

2: EMPLOYMENT AND THE LOCAL ECONOMY

POLICY E 1

Strategic Employment Sites

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Cllr Oldham, on behalf of Longdendale Ward Councillors	874	625	O	
Richard Macfarlane	647	535	O	
North West Development Agency	572	697	O (rd)	yes
Greater Manchester Passenger Transport Executive	339	359	S	
OBJ NO	SUMMARY OF OBJECTION			
625	Where employment development would lead to a loss of open land, part should be retained as public open space.			
535	The plan needs to do more to ensure that employment on strategic sites is targeted at local residents.			
697	The policy should recognise that both sites have been designated strategic regional sites.			
359	Location of the sites will reduce the need to travel and reduce reliance on the private car.			

Main Issues

- 2.1.1 i) Whether the policy recognises satisfactorily the strategic regional significance of the E1 sites.
 ii) Whether a portion of employment sites should be retained for open space purposes.
 iii) Whether the plan ensures that employment on strategic sites is targeted at local people.

Conclusions

- 2.1.2 **The first issue** is in response to the objection by the NWDA and the Council propose changes to policy E1. These are the deletion of the final part of the reasoned justification after... "This accords with the advice of PPG4"... and its replacement with the following text... *Both these sites have now been designated by the North West Development Agency as strategic regional sites and their delivery is critical to the implementation of the Regional Strategy. A strategic regional site should act as a flag ship development for the north west, accommodating the needs of inward investment and indigenous business. High standards of design, energy conservation, landscaping, quality of construction and urban design should ensure that all new development at the site contributes positively to environmental quality. There should be a presumption in favour of innovative and quality architectural design solution of the sites. The development of employment on these sites should seek to encourage the development of the growth target sectors of the regional strategy in an area where they are not currently well represented, provide important employment opportunities in the growth target sectors for local residents, and provide increased employment opportunities for residents throughout greater East Manchester, an area of recognised regeneration need. Site 1 in particular will provide closely available employment opportunities for residents of an area which has the highest unemployment rate in the Borough (St Peters Ward).*
- 2.1.3 These proposed changes whilst not formally advertised, attracted an objection from Manchester City Council who are concerned that referring to greater East Manchester introduces a concept that has not been proven, not been scrutinised in public and is without any planning status; that the changes introduce ambiguous statements relating

to regeneration priorities which could lead to confusion and encourage the development of target growth sectors which could have a negative impact on an area identified as a higher priority for regeneration in the region, that is East Manchester.

- 2.1.4 In the revised deposit version of the UDP policy E1 does not refer to the strategic regional sites identified by NWDA and contained in its regional economic strategy. I consider this to be an omission from the policy. However whilst the strategic sites are referred to in the reasoned justification to policy EC6 in the emerging RPG, there is a conflict in that NWDA sees these sites as suitable for accommodating indigenous business and inward investment, whereas the RPG refers only to them being appropriate for inward investment.
- 2.1.5 I have seen no substantive evidence which justifies the UDP policy being more permissive than regional guidance, therefore the policy should be modified to reflect RPG policy. However as there are still outstanding objections to EC6 and the content of the policy may change, it would not be appropriate for me to suggest an alternative form of wording at this stage. The indications are though that at a final version of the RPG will be issued in the Spring of 2003. It will therefore be possible to take into account the provisions of policy EC6 at the modification stage of the UDP process. This would ensure that the text accompanying E1 is in accord with the RPG and takes into account any residual tensions with the regional economic strategy.
- 2.1.6 As to the specific objections by Manchester City Council. As I understand it, greater East Manchester is a term which has emerged from the Mersey Belt Study where it is defined as the area around East Manchester and Tameside. It identifies a general area which encompasses part of one of the regeneration priority areas identified in the RPG within which various forms of economic aid are available in order to stimulate regeneration. The proposed change put forward by the Council does not seek to prioritise areas of need within greater East Manchester, but makes a general statement. Subject to my reservation above about inward investment, I do not believe incorporating the proposed change into the plan would lead to confusion for readers of the plan or devalue the importance of the East Manchester Regeneration Area.
- 2.1.7 I note here that in the light of my conclusions in respect of policy E1(2) below the reasoned justification to policy E1 will need to be changed to take account of the deletion of policy E1(2).
- 2.1.8 **In respect of the second issue**, from a practical point of view there are only 2 strategic employment sites allocated in the UDP (policies E1(1) and E1(2)). Schemes which have been put forward for both sites incorporate extensive areas of recreational land. It would therefore serve little purpose if the suggested alteration were included in this review of the plan.
- 2.1.9 **Finally the third issue**. The objection by Mr Macfarlane was made at the draft deposit stage. In response to this objection policy E7 was included within the revised deposit version of the plan. This policy encourages agreements with developers/major employers for the employment of and/or arrangements for training local people particularly within or close to areas of high unemployment. Such a policy is in accord with sustainable principles and links land use planning with socio-economic aims. It seems to me however that it would be overly prescriptive for the policy to seek such requirements by legal agreements in every case as circumstances can vary considerably with different schemes, developers and employers.
- 2.1.10 There was an objection to policy E7 at the revised deposit stage. In recognition of that objection the Council propose further unadvertised changes to the policy and I deal with

these in full at policy E7 below. Briefly however I conclude that these further changes do not fundamentally change the policy but add clarity to it and recognise that there is an appropriate balance between attracting employment and encouraging sustainable development.

Recommendation

2.1.11 I recommend that :

- i) policy E1 be modified to take account of the deletion of policy E1(2).
- ii) at the modification stage the change proposed by the Council to policy E1 be modified to take account of the final version of policy EC6 in relation to strategic/inward investment sites.

POLICY E 1(1)

Strategic Employment Sites - Ashton Moss

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Ashton-under-Lyne Cricket, Bowling and Tennis Club	49	10	O	
Ask Developments and Akeler	54	176	O	Yes
Drivers Jonas	873	175	O	
Stayley Developments Ltd & AMEC Developments Ltd	21	73	O	
OBJ NO	SUMMARY OF OBJECTION			
10	The club wishes to continue on its existing land with suitable access and without further impact.			
176	B1(a & b) uses should not be allowed on Ashton Moss if would prejudice North Manchester Business Park.			
175	B1(a) offices on Ashton Moss must demonstrate need and exclude small units suitable for town centre locations.			
73	The policy should be amended to allow B1(a) and B1(b) uses plus car showrooms south of the M60 and the Ashton Northern Bypass.			

Main Issues

- 2.2.1 i) Whether permitting B1a offices, B1b research and development establishments and sui generis uses similar in character to industry and warehousing on Ashton Moss would accord with national and regional planning policy or prejudice the development of other nearby developments such as North Manchester Business Park or the Henry Square development in Ashton town centre.
- ii) Whether allocation E1(1) would impact on Ashton-under-Lyne Cricket, Bowling and Tennis Club

Background

- 2.2.2 In the revised deposit version of the UDP it says that *The current permission* (for development on Ashton Moss) *excludes class B1a offices and B1b research and development because of concern by the Highways Agency about traffic impact.*
- 2.2.3 During the inquiry session into the objection by Stayley Developments Ltd and AMEC Developments Ltd the Council proposed changes and put forward an alternative wording for the policy. The text of which is set out in full below.

Ashton Moss, Ashton-under-Lyne for B1b research and development, B1c light industry, B2 general industry, B8 storage and distribution and sui generis employment uses, similar in character to industry and warehousing, including car

showrooms, and C1 hotel uses. A limited amount of B1a office development (no more than 10000sqm) will be acceptable in the part of the site at the junction of the A635 and the Ashton Northern Bypass. Any office development should be subject to a sequential test to prove that offices could not be accommodated in a town centre and these offices should be subject to strict conditions on types of occupier and minimum building sizes and lets, so that the development does not prejudice proposed office development in Ashton Town Centre, including the site at Henry Square. D2 assembly and leisure uses are acceptable in the area to the east of the M60, and south of the line of the Ashton Northern Bypass.

Reasoned Justification

This site situated north of Manchester Road, Ashton has outline planning permissions for a range of use. These comprise B1b research and development, B1c light industry, B2 general industry, B8 storage and distribution, sui generis employment uses including car showrooms, and C1 hotel. In the area to the east of the M60 and south of the line of the Ashton Northern Bypass there is also consent for D2 assembly and leisure and some associated A3 food and drink uses. In addition to these already permitted uses the policy also proposes limited B1a office development on part of the site west of the M60, subject to the restrictions outlined in the policy, to ensure that in particular the regeneration of the Henry Square area of the town centre by office led development is not prejudiced. The overall Ashton Moss development covers 58 hectares, of which 23.9 hectares is intended for employment use. These will be developed in two areas, firstly to the west of the M60 and secondly to the east of the M60 and north of the section of the bypass yet to be built.

- 2.2.4 Subsequently in a written response to the objection by Drivas Jonas and Ask: Akeler Developments Ltd the Council proposed a further change to policy E1(1). This is set out below in full.

Ashton Moss, Ashton-under-Lyne, proposals for B1b research and development, B1c light industry, B2 general industry and B8 storage and distribution, along with car show rooms and C1 hotel use will be permitted.

A limited amount of B1a office development (no more than 10000sqm) will be acceptable only on the part of the site at the junction of the A635 and the Ashton Northern Bypass. Office development will be subject to the ability to demonstrate a need for the proposed development and a sequential test, as defined in draft RPG policy DP1, to prove that offices could not be accommodated within a town centre.

Office development should also be subject to restrictions on types of occupier and a minimum building size and lets of 5000sqm so that development does not prejudice proposed office developments in Ashton Town Centre including Henry Square.

Applications to extend B1b floorspace over and above 9290sqm which reflects the extant permission (Ref 02/01168/OUT) will not be permitted in order to protect proposed development in Ashton Town Centre including Henry Square.

D2 assembly and leisure uses are acceptable in the area to the east of the M60 and south of the line of Ashton Northern Bypass.

Reasoned Justification

The site, situated north of Manchester Road, Ashton has outline planning permissions for B1b research and development, B1c light industry, B2 general industry, B8 storage

and distribution, car showrooms and C1 hotel. In the area to the east of the M60 and south of the line of the Ashton Northern Bypass there is also consent for D2 assembly and leisure and some associated A3 food and drink uses. In addition to these already permitted uses the policy proposes limited B1a office development only on part of the site at the junction of A635 and the Ashton Northern Bypass.

The purpose of these restrictions is firstly to limit the total amount of office floorspace on Ashton Moss in order to ensure that office development in this location does not prejudice proposals for office development within town centres including Henry Square.

