

1: PART ONE POLICIES

POLICY 1.1

Capturing Quality Jobs for Tameside People

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	C WDR
Fairfield Golf and Sailing Club	288	151	O
Government Office for the North West	327	272	O
Mr M Goodall	325	675	O (rd)
Invensys plc	434	164	S
OBJ NO	SUMMARY OF OBJECTION		
151	The allocated sites should be reassessed using the sequential approach and development opportunities focussed on brownfield land in the urban area.		
272	The reasoned justification should reflect the outcome of the legal challenge on Waterside Park.		
675	Reference to the proximity of Manchester Airport should be removed because of traffic congestion.		
164	The objector's site at Edward Street, Denton has potential to provide new employment opportunities.		

Main Issues

- 1.1.1
 - i) Whether the last paragraph of the reasoned justification should be altered to reflect the outcome of the Waterside Park decision.
 - ii) Whether policy 1.1 reflects other objectives in the plan which promote the use of brownfield land in the urban area.
 - iii) Whether reference to Manchester Airport should be deleted from the policy.

Conclusions

- 1.1.2 **The first issue.** Insofar as the objection by the GONW is concerned, the application for the Waterside Park development has been re-determined by the Secretary of State. His decision refusing the application was issued on the 14 November 2002 and a further legal challenge to that decision was made by the applicants in late 2002. My comments on Waterside Park (policy E1(2)) are to be found below in the employment chapter. In respect of this particular objection I consider it necessary to change the last paragraph of the reasoned justification to take account of the up to date position.
- 1.1.3 In order to reflect the changed situation the Council suggest replacing the last sentence of the final paragraph of the reasoned justification with *There has been little market in Tameside for office development, but modern business park type schemes in conjunction with recent and proposed transportation improvements could provide opportunities that will attract high quality office developments and employment to the Borough.* I support the proposed change which deletes the specific reference to Waterside Park.
- 1.1.4 **In relation to the second issue** the objectors would like to see the inclusion of the words *Bearing in mind the other objectives of the plan* included at the beginning of the second paragraph of the policy. It seems to me that it is implicit in the UDP policies generally that development must meet the overall objectives of the plan which are set out in the introduction at pages 6 and 7, amplified in the part one policies and put forward as site specific proposals in part 2 land use allocations.

- 1.1.5 As currently proposed policy 1.1 is clear in its intent of maximising the Borough's employment potential, by amongst other things, making land available at key accessible sites and by providing employment growth in town centres and on previously developed sites. Whether those sites identified for development purposes in the plan meet the sequential approach advocated in national and regional policy and/or the objectives of UDP policies are matters for consideration when looking at site specific policies. These matters do not obviate the need for the Council to ensure that there is a balance of sites in terms of scale and location to meet a range of needs and to provide quality jobs to address the structural problems inherent in the Borough's historic economic base.
- 1.1.6 It should be noted that the extensive Ashton Moss site (UDP policy E1.1) is identified as one of 11 regional inward investment sites in the NWDA's Regional (Economic) Strategy and referred to in emerging RPG13. It follows from the above that I do not consider the amendment put forward by the Fairfield Golf and Sailing Club to be necessary.
- 1.1.7 **I now turn to the third issue.** The reference to Manchester Airport was included at the revised deposit stage of the plan and is in line with emerging regional policy in RPG13 which recognises the importance of the airport to local and regional economic growth. I appreciate that there may be sites closer to the airport that could accommodate development, but the influence of the airport extends and serves more than just a local area. It is regionally important and in terms of travel times by both public and private modes, much of Tameside is within easy reach of the airport, far more so than many other districts within the Greater Manchester conurbation. It would in my view be an omission for the development plan for Tameside to ignore this factor.
- 1.1.8 Providing an improved public transport network and reducing the need to travel by car are inherent in national, regional and local planning policies. In line with this the airport Ground Transport Strategy has a target of 25% of all trips to/from the airport by public transport by 2005. This involves the construction of a multi-modal interchange, an extension of the metrolink and increasing the range, frequency and reliability of rail and bus services. In addition to this UDP policies T11 and T14 require new businesses to provide travel plans and transport assessments. These factors should ensure that the transport implications of any major developments are taken into account before permission is granted.
- 1.1.9 It cannot be disputed that the motorway network in the vicinity of the airport and between it and Tameside is heavily used. At peak times it is subject to congestion. But unless at the airport itself, where space is finite, most sites in Greater Manchester generating car borne traffic would have to use the same road network.
- 1.1.10 Neither policy 1.1 nor its reasoned justification contain any reference to the accessibility of the airport by public transport and this to my mind is an omission. At the inquiry it was suggested that this could be rectified by the replacement of the 4th sentence in the 3rd paragraph of the justification with *Manchester Airport is accessible from much of Tameside by public transport and with the recent extension of the M60 motorway much of the Borough is now within 15 to 20 minute drive time of the airport.* I support this change which makes clear the part public transport can take in providing access to/from the airport.

