

# **Employment Land Supplementary Planning Document**

## **Consultation Statement**

This statement has been prepared in order to comply with the regulations of the Planning and Compulsory Purchase Act 2004 (regulation 18(4)(b)).

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For a summary of this report in Gujarati, Bengali or Urdu please contact 0161 342 8355.

এই পুস্তিকাটির একটি সংক্ষিপ্তসার গুজরাটি, বাংলা এবং উর্দুতে পাবার ব্যবস্থা করা যেতে পারে।  
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# 1. Introduction

- 1.1 Under the Planning and Compulsory Purchase Act 2004 it is a requirement to prepare and publish a Consultation Statement for a range of planning policy documents, including Supplementary Planning Documents (SPDs). This is a reflection of Government's wish to give communities and stakeholders greater involvement in the development of local communities. The Council formally adopted a Statement of Community Involvement (SCI) on 11th July 2006, which sets out how the public will be consulted on new planning policy and significant planning applications. As the Statement of Community Involvement is adopted, all such planning documents will be required to conform to its provisions.
- 1.2 This Consultation Statement aims to reflect the intentions of Government planning guidance for reporting on community involvement in the plan making process. It describes the involvement of stakeholders, the community, voluntary organisations and statutory consultees in the preparation of the Employment Land Supplementary Planning Document Consultation Draft. The Consultation Draft was made available during a period of formal public consultation of four weeks in March and April 2008, and will also be made available to view alongside the final draft Supplementary Planning Document and the Sustainability Appraisal Report, in accordance with the appropriate regulations<sup>1</sup> at formal public consultation stage.

## 2. Process of Community and Stakeholder Involvement

- 2.1 Work on the preparation of the consultation draft document began in 2006 because it was apparent that additional guidance was required to support the Council's planning policies in relation to employment sites and premises across the Borough. The Employment Land SPD aims to set out the circumstances in which the release of employment sites and buildings for alternative uses will be considered. In addition it provides detailed guidance relating to design and layout of proposed employment development.
- 2.2 The consultation draft was circulated to Council departments for comment during August 2007. Following consultation with the Cabinet Deputy for Technical Services an amended version was produced and approved for the statutory four week period of public consultation on 19<sup>th</sup> February 2008.
- 2.3 Public consultation on the Employment Land Supplementary Planning Document (Consultation Draft) began on 17<sup>th</sup> March 2008 and ended on 25<sup>th</sup> April 2008.
- 2.4 Full documents were sent to some of the consultees, emails to all contactable consultees and letters to all other interested parties informing them that copies of the document could be viewed on the Council's web site, at all libraries in the Borough, Ashton-under-Lyne Customer Service Centre and the Planning department at Tameside Council Offices.

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<sup>1</sup> Town and Country Planning (Local Development) (England) Regulations 2004

- 2.5 For a list of specific consultation bodies and government departments consulted on the draft SPD see Appendix A and for a list of general and other consultees see Appendix B. Details of local councillors consulted are contained in Appendix C.
- 2.6 In addition to the consultees identified in the appendices the Council also notified those individuals and organisations on the Local Development Framework mailing list that consultation was taking place on the draft SPD and how to make a representation and where to access the draft SPD and accompanying documents.
- 2.7 A public notice was also prepared and published in the 'Reporter and Chronicle' newspaper (see Appendix D).
- 2.8 Consultees were invited to write, e-mail or fax any comments to the Planning and Building Control Department prior to the end of the consultation period (4pm 25<sup>th</sup> April 2008).
- 2.9 In addition to the Draft SPD, and as required by the Planning and Compulsory Purchase Act 2004, the Council carried out a Sustainability Appraisal (SA). The SA process incorporates the requirements of European Directive 2001/42/EEC, which requires a Strategic Environmental Assessment of any policy, plan or programme produced by a local authority.
- 2.10 The first stage of this was to produce and consult on a Scoping Report - an initial evidence gathering exercise which identifies plan and sustainability objectives. After considering the representations a Sustainability Report was published alongside the consultation draft of the Employment Land SPD.
- 2.11 The Council also carried out a Habitats Regulations Assessment as required under Article 6(3) and 6(4) of the Habitats Directive as implemented by the draft Habitat Regulations 2006. This involved consultation with the Greater Manchester Ecology Unit and Natural England. A copy of the assessment is available to view alongside the SPD.
- 2.12 A total of 16 representations were made on the Employment Land SPD, see Appendix F for details.
- 2.13 On completion of the consultation period, all the responses were gathered, read and assessed and a factual summary of the main points was produced during September 2008. Responses to comments received during the external consultation period, which closed in April 2008, are included in Appendix E, Table E.1. The changes to the supplementary planning document as a result of the comments shown in Table E.1 and supersede any previous changes.
- 2.14 The final Employment Land SPD was produced between September and November 2008 taking into account the responses to the consultation draft document published in March 2008.

# Appendices

## Appendix A. Specific Consultation Bodies Consulted on the Draft SPD

The following list of consultation bodies are those identified in Appendix G of the adopted Tameside Statement of Community Involvement.

- The Regional Planning Body – The North West Regional Assembly
- A relevant authority any part of whose area is in or adjoins the area of the local planning authority:
  - Derbyshire County Council;
  - Stockport Metropolitan Borough Council;
  - Oldham Metropolitan Borough Council;
  - Peak District National Park Authority;
  - High Peak Borough Council;
  - Manchester City Council;
  - Mossley Town Council;
  - Saddleworth Parish Council;
  - Tintwistle Parish Council;
  - Charlesworth Parish Council; and
  - Chisworth Parish Council.
- The Countryside Agency<sup>2</sup>
- The Environment Agency
- The Highways Agency
- The Historic Buildings and Monuments Commission for England (English Heritage)
- English Nature<sup>3</sup>
- Network Rail
- A Regional Development Agency whose area is in or adjoins the area of the local planning authority – North West Development Agency, East Midlands Development Agency
- Any person to whom the electronic communications code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003: British Telecommunications
- Any person who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority: Mobile Operators Association, Vodafone Ltd, One2One Personal Communications Ltd, O2 (UK) Ltd, Orange Personal Communications Services Ltd
- Any of the bodies from the following list who are exercising functions in any part of the area of the local planning authority:
  - I. Strategic Health Authority – Greater Manchester Strategic Health Authority
  - II. Person to whom a license has been granted under sec 7(2) of the Gas Act 1986 – Transco North West
  - III. Sewage undertaker United Utilities Properties Limited and United Utilities – Service delivery

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<sup>2</sup> The Countryside Agency merged with English Nature in October 2006 to form Natural England which is now a statutory consultee.

<sup>3</sup> English Nature merged with the Countryside Agency in October 2006 to form Natural England which is now a statutory consultee.



IV. Water undertaker: United Utilities Properties Limited and United Utilities –  
Service delivery

- Government Departments:
  - Department for Constitutional Affairs;
  - Department of Culture, Media and Sport;
  - Government Office for the North West (GONW);
  - Defence Estate Organisation (Ministry of Defence);
  - Department for Work and Pensions;
  - Department for Environment, Food and Rural Affairs;
  - The Home Office;
  - Office of Government Commerce;
  - Department for Education and Skills (through GONW);
  - Department of Transport (through GONW);
  - Department for Health (through the regional public health group);
  - Department for Trade and Industry<sup>4</sup>

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<sup>4</sup> The Department for Trade and Industry was replaced by the Department for Business Enterprise and Regulatory Reform (BERR) in 2007



## Appendix B. General and Other Consultees

General consultation bodies are those identified in Appendix G of the adopted Tameside Statement of Community Involvement:

- Voluntary bodies, some or all of whose activities benefit any part of the authority's area;
- Bodies which represent the interests of different racial, ethnic or national groups in the authority's area;
- Bodies which represent the interests of different religious groups in the authority's area;
- Bodies which represent the interests of disabled persons in the authority's area; and
- Bodies which represent the interests of persons carrying on business in the authority's area.