It also seeks to ensure that the adjoining highway network is not overloaded and that sites continue to offer a broad range of employment opportunities.

The restrictions on the type of office occupiers and minimum size of building and let is to prevent direct competition which could prejudice the implementation of town centre office schemes including Henry Square.

The purpose for the restriction on the total amount of B1b floorspace is to ensure that such development in this location does not prejudice proposals for B1b development within town centres including Henry Square.

Applications for B1a of more than 10000sqm, or totalling more than 10000sqm when combined with existing B1a development, or more than 9290sqm of B1b, or to allow units of less than 5000sqm or for the subdivision into units of less than 5000sqm will be treated as a departure from the plan.

Any application which falls within the criteria in policy E1(1) will only be permitted subject to conditions preventing subdivision of units, changes of use and any B1a development of over 10000sqm in total on the whole site. In all instances a Section 106 obligation will be required including covenants that no more than 10000sqm of B1a will be built on the site restricting subdivision or changes of use.

- 2.2.5 The second alternative policy is more restrictive. Before the close of the inquiry Stayley Developments Ltd and AMEC developments Ltd indicated that they were concerned at the proposed further changes and wished to object to them. However their comments were received after the close of the inquiry and consequently I have not taken them into account in reaching my conclusions on policy E1(1). I would however draw the Council's attention to these comments which they will no doubt wish to take into account at the modification stage.
- 2.2.6 Insofar as the objection by Stayley Developments/AMEC Developments seeks an element of retail use on E1(1) I deal with this aspect of the objection under policy S3 below.

Conclusions

- 2.2.7 **The first issue.** In the adopted UDP Ashton Moss is subject to policy ASH5 which says that the development will be a strategic high quality industrial estate to include substantial elements of class B1c light industrial, B2 general industrial, B8 storage and distribution and also leisure uses. It received planning permission for B1c, B2 and B8 uses in 1993. The permission was subject to a condition which restricted the uses in order to prevent the generation of unacceptable levels of traffic.
- 2.2.8 As the site has developed it now consists of 4 different areas. Area 1000 lying to the south of the Ashton Northern Bypass between it and the M60 and the A635 Manchester

Road originally proposed for industrial use, Area 2000 to the east of the M60 now with planning permission for leisure uses, Area 3000 a proposed industrial area to the north and east of the Ashton Northern Bypass, and Area 4000 which has already been developed as a supermarket and 2 non food units. It is primarily the widening of uses in Area 1000 which are contentious. The Master Plan for Ashton Moss shows Area 1000 accommodating 57000sqm of B2 and B8 use.

- 2.2.9 There have been various planning permissions granted since 1993. The information I have seen indicates that an application for Area 1000 (01/01085/OUT) - adding B1a offices (9290sqm), up to 3 car showrooms (2800sqm) and 90 bed hotel/restaurant to the permitted uses (44000sqm) was refused by the Council in July 2002. An inquiry was programmed for February 2003. The outcome of that inquiry is awaited at the time of writing this report. This application was followed by 2 others, firstly 01/01167/OUT which was similar to 01/01085/OUT but also included B1b uses and 01/01168/OUT which omits the B1a offices and includes instead 9290sqm of B1b uses. I understand the Council have now granted permission for 02/01168/OUT.
- 2.2.10 The HA confirmed by letter of 24 June 2002 that they have no objections to several planning applications at Ashton Moss including 01/01085/OUT. The situation is therefore that there is planning permission for B1b research and development with no objection from the HA for up to about 12000sqm of B1a offices. (I believe the 12000sqm includes 9000sqm on Area 1000 and a further 3000sqm on Area 3000 in another planning application)
- 2.2.11 Underpinning both national and regional planning guidance is the need to deliver sustainable development which makes the best use of land and buildings in the urban area and which reduces the need to travel, particularly by car. PPG4 says that one of the Government's key aims is to encourage economic growth in a way which is compatible with environmental objectives. It points out that the principles of sustainable development require the responsible use of resources. Development plans should ensure that there is sufficient land available to meet differing needs. Whilst this policy guidance was issued in 1992 its objectives are still valid.
- 2.2.12 PPG6 published in 1996 sets out a sequential approach for commercial and public offices which attract a lot of people, starting first with town centre sites, followed by edge of centre and finally out of centre locations. The key factors to be taken into account for out of centre developments include effects on the development plan strategy and the vitality and viability of town centres and accessibility by a choice of a means of transport. In respect of B1 offices PPG13 says the local authorities should adopt a plan led approach to identifying preferred areas which are accessible by public transport, walking and cycling. They should also give reasonable flexibility in terms of the range of employment uses which are appropriate on identified sites.
- 2.2.13 Emerging regional planning guidance RPG13 identifies a spatial development framework which seeks to concentrate development within the North West Metropolitan Area. Ashton Moss whilst not a priority location, lies within that area. In the *Economic Growth and Competitiveness with Social Progress Chapter* policy EC1 recognises that the region's economy should be strengthened by increasing focus on the sectoral priorities identified in the NWDA's regional economic strategy. (The 7 target growth sectors are largely knowledge based). Development plans should identify a range of suitable sites subject to the consideration of various criteria. These include the need to take account of the sequential approach to development set out in policy DP1.
- 2.2.14 The RPG sets out policies for various types of economic development and policy EC6 relates specifically to regional inward investment sites of which Ashton Moss is one. It

should be noted here that when identified by NWDA in the regional economic strategy these sites are identified as strategic regional sites and not intended to be confined to inward investment. This apparent conflict may be resolved when the final version of RPG13 is published. In the economic strategy Ashton Moss is seen as catering for high quality service sector developments. It is not limited to generic manufacturing or regional distribution. Policy EC6 whilst supportive of the investment sites also seeks to establish a sequential approach to development. It says that regional sites should be reserved for inward investment which cannot be satisfactorily located in more central locations and which support the region's sectoral priorities.

- 2.2.15 Finally RPG policy EC9 seeks to protect town centres by directing office developments which generate significant trips by visiting members of the public to suitable locations in or adjoining centres which are accessible to all by public transport. It goes on to say that a sequential approach to development must be adopted in line with national policy guidance. The justification for the policy explains that for uses such as call centres, data centres etc emphasis should be given to town and city centre locations. It also says that in order to promote sustainable development and to tackle social exclusion, development plans can impose limits on the floorspace of office developments on the edge of urban areas so as not to undermine the strategy of concentrating major office development in town centres, but that such restrictions should not undermine commercial viability. The concept of major office development is not defined in the glossary to the RPG.
- 2.2.16 The principle of development at Ashton Moss is already well established. Although it is an out of centre location it is within the conurbation and accessible by bus, with the planned metrolink extension passing through the site. It is therefore well served by public transport and close to a labour market. It has planning permission for a mixture of uses and development is already well advanced. The development of the site is supported by NWDA and the site is one of the 25 strategic sites identified by that organisation. It also scores well in relation to factors set out in regional policy guidance. I appreciate it was substantially a greenfield site, but planning decisions over the years have committed development on the site. The outstanding question is what type of development.
- 2.2.17 In preparing the UDP, Tameside Council have taken account of the need to revitalise and broaden the local economy. They seek to stimulate employment opportunities, particularly in the growth sectors by providing a range of sites which take account of existing and future businesses. My conclusions on policy E1(2) below mean that the portfolio of sites put forward by the Council is reduced by the deletion of Waterside Park.
- 2.2.18 It is not the purpose of planning policy to protect the interests of competing developers. North Manchester Business Park is like Ashton Moss a strategic investment site outside the city centre, although it does, for the main part, lie within East Manchester which is identified as one of the region's most important regeneration areas. Nevertheless Ashton Moss also lies within a regeneration priority area, is included within the Tameside EDZ and is an ERDF Objective 2 area. NWDA in developing its strategic sites do not suggest that priority should be given to one area above another.
- 2.2.19 Both sites are competing for the same market and as national policy guidance makes clear, it is useful to provide a range of sites to attract prospective developers. It is especially important in this eastern area of Manchester and Tameside where historically there has been low demand for quality office space and where the opening of the M60 has made the area more accessible. Both developments would provide a range of

employment opportunities for people living in East Manchester, albeit the scale of the North Manchester Business Park is far larger than Ashton Moss.

- 2.2.20 I have looked at the figures produced by Lambert Smith Hampton in relation to demand for offices in Tameside and East Manchester and the risk of over-provision. It is not clear from the figures what period of time the average annual uptake of land are based on or whether the figures for North and East Manchester include the time period since the M60 has been opened and higher quality sites have been available. In estimating the supply of land the figures also appear to assume that there would be no increase in the average annual take up of office space in this area. I note in addition the Council comments that the 307000sqm of floorspace identified on large sites in North and East Manchester is not proposed solely for B1, but also B2 and B8 uses. In any event it seems to me that the scale of office development currently proposed at Ashton Moss would not seriously affect the level or balance of industrial floorspace in North/East Manchester, especially if the deletion of Waterside Park as an allocation is taken onto account. I do not therefore consider in principle including B1a and B1b office uses at Ashton Moss would unfairly prejudice the development of North Manchester Business Park or be contrary to regional planning policy in this respect.
- 2.2.21 The situation is not so clear cut with Ashton town centre and the Henry Square development in particular. At the inquiry, because of commercial confidentiality details of the Henry Square development were not available, therefore my conclusions on this aspect are of necessity made with only partial information. From information which is available it is evident that the proposed development at Henry Square would be in the region of 31000sqm (333000sqft) of offices in buildings varying in size from 250sqm (2700sqft) to 4800sqm (52000sqft).
- 2.2.22 In response to the planning application for B1a uses on the Ashton Moss site the Council commissioned reports to estimate the impact of development on the Henry Square scheme. The Lambert Smith Hampton report of January 2002 finds that open competition between Ashton Moss and Henry Square would severely compromise the redevelopment of Henry Square and that the level of demand for offices in the foreseeable future in Ashton would not support both schemes. However the report recommends that Ashton Moss be permitted to exploit its business park potential until such time as Waterside Park is capable of delivery and in this way the competitive threats to Henry Square would be minimised. The report sees Ashton Moss as providing for manufacturing/distribution and a motorway business park, whilst Henry Square would accommodate town centre offices. It suggests that the difference in office markets be ensured by imposing a minimum size of letting at Ashton Moss in the region of 2800sqm (30000sqft).
- 2.2.23 I understand the second report produced for the Council by DTZ Pineda Consulting in July 2002 (Economic Development – Vision for Tameside) basically concludes that Ashton Moss would be attractive to office developments, but that in order to avoid unrestricted competition with Henry Square it should be aimed at different markets with perhaps a minimum size of unit of 3700sqm (40000sqft). It recommends that Ashton Moss be promoted to provide an M60 office park location for larger occupiers, until at least such time as Waterside Park can come on line.
- 2.2.24 Evidence produced at the inquiry updates the King Sturge report of February 2002 - A Detailed Office Market Analysis in Relation to Ashton Moss and Henry Square. Basically it concludes that it is inappropriate to look upon Ashton Moss or Henry Square or indeed other potential office venues on an either/or basis. For an office market to evolve there will need to be sites capable of accommodating both medium/large scale occupiers who would normally gravitate to out of town business

park locations and small/medium occupiers who would attract visits by the public and gravitate to in town locations. Consequently office development at Ashton Moss and Henry Square should complement each other.