Recommendation

- 1.1.11 **I recommend that the plan be modified by**
- i) **replacing the last sentence of the final paragraph of the reasoned justification with *There has been little market in Tameside for office***

- development, but modern business park type schemes in conjunction with recent and proposed transportation improvements could provide opportunities that will attract high quality office developments and employment to the Borough.*
- ii) *the replacement of the 4th sentence in the 3rd paragraph of the justification with Manchester Airport is accessible from much of Tameside by public transport and with the recent extension of the M60 motorway much of the Borough is now within 15 to 20 minute drive time of the airport.*

POLICY 1.2

Reducing Traffic Congestion

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	434	O	
Greater Manchester Passenger Transport Executive	339	355	S	
Greater Manchester Passenger Transport Executive	339	682	S (rd)	
OBJ NO	SUMMARY OF OBJECTION			
434	The policy does not accord with PPG12 nor does it adequately address the objectives and targets of the local transport plan.			
355	Increasing sustainability and improving safety and efficiency are compatible key aims of PPG13.			
682	The alteration gives added weight to public transport when considering priorities.			

Main Issue

- 1.2.1 Whether the policy as written accords with PPG12 and is compatible with the LTP.

Conclusions

- 1.2.2 Whilst the objection refers specifically to policy 1.2, the objectors are overall concerned with the compatibility of the proposed Waterside Park development (UDP policy E1.2) with the thrust of UDP policies. Where the objection relates specifically to the Waterside Park development my conclusions on policy E1.2 should be read.
- 1.2.3 Chapter 5 of PPG12 deals with the integration of transport and land use policies. It requires LTPs to take full account of and complement the land use strategy in the development plan. It also says that the development plan should underpin the land use issues arising from the implementation of the LTP proposals. Government policy on transport in PPG13 is based on the integration of planning and transport to promote sustainable transport choices and to reduce the need to travel especially by car.
- 1.2.4 Policy 1.2 seeks to reduce traffic congestion. It sets out the Council's intention of maintaining, managing and improving a balanced transportation strategy in accordance with the LTP objectives. The LTP covers the 10 districts within Greater Manchester and sets out a vision for the area which includes the objectives of strengthening the local economy in environmentally friendly ways, supporting urban regeneration, the efficient use of brownfield sites and focussing development in central areas. These core objectives are reflected in policy 1.2 and other general policies within both part 1 and part 2 of the UDP.
- 1.2.5 In my view the UDP and LTP set out a compatible framework for achieving the integration of land use and transportation, based on fundamental sustainable principles.

Both plans also include key environmental indicators which can be monitored throughout the lifetime of the plan as required by PPG12.

- 1.2.6 The specific land use allocations proposed by the Council have been incorporated into the plan based on the Council's belief that they accord with the basic sustainable principles which run through it. Whilst this view is not shared by everyone, as evinced by the number of duly made objections, it does not in my opinion detract from the sustainable aim of policy 1.2 nor its compatibility with PPG12 and the objectives of the development plan.
- 1.2.7 It follows from this that I do not consider any changes should be made to the policy as a result of the objection.

