,500 people in 2011 rather than the predicted stable population. However, the increased population remains unexplained/unattributed and as a consequence, it is not possible to have confidence in the projections and forecasts that are modelled from it.

65. The 2011 Census indicates 5.4% of households in the Borough to be overcrowded, compared to 4.9% in Greater Manchester and 4.6% across England. However, Table 4.6 of the SHMA 2015 Update indicates that house prices, rents, property sales and relative affordability in the Borough have been relatively stable in the years 2010-2014. Median market rents have remained below £500 per calendar month, with Lower Quartile Market Rents ranging from £425 to £440 during the period.
relative affordability of housing in the Borough has remained between 4.44 and 4.30, which indicates that land and associated dwelling prices are unlikely to be obstacles to many who are seeking to buy a home.\(^{25}\)

66. The SHMA 2015 Update has taken account of overcrowding, and the rate of development with reference to past measures that were taken to rebalance the housing market and address obsolete housing stock. Taking demolitions into account, during the period between 2008 and 2013 an average of 302 net additional dwellings has been made to the housing stock in the Borough, with 390 net in the three year period from 2010.\(^{26}\)

67. The Council estimates that the 2012-based household projections indicate an average increase of 436 dpa for the plan period 2012-2028, and 419 per annum during the projections period of 2012-2037. If a 2.7% vacancy rate is applied to the 436 figure, it would result in a need for 448 dwellings per year. The Council highlights a 3.4% vacancy rate in Rochdale and that this, along with stable lower quartile house prices, supports a view that market signals do not indicate a ‘pent up’ demand in the Borough.

68. Recent regeneration activity has included the demolition and replacement of housing stock. Many of these dwellings were unoccupied. Therefore, the regeneration work would reasonably be expected to result in a higher rate of occupation through the provision of new homes that are attractive to people who might otherwise have moved to areas in neighbouring authorities.

69. The manner in which PPG has shaped the SHMA 2015 Update includes its consideration and use of economic scenarios, markets signals, differential headship rates, and data from before and after the economic downturn.

70. The employment rate in Rochdale is lower than that within the remainder of Greater Manchester and nationally.\(^{27}\) In addition, 9,300 jobs were lost within the Borough between 2004 and 2013. CS strategic objectives seek to deliver, amongst other things, increased employment in a Borough with deprivation and high levels of unemployment, along with a housing mix that is intended to improve employment rates and reduce outmigration and out-commuting. This would be expected to result in some additional demand for housing in the Borough, but the extent to which this would reverse the trend for young people to move out of the Borough remains unknown.

71. The level of economic growth sought by the Core Strategy would provide a means of addressing deprivation, unemployment and under-employment within the Borough. Evidence the Examination in relation to these matters, for example that within the Background Paper (CD3) dealing with areas of deprivation, high crime, the nature of the Borough’s

\(^{25}\) That is the ratio of Lower Quartile earnings to Lower Quartile house prices 2010-2013

\(^{26}\) Including paragraph 4.31 and Table 4.7 of the SHMA 2015 Update

\(^{27}\) Evidence indicates these rates to have been 63.5%, 68.9% and 72.2% respectively
housing stock and its occupation, demonstrates that ‘Jobs-led’ modelling would be inappropriate for assessing OAN in the Borough.\(^{28}\)

72. In addition, given the understood population that provides a confident basis for modelling and the Council’s objectives for the economic and housing strategies within the CS, is it apparent that there would not be an imbalance between the projected growth in jobs and population in the Borough. These matters support the strategy proposed within the CS, as informed by the SHMA 2015 Update.