- 2.2.25 A further report produced by DTZ Debenham Tie Lung for Ask Developments Ltd in July 2002 considers that for Henry Square to attract larger enquiries 2300sqm + (25000sqft) it would be in competition with business parks such as Ashton Moss and the North Manchester Business Park. However it also found that Henry Square was a unique scheme within the M60 loop which could be successful. It considered the primary issues to be the ongoing availability of accommodation, image and rental sensitivity.
- 2.2.26 Looking at all this evidence leads me to the conclusion that an element of office use at Ashton Moss would not in principle be contrary to national and regional planning policy. Nor do I consider it would necessarily prejudice the provision of the Henry Square development which is in accord with regional planning guidance. In my view office uses would add to the attractiveness and diversity of the development and give a wider range of job opportunities. Research and development establishments are in many cases akin to industrial uses and are therefore appropriately located with industry, out of centre on purpose built estates with good access and servicing. Ashton Moss is a regional investment site and to my mind B1b is an entirely appropriate use. This view is reinforced by my findings on Waterside Park.
- 2.2.27 It must be recognised however that there is potentially a degree of competition between office development at Henry Square and Ashton Moss. As Henry Square is a town centre location which national and regional planning policies recognise should be the priority location for development, I consider policy E1(1) should have provisos written into it to ensure that both sites are developed to their full potential. However where to set the limit for Ashton Moss is not readily apparent from the conflicting evidence and bald assertions before me.
- 2.2.28 The Council in their response to objection 73 are clear that in principle they are agreeable to B1b uses on Ashton Moss and up to 10000sqm of B1a offices on Area 1000. Their position changes in their response to objections 175 and 176 where they say that B1a office development should be subject to the ability to demonstrate a need for it, that B1a office development should be subject to a minimum building size and let of 5000sqm and that B1b office floorspace should not be permitted to exceed the 9290sqm which already has planning permission. The Council say that these changes are necessary because Ask Developments Ltd (the developer of the Henry Square scheme) has said that *they could not proceed with the Henry Square scheme, on commercial grounds, unless a more prescriptive and restrictive UDP policy was adopted for office development on Ashton Moss*. No empirical evidence has been produced to substantiate this view. Nor does the proposed policy in paragraph 2.2.3 of the Council's statement contain any recognition of the different timescales of development on the 2 sites. I do not consider it would be appropriate to modify policy E1(1) as set out in para 2.2.3 above on a reported assertion by another party.
- 2.2.29 In order to comply with national and regional planning policy, it is my view that B1a office development on Ashton Moss should be subject to a sequential test to prove that offices could not be accommodated in the town centre. With regard to need however it is evident from the RPG and from the UDP that there is a need for B1 office uses in Tameside. I do not therefore consider a policy which relates to B1a uses should have the need for the proposed development written into it. As to the level of B1a offices to be provided, 10000sqm is a figure which is acceptable in principle to the Highways Agency and this to my mind is a reasonable figure to set in the first instance.

Depending on progress with the Henry Square development it may be that this ceiling could be revised in the future as part of a review of the plan, but in the interim I consider it recognises the need for quality sites in the borough, the deletion of Waterside Park and the likely longer timescale in bringing development on Henry Square forward due to land assembly factors and the like.

- 2.2.30 The evidence indicates that Henry Square and Ashton Moss will to a certain extent attract different markets, although there is also evidence to suggest that there could be a degree of overlap. I am mindful in particular of the general character of the scheme at Henry Square which it is said will provide a large scale coherent office development of a size and nature which is unique in the satellite towns of Manchester. I have also had regard to RPG13 which seeks to locate such uses as call centres in central locations. It is therefore important to protect the town centre site by imposing restrictions about the type of occupier, in particular excluding offices which attract large numbers of visitors and also in principle to limit the minimum size of building and let.
- 2.2.31 In respect of the minimum size of building and let I have seen various figures put forward but from the limited information before me I do not consider it would be wise at this stage to be prescriptive about such levels, as any choice would be arbitrary without fuller information. Therefore whilst I appreciate PPG12 requires policies to be explicit I believe it would be prudent for the policy to refer only to the generality of the restrictions and for the details to be agreed when a particular development is proposed. In this way it will be possible for the Council to take account of the state of progress of the town centre developments. To be overly prescriptive in the UDP policy would not allow this flexibility.
- 2.2.32 I turn now to B1b research and development establishments. There is planning permission for 9290sqm of this type of development. Consequently it needs to be included in the policy. Whilst originally the Council had no reservations about such development, I am not clear from the evidence whether an unlimited amount of B1b floorspace would be acceptable in terms of traffic generation and impact on the motorway/local road network. I also consider that to meet the provisions of national and regional policy such development should be subject to the sequential test to ensure it is located in the most sustainable location. The development of additional B1b floorspace should therefore be subject to a sequential test and a transport assessment in line with policy T14. Subject to these provisos I consider policy B1a and B1b development at Ashton Moss would be in accord with national and regional planning policy and would not prejudice the development of more preferential sites. I shall modify the policy accordingly.
- 2.2.33 I consider the sequential test is necessary because there are at least 2 sites identified in the UDP for office development and Henry Square is in a preferable location. However I believe the sequential test should be applied at the outline planning application stage. It is difficult to envisage how such a matter could be addressed as a planning condition or even as the subject of a legal undertaking. I note here that in evidence the Council were not clear about how such a test could practically be required in this way.
- 2.2.34 I have also considered the question of whether limiting minimum floorspace should be restricted to first lettings or should remain in perpetuity. It seems to me that if a scheme is suitably designed then this will influence future lettings and given that it is proposed to restrict the type of user I do not believe there is a necessity to control the area of lettings in perpetuity.
- 2.2.35 I conclude on this issue that Ashton Moss is suitable for various employment uses, that permitting additional uses would help to widen the employment base of the Borough

but would not prejudice the development of the North Manchester Business Park. The Henry Square development is in a sequentially preferable location and could also accommodate a variety of office uses. Although it must be noted that the sites are likely to be brought forward at different times and that Ashton Moss could cater for larger developments. However in order to ensure that office uses locate in accord with sustainable and economic objectives of national, regional and UDP policies, all applications for B1a uses and B1b uses above the 9290sqm already permitted should be subject to the sequential test.

- 2.2.36 My general findings and recommendation are made on the information before me, in the knowledge that further information will be available to the Council at the modification stage primarily with regard to comments by Stayley and AMEC Developments Ltd and policies in the final version of the RPG. Such additional information may well introduce new or change the weight of factors to be taken into account.
- 2.2.37 **I now turn to the second issue.** Policy area E1(1) encompasses the Ashton-under-Lyne Cricket Club. Therefore if development occurs as planned it will include the land on which the club is presently located.
- 2.2.38 I note that the club wish to be able to continue using their present site. As they own the land, irrespective of the UDP allocation they will retain legal rights as landowners. Therefore the use, could if the club so wished it, continue despite a UDP allocation for employment purposes. The UDP process does not contain a mechanism to make the present occupiers of the cricket club give up their use of the land.
- 2.2.39 The club mention two other points about drainage and access, but these are essentially development control matters which it is usual to sort out at the planning application stage. The consideration of the suitability of detail proposals and the manner of implementation of a planning permission falls outside the scope of the UDP process. Therefore whilst I fully understand the concerns of the cricket club, I recommend no modification to the policy as a result of the objection by Ashton-under-Lyne Cricket Club.

Recommendation

2.2.40 I recommend that policy E1(1) be modified to read:-

Ashton Moss, Ashton-under-Lyne for B1b research and development, B1c light industry, B2 general industry, B8 storage and distribution and sui generis employment uses, similar in character to industry and warehousing, including car showrooms, and C1 hotel uses.

A limited amount of B1a office development (no more than 10000sqm) will be acceptable in the part of the site at the junction of the A635 and the Ashton Northern Bypass. At the planning application stage any B1a office development should be subject to a sequential test to prove that offices could not be accommodated in a town centre and these offices should be subject to strict conditions on types of occupier and minimum building sizes and first lets, so that the development does not prejudice proposed office development in Ashton Town Centre, including the site at Henry Square.

Applications to extend B1b floorspace over and above the 9290sqm permitted by permission 02/01168/OUT will also be subject to the sequential test and will need to be accompanied by a Transport Assessment in accord with policy T14.

D2 assembly and leisure uses are acceptable in the area to the east of the M60, and south of the line of the Ashton Northern Bypass.

Reasoned Justification

This site situated north of Manchester Road, Ashton has outline planning permissions for a range of use. These comprise B1b research and development, B1c light industry, B2 general industry, B8 storage and distribution, sui generis employment uses including car showrooms, and C1 hotel. In the area to the east of the M60 and south of the line of the Ashton Northern Bypass there is also consent for D2 assembly and leisure and some associated A3 food and drink uses. In addition to these already permitted uses the policy also proposes limited B1a office development on part of the site west of the M60 and is permissive of additional B1b uses, subject to the restrictions outlined in the policy, to ensure that in particular the regeneration of the Henry Square area of the town centre by office led development is not prejudiced. The overall Ashton Moss development covers 58 hectares, of which 23.9 hectares is intended for employment use. These will be developed in two areas, firstly to the west of the M60 and secondly to the east of the M60 and north of the section of the bypass yet to be built.