Recommendation

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

POLICY 1.3

Creating a Cleaner and Greener Environment

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Countryside Agency	190	633	O (rd)	
Countryside Agency	190	98	S	
English Heritage	276	199	S	
Environment Agency	279	232	S	
Greater Manchester Ecology Unit	335	332	S	
English Nature	277	650	S (rd)	
OBJ NO	SUMMARY OF OBJECTION			
633	Rural difficulties should be presented as a serious economic issue and not considered only as an environmental matter.			
98	It is important that high quality design is an underlying principle of all development.			
199	Supports the aim of achieving a higher standard of design in the Borough.			
232	Support for the policy.			
332	Welcomes woodland planting where it would not be injurious to nature conservation.			
650	Support for the policy as it mentions enhancing nature conservation value of the Borough.			

Main Issue

- 1.3.1 Whether agricultural/rural problems are adequately addressed in the policy.

Conclusions

- 1.3.2 Policy 1.3 is essentially concerned with the enhancement of the appearance of the Borough. It does not deal specifically with agriculture. Countryside issues are addressed only so far as the landscape quality of the urban fringe is concerned. The reasoned justification whilst it refers to the economic difficulties of farming does so in the context of the threat to the upkeep and appearance of the countryside. In my view it would not be appropriate to refer to the rural economy or other countryside issues under this heading as such matters go much further than the policy and are related only in part to creating a cleaner and greener environment. To add concerns about agriculture and the rural problems would in my view be an artificial linkage which would dilute the thrust of the policy as it now stands.

- 1.3.3 The objection goes on to say that consideration of agricultural matters is an omission from the plan. There are, in the Countryside, Open Land, Sport and Recreation chapter, several policies which deal with rural/farming issues principally policies OL1, OL2, OL11, OL12 and OL13. However when the Overview of the Borough in part 1 of the plan refers to the urban fringe where agriculture is facing economic difficulties and where there is pressure for farm diversification it does so under the heading of open land and recreation. In my view the references to farming are fragmented and appear almost as afterthoughts.
- 1.3.4 I appreciate the Council's desire to keep the plan simple and to avoid "over elaborate plan making" as recommended in PPG12. Moreover I have seen no substantive evidence to challenge the Council's view that the Borough does not have a separate rural economy and that the needs of the fringe areas are closely related to the urban economy. However a significant part of the rural area is open countryside, with between 14 and 16% of the total area used for agricultural/horticultural purposes. The plan already refers in several places to problems within the countryside/urban fringe and I believe it would clarify the position if the Council were to gather together those views and set them out succinctly in part 1 of the plan possibly in the Overview of the Borough under a new heading Countryside, Open Land and Recreation. This would indicate that the Council has had full regard to the characteristics and needs of its urban fringe/rural area.
- 1.3.5 The objector also comments generally that it would be clearer if the reasoned justification to part 1 policies were to be contained within part 1 of the plan. I agree with this view. Both part 1 policies and their reasoned justifications are succinct and it is in my view unnecessary and artificial to separate the policies from their explanations.

Recommendation

1.3.6 I recommend that

- i) **In part 1 of the UDP under the heading - Overview of the Borough – Countryside should be added to the heading Open Land and Recreation and under that new heading the problems of farming and the urban fringe should be set out succinctly.**
- ii) **the reasoned justifications to part 1 policies be incorporated into part 1 of the plan.**

POLICY 1.4

Providing More Choice and Quality of Homes

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Countryside Agency	190	101	O	
Redrow Homes (North West) Ltd	643	521	O	
Roland Bardsley Homes	658	30	O	
Trustees of Mrs E Bissill's Fund & Stayley Developments Ltd	807	702	O (rd)	Y(part)
OBJ NO	SUMMARY OF OBJECTION			
101	It is not clear whether there has been any survey of rural housing needs.			
521	The policy should be amended to ensure regular monitoring addresses the quality and market sector of the sites identified.			
30	The policy should be amended to require regular satisfactory monitoring. The greenfield sites need to be reviewed in accord with PPG3. There is conflict between policy 1.4 and H4 in respect of affordable housing			
702	If annual monitoring indicates a shortfall of housing land additional sites should be allocated.			

