

SALFORD CITY COUNCIL
SUPPLEMENTARY PLANNING DOCUMENT
LOWER BROUGHTON DESIGN CODE
ADOPTED 18th JANUARY 2005

STATEMENT OF MAIN ISSUES RAISED IN REPRESENTATIONS

TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND)
REGULATIONS 2004

Regulation 18(4)(b)

This statement has been prepared in order to comply with the requirements of the Planning and Compulsory Purchase Act 2004, for the adoption of Supplementary Planning Documents by Local Planning Authorities.

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Housing and Planning Directorate
January 2006

1 Introduction

- 1.1 Under the Planning and Compulsory Purchase Act 2004 and regulations made thereunder, 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 the Government's desire to 'strengthen community and stakeholder involvement in the development of local communities'.
- 1.2 This document is a statement of the main issues raised in representations about the draft Supplementary Planning Document, Lower Broughton Design Code, and how these issues have been addressed in the SPD; it is prepared under Regulation 18(4)(b) of the Town and Country Planning (Local Development) (England) Regulations 2004. This statement also incorporates details from the previous consultation statement, published, in June 2005, under Regulation 17(1), of consultations carried out in the preparation of the draft SPD
- 1.3 In due course, the Council will be adopting a Statement of Community Involvement (SCI) that will set out how the public will be consulted on new planning policy and significant planning applications. Once the SCI is adopted, which is due to be in May 2008, planning documents will be required to conform to its provisions.
- 1.4 This Consultation Statement has been prepared in advance of the SCI, but aims to reflect the intentions of Government planning guidance for reporting on community involvement in the plan-making process.
- 1.5 The consultation process adopted meets both the minimum requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2004 and the gold standards in community involvement devised by Partners IN Salford.
- 1.6 The city council adopted the Lower Broughton Design Code in January 2006. This statement sets out a summary of the main issues raised in these representations and how they have been addressed in the SPD now proposed for adoption.

2 Gold Standards IN Community Involvement

- 2.1 Partners IN Salford (Salford's Local Strategic Partnership) have devised 5 aspirational standards for community involvement and all partners of the Council are signed up to delivering community involvement in this way (www.partnersinsalford.org/communityinvolvement). The Gold Standard is a goal for partners to aim towards, particularly where there is activity or proposed change within the City that will have a significant impact upon local communities. The standards are:
 - 1) Value the skills, knowledge and commitment of local people.
 - 2) Develop working relationships with communities and community organisations.
 - 3) Support staff and local people to work with and learn from each other (as a whole community)
 - 4) Plan for change with, and take collective action with, the community.
 - 5) Work with people in the community to develop and use frameworks for evaluation.

3 Background

- 3.1 The city council has formed a development partnership with Countryside Properties Plc., which is an agreement between the two parties to establish a framework under which the redevelopment of Lower Broughton will be planned, phased, and implemented. The agreement allows for the incorporation of additional developers to ensure diversity, variety and competitiveness.
- 3.2 The city council and Countryside Properties Plc. have jointly led the ongoing consultation exercise that underpins the emerging regeneration proposals for the area.
- 3.3 Countryside Properties Plc. has taken a lead role in producing the draft Lower Broughton Design Code, holding regular meetings with the city council at all stages in its production.
- 3.4 The council committed to the production of the Lower Broughton Design Code with the publication of the Local Development Scheme 2005/6- 2007/8, in March 2005.

4 Initial Process of Community Involvement

- 4.1 Extensive consultation was undertaken within the study area prior to preparation of the consultation draft SPD, in order to:
- Raise awareness of the planned regeneration of Lower Broughton;
 - Engender discussion about the area's role and composition;
 - Seek the maximum contribution of ideas and options from local residents, businesses and other interested parties; and
 - Build capacity around delivery of the emerging strategic vision.
- 4.2 The consultation exercise included:
- Preparatory and networking meetings with local groups and individuals;
 - An open community "Listening Event" in May 2004, attended by some 200 local people who identified on maps what they considered to be the good and bad parts of Lower Broughton, the heart of Lower Broughton, and the boundary of the area;
 - The holding of local meetings and the distribution of three newsletters;
 - A study trip of interested residents to Peckham and Great Notley in July 2004;
 - Filmed interviews with local youth in August 2004;
 - A 5-day collaborative design workshop in September 2004;
 - Themed design workshops in November and December 2004 with the residents to look at some more detailed design issues around transport and movement, open and green spaces, and housing; and
 - The evolution of a Community Steering Group into the Lower Broughton Regeneration Partnership, with representation from all interests across the area.
- 4.3 Key stakeholders involved in the consultation to date are listed in Appendix A.
- 4.4 The 5-day Collaborative Design Event was held at the Broughton Recreation Centre and the Church of the Nazarene. The aims of the event were
- To have collaborative participation between community, Council and Countryside in evolving the master plan;
 - To continue to build trust and constructive engagement by the community;
 - To make connections at different levels with different groups;
 - To build on issues and opportunities from earlier meetings and discussions;
 - To begin a shared learning process about long term regeneration and urban re-design; and
 - To establish some mechanisms for continuing flows of information.