Other consultees are those identified in Appendix G of the adopted Tameside Statement of Community Involvement:

- |   |  |
|---|--|
| (a) Age Concern;  | i. Campaign to Protect of Rural England <sup>5</sup> ;                                 |
| (b) Airport operators: Manchester Airport;  | ii. Friends of the Earth;  |
| (c) British Chemical Distributors Association;  | iii. Royal Society for the Protection of Birds; and                                    |
| (d) British Geological Survey;  | iv. Wildlife Trusts.   |
| (e) British Waterways, canal owners and navigation authorities;                         | (t) Equal Opportunities Commission   |
| (f) Centre for Ecology and Hydrology;   | (u) Fire and Rescue Services   |
| (g) Chambers of Commerce, Local CBI and local branches of the Institute of Directors;   | (v) Forestry Commission  |
| (h) Church Commissioners;   | (w) Freight Transport Association  |
| (i) Civil Aviation Authority;   | (x) Gypsy Council  |
| (j) Coal Authority;   | (y) Health and Safety Executive  |
| (k) Commission of Architecture and the Built Environment;                               | (z) Help the Aged  |
| (l) Commission for New Towns and English Partnerships;                                  | (aa) Housing Corporation   |
| (m) Commission for Racial Equality;   | (bb) Learning and Skills Council   |
| (n) Crown Estate Office;  | (cc) Local Agenda 21 bodies including:   |
| (o) Diocesan Board of Finance;  | i. Civic Societies;  |
| (p) Disability Rights Commission;   | ii. Community Groups;  |
| (q) Disabled Persons Transport Advisory Committee;                                      | iii. Local Transport Authorities;  |
| (r) Electricity, Gas and Telecommunications undertakers, and the National Grid Company; | iv. Local Transport Operators; and   |
| (s) Environmental groups at national, regional and local level, including:              | v. Local Race Equality Councils and other local equality groups.                       |
|   | (dd) National Playing Fields Association   |
|   | (ee) Network Rail  |
|   | (ff) Passenger Transport Authorities: Greater Manchester Passenger Transport Executive |

<sup>5</sup> Formerly The Council for the Protection of Rural England

- (gg) Passenger Transport Executives
- (hh) Police Architectural Liaison  
Officers/Crime Prevention  
Design Advisors
- (ii) Port Operators
- (jj) Post Office Property Holdings
- (kk) Rail Companies and Rail Freight  
Group
- (ll) Regional Development Agencies
- (mm) Regional Housing Boards
- (nn) Regional Sports Boards
- (oo) Road Haulage Association
- (pp) Sport England
- (qq) The House Builders Federation
- (rr) Transport for London
- (ss) Traveller Law Reform Coalition
- (tt) Water Companies
- (uu) Women's National Commission
- (vv) Council for British Archaeology
- (ww) Greater Manchester  
Archaeological Unit

## Appendix C. Councillor Consultee List

The following Councillors were contacted during the consultation process:

Councillor R Ambler	Letter, follow up email and hard copy of document
Councillor D Baines	Letter, follow up email and hard copy of document
Councillor B Beeley	Letter, follow up email and hard copy of document
Councillor JS Bell	Letter, follow up email and hard copy of document
Councillor H Bowden	Letter, follow up email and hard copy of document
Councillor W Bray	Letter, follow up email and hard copy of document
Councillor W Brelsford	Letter, follow up email and hard copy of document
Councillor D Buckley	Letter, follow up email and hard copy of document
Councillor V Carter	Letter, follow up email and hard copy of document
Councillor GP Cooney	Letter, follow up email and hard copy of document
Councillor J Davis	Letter, follow up email and hard copy of document
Councillor D Dickinson	Letter, follow up email and hard copy of document
Councillor A Doubleday	Letter, follow up email and hard copy of document
Councillor M E Downs	Letter, follow up email and hard copy of document
Councillor W Downs	Letter, follow up email and hard copy of document
Councillor A Etchells	Letter, follow up email and hard copy of document
Councillor R Etchells	Letter, follow up email and hard copy of document
Councillor J Fitzpatrick	Letter, follow up email and hard copy of document
Councillor A Gwynne	Letter, follow up email and hard copy of document
Councillor AJ Gwynne	Letter, follow up email and hard copy of document
Councillor W Harrison	Letter, follow up email and hard copy of document
Councillor A Highton	Letter, follow up email and hard copy of document
Councillor AJ Holland	Letter, follow up email and hard copy of document
Councillor B Holland	Letter, follow up email and hard copy of document
Councillor J Kelly	Letter, follow up email and hard copy of document
Councillor J Kitchen	Letter, follow up email and hard copy of document
Councillor J Lane	Letter, follow up email and hard copy of document
Councillor C A Meredith	Letter, follow up email and hard copy of document
Councillor J Middleton	Letter, follow up email and hard copy of document
Councillor M H Oldham	Letter, follow up email and hard copy of document
Councillor R Oldham	Letter, follow up email and hard copy of document
Councillor S Parker-Perry	Letter, follow up email and hard copy of document
Councillor C Piddington	Letter, follow up email and hard copy of document
Councillor K Quinn	Letter, follow up email and hard copy of document
Councillor S Quinn	Letter, follow up email and hard copy of document
Councillor J Reynolds	Letter, follow up email and hard copy of document
Councillor V Ricci	Letter, follow up email and hard copy of document
Councillor G Roberts	Letter, follow up email and hard copy of document
Councillor PJ Robinson	Letter, follow up email and hard copy of document
Councillor E Shorrock	Letter, follow up email and hard copy of document
Councillor M Sidebottom	Letter, follow up email and hard copy of document
Councillor M Smith	Letter, follow up email and hard copy of document

Councillor S Smith	Letter, follow up email and hard copy of document
Councillor J Sullivan	Letter, follow up email and hard copy of document
Councillor D Sweeton	Letter, follow up email and hard copy of document
Councillor JC Taylor	Letter, follow up email and hard copy of document
Councillor L Travis	Letter, follow up email and hard copy of document
Councillor B Walsh	Letter, follow up email and hard copy of document
Councillor M Wareing	Letter, follow up email and hard copy of document
Councillor B Warrington	Letter, follow up email and hard copy of document
Councillor K Welsh	Letter, follow up email and hard copy of document
Councillor R Welsh	Letter, follow up email and hard copy of document
Councillor C White	Letter, follow up email and hard copy of document
Councillor A Whitehead	Letter, follow up email and hard copy of document
Councillor M Whitley	Letter, follow up email and hard copy of document
Councillor B Wild	Letter, follow up email and hard copy of document
Councillor K Wright	Letter, follow up email and hard copy of document

## Appendix D. Public Notice

Public notice from the Reporter and Chronicle 13<sup>th</sup> March 2008:

**Planning and Compulsory Purchase Act 2004**  
**Employment Land Supplementary Planning Document**  
**Public Notice Inviting Representations**  
Under Regulation 17 of the Town and Country Planning Act (LD)(England)  
Regulations 2004

**Tameside Metropolitan Borough Council**  
Planning and Building Control  
March 2008

Pursuant to Regulation 17 above, Tameside Metropolitan Borough Council invites representations on its draft Employment Land Supplementary Planning Document (SPD), which it intends to adopt, in May 2008, subject to the outcome of this public consultation.

The draft SPD aims to update and improve on existing guidance notes, and so the SPD document includes three specific topics:-

- Guidance on the approach the Council will take to dealing with applications for mixed use or non-employment developments on employment land..
- Describes the local economic context, and the current situations with regard to existing employment land and premises, and the available supply of employment land.
- Advice and guidance on submitting applications for employment development or development on employment land and sets out the information that applicants are expected to provide in support of their applications.

The draft SPD is therefore subject to a period of public consultation from Monday 17th March to 25th April during which period we will receive representations. **The consultation period will end at 4:00pm on Friday 25th April 2008. We cannot accept late representations.**

Preferably, representations should be in writing on our representations form available from our deposit venues or website and sent by post to The Strategic Planning Office, Rm 1.41, Tameside Council Offices, Ashton-Under-Lyne, Tameside, OL6 6DL or FAX to 0161 342 2837 or by email attachment to [lucie.hawkins@tameside.gov.uk](mailto:lucie.hawkins@tameside.gov.uk). Any submitted representations will be available for public inspection at the Council Offices on closure of the consultation period. Anonymous responses will not be considered so please ensure that you provide us with a name and address and in return we will keep you informed of progress on this SPD.

The draft Employment Land SPD & supporting documents will be available for inspection from 17th March at the following locations:

- **Tameside Council Offices**, Planning and Building Control, Council Offices, Wellington Road, Ashton-under-Lyne, Tameside, OL6 6DL.  
Opening times: Monday to Wednesday - 9.00 a.m. to 5.00 p.m.  
Thursday - 9.00 a.m. to 4.30 p.m. Friday - 9.00 a.m. to 4.00 p.m.
- **On the Council's website** - <http://www.tameside.gov.uk/planning>  
**Look for the 'stop press'**  
(Where they can be downloaded)
- **Tameside Customer Service Centres** - Details of opening times can be found on the Council website [www.tameside.gov.uk](http://www.tameside.gov.uk) or by telephoning the Customer Service Centre (Tel No 0161 342 8355)  
All Customer Service Centres can be emailed at:  
[customer.services@tameside.gov.uk](mailto:customer.services@tameside.gov.uk)
- **All Tameside Libraries** - Details of opening times can be found on the Council website [www.tameside.gov.uk](http://www.tameside.gov.uk) or by telephoning the library/Customer Service Centre (Tel No 0161 342 8355)

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## Appendix E. Summary of Consultation Comments on the Consultation Draft SPD

- E.1 The following section summarises the main comments received during the six week statutory consultation period March/April 2008.
- E.2 The summary is presented in tabular form for ease of understanding – amendments to the SPD text are shown in red and deleted text is shown in red strikethrough.
- E.3 If required you may see the original consultation comments – please contact the Strategic Planning team to arrange on Tel: 0161 342 3104.