Main Issues

- 1.4.1
- i) Whether the policy and its reasoned justification should be amended to refer specifically to rural housing needs.
 - ii) Whether the policy should be amended to require regular monitoring to address the quality and market sector issues.
 - iii) Whether greenfield sites need to be reviewed in the light of the provisions of PPG3.
 - iv) Whether there is conflict between policy 1.4 and H4 with regard to affordable housing.
 - v) Whether the policy should say that if there is a shortfall in the housing targets additional land will be allocated.

Conclusions

- 1.4.2 **In respect of the first issue**, the objection by the Countryside Agency is closely linked with that to policy H4. Consequently my conclusions on this issue should be read in conjunction with those on policy H4.
- 1.4.3 Policy 1.4 says simply that a wide variety of housing types will be needed to meet the needs of the whole community. It does not distinguish between different housing types or different locations. The Council confirm in their statement that all parts of the Borough whether urban or rural were included in their 2001 housing demand and needs survey and that no particular problems were identified in the outlying settlements. In the Longdendale area there was a rough match between dwelling plots and identified need.
- 1.4.4 The Council point out that whilst there are a few “sought after” villages or hamlets where house prices may not be affordable for all, these settlements are not remote and there is virtually always affordable housing nearby. For instance Broadbottom and Mottram are close to Hattersley where housing is cheaper. Given these factors I do not consider it necessary to include specific mention of rural housing needs in either the policy or its reasoned justification.
- 1.4.5 **In respect of the second issue**, the policy itself says only that there will be annual monitoring to assess that the extent to which its objectives are being met. It does not go into details, nor do I consider it appropriate that a strategic policy should. The reasoned explanation however recognises that the quality of housing development is a factor to be taken into account and the justification for policy H1 (housing land provision) says that monitoring will be in accord with PPG3 which includes analysis of the types and sizes of dwellings. In my view this is sufficient to ensure that the monitoring of the plan will be satisfactory and include all necessary elements. It would add little of value for the plan to be modified in the way suggested.
- 1.4.6 **I now turn to issue three**. The greenfield sites referred to by the objector are those in the second paragraph of the reasoned justification where it says *...the Borough's brownfield ratio is likely to fall back as substantial allocated greenfield sites come on stream*. The Council in their statement clarify that the greenfield sites referred to are those in the adopted UDP which already have planning permission and on which construction has started. This is not clear from the text at the moment and I consider it should be modified to get remove the apparent conflict with national policy in PPG3.
- 1.4.7 **The fourth issue** is linked to an objection to policy H4 and my conclusions below should be read in conjunction with those of policy H4.

- 1.4.8 The reasoned justification to policy 1.4 was changed in the revised deposit draft of the plan. Whilst it continued to state that there was unlikely to be a general need for more affordable homes, it now goes on to say that in some areas there is a deficiency in social rented housing. Policy H4 which deals with the type, size and affordability of dwellings is meant to cater for the provision of an element of subsidised/low cost housing in areas where there is a demonstrable lack of affordable housing. It does not relate to social rented housing developments.
- 1.4.9 The Council acknowledge that at the present time there is no need for such housing and consequently the provisions of the policy are not required. However the plan is intended to cover the period up to 2011 and circumstances may change. In that case the requirements of the policy will ensure that affordable housing can be provided in line with national policy guidance. To my mind the policies are compatible and I see no need for any revisions.
- 1.4.10 **Finally turning to the fifth issue.** The amendment suggested by the objectors implies that a shortfall in the housing targets would be caused only by a lack of land. This is not the case. There could be any number of circumstances resulting in such an occurrence. In any event further allocations can only be made as part of a formal review of the plan, not on an ad hoc basis as the result of annual monitoring. I do not therefore support the amendment put forward by the objectors.
- 1.4.11 However the Council suggest that the policy could be amended by the addition of further words at the end of the last sentence to indicate that the annual monitoring would not only assess the extent to which the objectives of the policy were being achieved, but also indicate any need for review of the plan. I consider this to be a sensible addition which adds clarity to the policy.