- 4.5 This event produced the first draft of the strategic vision drawing for Lower Broughton.
- 4.6 The series of design workshops were held for the local residents at the drop-in centre on Mocha Parade between November and December 2004. These took aspects of the emerging strategic vision forward, by exploring detailed design issues around transport and movement, open and green spaces, and housing. Some residents were interviewed during the process. The outcome of this process, including many sketch drawings, was presented at a Christmas open evening.
- 4.7 The key design issues flowing from the September 2004 event and the design workshops held towards the end of 2004 are as follows:
- There should be no wasted space - all parks, gardens and streets should serve a purpose;
 - The river should be accessible to all, with opportunities for recreational and social activity at various points;
 - All public spaces and streets should be overlooked in the interest of community safety and amenity;
 - There should be no obvious differences externally between affordable homes and homes for sale;
 - Any residents should have good access to public transport, local amenities shops and recreational facilities;
 - The road network, cycle routes and pedestrian footpaths should promote integration of Lower Broughton with surrounding areas so that's the area does not fell like an isolated pocket of land but becomes an important part of central Salford.
- 4.8 This consultation activity provided a large amount of information that has fed into development of the 'strategic vision' for the area and into the production of this draft SPD. It is also influencing a wide variety of other strands of works that will help the development of a sustainable community.
- 4.9 A Lower Broughton Regeneration Partnership, with representation from all interests across the area has been established to oversee the regeneration programme.
- 4.10 The consultation networks established to date will continue to be used to guide all stages of the regeneration proposals.

5 Formal Public Consultation

- 5.1 The draft SPD was subject to formal public consultation from Monday 27th June to Friday 5th August 2005.
- 5.2 Anyone with an interest in the regeneration of Lower Broughton and the standards of design to be followed was encouraged to comment on the draft SPD.
- 5.3 The SPD documents were available for inspection at the following locations:
- On the council's website:
 - Salford Civic Centre, Chorley Road, Swinton, Salford, M27 5BW.
 - Broughton Library, 400 - 404 Bury New Road, Salford M7 4EY
- 5.4 The statutory consultees that were sent copies of the draft SPD documents and were formally invited to comment by letter are listed at appendix B.
- 5.5 All members of the Lower Broughton Regeneration Partnership were given a copy of the SPD documents.

- 5.6 All residents and businesses in the SPD area were notified, via a wider consultation exercise on the emerging proposals, led by Countryside Properties Plc. This included a newsletter, to be circulated to all households.
- 5.7 Throughout the summer months a consultation bus toured the streets of Lower Broughton for 10 weeks from mid June to mid August, which included the statutory consultation period for the SPD. The bus helped to engage with residents who might otherwise be difficult to access or who themselves have difficulty attending meetings. The bus carried copies of the draft SPD for information and comment.
- 5.8 Leaflets were regularly distributed to each household within Lower Broughton notifying residents of the timetable for the bus visits.
- 5.9 At the Lower Broughton Partnership meeting on 20th June 2005, attendees were informed of the forthcoming workshop on the SPD.
- 5.10 On Monday 25th July 2005, approximately 25 residents from Lower Broughton attended the special workshop held, at the Humphrey Booth Day Care Centre, to discuss and comment on the draft SPD. Each resident attending was provided with a copy of the draft SPD. The workshop began with a short presentation, which explained what the SPD is, its purpose and how it was put together. Residents understood that the SPD was very specific to Lower Broughton.
- 5.11 Following the presentation the residents worked in small groups with representatives from Countryside Properties and Salford City Council to discuss the issues and to put forward their comments. The feed back from the groups was that there was general support for the SPD Code, bearing in mind they had helped to develop it and there was no expression of opposition.
- 5.12 Letters were also sent to planning consultancies working in the Greater Manchester area, drawing their attention to the consultation exercise. The list of consultancies is attached as appendix C.