POLICY E 1(2)

Strategic Employment Sites - Waterside Park

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	423	O	
Andrew Bennett MP	81	16	O	
Fairfield Golf and Sailing Club	288	156	O	
Horses Field Residents Committee	406	411	O	
Sport England	711	574	O	
Stockport Metropolitan Borough Council	735	592	O	
Arrowcroft Group plc	30	630	O (rd)	
Government Office North West	327	273	O	Yes
Manchester City Council	499	691	O (rd)	
Arrowcroft Group plc	30	439	S	
North West Development Agency	572	490	S	
OBJ NO	SUMMARY OF OBJECTION			
423	The proposal is inconsistent with parts of draft RPG and the UDP and there are many uncertainties.			
16	The proposals fail to meet many of the policies in the UDP.			
156	Object to Waterside Park but welcome the commitment to protect existing uses if the refusal stands.			
411	The project should be abolished as it goes against everything the Council is aiming for in this UDP.			
574	Opposition to the allocation without adequate replacement provision for Fairfield Golf Club.			
592	Objection in principle, but if the allocation remains there should be improved public transport links to Stockport.			
630	The allocation should remain even if the current planning application is refused.			
273	Conditional withdrawal of the objection, if the final policy reflects the outcome of the re-determination.			
691	It is unclear why existing uses are not to be protected. Concern about the development of a greenfield site.			
439	Support the continuing allocation of this site as a mixed use development. Meets key criteria in RPG			
490	Site is included within list of 14 new strategic regional sites endorsed by NWDA.			

Background

- 2.3.1 The objection site was first identified as a potential business park in 1989. The site, DEN 1, in the adopted UDP is allocated for employment purposes, housing, golf course

and public open space; and it is proposed that the whole of the 97 ha site continue to be allocated for such uses in this draft plan. (that is E1(2), H1(2) and protected green space).

- 2.3.2 The current planning application which is in the courts was submitted in outline in 1998 for a 25 ha business park (75000sqm (800000sqft)), 7 ha of housing, a 45 ha golf course, 12 ha of public open space, 7 ha of private recreational area and ancillary public house/restaurant, retail and leisure services. The application was called in by the Secretary of State in February 1999, because of implications for open space provision in Greater Manchester. It has been through a planning inquiry (October to December 1999), been refused by the SOS (November 2000), the decision has been quashed following a challenge (November 2001), the application re-determined (November 2002) and another legal challenge made (December 2002).
- 2.3.3 The planning history of Waterside Park is therefore somewhat chequered. The Council continue to be supportive of the E1(2) allocation, but recognise that if planning permission for the development is not forthcoming, then it is unlikely to go ahead within the plan period. In these circumstances at the modification stage they propose deleting the allocation and that of H1(2), designating the golf courses as protected green space and leaving the remaining land unallocated.
- 2.3.4 Since the objections were heard the Secretary of State has again refused planning permission for the business park development and again a legal challenge has been made to that decision. In the event that this situation arose the Council considered there to be two options open to them. Firstly if the refusal of planning permission was made to a detail of the development - which could be overcome by the submission of fresh details - then the allocation would stand. Secondly if the outstanding issues were considered to be more substantial and their resolution uncertain, the policy would be deleted and would be protected until a further review of the plan could be undertaken, effectively recognising that it would be unlikely for circumstances to significantly change and justify an approval of permission for a similar development at least in the short term.
- 2.3.5 At the time the inquiry closed, so far as I am aware the Council were still considering the implications of the Secretary of State's decision and it is against this background that my conclusions must be read. I note at the outset that in principle a development plan allocation should not be contingent on the outcome of a specific planning application. It seems to me an unsatisfactory situation to delay the adoption of a development plan as a whole until such time as there is a definite and final decision on the current planning application. If past experience in this case is anything to go by, it could take several years.
- 2.3.6 My conclusions below are made in the knowledge that if planning permission were to be eventually granted for the development then a business park could be built irrespective of any UDP allocation. I also note at this stage that if the allocation were to be changed to protected green space, the bulk of the objections would be satisfied with only those by Arrowcroft remaining, although this in turn could generate objection from the other supporter of the policy.
- 2.3.7 Finally before I turn to the issues, there is no outstanding objection from the Highways Agency to the allocation. Therefore although concerns have been raised by objectors, there is no substantive evidence which justifies the fears expressed. Consequently this matter has carried little weight in reaching my conclusions.

Main Issues

- 2.3.8 i) Whether allocation E1(2) is necessary to fulfil the employment objectives of the plan and in accord with national and regional policy guidance.
ii) Whether there is a significant difference between the term *existing uses* in the draft deposit version of the plan and *existing open space* in the revised deposit version of the policy.

Conclusions

- 2.3.9 **On the first issue** it is a fact that in Tameside the local economy is structurally imbalanced with a historic dependency on the traditional manufacturing sector and a corresponding weakness in expanding service sectors such as financial and business services. Add to this an employment base which has remained static between 1995 and 2000, even though the number of people in employment grew by 14%, and it is evident that there is a need to provide higher waged, higher skilled, technology based research and office jobs. However it must also be acknowledged that these problems are not confined to Tameside but extend to the eastern side of Manchester in general. In principle I accept that widening the employment base can have knock-on effects in terms of social, educational, cultural improvements etc. To my mind there can be no doubt that there is a need for the economic base to be widened. The outstanding question is therefore whether E1(2) is necessary and/or suitable to fulfil that need.
- 2.3.10 In general, national policy seeks to ensure that the planning system makes a substantial contribution to the achievement of sustainable development by regulating the use of land, but to be balanced against this is the maintenance of high and stable levels of economic growth and employment.
- 2.3.11 At a regional level, in 1999 the Regional Assembly produced a sustainable development framework for the north west which has influenced both the emerging RPG and the regional economic strategy produced by NWDA in 2000. Whilst there is no absolute hierarchy between the three, the preamble to the RPG acknowledges that there is a two way relationship between the RPG and the economic strategy - NWDA must have regard to development plans in formulating and revising the strategy and the RPG must give spatial expression, where appropriate, to deliver the economic strategy. However both processes are dynamic. The situation at the time of writing the report is that NWDA have produced an economic strategy, identified 25 regional investment sites and are beginning a review of the strategy, whilst it is anticipated that the final version of the RPG will be published shortly.
- 2.3.12 Firstly looking at the RPG, it is a fundamental premise of the emerging guidance that development must be tested against sustainable factors. Of the 4 core development principles in RPG13, policy DP1 requires new development to be located to make the most effective use of land, promote appropriate mixes of uses, make efficient use of transport facilities and assist people to meet their needs locally. It sets out a sequential approach that development plans should follow starting first of all with the reuse of buildings and infrastructure in the urban area, then previously developed land and finally previously undeveloped land where it avoids areas of important open space and is well located in relation to houses, jobs and other services.
- 2.3.13 It seems to me that policy area E1(2) does not even meet the final category of DP1 as *Waterside Park* is an important area of open space. Even if the development were to be carried out as envisaged, retaining a significant amount of private open space and providing new public open space, it would still result in the loss of a golf course in an area where Sport England say there is a deficiency.

- 2.3.14 I accept that to the north on the Ashton Moss site there will be a new 9 hole golf course and driving range and that the UDP itself includes allocation OL6(4) for a new golf course to the south of E1(2). However there is no mechanism within the plan which would ensure that in the event of a business park being developed at Waterside Park, there would be commensurate replacement golf provision at OL6(4). Moreover Arrowcroft in objecting to the contingent allocation say that the provision of a new golf course at Windmill Lane could prejudice the deliverability of Waterside Park.
- 2.3.15 PPG17 says quite categorically that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space to be surplus to requirements. That is not so in the case of E1(2). Having regard to the largely greenfield status of E1(2) and the loss of the golf course, the allocation scores poorly in relation to policy DP1.
- 2.3.16 RPG policy SD1 sets out the spatial development framework for the region and identifies the North West Metropolitan Area as the focus for urban renaissance resources. Within that area, a sequential approach is adopted, and apart from the inner and central areas of Ashton, Tameside is not considered a priority area.
- 2.3.17 However another core development policy of the RPG, DP4 recognises the need for economic growth and competitiveness and requires development plan policies to ensure that development will help growth in the region's economy in a sustainable way. Whilst there are various policies in the *Economic Growth and Competitiveness with Social Progress Chapter* of the RPG, it seems to me that the most pertinent to the objection site is EC6 which deals with regional inward investment sites. I note here that there are outstanding objections to EC6 in that the March 2002 version of the RPG incorporating the Secretary of State's proposed changes has limited the policy to the development of inward investment projects which cannot be located in more central areas and which support the region's sectoral growth priorities. It may be that there are changes to the adopted version of the policy which affect my conclusions, if this is the case then the matter will need to be reassessed at the modification stage of the plan. In the meantime I must look at the most up to date version of EC6 which seeks growth in a sustainable way.
- 2.3.18 The criteria in EC6 must be considered within the context of policy DP4. In my view Waterside Park is well located to meet a good number of the criteria in policy EC6. It is within the North West Metropolitan Area which is the focus for urban renaissance resources, although a priority within that area. Tameside is also a Regional Priority Area and an EU Objective 2 area. It has Assisted Area Status and is an Economic Development Zone. It is suitable for the sectoral priorities as identified by NWDA.
- 2.3.19 In relation to public transport whilst the station to the north of the site has only a limited service at present, there is the potential for improved services and to both the north and south of the site there are busy bus corridors. The opportunities to provide bus links from within the site to these established services would ensure that the whole of the site was reasonably accessible to public transport. Despite assertions of poor road conditions in the locality, there are no fundamental objections to the allocation from the HA and/or indication that problems are insurmountable.
- 2.3.20 Waterside Park, even though a substantial area of open space, lies within the urban area close to large housing areas. However whilst there are a number of supporting commercial and community facilities in the locality, the distance of these from the site means that they are unlikely to be visited on foot during lunch breaks or before/after work. In addition the size of the site, its open nature and the scale of development proposed means that it could be easily landscaped, although some of the essentially

open character of the area would inevitably disappear with development. There are also in relatively close proximity existing and proposed employment areas.