**Table E.1 – Summary of consultation comments, council response and amendments:**

Comment	Response	Amendments
<p><b><u>ELSPD01 – Colliers CRE on behalf of Rodo Group Limited – site at Langham Street, Ashton-under-Lyne</u></b></p> <p>CCRE/Rodo fundamentally disagree with the assumption made in paragraph 5.14 that Langham Street is a high quality employment site, their view is that it is of low quality. Specifically units 1 and 4 should not be treated in the same manner as other units on the Langham Street area - they have distinguishable characteristics which mean that they are unattractive to the market in their current state and could not be redeveloped for employment purposes even if there were demand.</p>	<p><i>The Council is of the opinion that this site is a high quality employment site following the assessment of the site under phase one of the employment land review (Appendix A). The lack of availability of appropriate premises in Tameside is a significant barrier to economic enterprise.</i></p>	<p><b>No change</b></p>



Comment	Response	Amendments
<p>The submission also notes that the draft SPD does not identify the Rodo land as being marketed on an all enquiries basis neither does the document identify the state of repair of the premises.</p> <p>On the basis of the evidence proved then units 1 and 4 should not be treated in the same manner as other properties in the Langham Street industrial area.</p> <p>The submission disagrees with the approach of dealing with the Langham Street area as one with regards to assessment in line with the Government's Employment Land Review Guidance (2004). Evidence presented suggests that Units 1 and 4 are not required by the market even at a heavily discounted price.</p> <p>It is considered that the site has been rigorously tested by the market - 4 month Council sanctioned marketing campaign plus previous marketing before CCRE's involvement.</p>	<p><i>It is not the remit of this SPD to go into site specific details relating to marketing and the state of repair of the units.</i></p> <p><i>The 'high quality site' judgment is not made on the quality of individual units but on the suitability of the site for continued employment purposes.</i></p> <p><i>See above comment.</i></p> <p><i>This is of little relevance as the purpose of the SPD consultation is not to assess individual sites against proposed criteria (Paragraph 6.18) on activity that may have happened before the document has been adopted.</i></p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p>
<p><b><u>ELSPD02 – Cordingleys on behalf of MUSE Developments &amp; Stayley Developments – site bounded by Richmond St, Rayner Lane and</u></b></p>		

Comment	Response	Amendments
<p><b><u>the M60</u></b></p> <p>The representation argues that under the current policy allocation the site is financially non-viable. There are abnormal costs associated with the site: Peat - significant amount present and remediation would be required; and Fragmented Ownership - the site is within the ownership of five parties and this is a significant financial consideration. It is therefore believed that mixed use is the only option available.</p> <p>An approach allowing enabling development is the only way to deliver Plot 3000 for employment use. Due to existing Council policy and to locate B1(a) Office development in the town centre then residential C3 is seen as an option which could provide enabling assistance together with providing deliverable supply of housing that would assist the Council in meeting it's housing requirements.</p>	<p><i>These comments relate to the Employment Land Review detailed in Paragraph 5.14 and in Appendix A and should be taken into account in refining the quality and quantity audit. In terms of the SPD the remainder of the representation relates to the specifics of the site which is not part of the SPD consultation. It should be noted that the SPD specifically sets out in Paragraph 6.3 that each application will be treated on its own merits and that the Employment Land Study only gives a 'rough indication' of whether an applicant would be able to justify the release of a site.</i></p> <p><i>It is important to note in the context of this site the representation of the NWRDA. The Regional Economic Strategy specifically identifies Ashton Moss as a Strategic Regional Site under Transformational Action 80. This is based on delivery of high quality employment sites and premises.</i></p>	<p><b>No change</b></p> <p><b>No change</b></p>
<p><b><u>ELSPD03 – Indigo Planning Ltd on behalf of Dooba Investments V Ltd – Arrow Trading Estate, Audenshaw</u></b></p>		

Comment	Response	Amendments
<p>Object to designation of the Trading Estate being designated as 'High Quality'.</p> <p>Non availability of detailed assessment means that there is no information against which to test the suitability of the site for continued employment use.</p> <p>Although established the site cannot be considered 'high quality' due to ageing units, poor quality, relative poor location within a mainly residential area, poor configuration, poor servicing arrangements, increasing vacancy and short term lets, low density of jobs and low quality. The site fails to meet modern employment requirements and refurbishment is becoming increasingly unviable.</p> <p>Medium term - the sites would be suitable for residential development - meet the brownfield criteria in PPS3 and are close to town centre and local services.</p> <p>Site is seen as a suitable candidate for allocation as a new site for housing or mixed use in the medium term to fulfill emerging draft RSS housing figures. It is also recognised</p>	<p><i>These comments relate to the Employment Land Review detailed in Paragraph 5.14 and in Appendix A.</i></p> <p><i>The assessment was conducted in line with the Employment Land Review Guidance published by the Government in 2004. The Council is confident that this methodology produced clear results.</i></p> <p><i>The Council is of the opinion that this site is of 'high quality' following assessment against the 14 poor quality and 11 high quality criteria. When assessing the characteristics listed in the representation it is clear that would have little impact on the scoring against the low and high quality criteria (see Table A1 and A2 in Appendix A of the SPD). In addition the complete list of sites assessed is now on the Council's website.</i></p> <p><i>Agree – the site would fulfil the brownfield criteria in PPS3 but there is also no presumption that because of this that the site is suitable for housing development.</i></p> <p><i>Disagree – the site is not seen as a suitable candidate for housing development. The SPD clearly states that there is a limited supply of employment land and sites within the Borough.</i></p>	<p><b>No change</b></p> <p><b>No change</b></p> <p>6.4 The results of the Employment Land Study are shown in Appendix A and a full list of sites appraised is available on the Council's website at <a href="http://www.tameside.gov.uk/XXXXX">www.tameside.gov.uk/XXXXX</a> (not yet available) <a href="http://www.tameside.gov.uk/planning/ldf/spd/employland">www.tameside.gov.uk/planning/ldf/spd/employland</a>.</p> <p><b>No change</b></p> <p><b>No change</b></p>

Comment	Response	Amendments
<p>that the Council needs to allocate additional employment land but this should be allocated in locations that offer the maximum potential for employment regeneration.</p> <p>Possibility of including some modern employment space in a mixed use scheme to provide for existing or new tenants and to maximise job retention/creation.</p>	<p><i>Additionally the Borough currently has a XX years housing supply.</i></p> <p><i>The decision making mechanisms in the SPD allow the opportunity to demonstrate a partial release of high quality site for non-residential uses maybe warranted and that this evidence can be taken into account..</i></p>	<p><b>No change</b></p>
<p><b><u>ELSPD04 – Emery Planning Partnership</u></b></p> <p>The SPD should not seek to change the UDP itself as this already contains protection for employment sites.</p> <p>Care is needed so that mixed use development on an employment site does not cause blight by being inappropriate.</p> <p>Request for the restrictive policies being promoted on E3 land are not similarly imposed on the Borough's mixed use/opportunity areas under policy E2.</p> <p>There should be no requirement to</p>	<p><i>Agree – the aim of the SPD is to support these policies in the adopted UDP.</i></p> <p><i>Agree – this is covered in Paragraph 6.34 of the SPD.</i></p> <p><i>The SPD does not affect Policy E2 designations of the adopted UDP, it merely seeks to clarify the mechanisms used to determine the future use of employment land as defined by Policy E3 in which employment land will be retained for employment uses. E2 sites remain separate.</i></p> <p><i>Agreed - Paragraph 1.6 final sentence to</i></p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p> <p>1.6 'Established Employment Areas' are defined under policy</p>