Recommendation

1.4.12 I recommend that

- i) **the plan be modified by making it clear in the second paragraph of the reasoned justification that the substantial greenfield sites not only have the benefit of planning permission and/or are under construction but are also allocated in the adopted UDP.**
- ii) **The words *and indicate any need for plan review* be added at the end of the policy.**

POLICY 1.5

Following the Principles of Sustainable Development

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	419	O	
Fairfield Golf and Sailing Club	288	152	O	
Trustees of Mrs E Bissill's Fund & Stayley Developments Ltd	807	703	O (rd)	
Banks – Development Division	70	14	S	
English Nature	277	201	S	
Environment Agency	279	233	S	
Greater Manchester Passenger Transport Executive	339	356	S	
Invensys plc	434	165	S	
English Nature	277	651	S (rd)	
OBJ NO	SUMMARY OF OBJECTION			
419	Promoting quality of life - a principle of sustainability should be added to the policy.			

152	A comprehensive review of brownfield land would show there was virtually no need to develop greenfield sites. The policy should be amended.
703	The policy should refer to reuse of empty or underused buildings which are viable and capable of conversion.
14	Residential development of high design standard can provide a good quality sustainable environment.
201	Support the policy.
233	Support the policy.
356	This sets an excellent underlying principle for Part 2 policies.
165	Their site at Edward Street, Denton is a brownfield opportunity with potential for alternative uses.
651	Support policy as it refers to quality of life as guiding principle and to conserving natural assets

Main Issues

- 1.5.1 i) Whether the policy should specifically refer to resisting the loss of greenfield sites to development.
 ii) Whether the policy should refer only to empty or underused buildings which are economically viable and capable of conversion.

Conclusions

- 1.5.2 The Council recognise that promoting the quality of life is a guiding principle of the plan. As a result of objections to the omission of this aspect, the policy was rewritten and the revised deposit version of the plan now includes this reference. The concerns of these objectors have therefore been met, although the objection by Action Against Kingswater Park has not been formally withdrawn.
- 1.5.3 **In respect of the first issue,** it is a fundamental principle of sustainable development that priority will be given to the development of previously used land and this is now stated explicitly in the revised deposit version of policy 1.5. To my mind this is preferable to the amendment advocated by the Fairfield Golf and Sailing Club, as that proposed change implies the protection of greenfield sites should be given some kind of special priority. In seeking to achieve sustainable development a balance must be taken of environmental, social and economic factors. The rewording of the policy as set out by the Council in my opinion achieves that balance.
- 1.5.4 The Council say that there is no need for a comprehensive review of brownfield land as a significant amount of survey work informed the preparation of the UDP including submissions for the National Land Use Data Base and derelict land reclamation. I have seen no evidence which causes me to question the nature or suitability of the survey work which informed the preparation of the plan. In general the strategic objective of sustainable development and maximising the use of brownfield land in accessible locations is evident from the land use allocations and part 2 policies. Whether all these allocations and policies meet the requirements of sustainable development is more appropriately considered in relation to individual objections to specific part 2 policies.
- 1.5.5 **I now turn to the second issue.** Policy 1.5 is a strategic policy which deals with the principles of sustainable development. In seeking to make the most efficient use of land PPG3 advocates the re-use and conversion of buildings. The policy is therefore in line with national policy. Whilst factors such as the suitability and viability of buildings are practical matters which will inevitably determine whether individual buildings are reused, they do not affect the fundamental principle and to my mind it is not necessary to include them in an strategic policy such as 1.5. Such matters are more appropriate in the detailed part 2 policies.