**Affordable housing**

73. The SHMA 2015 Update identifies an *annual imbalance across Rochdale* of 204 affordable dwellings during the plan period and the type and tenure of housing that is expected to be required. The 2010 SHMA identified a ‘net annual shortfall’ of 128 affordable dwellings. Evidence indicates that the ‘annual net imbalance’ identified by the SHMA 2015 Update is most apparent in the Pennines Township, and that it is larger than the previous figure mainly due to a reduction in the supply of appropriate dwellings rather than a change in the underlying need.\(^{29}\)

74. A level of affordable home delivery to fully address the ‘annual net imbalance’ would cause the percentage of affordable homes to increase from 32% to 44% of the minimum annual additional dwellings proposed by the Council for CS policy C1. CS policy C4 notes that affordable homes would be sought on developments of 15 dwellings or more, and the policy seeks to deliver affordable homes through contributions that equate to 7.5% of the development sales value of the overall scheme. There is an evident disparity between the level of affordable housing required to meet the identified need, the percentage of housing this represents in regard to the overall minimum housing requirement that would be provided for by CS policy C1, and the level of contributions sought through CS policy C4.

75. Paragraph 173 of the Framework states that “…the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened…”. The SHMA 2015 Update highlights the importance of viability to the deliverability of development.

76. Delivering 204 affordable homes per year through Core Strategy policy C4 would appear to be very ambitious within the context of the scale of requirement proposed for Core Strategy policy C1.\(^{30}\) Reference has been made to the Borough’s high vacancy rate and the possible contribution that the reoccupation of these dwellings could make toward meeting the need for affordable homes. In 2011 there were 3,623 vacant dwellings across the Borough.\(^{31}\) It is unclear how many of these properties, if

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\(^{28}\) Paragraphs 5.6 to 5.19 of the Council’s Examination document ref:RC0022

\(^{29}\) Table 4.12 of CD30 and paragraph 2.16 of the Council’s statement for the resumed hearing

\(^{30}\) As highlighted by the Home Builders Federation (HBF) in its response to the consultation on the draft of the SHMA 2015 Update

\(^{31}\) Paragraphs 7.20 and 7.21 of the SHLA 2015 Update
brought back into occupation, could meet the Framework definition of an affordable home and therefore reduce the policy burden on new build market housing schemes.

77. The revised level of affordable housing proposed has only been delivered in one year since the economic downturn. It has been highlighted that a comparable ratio of affordable-v-market homes delivery to that in the CS would equate to a Core Strategy policy C1 requirement of 650 dpa. However, that ratio is not the policy objective within CS policy C4 and its supporting text.

78. A number of objectors have raised concerns regarding the deliverability of the CS housing strategy due to viability considerations. CD34 - Economic Viability of Affordable Housing Requirements was prepared for the 2010 SHMA. CD34 was produced in the years immediately following the economic downturn and consequently considered, amongst other things, the effect of restrictive lending practices. It refers to the level of affordable housing provision that would be the 'tipping point' which threatens the viability of 14 'beacon sites'.

79. However, CD34 also states that “...It is important to note that the viability of affordable housing provision will inevitably vary depending upon the circumstances of each actual site...”. It notes that a balance needs to be struck between the delivery of market and affordable housing to meet the identified need and to create a sustainable community. It recommended that an initial target of up to 15% affordable housing (equivalent to the CS policy C4 7.5% of the gross development value) on all sites be applied across the Borough, which reflects the existing figure within the Council’s Affordable Housing SPD - adopted March 2008 (CD33).

80. The Local Plan Viability Assessment – June 2013 (CD79) was produced following the publication of, and with reference to, the Framework and advice within the Local Housing Delivery Group’s Viability Testing Local Plans. CD79 is a Council document, but the Introduction indicates that it was "...undertaken collaboratively, having regard to the views of developers and key stakeholders...". It sets out to be "...an additional and complimentary assessment of viability evidence..." to that in CD34.32

81. Within the evidence base for the CS are viability assessments that have addressed a range of differing site typologies and indicate that most, but not all of the sites considered would be viable. With no policy requirement 77% of the 22 sites considered within CD79 would be viable and 5% marginal, which become 64% and 9% respectively when the cumulative impact of all policies are taken into consideration.33

82. These figures for ‘all policies’ would have included CS objectives in relation to the Code for Sustainable Homes which would now be addressed through Building Regulations. However, CD79 has not factored in a costing for abnormals (such as contamination remediation)

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32 Pages 7 and 18 of CD79
33 Page 33 of CD79, with sensitivity testing in Section 9 of the document
which would be expected to provide some balancing for the removal of the planning policy burden in relation to the Code for Sustainable Homes.