Comment	Response	Amendments
<p>apply the same tests as for policy E3 to policy E2 sites. These are specifically identified as being completely separate from E3 sites for very clear reasons.</p> <p>Therefore clarification is sought that the SPD will not apply to Policy E2.</p>	<p><i>be amended as follows:</i></p>	<p>E3 of the UDP and in most instances are shown on the proposals map. Proposals for redevelopment of employment sites that are not shown on the UDP proposals map are also covered by policy E3. The scope of this SPD therefore extends to all sites and premises that are currently in, or were last in employment use and sites proposed for employment use, <b>with the exception of sites identified in UDP Policy E2 (Development Opportunity Areas) because of the way that land use suggestions are made for each area in the policy text.</b></p>
<p><b><u>ELSPD05 – Northwest Regional Development Agency</u></b></p> <p>Council's approach towards the protection of employment land is seen as appropriate in view of the limited supply of employment land sites, especially those that are of better quality and genuinely available, and the need to identify new allocations to satisfy the requirements of emerging Draft RSS.</p> <p>Reference to the aspirations of the RES in Paragraph 6.38 is noted. These are not set out in the Draft SPD and it is suggested that a brief summary of the RES, its Vision and the need to close the Region's £13 billion GVA output gap be included in the section on national and regional policy context in Chapter 3. It would be helpful to refer also to</p>	<p><i>Noted.</i></p> <p><i>Include brief summary of RES in section on regional policy context. The following addition was made as paragraph 3.15 in the final version of the Employment land SPD.</i></p>	<p><b>No Change</b></p> <p><b>3.15 Northwest Regional Economic Strategy (RES) (2006).</b></p> <p>The RES identifies three main drivers to attain the strategy's vision and closing the output gap between the north west and the average for England:</p> <ul style="list-style-type: none"> <li>• Improve productivity and grow the market;</li> <li>• Grow the size and capability of the workforce; and</li> <li>• Create and maintain the conditions for sustainable growth.</li> </ul>

Comment	Response	Amendments
<p>RES Actions of particular reference to Tameside, notably transformational actions 26 (re skills) and 80 (re the Ashton Moss strategies regional site).</p> <p>In a national planning policy context it would be helpful to reference PPS25 and PPS4.</p>	<p><i>Include PPS4 and PPS25 Consultation Paper in section on national planning policy (Paragraphs 3.10 and 3.13).</i></p>	<p>Tameside is identified under a number of transformational actions:</p> <ul style="list-style-type: none"> <li>• Delivering the basic skills required by employers for those without qualifications: and</li> <li>• Delivering the designated Strategic Regional Sites (Ashton Moss).</li> </ul> <p><b>3.10 Consultation Paper on a new Planning Policy Statement 4 (PPS4) Planning for Sustainable Economic Development (December, 2007).</b></p> <p>This draft guidance has emerged in the light of the <i>The Review of Land Use Planning</i> by Kate Barker. Set against delivering sustainable development the guidance aims to raise the UKs economic productivity, increase job opportunities for all, improve the performance of the English regions and build prosperous communities.</p> <p>The document emphasises the importance of a robust evidence base and flexibility in the approach to the supply of land in order to plan positively.</p> <p><b>3.13 Planning Policy Statement 25 (PPS25) Development and Flood Risk (DCLG, 2006).</b></p> <p>PPS25 sets out the Governments approach to planning and flood risk. The overall aim is to steer new development to areas with the lowest risk of flooding (Flood Zone 1). Developers have the responsibility of ensuring their proposal is consistent with PPS25, providing a Flood Risk Assessment (FRA) for all proposals in flood zones 2 and 3 and for all developments over 1 hectare in flood zone 1, using design that will reduce flood risk and enhancing biodiversity and</p>

Comment	Response	Amendments
<p>Also with regard to the figures in table 5.1 on the need for employment land - these should be updated to reflect the Sec of State proposed changes to the Draft RSS (2261 and 893 Hectares).</p>	<p><i>Table content and text amended (table 5.1, page 12) to reflect the changes in the now adopted North West of England Plan: Regional Spatial Strategy to 2021. Original paragraphs 3.11 and 3.12 deleted and replaced with new paragraph 3.14.</i></p>	<p>amenity.</p> <p><b>3.11 Regional Spatial Strategy: Regional Planning Guidance for the North West RPG13 (GONW, 2003)</b></p> <p><del>RSS Core Development Principle 'DP3: Quality in New Development' requires Local Authorities to prepare guidance to ensure that new development is integrated with surrounding land uses taking into account the landscape character, setting, the quality, distinctiveness and heritage of the environment and use of sympathetic materials. This SPD conforms with these requirements.</del></p> <p><b>3.12 The North West Plan: Submitted Draft Regional Spatial Strategy (NWRA, 2006)</b></p> <p><del>Draft RSS Policy W4 'Release of Allocated Employment Land' requires that there should be a presumption against the release of allocated employment sites for other uses when considering proposals and schemes. Sites should not be released where they provide, or have the potential to provide an important contribution to the economy of the local area. Before releasing sites, Local Authorities should make sure that there:</del></p> <ul style="list-style-type: none"> <li><del>• Is an appropriate supply of sites available for employment uses, and</del></li> <li><del>• Are replacement sites available, of equal or better quality, or alternative means of incorporating employment land needs have been identified (if required).</del></li> </ul> <p><b>3.14 The North West of England Plan: Regional Spatial Strategy to 2021 (GONW, Sept 2008).</b></p> <p>RSS Spatial Principle 'DP4: Make the Best Use of Existing Resources and Infrastructure' suggests that locations should</p>

Comment	Response	Amendments
		<p>be utilised that build on existing concentrations of activities and existing infrastructure and that development should follow a sequential approach based firstly upon using existing buildings within settlements and previously developed land within settlements. This SPD conforms with the Requirements of DP4 and those of the other spatial principles.</p> <p>RSS Policy W4 'Release of Allocated Employment Land' requires that there should be a presumption against the release of allocated employment sites for other uses when considering proposals and schemes. Sites should not be released where they provide, or have the potential to provide an important contribution to the economy of the local area. Before releasing sites, Local Authorities should make sure that there:</p> <ul style="list-style-type: none"> <li>• Is an appropriate supply of sites available for employment uses, and</li> <li>• Are replacement sites available, of equal or better quality, or alternative means of incorporating employment land needs have been identified (if required).</li> </ul>
<p><b><u>ELSPD06 – Environment Agency</u></b></p> <p>The Environment Agency supports the aspirations of the SPD.</p> <p>Flood Risk (Chap 7) - Paragraph 7.8 - support the inclusion of reference to the sequential test. The Gtr Manchester SFRA should be used in the sequential testing of employment sites once it is completed.</p>	<p><i>Noted.</i></p> <p><i>Noted and amended to include reference to use of GM SFRA in sequential testing. Following sentence inserted into Paragraph 7.9 (renumbered due to addition of new paragraph 7.7).</i></p>	<p><b>No Change</b></p> <p><b>7.9</b> Under the requirements of PPS25, developers and Local Planning Authorities should apply a risk-based sequential test when considering development sites which may be liable to flooding. <b>The Greater Manchester Strategic Flood Risk Assessment (GM SFRA) will, when adopted, be used for the sequential testing of sites.</b> It is worth noting that sites that are</p>



Comment	Response	Amendments
<p>Paragraph 7.9 - This Paragraph indicates the Flood Risk Assessments are only required where sites are over 1 Ha. PPS 25 requires FRA to be undertaken when a proposed development is to be located in flood zones 2 and 3 (EA Flood Maps) as well as where the development is over 1 Ha in flood zone 1.</p> <p>Under PPS25 Employment Uses are classed as less vulnerable uses and are not permitted in areas of functional floodplain (Zone 3B).</p> <p>Further guidance on Flood Risk Assessments and advice for developers can be found at <a href="http://www.pipernetworking.com">www.pipernetworking.com</a> - this should be included in Appendix B as a useful resource for SUDs as part of attenuation for surface water runoff.</p> <p>Design and Layout (Chap 10) - Where sites are located near to a main river the EA would expect a clear, undeveloped buffer of 8 metres between the development and top of bank. Any works within the 8 metres requires our formal</p>	<p><i>Paragraph 7.10 will be amended to reflect the requirements of PPS 25 (Annex D) (renumbered due to addition of new paragraph 7.7).</i></p> <p><i>Insert an additional sentence to clarify this in Chapter 7 – paragraph 7.11.</i></p> <p><i>Amend Appendix B with additional guidance resource.</i></p> <p><i>Insert additional paragraph (10.10) setting out these points</i></p>	<p>considered to be unacceptable for residential development may be considered acceptable for other uses including employment.</p> <p><b>7.10 Flood Risk Assessments <del>may be required for sites of one hectare or more</del> are required for sites located in flood zones 2 and 3 and for sites of one hectare or more located in flood zone 1 (Environment Agency Flood Maps).</b></p> <p><b>7.11 Under PPS25 employment uses are classed as 'less vulnerable' but are not permitted in areas of functional floodplain (zone 3b).</b></p> <p><b>Flood Risk Assessment – SUDS and attenuation of surface water runoff: <a href="http://www.pipernetworking.com/floodrisk">http://www.pipernetworking.com/floodrisk</a>.</b></p> <p><b>10.10 For development located near to a main river the Environment Agency expect a clear, undeveloped buffer between the development and the top of the bank. Any work within eight metres requires formal consent from the Environment Agency (under land drainage byelaws (Water Resources Act 1991)).</b></p>