- 2.3.21 Finally in relation to the criteria, subject to planning permission being forthcoming, there is no evidence to suggest that the site cannot be developed within the plan period, it is within about 15 minutes drive time of Manchester Airport and the universities of Manchester and the teaching hospital are about 6.5km to the west.
- 2.3.22 The criteria however must be seen within the sustainable framework. For instance when policy EC6 expresses only a *preference* for regional sites to be located on recycled land, I do not believe that this should be seen as overriding the general thrust of the core development principles for priority to be given to recycled buildings and land.
- 2.3.23 Moreover it is not just the criteria themselves which are important, there are riders contained within the policy. The policy begins with the premise that such sites should only be for development which cannot be satisfactorily located in more central locations. It also requires such sites to be identified in consultation with the regional assembly and GONW. In the case of E1(2), it appears from the second recent refusal of planning permission on the objection site and the gist of the reasons for that refusal (whether justified or not) that there are serious doubts about the sustainability of the objection site.
- 2.3.24 A number of strategic investment sites have been identified by NWDA as part of its regional economic strategy. At the time of preparation of the RPG, NWDA had identified 11 sites and these are referred to in the justification accompanying EC6. The text says that the list is mentioned without prejudice to later formal consideration at other junctures including the development plan stage. Although the objection site is not within the list of 11, it is one of 14 further sites identified by NWDA in December 2001.
- 2.3.25 It is a matter of fact that NWDA considers over the next 20 years the delivery of these strategic sites to be critical to the effective implementation of the regional economic strategy. However the agency also notes that in designating the sites it is not taking any land use planning decisions. Furthermore it recognises that the Regional Assembly consider that the list of strategic regional sites should be jointly agreed between it and GONW following the publication of the final RPG. Therefore whilst there is unequivocal support for the proposal from NWDA, it would be premature to say that this view is shared by other regional bodies.
- 2.3.26 There is also support for the development of the objection site in the Mersey Belt Study published in May 2002. This document shows Waterside Park together with Ashton Moss and a cluster of sites in Denton as part of a strategic corridor leading from the southern crescent. The cluster of sites in Denton, like Waterside Park and Ashton Moss, is identified as having medium potential for the target sectors.
- 2.3.27 In the last 10 years or so it is readily apparent that the type of employment lacking in Tameside has been attracted to business parks which are highly accessible, often within easy reach of a motorway junction, and offering a high quality environmental setting. Looking at the location of some of these sites on the NWDA list such as Daresbury Park, Runcorn it is evident that sustainability of location, proximity to facilities, access by means other than the car and use of previously developed land have not always been of paramount importance in the identification of sites.

- 2.3.28 On the other hand some recent initiatives indicate that increasingly efforts are being made to attract the growth sectors to brownfield sites within the urban area such as East Manchester, the North Manchester Business Park and Henry Square in Ashton Town Centre. A co-ordinated approach to the revitalisation of these deprived areas and investment from both the private and public sector is seeking to provide employment opportunities in areas of need which are broadly in line with national and regional sustainable principles. It is considered that Greater East Manchester (defined as the area around East Manchester and Tameside, in the Mersey Belt Study) has the potential to accommodate investment in the target sectors.
- 2.3.29 Whilst it has previously been considered that development of Waterside Park would act as a catalyst for the redevelopment of brownfield land, I am not sure the situation is now so clear cut. There are several sites essentially competing for the same market. The preparation of the brownfield sites is more advanced than it was when the last UDP inquiry took place and even when the call in inquiry into the Waterside Park application was held. In addition Ashton Moss which at one time was considered to be complementary to Waterside Park, is also seeking similar development. Henry Square in the centre of Ashton, is a new concept in the area and whilst it will not provide a park land setting it will be able to cater for the growth sector market.
- 2.3.30 It seems to me that if past experience of development trends is taken into account it is likely that a greenfield site close to a motorway junction would be seen as preferable to a brownfield site, the development of which may be more problematical. I have also considered the view that if greenfield land is not available then development will not come to Tameside, but as will be evident from my conclusions on E1(1) above there is greenfield land available and committed in Tameside which could act as a catalyst to development. I acknowledge that the ceiling imposed at present of 10000sqm on the Ashton Moss site is somewhat different in scale to that envisaged at Waterside Park, but that doesn't include B1b uses and the deletion of policy E1(2) will of necessity involve a rethink in the economic strategy of the Borough by TMBC.
- 2.3.31 Since the Inspector at the previous UDP inquiry determined that *there was a clear and powerful case for the proposal in need terms to counter the long standing structural problems of the area's economy* there has been a shift in national policy guidance and an increasing emphasis on the reuse of previously developed land within the urban area which is accessible by alternative means of transport to the private car. This is reflected in the Secretary of State's most recent refusal of planning permission for a business park type development on the site.
- 2.3.32 Whilst there has been no improvement in the economy of the area since the adopted UDP was prepared, the situation has I believe changed in other respects. Overall this leads me to conclude on the first issue that it is necessary to seek a wider employment base in the Borough. However that need is not just in Tameside but in East Manchester generally. The objection site whilst it might score highly with potential employers and some of the criteria in RPG policy, is essentially greenfield in nature and its development would result in the loss of a golf course. This would be contrary to national planning policy and emerging regional policy. Within Tameside there is an alternative regional investment site which although greenfield, has planning permission and will be developed within the plan period. Its setting and location is such that it would be capable of attracting similar business as E1(2) and act as a catalyst to development.
- 2.3.33 In addition there are alternative schemes for the redevelopment of brownfield land which seek to attract a similar type of user to the business park. The redevelopment of such land in the urban areas is a priority at both national and regional level. To

encourage the development of more greenfield sites than those already committed would increase competition and would be likely to militate against the development of brownfield sites which may be more problematical in terms of land assembly and motorway access.

- 2.3.34 The objection site has much to recommend it as a development site which would attract the growth sectors and it is supported, particularly by the NWDA. However on balance I conclude that the allocation of the objection site for employment purposes would be contrary to the objectives of emerging regional and national policy and that there are alternative sites available that could accommodate the type of development required to widen the employment base of Tameside, in particular and East Manchester in general. I shall therefore recommend its deletion from the plan.
- 2.3.35 In reaching this conclusion I have been mindful that there is much competition for the growth sectors from both within and outside of the region. However predicting and providing for such development is not an exact science and depends to a large extent on factors, such as fiscal incentives, outside the planning system. Moreover I appreciate that if inward investment still demands a greenfield parkland setting, it will not come to Tameside, if such land is unavailable. But it seems to me that the question is one of balance between stimulating growth in the economy and economy in the use of land. In the present case whilst finely balanced I conclude the weight is in favour of the economy of resources.
- 2.3.36 Because of my conclusions on the first issue I have not examined in any detail the relative merits of alternative policy wording. Nor do I consider the policy in any detail against other UDP policies. In general though I believe it is inevitable that policies will have different objectives and it will always remain a matter of judgement where the balance should lie when testing site specific policies against the more general policies in the plan. Finally I note that this is the third time the Waterside Park proposals have been through an inquiry process and the objectors have to a greater or lesser extent relied on information which is not always before me in detail. Where there appears to have been little change in the matters considered previously I have made no comment in my conclusions.
- 2.3.37 **I now turn to the second issue.** There is no policy in the plan which seeks to protect existing uses, in a similar way to policies OL4 and OL5 which protect green space. It is logical therefore that the revised deposit version of the plan seeks to safeguard those elements of the site to which these policies apply. To my mind the new wording does not imply that there is an intention to clear existing uses and prepare the site for development only that the Council has no plans for the development of the additional land during the plan period. If a landowner and/or developer were to clear land on the expectation of development being permitted on any part of the site that would be his right. It does not suggest in any way that that the Council would be agreeable to approving development which would be contrary to either national, regional or development plan policy.

Recommendation

- 2.2.38 I recommend that policy E1(2) be deleted in its entirety and the golf courses be designated protected green space under policies OL4 and OI5.**

As a result of this recommendation there will need to be consequential amendments to other parts of the plan which refer to policy E1(2).

POLICY E 1(3)

Strategic Employment Sites - Mottram

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Mr + Mrs Bagshaw	66	11	O	
Dr Peter Booth (no longer at address given)	93	58	O	
Mr + Mr Bradley	103	59	O	
Mr + Mrs Buckley	123	66	O	
Mrs B Gibbs	321	260	O	
Mrs D Kelly	454	450	O	
Ian Maher	490	459	O	
Mrs J O'Pray	585	493	O	
D R Ollerenshaw	581	492	O	
R Ownall	623	524	O	
Alan + J Smith	698	568	O	
Chris Talbot	745	597	O	
Mr + Mrs Winson	854	618	O	
Ms Sue Wood	861	622	O	
J A & J I Dyson	262	639	S (rd)	

OBJ NO	SUMMARY OF OBJECTION
11	Loss of valued Green Belt land for industrial development which is inappropriate for the area.
58	Loss of valued Green Belt land for industrial development which could be located in the urban area..
59	Loss of Green Belt land.
66	Loss of valued Green Belt land for industrial development which could be located in the urban area..
260	Loss of Green Belt land and effect on Mottram.
450	Many areas of derelict land and buildings, and existing industrial estates, which could be used.
459	Loss of Green Belt land.
493	Further loss of Green Belt, plenty of derelict areas available, more traffic generated.
492	Plenty of derelict areas which could be used, also many industrial estates with vacant land.
516	Loss of Green Belt land. Road proposals will already affect riding activities.
524	Do not need a business park here. Mottram has been spoilt enough in the past.
568	Loss of Green Belt. Land could be better used for recreational purposes, such as a golf course.
597	Has derelict and vacant land been eliminated, will any real jobs go to local people, extra traffic ?
618	Fail to see how taking Green Belt farming land for industrial units will protect local heritage.
622	Loss of Green Belt land, will not preserve local heritage, derelict industrial land available.
639	Support decision to remove this site and retain the land in Green Belt.

2.4.1 This policy was withdrawn in the revised deposit version of the plan. I therefore make no comment on the outstanding objections.

POLICY E 2

Development Opportunity Areas

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Reeb Estates Ltd	645	178	O	Yes
English Nature	277	653	O (rd)	Yes
Langtree Group plc	928	689	O (rd)	Yes

OBJ NO	SUMMARY OF OBJECTION
178	The site west of Ashton Road, Denton could be allocated for retail development under this policy.
653	Several E2 allocations are designated for nature conservation including areas of SSSI and are inadequately covered.
689	Object to blanket requirement for preparation of development briefs for every Development Opportunity Area

Main Issues

- 2.5.1 i) Whether the reasoned justification should contain a blanket requirement for development briefs for each Development Opportunity Area.
 ii) Whether E2 policies recognises the importance of the nature conservation value of the designated sites.