83. The Affordable Housing SPD pre-dates the Framework and the clear Government objective to boost significantly the supply of housing and that local authorities should “...use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...”.34

84. The Council believes that the SPD and CS provide a consistent approach to the delivery of affordable homes that strikes the right balance between needs and viability in the delivery of affordable homes. It highlights that house prices, developers’ costs and land values are considered unlikely to have changed significantly since the production of CD79, and indeed, there is no convincing evidence to the contrary.

85. It is not apparent that CS policies C1 and C4 would deliver sufficient new homes to meet the identified ‘net annual imbalance’ for affordable housing. However, policies C1 and C4 would increase affordable housing through a significant boost in the delivery of market housing. In addition, evidence has shown that housing in the Borough is affordable to many working families, with Rochdale ranked as the 9th most affordable district in the North West of England.35 The expected failure to meet the need for affordable housing would occur within this context and the overall objectives for the Core Strategy.

Gypsies, travellers and travelling show people

86. CS Policy C5 seeks to address the needs of gypsies, travellers and travelling showpeople. The policy does not include pitch and plot targets, with the reasoned justification indicating the identified need in the GMGTAA would be the subject of a subsequent Allocations DPD. The resumed Examination heard that: a draft update to the GMGTAA indicated a much lower need than had been previously identified; and, sufficient pitches had already been provided to meet the need between 2014 and 2019. Given the strategic capability within Greater Manchester and the scope for effective working under the DtC, there is no reason to doubt that the Council will continue to plan effectively for the needs of gypsies, travellers and travelling showpeople. MM20 is necessary to ensure that the CS is the most appropriate strategy based on the latest assessment of need.

The objectively assessed need (OAN) for housing

87. PPG confirms that DCLG household projection figures are statistically robust and that they should provide the starting point estimate of overall housing need. PPG indicates that it may be necessary to adjust the

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34 Paragraph 47 of the Framework
35 As noted above and as detailed at paragraph 3.11 and Table 4.8 of the 2015 SHMA Update, the relative affordability of housing in the Borough (as expressed by the ratio of Lower Quartile earnings to Lower Quartile house prices) has remained between 4.44 and 4.30
household projection-based estimate of housing need. For the reasons set out above, jobs-led forecasting would be inappropriate in this instance. The Council has explained its approach to assessing housing need. The SHMA Update’s OAN was the lowest figure from the POPGROUP modelling, but it was not the lowest from the relevant models.

88. It is clear that the plan is unlikely to deliver the identified 204 dpa ‘net annual imbalance’ of affordable housing be that with the SHMA Update OAN of 460 dpa (or 448 dpa taking into consideration the 2012-based Household Projections), objectors’ suggested 650 dpa, or somewhere in between the two figures.

89. CS policy C4 would take forward a contribution target for affordable housing that pre-dates the Framework. Neither the Framework nor the PPG suggest that affordable housing needs have to be met in full when determining the full OAN. CS policies C1 and C4 would be expected to increase affordable housing provision through a significant boost in the delivery of market housing. In addition, evidence has shown that housing in the Borough is affordable to many working families, with Rochdale ranked as the 9th most affordable district in the North West.

90. The expected failure to meet the need for affordable housing would occur within this context and the overall objectives for the Core Strategy. As such and given the viability evidence referred to above, CS policy C4 is a reasonable and justified approach to the provision of affordable homes, and an uplift in the housing requirement to increase affordable housing delivery is not realistic or viable.

91. For the most part the Council demonstrated that a figure of 460 dpa would be an appropriate evidenced-based position that reflects the strategic objectives of the Core Strategy and the likely outcomes. It would be reasonable to assume that outmigration would reduce as the Borough becomes attractive to those who wish to have (amongst other things) larger homes. However, the evidence set against the Council’s position refers to modelling that includes unattributed population change, which significantly reduces confidence in the output of the modelling.

92. Framework paragraph 47 seeks local planning authorities to boost significantly the supply of housing and the Council’s proposed modified OAN figure of 460 additional dwelling per year would not be a limit. 460 dpa would provide a small number of dwellings over the 2012-based household projections for the Borough, and as set out above the Council has justified its approach.