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<p>consent (under land drainage byelaws (water Resources Act 1991)). Paragraph 10.11 - opportunities exist where there are culverted watercourses to 'open up' the culvert to improve biodiversity and reduce flood risk - this improves overall design of the development.</p> <p>The EA has a policy against culverting watercourses and would object to proposals which show this as part of their design.</p>	<p><i>In new Paragraph 10.14 make reference to opening culverted watercourses in relation to reducing flood risk and improving biodiversity. Also make reference to EA's policy against culverting.</i></p>	<p><b>10.14</b> Opportunities exist, where there are culverted watercourses, to 'open up' the culvert to improve biodiversity and reduce overall flood risk. The Environment Agency has a policy stance opposed to the culverting of any watercourses and will object to any proposal which shows this as a part of the scheme. This contributes to the overall design of the development.</p>
<p><b><u>ELSPD07 Jones Lang LaSalle on behalf of BP Castrol</u></b></p> <p>Operations will close at the end of 2008. Redevelopment of the site with a mixed use scheme could deliver significant environmental and regeneration benefits.</p> <p>Furnace Street is identified as a 'middle ranking site' which can allow for regeneration benefits to be exercised on the site, we consider that the SPD does not provide sufficient guidance for such sites.</p> <p>Concerns raised over the lack of</p>	<p><i>These comments relate to the Employment Land Review detailed in Paragraph 5.14 and in Appendix A and should be taken into account in refining the quality and quantity audit that is part thereof.</i></p> <p><i>The Employment Land Review is intended as a 'rough guide' to the likelihood of a site being suitable for release from employment designation. As the SPD explains – "Each application will be treated on its own merits".</i></p> <p><i>Refer to Economic Development for work</i></p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p>

Comment	Response	Amendments
<p>clarity in terms of the level of marketing required. It is not felt that it is appropriate to seek a 12 month marketing period for the partial loss of employment land as part of the delivery of a mixed use scheme, where significant environmental and regeneration benefits will accrue.</p> <p>The supportive planning policy framework at a national, regional and local level for development indicates that new development can provide significant regeneration benefits. The view is that the SoS attaches significant weight to regeneration benefits delivered through development in determining planning applications (appeal or call-in). Therefore it is clear that regeneration benefits are a 'material consideration' in the determination of planning applications.</p> <p>It is not considered that the SPD reflects the significant regeneration benefits that can be provided and should include more specific guidance perhaps through a criteria based approach.</p> <p>It is argued that where a mixed use scheme is provided a marketing exercise should not be required - especially where the number of jobs</p>	<p><i>on the marketing criteria.</i></p> <p><i>Agree – but the aim of the SPD is to balance the needs of regeneration with the need for employment land and sites. The SPD does not prejudice sites in this respect as it sets out in Paragraph 6.3 “Each application will be treated on its own merits...”</i></p> <p><i>Similar response to above point – the SPD in conjunction with UDP Policy E3 is set out to ensure a rational and consistent approach to the redevelopment of employment sites. The criteria based approach is already set out in Figure 6.1.</i></p> <p><i>Again refer to the point above – the aim of the SPD is to balance the need for regeneration with the retention of employment sites given the pressure on</i></p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p>

Comment	Response	Amendments
<p>created results in no net loss of jobs. It is not felt that the SPD reflects such opportunities - indeed the requirement for a 12 month marketing period in such situations can delay the delivery of such opportunities by leaving vacant sites undeveloped.</p> <p>It is also argued that undeveloped sites cause blight and create opportunities for crime and vandalism. Enabling development reduces this burden on the local community and the site owner.</p> <p>Additionally request that the statement by Baroness Andrews is taken into account. This puts forward that the wider benefits of development, when in accordance with the development plan, are taken into account and that the focus is on the RSS housing requirements and not the five year supply. Some flexibility is requested in this regard in the SPD.</p> <p>The concluding point is that a more defined approach is required in the document that will provide clear guidance for 'middle-ranking' sites.</p>	<p><i>such sites from alternative uses.</i></p> <p><i>Agree – but it is the responsibility of the owner to maintain the security and appearance of the site.</i></p> <p><i>Noted – this point is addressed above.</i></p> <p><i>See above point.</i></p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p>
<p><b>ELSPD08 – Greater Manchester Passenger Transport Executive</b></p>		

Comment	Response	Amendments
<p>The location, layout and design of new employment has a direct influence on how people choose to travel and therefore it is important that public transport is considered at the outset of new development proposals rather than fitted in at a later stage. This SPD will be an important tool in enabling this to happen and therefore it is considered that a section on public transport should be included, in Chapter 9. This should include specific guidance about the location and design of new development in relation to public transport. Bus movements need to be taken into account and the aim should be to ensure that buses can, where appropriate penetrate the development and that there is convenient pedestrian access to stops and stations.</p> <p>It is important for new employment development to be located within reasonable walking distance of a bus stop, or railway station. This will ensure equality of opportunity for those people who do not have access to a car, and will also encourage people to use their cars less. Ideally all parts of a development should be: within 400m</p>	<p><i>Agree – include additional paragraphs in Chapter 9 relating to public transport. See also new paragraphs 9.6 to 9.9.</i></p> <p><i>Agree – but new paragraph 9.7 has been amended to reflect the spirit of this suggestion whilst not dictating such precise measurement which would be unrealistic. See paragraph 9.7 opposite</i></p>	<p><b>Public Transport</b>  <b>9.6</b> The location, layout and design of new employment developments has a direct influence on how people choose to travel and therefore it is important that public transport is considered from the outset of new development proposals.</p> <p><b>9.7</b> New employment development should be located within reasonable walking distance of a bus stop, or railway station. This will ensure equality of opportunity for those people who do not have access to a car, and will also encourage people to use their cars less.</p>

Comment	Response	Amendments
<p>of a bus service running every 15 mins at all times; or within 250m of a bus service running every 30 mins (day) and hourly (eves and Sun); or within 800m of a rail station.</p> <p>Where a new development is not considered to meet accessibility standards then a developer contribution should be requested to provide additional bus services to the development site.</p> <p>Even where a site is reasonably accessible it is important to encourage the use of public transport and developers may be asked to contribute towards the following measures: Improvements to public transport infrastructure; Tailor-made Travel Packs. GMPTE has produced a 'mock-up' of a Travel Pack, which is available to share with developers; A 'free' one year travel pass or travel voucher to be used for the purchase of a travel ticket; and a personalised Journey Planner.</p> <p>GMPTE can also advise in more detail on the type of design it would recommend for layouts, highways and bus stops - this is probably too detailed for inclusion in this SPD.</p>	<p><i>Agree – incorporate into amendments on Chapter 9. See paragraph 9.8 opposite.</i></p> <p><i>Agree – but too much detail to include in this SPD – more appropriate to make reference and give contact details in additional information. See paragraph 9.9 and amendments to List of Useful Resources and Contacts on page 35.</i></p> <p><i>Agree – again too much detail – reference should be made and contact details given.</i></p>	<p><b>9.8</b> For sites where new development is not considered to meet the accessibility standards then a developer contribution should be requested to provide additional public transport to the site.</p> <p><b>9.9</b> For more information on addressing public transport issues GMPTE have published the following guidance - <a href="http://www.gmppte.com/upload/library/land_use_planning280208.pdf">http://www.gmppte.com/upload/library/land_use_planning280208.pdf</a>.</p> <p>Greater Manchester Passenger Transport Executive: Land use Planning Guide: <a href="http://www.gmppte.com/upload/library/land_use_planning280208.pdf">http://www.gmppte.com/upload/library/land_use_planning280208.pdf</a></p>