Conclusions

- 2.5.2 The Council agree with the objector in respect of **the first issue** and suggest that the reasoned justification be altered to refer to the production of development briefs only where necessary. This is a minor amendment and a clarification of the plan which I support.
- 2.5.3 **In respect of the second issue**, the objection by English Nature points out that several of the Development Opportunity Areas are also designated for nature conservation value and seeks to have matters such as mitigation, compensation and legal obligations covered in the reasoned justification. This has resulted in the Council proposing changes to policies E2(2), E2(7), E2(8) and E2(10). These are set out below.
- 2.5.4 **Policy E2(2) Portland Basin Surrounds.** The Council suggest additional text be added at the end of the paragraph to read: *The Ashton Canal to the east of the Portland Basin is a Site of Special Scientific Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation interest of the site. The Ashton Canal to the west of Portland Basin and the Peak Forest Canal are both Grade A Sites of Biological Importance and contain floating water plantain in places, which is a European protected species. These factors should also be taken into account in any nearby development.*
- 2.5.5 **Policy E2(7) Mossley Mills Mossley** The Council suggest the following changes between the third and fifth sentences. *The Huddersfield canal on the eastern edge of the site is an important informal recreational resource, and has recently been reopened for navigation. However, it is also a Site of Special Scientific Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation interest of the site.*
- 2.5.6 **Policy E2(8) Castle Street, Stalybridge** The Council suggest adding at the end of the paragraph *The Huddersfield Narrow Canal is a Site of Special Scientific Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation of the site.*
- 2.5.7 **Policy E2(10) Knowl Street, Stalybridge** The Council suggest adding at the end of the paragraph *The Huddersfield Narrow Canal is a Site of Special Scientific Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation of the site.*

- 2.5.8 All these changes add clarity to the plan and English Nature has indicated that it will withdraw its objections if the changes are incorporated into the plan. I will recommend the plan is modified to take account of the changes.
- 2.5.9 Events have overtaken the objection by Reeb Estates Ltd. The site to the west of Ashton Road, Denton was included as allocation E2(15) in the revised deposit version of the plan. However after the legal challenge to the planning permission on the site was withdrawn, the Council proposed deleting E2(15), allocating the site under policy S2(1) and including it within the town centre boundary to reflect the retail permission on the site. These are changes which I support and are dealt with in full in the Town Centres, Retailing and Leisure Chapter below. The objector company has indicated that it is content with the proposed changes.

Recommendation

- 2.5.10 I recommend that the plan be modified by
- i) changing the penultimate sentence in the first paragraph of the reasoned justification to read *Development briefs will be prepared where necessary to guide the balance of uses and the form of the development appropriate to each area, taking account of other relevant policies and constraints.*
 - ii) Incorporating the changes set out in paragraphs 2.5.4, 5, 6 and 7 into policies E2(2), E2(7), E2(8) and E2(10) respectively, that is :-
Policy E2(2) - add the following text to the end of the paragraph to read.
The Ashton Canal to the east of the Portland Basin is a Site of Special Scientific Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation interest of the site. The Ashton Canal to the west of Portland Basin and the Peak Forest Canal are both Grade A Sites of Biological Importance and contain floating water plantain in places, which is a European protected species. These factors should also be taken into account in any nearby development.
Policy E2(7) - between the third and fifth sentences insert *The Huddersfield canal on the eastern edge of the site is an important informal recreational resource, and has recently been reopened for navigation. However, it is also a Site of Special Scientific Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation interest of the site.*
E2(8) - add at the end of the paragraph *The Huddersfield Narrow Canal is a Site of Special Scientific Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation of the site.*
E2(10) - add at the end of the paragraph *The Huddersfield Narrow Canal is a Site of Special Scientific Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation of the site.*

POLICY E 2(4)

Development Opportunity Areas - Market Street, Droylsden

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Consignia plc	181	624	O	
British Waterways – South Pennine Ring	109	62	S	
OBJ NO	SUMMARY OF OBJECTION			
624	Concerned about practical and detailed aspects of the proposal and expect close consultation.			
62	This is a significant opportunity for a high quality development with a canal basin as a focus.			

Main Issue

- 2.6.1 Whether the allocation pays sufficient regard to the operational needs of the sorting office.

Conclusions

- 2.6.2 Whilst the objector company has no objection in principle to the allocation it is concerned about future detail proposals. It seems to me that there is nothing in the principle of the allocation which means that the sorting office would of necessity be redeveloped as a result of the E2 designation or that it would be located next to incompatible uses in a redevelopment scheme. From the Council representations it appears that there is as yet no detailed scheme for the area.
- 2.6.3 The umbrella policy E2 makes it clear that if a property lies within a designated area, this does not mean that it will be redeveloped. It is a matter for individual landowners/occupiers/users of a property to negotiate with prospective developers in the normal way outside of the UDP process. It is as part of the development control process that I would expect consultations to take place with businesses and individuals affected by any redevelopment proposals. It follows from this that I do not consider the policy should be modified as a result of this objection.

Recommendation

- 2.6.4 I recommend no modification to the policy as a result of this objection.

POLICY E 2(5)

Development Opportunity Areas - The Thorns, Godley

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
English Nature	277	228	O	
OBJ NO	SUMMARY OF OBJECTION			
228	The nature conservation interest on this site should be protected from the impact of development.			

Main Issue

- 2.7.1 Whether the policy covers nature conservation interests adequately.

Conclusions

- 2.7.2 At the revised deposit stage the Council added text to the reasoned justification to refer to nature conservation interests and the Grade B Site of Biological Importance. This to my mind adequately addresses nature conservation interests. Although not formally withdrawn English Nature say that they support the position held by the Greater Manchester Ecology Unit with respect to policy E2(5). The GMEU objection to the policy was withdrawn as a result of the changes made at the revised deposit stage of the UDP process. It follows I do not consider it necessary to recommend any modification to the plan as a result of this objection.

Recommendation

- 2.7.3 I recommend no modification to the policy as a result of this objection.

POLICY E 2(7)

Development Opportunity Areas - Mossley Mills

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
English Nature	277	229	O	Yes
The Grosvenor Group	354	464	O	
Mr J Winterbottom	855	619	O	
OBJ NO	SUMMARY OF OBJECTION			
229	The flood risk issue on this site should be addressed.			
464	The policy provides insufficient guidance on the form of development. The site is suitable for housing and should be allocated accordingly.			
619	Will cause increased traffic congestion, destroy a green environment, create a less safe environment			

Main Issues

- 2.8.1 i) Whether the policy adequately addresses the issue of flood risk.
 ii) Whether the policy provides sufficient guidance on the form of development envisaged.
 iii) Whether the policy would lead to increased congestion, destroy a green area and encourage commuter traffic to take up the jobs provided.

Conclusions

- 2.8.2 **On the first issue**, as a result of this and other objections the Council made additions to the reasoned justification to the policy to refer specifically to flood risk and altered the proposals map in respect of areas liable to flooding. I consider that this adequately addresses flood risk and that no further changes are necessary to address this issue at present. I note however that it may be necessary to make further changes to the flood plain map in the light of more up to date information from the Environment Agency, but this is a matter that can be addressed at the modification stage.
- 2.8.3 The Council are proposing changes to policy E2(7) to address nature conservation issues. I deal with this matter at paragraph 2.5.5 above but for the sake of completeness set out my recommendation in full below.
- 2.8.4 **I now turn to the second issue**. Since the objection was made the Council have granted planning permission for part of the site for residential purposes and the site is also covered by policy H1(6). That policy says that allowing for constraints it is

estimated that approximately 120 dwellings could be provided within the 11.5 ha site. The Development Opportunity Area however covers other areas which are not suitable for housing development and which are in industrial use. It is in line with sustainable principles that employment uses should be retained/provided close to areas of population and the Council would like to see buildings refurbished and new accommodation for small businesses. Consequently the site is allocated under E2.

- 2.8.5 Given these circumstances it is in my view appropriate that the site be designated a Development Opportunity Area and not just reserved for housing. I also consider the policies which relate to the site give sufficient guidance as to the type of development envisaged by the Council. I do not believe any modification to the plan is necessary as a result of this objection.
- 2.8.6 **In respect of the third objector** my conclusion below should be read in conjunction with those to policy H1.3 and H1.12 as the objection is an integral part of a wider objection to other development proposals in Mossley.
- 2.8.7 In general however I would comment that Mossley is an established community which provides housing and employment. It is though in need of regeneration as the older established industrial areas are becoming under used and premises demolished. Policy area E2(7) recognises that within the Mossley Mills area there is scope for improvement by both redeveloping land and refurbishing property in order to bring about environmental improvements and increased choice for residents in terms of employment, housing and recreation, whilst at the same time protecting nature conservation interests.
- 2.8.8 Although I accept that these new and improved facilities would not necessarily benefit only local people, in terms of job prospects etc, they would provide additional opportunities in an established settlement where there is already investment in infrastructure and community facilities. There is nothing within the general objectives of policy E2(7) which cause me to believe that promoting this Development Opportunity Area would give rise to increased traffic congestion, destroy a clean and green environment or compromise the bringing forward of an accessible, safe and healthy environment. Consequently I do not consider the policy should be deleted in response to this objection.

Recommendation

- 2.8.9 I recommend that policy E2(7) be modified by deleting all text between the third and fifth sentences and inserting the following. *The Huddersfield canal on the eastern edge of the site is an important informal recreational resource, and has recently been reopened for navigation. However, it is also a Site of Special Scientific Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation interest of the site.*

POLICY E 2(11)

Development Opportunity Areas - Edward Street, Denton

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Invensys plc	434	169	O	
J A & J I Dyson	262	640	O (rd)	

Langtree Group plc	928	690	O (rd)	Yes
Morbaine Limited	529	693	O (rd)	Yes
OBJ NO	SUMMARY OF OBJECTION			
169	The Development Opportunity Area should promote a mix of uses also including retail and housing.			
640	The prospective redevelopment uses should not include residential because of the contamination of the site.			
690	A retail-led, mixed use scheme would be the most appropriate way to facilitate redevelopment.			
693	The site is most appropriate for retail development Reference to a mixed use scheme should be deleted.			

Main Issues

- 2.9.1 i) Whether residential after use should be precluded because of potential contamination problems.
ii) Whether the potential uses should be retail led.