6 Representations Received

- 6.1 The following 13 persons submitted representations within the formal public consultation period:
- Central Salford Urban Regeneration Company
 - Emery Planning Partnership (on behalf of BSS Developments)
 - Environment Agency
 - Government Office for the North West
 - Greater Manchester Archaeological Unit
 - Highways Agency
 - How Commercial Planning Advisors (on behalf of Countryside Properties Plc)
 - JWPC Ltd (on behalf of Mr and Mrs Anand)
 - North West Regional Assembly
 - Northwest Regional Development Agency
 - Ramblers Association
 - Red Rose Forest
 - Sport England North West
- 6.2 The following 4 persons acknowledged receipt of the consultation but either had no comments or were unable to respond:
- CABE
 - Countryside Agency
 - English Nature

- Riverside Island Tenants Association

6.3 Appendix D sets out a detailed schedule of all the representations, the council's responses and proposed changes to the SPD.

7 Main Issues Raised

- 1.3 **Scope of the SPD and future Area Action Plan:** The North West Development Agency questioned whether the some of the policies go beyond design issues and may be more appropriate for inclusion in the proposed Area Action Plan; draft policy LBDC12, for example, relates to the location of uses as well as their design.
- 1.4 The council are satisfied that the document does generally comply with the statutory limitations on the scope and content of SPDs. The document tries to differentiate between the emerging strategic vision, as described for context in paragraph 6, and design policies that do not allocate sites and this does create some ambiguity.
- 1.5 A number of detailed changes to the draft are proposed that address potential conflicts. In particular, it is agreed that draft policies LBDC12 and13 are inappropriately specific as to the potential location of retail, community and employment uses. It is proposed that these policies be combined and revised to give more general design advice as to the character of any such uses.
- 1.6 It is agreed that any conflict would be avoided by the preparation of the intended Lower Broughton Area Action Plan. However, statutory procedures mean that this latter document would not be adopted for several years. There is an urgent need for policy support for the current regeneration of Lower Broughton and this document is intended to provide such advice, within the limitations of the SPD format.
- 1.7 Several other representations suggest the inclusion of policies that would be site-specific and should therefore be included in the future Area Action Plan rather than this SPD.
- 1.8 **Potential Loss of Open Space:** Government Office for the North West, Sport England and Red Rose Forest challenge the statement in draft policy LBDC08 that development of existing open space would be permitted as no evidence has been presented in the draft SPD that an assessment of the existing and future needs of the communities for open space, sports and recreational facilities has been carried out and how it has informed the draft policy.
- 1.9 It is accepted that proposals to develop existing areas of open space will have to be considered in accordance with the approach set out in PPG17. This will be carried out as part of an overall open space strategy that ensures that an integrated network of open spaces of an appropriate quality and quantity is provided.
- 1.10 It is not appropriate for this SPD to include such an assessment and set out the proposed strategy, as this will be addressed in the proposed Greenspace SPD. On reflection, it is therefore inappropriate for policy LBDC8 to refer to potential development of existing areas of open space. It is therefore proposed to amend it to retain only advice on the design of any open space and adjoining development.
- 1.11 **Biodiversity:** The Environment Agency and Red Rose Forest propose the inclusion of a policy relating to biodiversity issues.
- 1.12 It is agreed that the regeneration of Lower Broughton offers significant opportunity for enhancing the ecological, landscape and recreational value of the area. The proposed SPD on Biodiversity will provide policy advice that will apply to Lower Broughton and it is not appropriate to duplicate such policies.

- 1.13 It is agreed that this document should provide further information on the local ecological issues that should be taken into account in the design of new development. It is not appropriate to include site specific proposals or policies in this SPD. However, these issues should be considered in the proposed Area Action Plan.
- 1.14 **Flood Risk:** The Environment Agency proposes several changes to give greater emphasis to this issue.
- 1.15 It is agreed that flood risk is a significant issue in the area and it is proposed that some changes be made in response to the Agency's representations. However, some of the points raised are already addressed by other policies; this document is intended to supplement, not duplicate other local development documents. Some of the suggestions relate to site-specific measures which should be considered in the proposed Area Action Plan.
- 1.16 **Relationship to Surrounding Areas:** Several representations suggest that the SPD should give greater emphasis on the relationship between Lower Broughton and other areas and initiatives, such as the potential Croal Irwell regional park, established cycle routes and key streets linking to neighbouring communities.
- 1.17 These proposals have generally been accepted.