93. MM19 to the supporting text of CS policy C4 provides the clarification necessary to reflect the SHMA findings in relation to affordable housing. Affordable housing provision and site viability would have to be considered in relation to each development proposal that would fall within the scope of CS policy C4.

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36 PPG Reference IDs: 2a-015-20140306 & 2a-017-20140306
37 As highlighted by Table 18 of the Background Paper (CD3) in relation to the 2010 SHMA
94. Matters above also result in **MM16, MM16A** and **MM18** which clarify the strategy provided by policies C1 and C3 and its consistency with the Framework, as would **MM17** for policy C2. **MM16B** would remove the supporting text to policy C1 that states “...*Given under-performance in recent years it is considered that initially an additional buffer of 20% is necessary...*” A buffer of 20% is applicable at this point. However, MM16B would provide greater clarity regarding policy C1 following MM16A. These MMs are necessary to ensure the strategy within the policies is clear, the most appropriate and therefore, justified.

**Supply**

95. No base date has been provided within the CS for the calculation of the 5 year housing land supply. However and as noted above, representations to the Examination confirmed the plan period to be 2012-2028 and the base date of 2012 reflects the evidence base for the CS.

96. The SHLAA published in November 2014 has identified land for 9,146 dwellings over the next 15 years, with an additional 190 dwellings beyond year 15. These figures exclude ‘windfall’ sites. Consequently, sites within the SHLAA would provide 610 dwellings per year that with an assumed 20 demolitions per year, would equate to 590 net additional dwellings per year.  

97. It is suggested that the Council’s objectives cannot be met unless sites are provided that would be suitable for developments of large higher value homes. The Council has indicated areas where higher value homes are currently located, and these may correlate with areas of the Borough where development opportunities are heavily constrained. However, Core Strategy policies would not prevent suitable sites for higher value homes coming forward for inclusion in the future Allocations DPD, or for consideration independently of it.

98. Reference was made to previous documents allowing for up to 100 demolitions per year, but in the absence of housing renewal/clearance schemes I accept that 20 demolitions per year is a more appropriate figure to use.

99. Therefore:

   i. The requirement = 460 dpa x 5 years = 2,300
   ii. Less known completions for 2012-2014 = 720  
   iii. Shortfall for April 2012 to March 2014 = 200 
   iv. Deliverable sites/gross supply 2014/2028 = 8,405

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38 Paragraph 4.32 of the SHMA 2015 Update  
39 2012/13 = 448 and 2013/14 = 272 at Footnote 2 of the Taylor Wimpey statement on Matter 4 for the resumed Examination  
40 2012/2013 (460-448) = 12 and 2013/14 (460-272) = 188
v. Requirement + shortfall = 2,500
vi. Applying a buffer (if this were to be 20% = 2,500x1.2) = 3,000
vii. 5 year annualised average = 600 dpa
viii. Housing land supply = 8,405/600 = 14 years

100. Consequently, the 2014 SHLAA identified there to be sufficient provision to meet the housing requirements of the Core Strategy, including a five year supply of deliverable sites for housing in accordance with paragraph 47 of the Framework. Within the context of the scale of identified housing land supply, I have no evidence to suggest that matters have arisen that would cause the Council to be unable to demonstrate a 5 year supply of deliverable sites for housing. In addition and for these reasons, and having given consideration to viability issues (which include matters that may change over the plan period), the evidence indicates there to be no need for suggested key/strategic sites to be included within the CS.

Health, Sport, Recreation and Open space

101. In relation to improving health and well-being, MM21 and MM22 are necessary to provide greater clarity, and therefore justification of the strategy within CS policy C6 which pays particular attention to the provision of, and access to, food shops for deprived areas.

102. Correspondence confirmed a Council commitment to carry out assessments in relation to open space, sport and recreation and MM23 to CS policy C8 would support the application of CS policy DM2. MM23 is necessary to ensure that policy C8 is positively prepared to address future open space, sport and recreation needs in the borough.

103. Framework paragraph 74 provides three criteria that should be met for existing open space, sports and recreational buildings, and land including playing fields to be built on. MM40 to policy G6 would ensure that development is consistent with the Framework.