Conclusions

- 2.9.2 Insofar as the objection by Invensys plc is concerned the revised deposit version of the plan includes retail and residential use. The concerns of this objector are therefore met although the objection has not been formally withdrawn.
- 2.9.3 **With regard to the first issue** as I understand it there is as yet no firm scheme for the objection site. In principle I see no reason on planning grounds why housing should be precluded from the list of potential uses. The site is adjacent to existing residential properties and within the designated town centre area. PPG3 encourages the reuse of brownfield land for residential purposes and a wide mix of potential after uses would give flexibility for the redevelopment of the area.
- 2.9.4 I appreciate the objectors' concerns about ground contamination and agree that it is likely that the previous use of the site will have resulted in a degree of contamination which will require treatment before redevelopment can take place. It is also likely that the concentration of contaminants will vary over the land, but this is not an unusual situation. In such cases where there is known or suspected contamination, as part of the development control process the site can be investigated before permission is granted or planning conditions to be imposed to require investigation of and details of remediation measures before development can start. There are legal controls to ensure that contamination is dealt with adequately
- 2.9.5 I accept that it cannot be guaranteed that acceptable thresholds of contamination will remain the same. However this scenario applies to all sites which are reclaimed to a specific level to meet the standards of the day. It is not unique to site E2(11) and from the evidence before me I do not consider it a good reason to prevent housing development on this particular site.
- 2.9.6 National policy guidance is contained in PPG23 where it says that the principle of sustainable development means that brownfield sites, including those affected by contamination should be recycled into new uses. The Government's policy towards tackling contamination is that the reclamation works should deal with any unacceptable risks to health or the environment, taking into account the actual or intended use. To preclude, in principle, residential after use from E2(11) before any investigation and/or necessary remediation works are carried out would be contrary to national policy. Such a course of action also assumes that any reclamation works would not be suitable for the after use in the longer term and that any development which resulted in multiple land ownership should be precluded from contaminated land as a matter of principle. In general this would not be a satisfactory situation and in particular in this case there is no

substantive evidence to justify this course of action and delete housing as a potential after use.

- 2.9.7 **In respect of the second issue** and the objections by the Langtree Group plc and Morbaine Ltd, the Council propose changing the reasoned justification to the policy to begin the last sentence of the first paragraph with *A retail led mixed use scheme would be particularly appropriate...* The site is brownfield and within the town centre. As such I see no objection in principle to the text referring to a retail led scheme. However other uses such as leisure, employment and housing are also promoted by national policy guidance in such locations. I therefore support the concept of a retail led mixed use scheme.
- 2.9.8 Both objectors have indicated that they are content with the change proposed. I shall therefore recommend that the policy be modified in line with the Council's proposal.

Recommendation

- 2.9.9 I recommend that the final sentence of the first paragraph of the reasoned justification be modified to read - *A retail led mixed use scheme would be particularly appropriate and should assist in revitalising the town centre and bringing about an improvement in the overall appearance of the area, complementing other proposals that have come forward.*

POLICY E 2(13)

Development Opportunity Areas - Longlands, Godley

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
English Nature	277	230	O	
OBJ NO	SUMMARY OF OBJECTION			
230	The nature conservation interest on this site should be protected from the impact of development.			

Main Issue

- 2.10.1 Whether the policy covers nature conservation interests adequately.

Conclusions

- 2.10.2 At the revised deposit stage the Council added text to the reasoned justification to refer to nature conservation interests and the Grade B Site of Biological Importance. This to my mind adequately addresses nature conservation interests. Although not formally withdrawn English Nature say that they support the position held by the Greater Manchester Ecology Unit with respect to policy E2(13). The GMEU objection to the policy was withdrawn as a result of the changes made at the revised deposit stage of the UDP process. In my view no further modification is required to meet the objection.

Recommendation

- 2.10.3 I recommend no modification to the policy as a result of this objection.

POLICY E 3

Established Employment Areas

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Redrow Homes (North West) Ltd	643	470	O	
Roland Bardsley Homes	658	35	O	
Land Securities Properties plc	466	543	S	
OBJ NO	SUMMARY OF OBJECTION			
470	The policy does not allow for the residential redevelopment of employment areas consistent with PPG3.			
35	Reassessment of current employment allocations is required to see if they are more suited to other uses. The revised deposit rewording of the policy is negative.			
543	Shepley Industrial Estate is an appropriate site for continued concentration of employment uses.			

Main Issue

- 2.11.1 Whether the policy reflects adequately the need for a reassessment of employment sites required by PPG3.

Conclusions

- 2.11.2 The revised deposit version of the policy significantly changed policy E3 and its justification. It is now explained that a review of employment sites was carried out as part of the UDP process and that the UDP only proposes 2 employment allocations. Where the Council considers there is scope for mixed use schemes these are mainly to be found under policy E2 and called Development Opportunity Areas. The established employment areas are essentially considered best suited by the Council to continue in the same use. However the more protective policy for employment areas was replaced in the revised deposit plan by a set of criteria against which to test proposals for residential or mixed use developments. As now written I consider the policy and its justification reflect national policy guidance in PPG3 and the need to review employment allocations.
- 2.11.3 I note here that it has been agreed by the Council and Redrow Homes (North West) Ltd that objection 470 is in fact to policy E3 above and not E4 as originally stated.

Recommendation

- 2.11.4 I recommend no modification to the plan as a result of these objections.

POLICY E 4

Local Employment Sites

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Government Office for the North West	327	680	O (rd)	Yes
Countryside Agency	190	103	S	
OBJ NO	SUMMARY OF OBJECTION			
680	The policy reads as a statement of intent.			
103	Welcomes recognition of need for new local employment where travel to work journeys are long.			

Main Issue

2.12.1 Whether the policy as written is appropriate for a land use policy to guide development.

Conclusions

2.12.2 I agree with the objector that after changes at the revised deposit stage all that remains of the policy is a statement of intent which does not set out criteria or give details of where and when planning permission will be granted.

2.12.3 In recognition of this the Council propose changes. These involve the deletion of policy E4 in its entirety and carrying over the measures to overcome constraints into policy E5. The objector is content that the proposed change would meet their objection. I also support the changes which give purpose to the policy. Whilst it could in its new form be a policy in its own right, I see no reason why it should not be located within policy E5 - Local Employment Opportunities and Mixed Uses.

2.12.4 Whilst I support the modified policy in principle. The reasoned justification refers to site selection by means of reference to national and local planning policy and environmental impact criteria. There is no explanation or definition of these terms and I consider this results in a lack of clarity in the policy which should be addressed at the modification stage.

Recommendation

2.12.5 I recommend that

- i) policy E4 be deleted and
- ii) E5 be modified by inserting at the end of the policy - *The Council will permit and facilitate developments for local employment use by such measures as land assembly, derelict land reclamation, remediation of contamination, access improvements and environmental enhancements, where appropriate and necessary to overcome constraints on previously developed sites which are part of or within designated regeneration programmes.*
- iii) and inserting at the end of the reasoned justification - *There is often a need for more land to help meet local unemployment needs or provide facilities for new businesses, but sites can sometimes be difficult to develop owing to physical problems such as dereliction and contamination, or complicated patterns of ownership. The Council has for many years been successful in attracting regeneration investment programmes and financial support from the European Union, central Government and regional development agencies. They invariably involve employment generating or sustaining projects that have a site specific land use element. Neighbourhood capacity building, social inclusion and entrepreneurial encouragement are also key features, particularly in the Council's current programmes for SRB3, 5 and 6, EDZ Objective 2, Ashton Renewal Area and ESF schemes. To facilitate implementation the Council is intent on being pro-active in bringing forward schemes from brownfield land, which is the main theme behind the SRB6 programme. Sites will be chosen by reference to national and local planning policy environmental impact criteria.*
- iv) the reasoned justification to the policy explain which national and local planning policy and what environmental impact criteria will be used in the site selection process.

POLICY E 4(1)

Local Employment Sites - Woolley Lane, Hollingworth

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Roland Bardsley Homes	658	36	O	
OBJ NO	SUMMARY OF OBJECTION			
36	Query the definition of local employment sites, how they differ from E3 sites and the means of implementation.			

Main Issue

- 2.13.1 Although policies E4 and E4(1) have been deleted in their entirety, the thrust of policy E4 has now been included under policy E5. Consequently I deal here with that part of the objection which is still pertinent after the deletion of the site specific policy. And I consider the main issue to be whether the policy adequately sets out the site selection process and the means of implementation.

Conclusions

- 2.13.2 The means of implementing the policy, and the Council's pro-active approach to facilitating sites for local employment is now explained in the proposed changes to policy E5. The new text explains that this will be through potential brownfield reclamation and designated regeneration areas such as those covered by SRB, ERDF and the like. The programmes can either be site specific or policy led and apart from employment generating projects they can also include neighbourhood capacity building, social inclusion and entrepreneurial encouragement. This is appropriate for a policy which relates not only to local employment opportunities but also mixed uses.
- 2.13.3 However where the proposed policy is not clear is where it refers to site selection by reference to national and local planning policy and environmental impact criteria. To my mind it would give clarity to the policy if these were explained in the reasoned justification. I have recommended accordingly in paragraph 2.12.5 above.

Recommendation

- 2.13.4 I recommend the deletion of policy E4 and the modification of policy E5 as set out in paragraph 2.12.5 above.

POLICY E 5

Local Employment Opportunities and Mixed Uses

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Redrow Homes (North West) Ltd	643	471	O	
OBJ NO	SUMMARY OF OBJECTION			
471	The policy does not address the viability of reusing redundant employment sites for employment purposes. Residential use could be a more realistic option			

Main Issue

- 2.14.1 Whether the policy addresses the viability of reusing redundant employment sites for employment purposes.

Conclusions

- 2.14.2 The policy is not intended to address the viability of reusing redundant sites for employment purposes. What it sets out to do is to encourage employment development outside the established employment areas for the establishment and growth of modern forms of employment and working practices in non traditional locations and buildings. It is not confined to former employment sites. As the policy is in the employment chapter it promotes employment opportunities. There are similar policies in the housing section which seek to encourage housing opportunities, such as H2. In addition policy E3 provides criteria for assessing residential /mixed use proposals on former employment sites.
- 2.14.3 Within the context of policy E5 it must remain with prospective developers to judge whether their schemes are viable. That is not role of the UDP. However the proposed changes to policy E5 put forward by the Council demonstrate that they will take a proactive role in bringing forward brownfield sites where they are able in order to achieve the objectives of the policy.

Recommendation

- 2.14.4 I recommend no modification to policy E5 as a result of this objection, but it should be noted my recommendations at 2.12.5 above involve changes to policy E5.

POLICY E 7

Local Access to New Employment

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Stayley Developments Ltd & AMEC Developments Ltd	21	700	O (rd)	
Greater Manchester Passenger Transport Executive	339	684	S (rd)	
OBJ NO	SUMMARY OF OBJECTION			
700	Implementation of this new policy should be subject to criteria on costs, skills and relocation.			
684	This new policy is supported as it should reduce travel distance and reliance on the private car.			