Recommendation

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

POLICY 1.6

Securing Urban Regeneration

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	422	O	
Fairfield Golf and Sailing Club	288	153	O	
House Builders Federation	408	412	O	
Trustees of Mrs E Bissill's Fund & Stayley Developments Ltd	807	704	O (rd)	
Banks – Development Division	70	13	S	
Denton Local History Society	230	137	S	
Invensys plc	434	166	S	
OBJ NO	SUMMARY OF OBJECTION			
422	The policy should be amended to prohibit development of sites in regular use which are not derelict. The policy should be aimed at areas of greatest need.			
153	All types of development not just housing should be encouraged to look first at brownfield locations.			
412	Concern about restrictions on greenfield release when there are doubts about the feasible delivery of brownfield sites.			
704	The reference to the reuse of empty or underused buildings should be limited to those which are viable and capable of conversion.			
13	Older industrial areas often fail to provide conditions necessary to provide quality employment.			
137	Greenfield sites should not be used for housing when brownfield sites are available.			
166	Their site at Edward Street, Denton is a brownfield opportunity with potential for alternative uses.			

Main Issues

- 1.6.1
 - i) Whether the policy should prohibit development of sites in use.
 - ii) Whether the policy should relate to areas in greatest need.
 - iii) Whether the last paragraph in the policy should refer to housing development only
 - iv) Whether the policy should restrict the release of greenfield sites for housing.

Conclusions

- 1.6.2 Insofar as the objection by Action Against Kingswater Park relates to the Waterside Park development my conclusions on policy E1.2 should be read.
- 1.6.3 **Firstly issue (i).** Policy 1.6 is a positive policy which lists ways in which regeneration of the Borough's older areas will be sought. The amendment suggested to prohibit development of sites in use is a negative constraint which would not necessarily apply to all sites. For instance in order to improve the environment and the living conditions of neighbours it may be necessary to get rid of a problematic use in a particular area. To incorporate the suggested amendment to the policy would preclude such action. It follows from this that I do not support the alteration proposed.
- 1.6.4 **I now turn to the second issue.** The policy as presently written refers only to the older urban areas and there is no definition of the term. The Council suggest that to meet the objection the policy should be amended to refer to the regeneration of the urban areas in need. I agree that this is a reasonable alteration which more accurately describes the areas the policy is aimed at. I support the proposed change.

- 1.6.5 **With regard to the third issue**, presently the first paragraph of policy 1.6 is non specific and refers to development generally. It is only the second paragraph which relates solely to housing. It is appropriate that it does refer to housing as this accords with national policy guidance in PPG3 which says that the presumption is that previously developed sites should be developed before greenfield sites. No such presumption is specifically stated in national policy relating to other forms of development. However underlying the sustainable principles of the UDP is the understanding that urban brownfield sites should in general be developed before greenfield land. I therefore see no reason why the second paragraph should not also relate to development generally.
- 1.6.6 However I agree with the Council that deleting only the word *housing* could be tantamount to prohibiting all greenfield development when there may be occasions, for whatever reason, when it would be better to develop unallocated greenfield sites in preference to previously used buildings and land. This is the position which is recognised by the sequential approach set out in policy DP1 of the emerging RPG13. To better reflect the general sequential approach I believe the policy should be modified to read *To stimulate urban regeneration, priority will be given to the reuse of previously developed land and buildings. Unallocated greenfield sites will not be released for development whilst sufficient, suitable, previously developed land and buildings are available within the urban area.*
- 1.6.7 I understand the Council's belief, especially in relation to employment land and the economic difficulties of the Borough, that there is a need for greenfield sites to be developed and this is reflected in some of the allocations in part 2 of the plan. However in my proposed modification, the second paragraph of policy 1.6 is qualified. It does not say *per se* that greenfield sites will not be released if there is sufficient brownfield land. It says that unallocated greenfield sites will not be released whilst there is sufficient *suitable* previously developed land/buildings. Given this qualification, I consider as proposed the second paragraph would better reflect the fact that one of the ways of securing urban regeneration is by giving priority to using previously used land within the urban area, whilst at the same time acknowledging that some of the allocated sites involve the use of greenfield land.
- 1.6.8 **The fourth issue.** As I have concluded on issue 3 that the policy should be modified to refer to all development, it follows that I do not believe new housing should be excluded from the need to consider brownfield sites first. In general terms the Council have followed a pragmatic approach in its review of land availability/brownfield sites and in part 2 policy allocations include part brownfield part greenfield allocations in order to stimulate regeneration. Historically the Council has consistently achieved a higher percentage of housing on brownfield sites than required by national policy and there is no evidence to suggest that this will not continue to be the case. It is in my view entirely appropriate that a strategic part 1 policy should refer to the preference of reusing brownfield land before greenfield sites.
- 1.6.9 The objection by the Trustees of Mrs E Bissill's Marriage Settlement Fund to policy 1.6 is essentially the same as to policy 1.5 above. Consequently my conclusions on that objection apply equally to policy 1.6.