Conclusion on Issue 3

104. Overall, I am satisfied that the Core Strategy is seeking to meet a range of different needs and widen the choice of homes in accordance with the Framework. With the above MMs, appropriate provision would be made for housing having regard for the Framework and taking account of the proposed numbers and types of housing, provision for gypsies and travellers, and other groups. I conclude that the evidence indicates the Core Strategy would deliver sufficient housing of the right types to support the creation of successful and healthy communities.

Issue 4 – Whether the Core Strategy would improve design, image and quality of place

41 In this instance using the lower figure provided by objectors on page 6 and Footnote 3 of the Taylor Wimpey statement on Matter 4 for the resumed Examination i.e. 8,685–280 demolitions = 8,405
105. The Council’s approach within CS policy P1 – *Improving image* requires high quality design in all new development and recognises the role of key locations for the image of the Borough. Support has been shown for the proposed use of trees to green the urban environment through planting that would include street trees. These themes are reflected in CS policy P2 - *Protecting and enhancing character, landscape and heritage.*

106. It is possible that large scale infrastructure projects would conflict with CS policy P2 criteria a. and b. by failing to integrate successfully with key natural features, or failing to take opportunities to protect and open up important views. However, decisions regarding such development would have to weigh any policy conflict against matters in favour of the proposal.

107. The overall approach within policies P1 and P2 (and P3) is consistent with national policy that considers good design to be a key aspect of sustainable development. The policies address the need for high quality and inclusive design. They are consistent with the policies in section 7 of the Framework, and with MM24 to provide greater clarity regarding the policy documents referred to within policy P3, policies P1, P2 and P3 meet the other tests of soundness. Accordingly, the Core Strategy would be expected to improve design, image and quality of place.

**Issue 5 – Are CS policies appropriate for promoting a greener environment?**

**Introduction**

108. CS Strategic Objective SO4 seeks to promote a greener environment, which is the focus of policies within CS Chapter 10. The introduction to the chapter and the strategy that its policies provide detail to would be clearer with MM25 and MM26. These MMs are necessary to provide the most appropriate strategy and therefore, justify the plan.

109. Natural England considered that the plan’s Habitats Regulations Assessment (HRA) failed to meet the requirements of the Habitats and Birds Directive and the Habitats Regulations and objected to the CS. A resolution to this resulted from additional work carried out on the HRA and agreement regarding a number of modifications (MM01, MM13, MM15, MM41, MM42 and MM60). Natural England confirmed this in a letter, dated 20 August 2013, which stated that Natural England’s previous concerns had been adequately addressed and the CS was no longer considered to be unsound in relation to the Habitats Regulations. Accordingly, these MMs are necessary to justify the strategy as the most appropriate and ensure its consistency with national policy in regard to the natural environment.

**Tackling and adapting to climate change**

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42 CD2d - Proposed Changes To The Core Strategy Following Further Discussions With Natural England In Respect Of The Core Strategy Habitats Regulations Assessment (HRA)
110. National policy seeks to protect peatlands from mineral extraction, but it does not set out to prevent all development. A proposal for development that would include an area of peatland may have a degree of harm that is considered to be sustainable and not unacceptable. This would need to be more clearly expressed than in the suggested MM for the fifth bullet point of policy G1. MM27 and MM31 address this and the resulting movement of CS policy G1 wording to the supporting text, along with clarifications within the supporting text, and are necessary to justify the strategy within policy G1.

111. The CS approach to technical housing standards does not reflect the changed regulatory approach to housing standards and the implications of this for building sustainability policy within the Framework. The Council’s proposed changes to CS policy G1 bullet a. and the supporting text to policy G1 seeks to ensure that the policy reflects changes in the Government’s approach to zero carbon development. MM28, MM29 & MM30 would remedy this potential unsoundness by ensuring that policy G1 remains effective.

112. With these modifications Core Strategy policy G1 would be sound, which includes being consistent with national policy. Accordingly, there would be no need to include the tests of a planning obligation in the eighth bullet point of the policy as these are already within legislation and national planning policy.