Comment	Response	Amendments
<p>Specific Comments:</p> <p>Paragraph 2.1.1 states that employment development will take place in 'appropriate locations'. This needs defining, and it is considered that 'accessible by public transport' could be added in here.</p> <p>Paragraph 2.2 states 'three' objectives whereas there are actually four. Objective four is to be welcomed as GMPTE would also wish to avoid 'low density development' and 'promote development that is accessible by public transport'.</p> <p>Paragraph 4.7 GMPTE would be keen to be involved in pre-application discussions when appropriate, i.e. when there are public transport implications. It is better to resolve any problems prior to the planning application being submitted.</p> <p>Paragraph 4.16 reference is made to 'modern access expectations'. Please can this be defined?</p>	<p><i>Agree – paragraph text amended. Public transport is not dealt with under the key aims but there is renewed emphasis in Chapter 9.</i></p> <p><i>Noted and amended.</i></p> <p><i>Noted – however the Council adopts a development team approach to assisting applicants with planning applications and as a consequence relevant assistance will always be invited to participate.</i></p> <p><i>Agree – this will be defined in the amended text. See footnote i added to page 9.</i></p>	<p>2.1 The key aims of this Supplementary Planning Document are:</p> <ol style="list-style-type: none"> <li>1. To enable employment generating development to take place in <del>appropriate locations</del> <b>the best locations available</b> to meet employment objectives contained in the Regional Spatial Strategy, the Tameside Unitary Development Plan and the emerging Tameside Economic Development Plan; and</li> <li>2. To achieve high-quality design in employment developments.</li> </ol> <p>2.2 From these aims, <del>three</del> <b>four</b> key objectives have been established:</p> <p><b>No change</b></p> <p><b>i Modern access expectations can be summarised as including two aspects: vehicular and transport links - why and how layout and routes have been chosen; and inclusive access - how everyone can get to and move through a place</b></p>

Comment	Response	Amendments
<p>Paragraph 5.7 GMPTE lends support to the encouragement of employment development in sustainable locations and suggests that the accessibility criteria referred to earlier in this letter is applied.</p> <p>Paragraph 6.13 when compiling a list of alternative sites applicants should ensure that they are accessible by public transport.</p> <p>Paragraph 9.2 the words 'where appropriate' in relation to public transport need to be defined. GMPTE supports that large schemes should be in locations that are 'highly accessible by public transport'. The final sentence does not make sense, as it would not be possible to encourage people to use public transport in areas that are not well served by public transport. As</p>	<p><i>Noted – reference should be made to this in paragraph 5.7 to the details to be included in Chapter 9.</i></p> <p><i>Agree – include this as an additional bullet point in paragraph 6.13.</i></p> <p><i>Agree – this paragraph needs clarification. The final part refers to encouraging people to use means other than their own cars on an individual basis – this could range from walking and cycling to operating a car sharing scheme.</i></p>	<p><i>on equal terms (see CABE guidance Design and Access Statements - How to write, read and use them (2007)).</i></p> <p>5.7 Many manufacturing and commercial sites have been lost to residential and retailing uses and the much higher land values associated with these uses are putting pressure on remaining sites. The Council wants to encourage employment development in sustainable locations to enable more enterprise and job opportunities. <i>To assist in this process please refer to the GMPTE guidance in Chapter 9.</i></p> <p>6.13 When compiling a list of alternative sites, applicants should ensure that these are:</p> <ul style="list-style-type: none"> <li>• genuinely available for development within a reasonable time frame;</li> <li>• free from constraints that would impact on the site's development prospects;</li> <li>• at least of an equal quality to the application site; and</li> <li>• <i>accessible by public transport (see also paragraph 9.7).</i></li> </ul> <p>9.2 Suitable arrangements should be made for access to and from the highway, including access by pedestrians, cyclists and disabled people, and for convenient access by public transport <del>where appropriate</del>. <i>Ideally</i>, Large schemes should be in locations that are highly accessible by public transport. Where development is proposed in locations that are not well served by public transport, a Travel Plan should be produced to encourage employees to use methods of transport other than cars to travel to work.</p>



Comment	Response	Amendments
<p>above, the guidance needs to specify the circumstances when a Travel Plan is required. In areas that are not well served by public transport developers should be asked to make financial contributions towards public transport improvements.</p> <p>Paragraph 10.3 GMPTE would welcome pre-app discussions with regard to the design and layout of industrial sites in relation to public transport.</p> <p>Appendix B - This could include GMPTE as a useful contact.</p> <p>Appendix C.1 the final point includes a list of documents and this list should include a Travel Plan.</p>	<p><i>Noted – however it should be down to the Development Control officer assigned to the discussions to include appropriate external organisations.</i></p> <p><i>Agree – GMPTE to be added to Appendix B.</i></p> <p><i>Agree – Travel plans should be added to the list in the SPD Appendix C (Policy T11 in the UDP).</i></p>	<p><b>No Change</b></p> <p><b>Greater Manchester Passenger Transport Executive</b>  <a href="http://www.gmppte.com">www.gmppte.com</a> 0161 244 1000</p> <p>If you are proposing a major development (at least 1,000 sq.m. of floorpace or a site area of at least 0.5 ha), have you checked whether you need to supply the following?</p> <ul style="list-style-type: none"> <li>• A Transport Assessment;</li> <li>• <b>A Travel Plan</b></li> <li>• An Environmental Impact Assessment;</li> <li>• A Sustainability Statement;</li> <li>• A Consultation Statement;</li> <li>• A retail or leisure impact study;</li> <li>• Information about the economic and / or regeneration impact</li> </ul>
<p><b><u>ELSPD09 – United Utilities</u></b></p> <p>Paragraph 7.9 - UU are responsible for two forms of flood risk, sewer and</p>	<p><i>Paragraph 7.9 refers to FRA's and this will be amended to reflect PPS25 Annex D.</i></p>	<p><b>7.2 Flood Risk Assessments are required for sites located in flood zones 2 and 3 and for sites of one hectare or more</b></p>

Comment	Response	Amendments
<p>reservoir inundation. Details of properties at risk from these two sources are not in the public domain as there would be a risk of property blight.</p> <p>Development proposals of 1ha or greater and all proposals for development located in flood zones 2 &amp; 3 require Flood Risk Assessments and this requires the local authority to consult the Environment Agency. UU would be pleased to inform a Flood Risk Assessment in relation to the two forms of flooding which are our responsibilities.</p> <p>Paragraph 7.10 - UU supports the principle of SUDS.</p> <p>Paragraph 8.2 - UU supports the use of BREEAM standards as this encourages potable water saving.</p> <p>Paragraph 8.3 - UU supports the principle of SUDS.</p>	<p><i>United Utilities should be added to the list of useful contacts in Appendix B.</i></p> <p><i>Noted</i></p> <p><i>Noted</i></p> <p><i>Noted</i></p>	<p>located in flood zone 1 (Environment Agency Flood Maps).</p> <p>United Utilities (Asset Protection) - in relation to informing flood risk assessments: <a href="mailto:planning.liaison@uuplc.co.uk">planning.liaison@uuplc.co.uk</a> 01925 537 258</p> <p><b>No Change</b></p> <p><b>No Change</b></p> <p><b>No Change</b></p>
<p><b><u>ELSPD10 – Greater Manchester Ecology Unit</u></b></p> <p>Overall there is a general lack of regard towards biodiversity and the potential opportunities for biodiversity enhancement that</p>	<p><i>Agree – the text in Chapter 7 – ‘Location’ and Chapter 10 ‘Design and Layout’ should be amended to put greater emphasis on biodiversity and</i></p>	<p><b>7.7 The potential impact on biodiversity and/or geodiversity of any development or redevelopment on an employment site should be recognised and the Tameside Sustainable Design and Construction SPD should be taken into account. This</b></p>

Comment	Response	Amendments
<p>sustainable design can achieve. Tameside's 'Sustainable Design and Construction Guide' raises this issue by stating "nature and geology conservation issues should be addressed in all development activity, including on pdl" but it does not appear to have been followed through in this SPD.</p> <p>In addition one of the key principles of PPS9 states that: "plan policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development". PPS9 goes on to state that: "Local authorities should take an integrated approach to planning for biodiversity and geodiversity when preparing LDDs. They should ensure that policies in LDDs reflect, and are consistent with, national, regional &amp; local biodiversity priorities and objectives (including those agreed by local biodiversity partnership)", and that "Development proposals provide many opportunities for building-in beneficial biodiversity...features as part of good design. When considering proposals, LPAs should maximise such opportunities in and around developments, using planning obligations where appropriate".</p>	<p><i>geodiversity.</i></p> <p><i>New paragraph 7.7 added.</i></p> <p><i>New paragraph 10.9 added.</i></p>	<p>guidance is available on the Council's website - <a href="http://www.tameside.gov.uk/planning/ldf/spd/sustainable">http://www.tameside.gov.uk/planning/ldf/spd/sustainable</a></p> <p><b>7.7 7.8</b> Other uses that provide employment such as crèches, hotels and built leisure developments may have regeneration benefits and could also be appropriate development in Established Employment Areas dependant on compliance with other policies including Planning Policy Statement 6: Planning for Town Centres.</p> <p><b>10.9</b> In line with PPS9 the Council see development proposals as an opportunity to build in biodiversity benefits as part of good design. The Council would like to see these opportunities maximised.</p>