Recommendation

1.6.10 I recommend that

- i) **the first line of the policy be modified to read *Regeneration of the Borough's urban areas, where in need, will be....***

- ii) **The second paragraph of the policy be deleted and replaced by *To stimulate urban regeneration, priority will be given to the reuse of previously developed land and buildings. Unallocated greenfield sites will not be released for development whilst sufficient, suitable, previously developed land and buildings are available within the urban area.***

POLICY 1.7

Supporting the Role of Town Centres

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Fairfield Golf and Sailing Club	288	154	O	
Invensys plc	434	167	S	
OBJ NO	SUMMARY OF OBJECTION			
154	The policy should also refer to town centres as the focus for office and other B1 uses, in line with Government policy.			
167	Support town centre focus and bringing forward derelict and underused sites to strengthen their role			

Main Issue

- 1.7.1 Whether the policy should refer to office and other B1 uses

Conclusions

- 1.7.2 The objection was to the deposit draft of the UDP. Subsequently in the revised deposit plan the Council made specific mention of commercial, office and other employment uses. I consider, as now set out, the policy not only meets the objector's concerns it also satisfactorily includes reference to uses normally associated with town centres. Consequently I do not consider the policy should be modified further as a result of this objection.
- 1.7.3 I note here that as part of its list of unadvertised changes put forward in the summer of 2002, the Council propose alterations to the reasoned justification to the policy. These changes are essentially updating the situation in various town centres. They do not represent any basic alteration to the principle underlying the policy. At the time of writing this report they are however already out of date in some respects and further changes will need to be made at the modification stage to reflect the up to date position.

Recommendation

- 1.7.4 **I recommend that the reasoned justification to the policy be modified to take account of the up to date position in the various town centres.**

POLICY 1.8

Retaining and Improving Opportunities for Sport, Recreation & Leisure

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	430	O	

Government Office for the North West	327	678	O	Yes
English Nature	277	211	S	
Fairfield Golf and Sailing Club	288	155	S	
Invensys plc	434	168	S	

OBJ NO	SUMMARY OF OBJECTION
430	The policy should incorporate the concept of inter-generational equity. There should be a presumption against development in under-provided areas and the quality of open land should be a key factor in planning decisions.
678	The title of the reasoned justification should be consistent with that of the policy.
211	Provides a good basis for provision of public access to areas of nature conservation importance.
155	There is a very close relationship between maintaining recreation / open space and social wellbeing.
168	Support town centre focus and bringing forward derelict and underused sites to strengthen their role

Main Issues

- 1.8.1 i) Whether the policy should include the concept of inter-generational equity.
ii) Whether the reasoned justification should have the same title as the policy.

Conclusions

- 1.8.2 As far as the objection relates to the loss of open space and the development of Waterside Park for employment purposes, this is dealt with under policy E1(2) below in the employment chapter of this report.
- 1.8.3 **In relation to the first issue** policy 1.8 sets out the overall strategy of developing a wider range of recreational opportunities, protecting the existing pattern of parks and conserving the river valleys and areas of accessible countryside. Its provisions are in line with the principles of inter-generational equity in the Rio Declaration, as are other part 1 policies. In particular 1.5 is concerned specifically with following the principles of sustainable development. Given the provisions of other part 1 policies there is in my view no necessity for policy 1.8 to refer specifically to inter-generational equity.
- 1.8.4 **I now turn to the second issue.** It was an oversight by the Council that the heading for the reasoned justification was not expanded in the same way as the policy itself in the revised deposit version of the plan. In its unadvertised changes put forward in the summer of 2002 the Council seek to rectify this omission. In my view it is sensible for the policy and its explanation to have the same title. I support the change.