Energy and new development

113. Representations raised concerns that CS policy G2 duplicates other standards. Table 1 of the policy would provide an Energy target framework that seeks between 42% and 79% betterment over Building Regulations Part L 2010 or equivalent.

114. In a Written Statement to Parliament – Planning update March 2015, delivered on 25 March 2015, the Secretary of State for Communities and Local Government highlighted that from the date that the Deregulation Bill 2015 was given Royal Assent, local planning authorities should not set in their emerging Local Plans (and other planning policy documents) and additional local technical standards or requirements relating to construction, internal layout or performance of new dwellings. Therefore, the inclusion of Table 1 and Figure 8 and associated text within policy G2 would not be the most appropriate strategy. MM32, MM33 & MM34 would address this.

115. The requirements of Core Strategy policy G2, as modified through the MMs referred to above, would address national requirements for residential development while implementing the Council’s wishes for greater energy efficiencies in other forms of development. There is no convincing evidence to suggest the modified form of policy G2 would
place a burden on developers that would put at significant risk the future delivery of development within the Borough. As such, policy G2 would be sound.

Renewable energy

116. CS policy SP2, its supporting text and CS Figure 5 indicate the differing restrictions and opportunities for development in the ‘Pennine’ and ‘Manchester’ fringes. To include renewable energy within Figure 5 and part 2 of the policy would fail to recognise that renewable energy can be delivered in many forms, and across the Borough.

117. The first paragraph of CS policy G3 would require harm to be ‘fully mitigated’, but given the nature of renewable energy facilities there likely would be a significant proportion of proposals that could not achieve such a ‘high bar’, nor would it be reasonable to expect them to do so. MM35 would remove this requirement (and a requirement to ‘minimise’ towards the end of the policy) and clarify the remaining policy to provide a more appropriate approach to mitigation.

118. MM35 would also address consistency with Framework paragraph 32 in relation to possible effects on highway safety, the scope of other regulatory regimes and clarity regarding the potential importance hydrological impacts. If amended in this way it would retain reference to matters that have the potential to be impacts associated with certain forms of renewable energy development. 45

119. The House of Commons: Written Statement (HCWS42) of 18 June 2015 regarding wind energy development indicates that planning applications for wind energy development should only be granted planning permission if: the proposed development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and, following consultation it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

120. CS policy G3 provides a criteria based approach to the consideration of proposals for wind energy development, but the Core Strategy does not identify ‘suitable areas’ for wind (and other) energy development. The Council has confirmed that it proposes to identify suitable areas for wind energy development in a subsequent Allocations DPD and has suggested a MM for policy G3 and associated supporting text. 46

121. Policy G3 would be ineffective and inconsistent with transitional arrangements set out in the WMS of 18 June 2015 and hence unsound. This unsoundness would be addressed by the suggested MMs to policy G3

45 For example, Health and Safety considerations as described in relation to Major Hazards in Annex 2 of the Framework
46 The context of the Written Statement is now within Planning Practice Guidance - Reference ID: 5-005-20150618, entitled How can local planning authorities identify suitable areas for renewable and low carbon energy? and Reference ID: 5-014-20150618, entitled - What are the particular planning considerations that relate to wind turbines?
and its supporting text (MM36 & MM37). These MMs take into consideration the intended future Allocations DPD, which would be the most appropriate document for detailed local policies in regard to on-shore wind energy development.

Protecting Green Belt Land

122. Framework paragraph 14 indicates what the presumption in favour of sustainable development means for plan-making and decision-taking. In both respects Footnote 9 of the Framework confirms the continued importance that is placed on Green Belt, and that the designation indicates development should be restricted.

123. CS policy G4 seeks to protect the Green Belt through reference to the requirements of national planning policies. Very special circumstances are explicitly referred to within the policy, as they currently are within paragraph 87 of the Framework. However, the Framework addresses the protection of the Green Belt by reference to, and consideration of, ‘inappropriate’ development. Given the wording of CS policy G4, MM38 would ensure its consistency and soundness are explicit, and the policy would be clearer within its terms of reference.

124. A deletion within the supporting text to policy G4 would also highlight that future Green Belt policy would be the subject of a DPD and the associated procedures, rather than an SPD (MM39).