Main Issue

- 2.15.1 Whether the policy takes into account the costs of employing local people and the differing needs of new businesses.

Conclusions

- 2.15.2 Policy E7 seeks to address the need to improve the match between the skills of local people and the skill/recruitment needs of employers. It flows from the Tameside Community Plan, where one of the objectives is to capture quality jobs for Tameside people. To achieve this not only must businesses be encouraged to invest in the Borough, but local people need to be able to take advantage of those employment opportunities. In addition to the UDP, part of the Employment Development Zone programme will be a project to liaise with employers to help identify their recruitment needs and link them with training schemes and local people to ensure that people are aware of training and employment opportunities.

- 2.15.3 The policy also seeks to ensure that local people benefit from new employment schemes in a similar fashion. However the policy must be realistic and ensure that its requirements do not become disproportionate for new employers. In recognition of this the Council propose changes to the policy. They suggest that it be rewritten as follows – *The Council will negotiate with developers or occupiers of major employment schemes to agree targets for the employment of people living within the local area, taking account of the available skill base and the additional costs which may be involved, and not restricting the employment of skilled personnel from outside the local area who are essential to the establishment of new developments. Where appropriate and at reasonable cost, the Council will wish to see the developer or occupier make arrangements for training for local people in skills related to employment opportunities at the proposed development, particularly if this is located in or adjacent to areas of the Borough where there are high levels of unemployment or deprivation.*
- 2.15.4 In my view the policy as now proposed provides a reasonable balance between the needs of business and matching the skills of the local population to employment opportunities. It is in accord with the sustainable principles of the plan. I appreciate that the policy does not set out explicitly the criteria proposed by the objector, but it does nevertheless establish the basic factors that will be subject to consideration such as the available skill base, the costs involved and the necessity to keep key personnel. I therefore conclude that the policy should be modified in line with the change proposed by the Council.

Recommendation

- 2.15.5 I recommend that policy E7 be modified to read - *The Council will negotiate with developers or occupiers of major employment schemes to agree targets for the employment of people living within the local area, taking account of the available skill base and the additional costs which may be involved, and not restricting the employment of skilled personnel from outside the local area who are essential to the establishment of new developments. Where appropriate and at reasonable cost, the Council will wish to see the developer or occupier make arrangements for training for local people in skills related to employment opportunities at the proposed development, particularly if this is located in or adjacent to areas of the Borough where there are high levels of unemployment or deprivation.*

NON POLICY SPECIFIC OBJECTIONS

Employment and the Local Economy

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Arrowcroft Group plc	30	440	O	
OBJ NO	SUMMARY OF OBJECTION			
440	Land to north of Ashton Street, Dukinfield should be allocated for B1, B2 and B8 employment uses.			

Main Issue

- 2.16.1 Whether the objection site should be deleted as protected green space and allocated for employment purposes.

Conclusions

- 2.16.2 I do not agree with the objector's view that the site is physically, functionally and visually separate from the rest of the protected green space. To my mind it forms an integral part of the larger site bounded by the River Tame, Ashton Street and the rail and canal embankments. The raised embankments of the railway are a feature of the open area. The protection of other land under policy OL4 also means that it forms part of a wider area of river valley which lies between various industrial areas and as such it is an essential part of a larger area of strategic importance. The Council's evidence suggests that the policy of protecting the Tame valley has been carried on in various forms since the 1960's and that maturing screen tree belts around the site were part of that policy. I understand that, since at least the 1980s, the site has been the subject of various development plan open land policies.
- 2.16.3 Whilst the results of the walkover survey undertaken on behalf of the objector indicates that the site supports only an - unremarkable assemblage of commonly occurring habitats and plant and animal species - this does not negate its function as a part of a wildlife corridor. Moreover even though Shepley South and Tudor industrial estates physically separate the largely open land corridors to the north and south, the river and the canal do provide a degree of continuity between the protected green space to their north and the green belt to the south. This is emphasised by the undeveloped land on Gate Street. It seems to me that when looking at the site in its location, to varying degrees, it fulfils the functions of a protected green space under policy OL4.
- 2.16.4 I also believe it contributes to the character of the Tame valley which from the junction of the Ashton and Peak Forest Canals southwards is largely bounded by open land. It therefore has some relevance to policy OL5 in that it has a local amenity function.
- 2.16.5 The site is basically flat and open with trees around the perimeter. The majority of equipment at the water treatment works to the west of the road is at ground level and maintains the open nature of the wider area. When looking at the nature of the vegetation and the lack of evidence of the previous use, it seems to me that the objection site does not fall within the definition of previously developed land in PPG3.
- 2.16.6 Now turning to look at the need for employment sites. The Council are content that there are sufficient employment development opportunities in the Borough and even though I have recommended the deletion of policy E1(2) I share that view. There is a large site at Ashton Moss, extensive areas are designated under policy E3 which have the potential for infill, redevelopment or refurbishment and there are further opportunities in the Development Opportunity Areas designated under policy E2.
- 2.16.7 Moreover I do not find there is any substantive evidence to counter the Council's view that there is a significant level of development potential within the immediate area. Given these circumstances even though the objectors evidence suggest there are no physical constraints to preclude development for industrial purposes, it seems to me that the site continues to fulfil the functions of protected green space and that there is no evidence to demonstrate that the need for industrial land is sufficient to justify the removal of that allocation from the objection site.

Recommendation

- 2.16.8 I recommend no modification to the plan as a result of this objection.**

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Grosvenor Group	354	465	O	
OBJ NO	SUMMARY OF OBJECTION			
465	The area off Waggon Road, Mossley should be excluded from policy E3 and added to policy E2(7) for residential development.			

Main Issue

- 2.16.9 Whether it is appropriate to include Queen Street and Britannia Mills within policy area E2(7)

Conclusions

- 2.16.10 Subsequent to the objection being made the Council approved an application in September 2001 for residential development on part of policy area E3. In recognition of this at the revised deposit stage of the plan, area E2(7) was extended to take in that portion of the site which has permission for residential development.
- 2.16.11 The Council say and I have no reason to doubt that the objection site is one of the few remaining concentrations of mills and factories along the Tame valley. The premises are largely still in general industrial use and whilst they remain in employment generating uses they help to ensure Mossley retains an economic base. This is particularly important as there are a number of housing sites proposed in the UDP which will increase the local population and in the interests of sustainable development it is necessary to provide jobs close to housing areas to minimise the need to travel.
- 2.16.12 There is no evidence to suggest that there is a need for additional housing in Mossley, therefore given these factors I do not consider it appropriate to include the remainder of Queen Street and Britannia Mills in policy area E2(7) to enable them to be developed for residential purposes.

Recommendation

- 2.16.13 I recommend no modification to the plan as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Richard Macfarlane	647	536	O	
Richard Macfarlane	538	537	O	
Richard Macfarlane	647	538	O	
OBJ NO	SUMMARY OF OBJECTION			
536	The plan should seek to work with developers willing to target new job growth at the socially excluded			
537	The plan should seek developer assistance to help develop the local labour market			
538	Developer assistance in training the local workforce in appropriate skills should be secured by planning obligations.			

Main Issue

- 2.16.14 I consider the above 3 objections together as they are interrelated. The main issue they raise is whether the plan adequately addresses the need for new employers to make a contribution towards providing jobs for the workforce in the area they are located.

Conclusions

- 2.16.15 As result of these objections the Council introduced policy E7 at the revised deposit stage of the plan process. It promotes agreements with developers/major employers to provide local people with job opportunities and training.

2.16.16 However the policy attracted objection and as result the Council propose changes in order to provide a realistic policy which does not impose a disproportionate burden on developers/employers. They suggest that it be rewritten as follows – *The Council will negotiate with developers or occupiers of major employment schemes to agree targets for the employment of people living within the local area, taking account of the available skill base and the additional costs which may be involved, and not restricting the employment of skilled personnel from outside the local area who are essential to the establishment of new developments. Where appropriate and at reasonable cost, the Council will wish to see the developer or occupier make arrangements for training for local people in skills related to employment opportunities at the proposed development, particularly if this is located in or adjacent to areas of the Borough where there are high levels of unemployment or deprivation.*

2.16.17 I deal with this change in full under policy E7 above. In brief I consider the policy as now proposed provides a reasonable balance between the needs of business and matching the skills of the local population to employment opportunities. It follows from this that I do not consider any further modifications to the policy are required as a result of these objections.

Recommendation

2.16.18 I recommend no modification to the plan as a result of these objections.

*** But see also recommendation at paragraph 2.15.5 above**

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Cllr Sidebottom, on behalf of Ashton St Michael's Ward Cllrs	693	561	O	
OBJ NO	SUMMARY OF OBJECTION			
561	Tahiti Aquarium Mill in Ashton should be recognised as an employment site and historical landmark.			

Main Issue

2.16.19 Whether Tahiti Aquarium Mill should be an employment site and listed.

Conclusions

2.16.20 Events have overtaken this objection. Planning permission was granted in December 2001 for demolition of the mill and the erection of 33 houses and apartments. This was after English Heritage had determined that the mill did not have sufficient interest in a national context to justify its listing. Given these circumstances it would serve little purpose for me to comment further on the objection.

Recommendation

2.16.21 I recommend no modification to the plan as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL		OBJ'R	OBJ NO	O or S	C WDR
Cllr Sidebottom, on behalf of Ashton St Michael's Ward Cllrs		693	563	O	
OBJ NO	SUMMARY OF OBJECTION				
563	The agreed employment area at Queens Road Reservoirs, Ashton should be recognised as such in the UDP.				

Main Issue

2.16.22 Whether the employment area at Queens Road reservoir should be designated an established employment area under policy E3.

Conclusions

2.16.23 Planning permission 00/00091/FUL for a mixed development of housing, employment, fishing pond, highway infrastructure and open space was approved in January 2001. The section 106 agreement accompanying the permission ensures that the land for employment use will be handed over to the Council after appropriate infrastructure is provided and within 2 years of the commencement of the residential development.

2.16.24 The Council statement says that the site has not yet been developed, consequently it cannot be designated an established employment area. Moreover given its size it is not considered to be of a scale which is of strategic economic importance, consequently it is not suitable as an E1 site. However, although not specifically allocated for employment purposes, its future use is assured and under the control of the Council. For all practical purposes it would therefore serve little purpose if it was to be given an employment designation in the UDP.

Recommendation

2.16.25 I recommend no modification to the plan as a result of this objection.