Recommendation

- 1.8.5 **I recommend that the heading of the reasoned justification to policy 1.8 be modified to read Retaining and Improving Opportunities for Sport, Recreation and Leisure.**

POLICY 1.9

Maintaining Local Access to Employment and Services

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Roland Bardsley Homes	658	31	O	
Ashton-under-Lyne Civic Society	47	6	S	
Denton Local History Society	230	140	S	

Greater Manchester Passenger Transport Executive	339	357	S
OBJ NO	SUMMARY OF OBJECTION		
31	The policy is contrary to PPG3 in that it seeks to protect employment sites without establishing the need for employment land.		
6	Support the policy for local shops but see little evidence of effort from the Council.		
140	Agree.		
357	Support the implementation of mixed use development to help reduce the need to travel.		

Main Issue

1.9.1 Whether the policy presupposes no changes to the use of local employment sites.

Conclusions

1.9.2 Policy 1.9 is a strategic policy which encourages mixed use areas in order to avoid or reduce the number and length of vehicular journeys. As such its objective is in line with a fundamental aim of national policy guidance. Paragraph 46 of PPG3 seeks the provision of sustainable environments, by amongst other things, encouraging mixed use developments. This is also the objective of policy 1.9 which is positive in its support to retain and increase local employment in predominantly residential areas. The policy does not seek to preclude change to local employment sites *per se*.

1.9.3 Whilst I appreciate that paragraph 42 advocates reallocating employment and other land to housing if it cannot realistically be taken up for the purposes proposed, it does not suggest that all brownfield land should be used for housing. The Council indicate that a review of all employment land was undertaken in the course of preparation of the UDP and point to the changes between the adopted and the replacement plan. Moreover the emerging plan contains policies such as E3 and H2 which recognise respectively that housing/mixed use development may be appropriate in established employment areas or on unallocated sites. Also the indicators set out to measure the plan's performance include reviews of employment and residential land. Given these circumstances I consider the plan is in line with national policy guidance and there should be no change to policy 1.9.

Recommendation

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

POLICY 1.10

Protecting and Enhancing the Natural Environment

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	435	O	
Denton Local History Society	230	141	S	
English Nature	277	212	S	
Environment Agency	279	234	S	
English Nature	277	652	S (rd)	
OBJ NO	SUMMARY OF OBJECTION			
435	The policy should stress the need for detailed consideration of the effects of development on conservation and the environment.			
141	Agree, but does this conflict with recognition of the Tame valley as an area for leisure ?			
212	Provides a broad scope for meeting nature conservation issues in more detail in Part 2 of the plan.			

234	Support the policy.
652	Support policy especially as it now includes biodiversity action plan priority habitats and species.

Main Issue

- 1.10.1 Whether the policy should be modified to refer to the need for detailed consideration of development proposals.

Conclusions

- 1.10.2 In line with national policy guidance in PPG12 the UDP part 1 policies state in broad terms the overall strategic principles of the plan. Policy 1.10 therefore sets out the principle that the Council will safeguard and where possible enhance the natural environment, countryside character and biodiversity of the Borough. In part 2 of the plan this strategic objective is turned into more detailed policies which individual proposals must satisfy. It would to my mind add little of value if the policy were to be modified in the way suggested.

Recommendation

- 1.10.3 I recommend to modification to the plan as a result of this objection.

POLICY 1.11

Conserving Built Heritage and Retaining Local Identity

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	436	O	
OBJ NO	SUMMARY OF OBJECTION			
436	The policy should stress the need for detailed consideration of the effects of development on conservation and the environment			

Main Issue

- 1.11.1 Whether the policy should be modified to refer to the need for detailed consideration of development proposals

Conclusions

- 1.11.2 In essence the objection to policy 1.11 is the same as that to policy 1.10. It is only different in that policy 1.11 relates to the conservation of the built heritage and retaining local identity. Therefore my conclusions apply equally to this objection and it follows that I see no necessity for the policy to be modified to take account of the objection.

Recommendation

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