125. Paragraph 83 of the Framework is unambiguous that “…Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan…”. As a result, both the timing and means of Green Belt review are understood and policy G4 would be sound without a review mechanism included within it or another Core Strategy policy.

Managing protected open land

126. CS policy G5 would continue to protect areas of open land not in the Green Belt and outside the urban area. It states the circumstances in which development of Protected Open Land would be appropriate, and provides criteria for the release and allocation of Protected Open Land. Given the provisions within the CS policy G5 and the identified level of housing land supply, the policy meets the tests of soundness without the inclusion of a means to review Protected Open Land.

Enhancing Green Infrastructure

127. By enhancing green infrastructure CS policy G6 seeks to, amongst other things, deliver quality of place and a positive image, and a better quality of life. The objectives of the policy include sustaining and enhancing a green network to support growth and regeneration in the Borough, and providing a high quality environment and improving opportunities for recreation. The Township Strategy Maps show the Rochdale canal corridor and areas of Strategic Green Infrastructure that are the subject of Policy G6. Land at Trub Farm has been included within these designations.
128. Policy SP3/R refers to mixed use development at Trub Farm with enhancement along the canal corridor and support for tourism. Given that it should be possible to develop this land in a manner that is sympathetic to the aims of policy G6 (and SP3/R), the inclusion of the land within the designated area has not been shown to be unsound.

Managing water resources and flood risk

129. Suggested amendments to the supporting text for CS policy G8 take into consideration PPG and would ensure that the context for the policy is up-to-date thus providing clarity that the strategy is the most appropriate and justified (MM43).

Reducing the impact of pollution

130. In regard to CS policy G9 criterion b., parties to the Examination agreed a wording that addresses the likely scope of planning decisions that would be made with reference to the policy. However, what the agreed wording seeks to achieve could be done in a shorter and clearer form. MM45 would result in policy G9 having greater consistency with national policy and make it effective.

131. Rochdale has former land uses, such as coal mining, which have resulted in ground conditions that need to be addressed to provide safe and stable development. The effectiveness of Core Strategy policy G9 and its soundness would also be ensured by MM44, MM46, MM47 & MM48, which are necessary to address contamination and land instability in the policy, its criterion e., supporting text and associated titles.

132. These MMs would ensure that Core Strategy policy G9 is sound, and they would address matters that are within the scope of such a planning policy.

Managing mineral resources

133. Also, a suggested additional criterion for CS policy G10 would clarify the approach to sites with peat deposits to ensure the sustainable use of mineral resources (MM49).

Conclusion on Issue 5

134. For these reasons and with these MMs the Core Strategy would promote a ‘greener environment’ and would be expected to ensure the sustainable use of the Borough’s natural resources.

Issue 6 – Would the Core Strategy improve accessibility and deliver sustainable transport?

135. The title of CS Chapter 11 - Improving accessibility and delivering sustainable transport reflects Strategic Objective 5 and its policies seek to enable improved sustainable access across the borough, attract inward investment and visitors, and promote economic growth. Clarification of

47 For example, within paragraphs 7, 17 and 110 of the Framework
the strategy and its consistency with the aims of national policy would be provided by MM50.48

136. The Council confirmed that the authority would be no longer taking forward the proposed Rochdale Town Centre Relief Road. MM52 would remove the Relief Road from CS policy T1 to ensure that the policy provides the most appropriate strategy.

137. While some parties may have concerns regarding the scope of proposals that could come forward under policies relevant for the transport strategy, each of those proposals would be subject to a decision-making process to assess the possible effects and appropriateness of it.

138. Amendments to CS policy T1 and its reasoned justification are necessary to update the policy. They address current proposals for the efficient running of motorway traffic, reductions in vehicle emissions within AQMAs and consistency with future Local Transport Plans. Overall, the suggested MMs improve clarity regarding the strategy and its funding (MM51, MM53, MM54, MM55, MM56, MM57 & MM58).