Comment	Response	Amendments
<p><b>SPD</b></p> <p>1) You should be aware that you will need to undertake a Habitats Regulation Assessment for the SPD. If you require any assistance with this procedure, please let us know.</p> <p>2) We would recommend that you include PPS9 in the list of national policies, particularly the last quote from above (from section 14).</p> <p>3) In light of the above national requirements, we would recommend that the section on Design and Layout includes a segment on providing biodiversity enhancements as part of good design. Enhancement measure could include features such as brown/green roofs, provision of bird/bat boxes, using locally native species in landscaping schemes or creating new habitats.</p> <p><b>SA Report</b></p> <p>The appraisal states that the SPD will have no impact on any</p>	<p><i>Appropriate Assessment was carried out for the SPD and was included as Appendix 5 'Habitat Regulations Assessment Screening Opinion' in the executive decision pack.</i></p> <p><i>PPS 9 will be included in the list of national policy guidelines in Chapter 3.</i></p> <p><i>See above comment – addition of Paragraphs 7.7 and 10.9.</i></p> <p><i>Agree – the data gaps need filling in the SA report. However, SA is intended as an iterative process so it is not unusual to</i></p>	<p><b>No Change</b></p> <p><b>3.12 Planning Policy Statement 9 (PPS9) Biodiversity and Geological Conservation (ODPM 2005)</b>  This guidance sets out policies that need to be taken into account in relation to biodiversity (as defined in the UK Biodiversity Action Plan) and geodiversity (as defined by the Geological Conservation Review held by the Joint Nature Conservation Committee) when formulating LDF documents and dealing with individual planning applications.</p> <p><b>See amendments to paragraphs 7.7 and 10.9 above.</b></p> <p><b>No change</b></p>

Comment	Response	Amendments
<p>biodiversity issues listed in section 12 of both appraisals. Since question 12b - 12d have been identified as "data gaps", it is not clear how this conclusion has been reached. As well as avoiding harm to local biodiversity, as stated above, the council should be seeking opportunities for biodiversity enhancement in all new developments. Therefore there could be the potential for the SPD to have an overall positive impact on local biodiversity. As an example the GM BAP, in which Tameside is a partner, has a target for the creation of 50 new green/brown roofs across GM in the next five years. The development of employment land in Tameside provided it is not on areas of existing biodiversity value could contribute to this target,</p>	<p><i>have criteria with data gaps in the baseline information/targets identified in this way.</i></p> <p><i>This will be followed up with the Ecology Unit in order to produce some baseline info and targets so that the gaps in the Sustainability Appraisal can be filled in.</i></p>	
<p><b><u>ELSPD11 – Natural England</u></b></p> <p>Very much support the preparation of guidance to achieve better quality development, including guidance on sustainable design and construction. Therefore welcome the preparation of the SPD. In particular, they are pleased to note that the SPD requires, amongst other things, surveys of landscape and nature conservation features prior to</p>	<p><i>Noted.</i></p>	<p><b>No Change</b></p>

Comment	Response	Amendments
<p>application and refers to these further in the Application Checklist.</p> <p>Reinforcement of the key message would particularly be welcomed - that new development for employment, as well as for other uses, should create opportunities for enhancement of the landscape or landscaping and the creation of new wildlife habitats, in addition to the conservation of existing landscape and nature conservation features.</p>	<p><i>Paragraphs 7.7 and 10.9 have been amended to reinforce the message that redevelopment and new development present opportunities for biodiversity and geodiversity to be taken into account and for biodiversity to be enhanced.</i></p>	<p><b>7.7</b> The potential impact on biodiversity and/or geodiversity of any development or redevelopment on an employment site should be recognised and the Tameside Sustainable Design and Construction SPD should be taken into account. This guidance is available on the Council's website - <a href="http://www.tameside.gov.uk/planning/ldf/spd/sustainable">http://www.tameside.gov.uk/planning/ldf/spd/sustainable</a></p> <p><b>7.7 7.8</b> Other uses that provide employment such as crèches, hotels and built leisure developments may have regeneration benefits and could also be appropriate development in Established Employment Areas dependant on compliance with other policies including Planning Policy Statement 6: Planning for Town Centres.</p> <p><b>10.9</b> In line with PPS9 the Council see development proposals as an opportunity to build in biodiversity benefits as part of good design. The Council would like to see these opportunities maximised.</p>
<p><b><u>ELSPD12 - The Theatres Trust</u></b></p> <p>No comment to make but look forward to being consulted on further LDF documents - Core Strategy stages DC Policies, Planning Obligations and town centre AAPs.</p>	<p><i>Noted.</i></p>	<p><b>No Change.</b></p>
<p><b><u>ELSPD13 - Council for British Archaeology (North West)</u></b></p> <p>The SA raises the following issues:</p> <p>4c. Will it identify, assess and</p>	<p><i>Agree – the data gaps need filling in the</i></p>	<p><b>No Change.</b></p>

Comment	Response	Amendments
<p>incorporate the physical, social, economic and environmental value of the historic environment in the regeneration of the borough? The baseline date cited for 4c is 'Nine identified Conservation Area and 312 listed buildings in the borough'.</p> <p>10a. Will it help conserve historic buildings through sensitive adaptation and re-use? The baseline data cited is the same.</p> <p>10b. Will it use architectural design to enhance the local character and 'sense of place' of development?</p> <p>10c. Will it improve access to buildings and landscapes of historic/cultural value?</p> <p>10d. Will it protect and enhance places, landscapes and buildings of historic, cultural and archaeological value? For 10b-d there is no baseline data.</p> <p>It concludes that the historic environment will fare better with the production of an Employment Land SPD (Option Two) than with the continuation of existing policies.</p> <p>We are pleased that issues relating to the historic environment have</p>	<p><i>SA report. However, SA is intended as an iterative process so it is not unusual to have criteria with data gaps in the baseline information/targets identified in this way.</i></p> <p><i>Follow this up with the bodies identified in the representation to produce some baseline info and targets to fill in the gaps in the SA.</i></p> <p><i>Noted.</i></p>	<p><b>No Change.</b></p>

Comment	Response	Amendments
<p>been raised so clearly. However, the only relevant paragraph seems to be 6.25 - This partly addresses issues 10a-d. However, the lack of baseline data referred to in the SA means that many opportunities may be lost. The historic environment is treated as a known resource, in the form of the 'nine identified conservation areas and 312 listed buildings...'</p> <p>Almost certainly further historically significant buildings (or buildings that housed historically significant industries) remain to be identified and assessed (objective 4c); many of these will be listed in the GM (Archaeological) Sites and Monuments record (SMR). In addition, a series of eight volumes on the Archaeology of Tameside has been written by Dr. Mike Nevell of Manchester University (<a href="mailto:Mike.Nevell@manchester.ac.uk">Mike.Nevell@manchester.ac.uk</a>).</p> <p>Even where it is not practical for historic buildings to be preserved, it may be important for them to be recorded before demolition.</p> <p>For further advice on identifying the extent of the historical resource of the borough and its potential, and for advice concerning proposals for individual buildings, we strongly recommend that you contact the GM</p>	<p><i>This process is already undertaken and it can be included in the conditions of a planning permission.</i></p> <p><i>The Greater Manchester Archaeological Unit already receive the weekly applications list and are therefore involved in the consultation process on all development that could be of interest to them.</i></p>	<p><b>No Change.</b></p> <p><b>No Change.</b></p>



Comment	Response	Amendments
<p>County Archaeologist, Norman Redhead (<a href="mailto:norman.redhead@manchester.ac.uk">norman.redhead@manchester.ac.uk</a>).</p> <p>For the views of a local voluntary group we also recommend that you contact the Tameside Archaeological Society (<a href="http://www.tas-archaeology.org.uk">http://www.tas-archaeology.org.uk</a>).</p> <p>In Paragraph 4.7 of the SPD it is stated that pre-app discussions are preferred. It would be good practice for these also to take place between Tameside planning officers, developers and the GMAU regarding the historical significance of buildings/areas being considered for redevelopment; experience shows that this can save money and achieve a better outcome for all parties concerned.</p>	<p><i>Agree – this is a useful contact and it has been added to Appendix B ‘List of Useful Resources and Contacts’.</i></p> <p><i>Noted. In the event of pre-app discussions concerning a building/area of historical significance the Council’s Conservation Officer would be involved. It would be at the Conservation and Development Control case officer’s discretion as to whether GMAU were involved at this stage and not later in the process through GMAU’s monitoring of the weekly planning application list.</i></p>	<p>Tameside Archaeological Society (Local Voluntary Group) - <a href="http://www.tas-archaeology.org.uk">http://www.tas-archaeology.org.uk</a></p> <p><b>No Change.</b></p>
<p><b><u>ELSPD14 – Lancashire County Council</u></b></p> <p>Do not wish to make any observations.</p>	<p><i>Noted</i></p>	<p><b>No Change.</b></p>
<p><b><u>ELSPD15 - North West Regional Assembly</u></b></p> <p>Representation emphasises that the emerging draft RSS "The North</p>	<p><i>Noted – the text on planning policy (Chapter 3) will be amended to reflect the</i></p>	<p><b>3.11 Regional Spatial Strategy: Regional Planning Guidance for the North West RPG13 (GONW;</b></p>