139. With these MMs, the transport strategy in the CS would support the provision of a wide range of choices for travel within the Borough, and to other locations within the conurbation and beyond. Focusing development in the south of the Borough ensures that the use of existing strategic road, rail and light rail links can be maximised to reduce both the need to travel and associated emissions. The transport strategy would also serve an appropriate scale of development in the Pennine fringe.

140. Evidence demonstrates that the Core Strategy’s transport policies are integral to the plan’s Spatial Strategy. They would facilitate the delivery of sustainable development within the Borough through improved accessibility and sustainable transport solutions.

Issue 7 – Would the Core Strategy provide an effective basis for managing delivery and monitoring progress?

141. Amongst other things, Chapter 12 provides general requirements that apply to all development and these are the subject of CS policy DM1. Two MMs, including one agreed during the Examination hearings (MM59 and MM60), would provide a more appropriate basis on which to assess the impacts of development on amenity and the water environment.

142. To include specific site, area or sector issues within policy DM1 would not reflect the thrust of the policy, or indeed, the function of other policies in the plan. However, the policy would provide a clearer and consequently more justified strategy if it were to make reference to European Protected Sites (MM60).

143. When read and considered within the context of the other policies in the development plan, CS Chapter 12 would provide developers with clarity

48 It also would be consistent with the GM Spatial Framework and GM Transport Vision
144. Paragraph 173 of the Framework is clear that “...Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable...”. MM61 would ensure that viability considerations are integral to decisions that refer to CS policy DM2. In addition, MM62 is necessary to ensure that the supporting text to policy DM2 and Footnote 37 is consistent with national policy and legislation.

145. The CS includes indicators for monitoring delivery and outcomes under the plan. For consistency, MM63 & MM65 would remove indicators associated with CS policy G2 following MMs to CS Chapter 10.

146. MM64 clarifies one of the main bodies/agencies/partners in Appendix 1 who would be involved in the delivery of CS policy E5.

147. Appendix 3 confirms which UDP policies would be saved following the adoption of the Core Strategy. In relation to planning proposals that come forward under the Core Strategy, the extent to which saved UDP policies reflect more recent policy development is a matter that would be considered during the determination of any such planning application.

148. These MMs would ensure that Chapter 12 and Appendix 1 of the Core Strategy would provide an effective basis for managing delivery and monitoring progress in relation to the plan’s objectives.
Assessment of Legal Compliance

149. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

<table>
<thead>
<tr>
<th>LEGAL REQUIREMENTS</th>
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<tbody>
<tr>
<td>Local Development Scheme (LDS)</td>
<td>The Core Strategy is identified within the approved LDS August 2012 which sets out an expected adoption date of October 2013. The Core Strategy’s content is compliant with the LDS; the delay results from the additional work required following the suspension of the Examination in 2014. The Core Strategy is now expected to be adopted during 2016.</td>
</tr>
<tr>
<td>Statement of Community Involvement (SCI) and relevant regulations</td>
<td>The SCI was adopted in October 2010 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed ‘main modification’ changes (MM).</td>
</tr>
<tr>
<td>Sustainability Appraisal (SA)</td>
<td>SA has been carried out and is adequate.</td>
</tr>
<tr>
<td>Appropriate Assessment (AA)</td>
<td>A Habitats Regulations Assessment was the subject of consultation in January 2012 to which Natural England expressed concerns in regard to mitigation measures. The Habitats Regulations Assessment (July 2013) provided a screening opinion in relation to the need for Appropriate Assessment and recommended changes to the CS. These enabled Natural England to conclude on 20 August 2013 that Appropriate Assessment is not required. MMs (as suggested in CD2d) ensure that the Core Strategy contains an adequate policy framework to avoid or adequately mitigate effects on European Sites.</td>
</tr>
<tr>
<td>National Policy</td>
<td>The Core Strategy complies with national policy except where indicated and modifications are recommended.</td>
</tr>
<tr>
<td>2004 Act (as amended) and 2012 Regulations.</td>
<td>The Core Strategy complies with the Act and the Regulations.</td>
</tr>
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Overall Conclusion and Recommendation

150. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adopting of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
151. The Council has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Rochdale Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Clive Sproule

INSPECTOR

This report is accompanied by the Appendix containing the Main Modifications.