Comment	Response	Amendments
<p>West Plan" can now be given considerable weight because of the strong possibility that it will be published in that form by the SoS.</p>	<p><i>changed status of the RSS – which has now been adopted.</i></p>	<p><del>2003)</del>  <del>RSS Core Development Principle 'DP3: Quality in New Development' requires Local Authorities to prepare guidance to ensure that new development is integrated with surrounding land uses taking into account the landscape character, setting, the quality, distinctiveness and heritage of the environment and use of sympathetic materials. This SPD conforms with these requirements.</del></p> <p><del>3.12 The North West Plan: Submitted Draft Regional Spatial Strategy (NWR, 2006)</del>  <del>Draft RSS Policy W4 'Release of Allocated Employment Land' requires that there should be a presumption against the release of allocated employment sites for other uses when considering proposals and schemes. Sites should not be released where they provide, or have the potential to provide an important contribution to the economy of the local area. Before releasing sites, Local Authorities should make sure that there:</del></p> <ul style="list-style-type: none"> <li><del>• Is an appropriate supply of sites available for employment uses, and</del></li> <li><del>• Are replacement sites available, of equal or better quality, or alternative means of incorporating employment land needs have been identified (if required).</del></li> </ul> <p><del>3.14 The North West of England Plan: Regional Spatial Strategy to 2021 (GONW, Sept 2008)</del></p> <p><del>RSS Spatial Principle 'DP4: Make the Best Use of Existing Resources and Infrastructure' suggests that locations should be utilised that build on existing concentrations of activities and existing infrastructure and that development should follow a sequential approach based firstly upon using existing buildings within settlements and previously developed land</del></p>

Comment	Response	Amendments
<p>Of the key aspects of the proposed changes that differ significantly from or that are additional to the Panel's Recommendations none are specific to employment land issues. However, it is important to note the following:</p> <ul style="list-style-type: none"> <li>The Regional Spatial Framework - this will be amended and brought more closely in alignment with the RES and NW Regional Funding Allocations advice;</li> </ul>	<p><i>Noted – RES summary to be added to Chapter 3 also.</i></p> <p><i>Noted.</i></p>	<p>within settlements. This SPD conforms with these requirements and those of the other spatial principles.</p> <p>RSS Policy W4 'Release of Allocated Employment Land' requires that there should be a presumption against the release of allocated employment sites for other uses when considering proposals and schemes. Sites should not be released where they provide, or have the potential to provide an important contribution to the economy of the local area. Before releasing sites, Local Authorities should make sure that there:</p> <ul style="list-style-type: none"> <li>Is an appropriate supply of sites available for employment uses, and</li> <li>Are replacement sites available, of equal or better quality, or alternative means of incorporating employment land needs have been identified (if required).</li> </ul> <p><b>3.15 Northwest Regional Economic Strategy (RES) (2006).</b></p> <p>The RES identifies three main drivers to attain the strategy's vision and closing the output gap between the north west and the average for England:</p> <ul style="list-style-type: none"> <li>Improve productivity and grow the market;</li> <li>Grow the size and capability of the workforce; and</li> <li>Create and maintain the conditions for sustainable growth.</li> </ul> <p>Tameside is identified under a number of transformational actions:</p> <ul style="list-style-type: none"> <li>Delivering the basic skills required by employers for those without qualifications: and</li> <li>Delivering the designated Strategic Regional Sites</li> </ul>

Comment	Response	Amendments
<ul style="list-style-type: none"> <li>• Key Service Centres - proposed that the named key service centres are deleted and are replaced with a criteria-based approach set out in LDFs;</li> <li>• Housing Figures - ceiling is removed from allocations to allow more flexible approach of PPS3;</li> <li>• Decentralised Energy - it is proposed that the policy for on-site renewables is replaced with a new policy on decentralised energy supply; and</li> <li>• Partial Review - early review accepted with immediate focus on key areas of housing, energy and waste.</li> </ul> <p>Other NWRA documents of potential assistance: The NW Best Practice Design Guide - provides broad advice on design issues; The Draft Green Infrastructure Guide for the NW - provides a detailed definition of green infrastructure; The Sustainable Energy Strategy - reinforces the relevant policies from the draft RSS but also offers practical advice; and The NWRA -</p>	<p><i>Noted.</i></p> <p><i>Noted.</i></p> <p><i>Noted.</i></p> <p><i>Noted – the partial review remit has now changed and will no longer consider housing.</i></p> <p><i>Noted – The NW Best Practice Design Guide will be added to Appendix B and the title will be amended to ‘List of Useful Resources and Contacts’ will be given to the other NWRA documents listed here. The other documents are noted for future reference.</i></p>	<p><b>(Ashton Moss).</b></p> <p><b>No Change</b></p> <p><b>No Change</b></p> <p><b>No Change</b></p> <p><b>The North West Best Practice Design Guide:</b>  <a href="http://www.nwrpb.org.uk/documents/?page_id=4&amp;category_id=105">http://www.nwrpb.org.uk/documents/?page_id=4&amp;category_id=105</a></p>

Comment	Response	Amendments
Sustainability Appraisal Toolkit.		
<p><b><u>ELSPD16 – CABE</u></b></p> <p>Unable to comment specifically.</p> <p>General comments:</p> <p>1) Design now well established in planning policy as national and regional levels, and LDFs offer an opportunity to secure high quality development, of the right type, in the right place, at the right time;</p> <p>2) Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frame works to site-specific scales;</p> <p>3) To take aspiration to implementation, local planning authorities' officers and members should champion good design;</p> <p>4) Treat design as a cross-cutting issue - consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm;</p> <p>5) Design should reflect understanding of local context, character and aspirations; and</p> <p>6) You should include adequate wording or 'hooks' within your policies that enable you to develop</p>	<p><i>Noted</i></p> <p><i>Noted – design will become a fundamental issue throughout the Council with strong policies set down in all LDF documents and the SCS. This message will be strengthened in this SPD with cross referencing to the Sustainable Design and Construction Guide SPD, Oct 2005.</i></p> <p><i>CABE Design and Access Statements guidance added to Appendix B 'List of Useful Resources and Contacts'.</i></p> <p><i>Also added to Appendix B 'List of Useful Resources and Contacts' reference to the North West Design Review Panel.</i></p>	<p><b>CABE – Design and Access Statements:</b>  <a href="http://www.cabe.org.uk/default.aspx?contentitemid=1334">http://www.cabe.org.uk/default.aspx?contentitemid=1334</a></p> <p><b>The North West Design Review Panel -</b>  <a href="http://www.renew.co.uk/Pages/Article.aspx?id=170">http://www.renew.co.uk/Pages/Article.aspx?id=170</a></p>

<b>Comment</b>	<b>Response</b>	<b>Amendments</b>
<p>and use other design tools and mechanisms, such as design guides, site briefs and design codes.</p> <p>The following CABE Guidance might be useful - 'Making Design Policy Work: How to Deliver Good Design Through Your LDF'; 'Protecting Design Quality in Planning'; and 'Design at a Glance: A Quick Reference Wall Chart Guide to National Design Policy'.</p>		



## Appendix F. List of Stakeholders That Responded

- F.1 The Council received 15 responses within the allotted consultation period. No responses were received after the six week period had elapsed.
- F.2 The comments are summarised in the previous section and amendments, additions or deletions are also indicated in the summary table.

**Table F.1 List of respondents with references:**

ELSPD01	Colliers CRE on behalf of Rodo Group Limited
ELSPD02	Cordingleys on behalf of MUSE Developments Ltd and Stayley Developments Ltd
ELSPD03	Indigo Planning on behalf of Commercial Estates Group representing Dooba Investments V Ltd.
ELSPD04	Emery Planning Partnership on behalf of various clients
ELSPD05	Northwest Regional Development Agency
ELSPD06	Environment Agency
ELSPD07	Jones Land LaSalle on behalf of BP Castrol
ELSPD08	Greater Manchester Passenger Transport Executive
ELSPD09	United Utilities
ELSPD10	Greater Manchester Ecology Unit
ELSPD11	Natural England
ELSPD12	The Theatres Trust
ELSPD13	Council for British Archaeology, North West Regional Group
ELSPD14	Lancashire County Council
ELSPD15	North West Regional Assembly
ELSPD16	Commission for Architecture and the Built Environment (CABE)