8 Sustainability Appraisal

- 8.1 In adopting the final draft, the council must consider how sustainability issues have been integrated into the document and how the Sustainability Appraisal has been taken into account.
- 8.2 The appraisal of the consultation draft made no recommendations regarding its content. None of the representations received questioned the content of the SA.
- 8.3 The appraisal has been amended to reflect the changes to policies made in response to other representations. It is considered that sustainability issues have been adequately addressed. The revised SA is published on the council's website. (www.salford.gov.uk/lowerbroughtondesigncode)

9 Equality Impact Assessment

- 9.1 In accordance with the Race Relations (Amendment) Act 2000, a first-stage Equality Impact Assessment has been carried out on the draft SPD. This concluded that a more detailed appraisal was not required, as the proposed policy has no significant differential impact on any group.
- 9.2 The assessment is published on the council's website. (www.salford.gov.uk/lowerbroughtondesigncode)

Appendix A

LIST OF STAKEHOLDERS INVOLVED IN CONSULTATION PRIOR TO PREPARATION OF CONSULTATION DRAFT

Residents throughout Lower Broughton
Riverside Island Tenants Association (RITA)
Local Businesses and Traders
Broughton Trust
Broughton Action Group
Church of the Nazarene
Ascension Church
G M Police
Groundwork Trust, Manchester Salford and Trafford
Salford City Council, including Housing, Planning, Regeneration, Property, Environmental, Neighbourhood Management, Education and Economic Development
Albert Park Tenants Association
Irwell Valley Tenants Association
Salford URC
Salford University
Salford Education Business Partnership

Appendix B

STATUTORY CONSULTEES –INVITED TO COMMENT ON THE DRAFT SPD BY LETTER
DATED 24 JUNE 2005

AGE CONCERN SALFORD
ALBERT PARK TENANTS ASSOC.
ASCENSION CHURCH
BROUGHTON ACTION GROUP
BURY MBC
BUS USERS UK
CABE
CENTRAL SALFORD URBAN REGERATION COMPANY
CHURCH OF THE NAZARENE
CIVIC TRUST (NORTHERN OFFICE)
COMMUNITY REGENERATION LTD.
CONTOUR HOUSING ASSOCIATION
COUNTRYSIDE AGENCY (NORTHWEST REGION)
DIVERSITY LEADERS UK
ENCAMS
ENGLISH HERITAGE
ENGLISH NATURE
ENVIRONMENT AGENCY
GM POLICE ARCHITECTURAL LIASON OFFICER
GMPTE
GOVERNMENT OFFICE NORTH WEST
GREATER MANCHESTER ARHAEOLOGICAL UNIT
GREATER MANCHESTER ECOLOGY UNIT
GREATER MANCHESTER GEOLOGICAL UNIT
GREATER MANCHESTER PEDESTRIANS ASSOCIATION
GREATER MANCHESTER STRATEGIC HEALTH AUTHORITY
GREATER MANCHESTER TRANSPORTATION UNIT
HIGHWAYS AGENCY (NETWORK STRATEGY)
HIGMAN AND CO
IRWELL VALLEY HOUSING ASSOCIATION
MANCHESTER CITY COUNCIL
MANCHESTER CIVIC SOCIETY
MANCHESTER DIOCESAN BOARD
NATIONAL PLAYING FIELDS ASSOCIATION
NEW DEAL FOR COMMUNITIES PARTNERSHIP BOARD
NORTH WEST ARTS BOARD
NORTHWEST DEVELOPMENT AGENCY
NW REGIONAL ASSEMBLY
OPEN SPACES SOCIETY
PASSENGER TRANSPORT USER ADVISORY CTTE (NORTH)
PEAK AND NORTHERN FOOTPATHS SOCIETY
PRIMARY CARE TRUST
RAMBLERS ASSOCIATION MANCHESTER AREA
RED ROSE FOREST

RIVERSIDE ISLAND TENANTS ASSOC
ROYAL INSTITUTE OF BRITISH ARCHITECTS
SALFORD AND TRAFFORD GROUNDWORK TRUST
SALFORD CHAMBER OF COMMERCE AND INDUSTRY
SALFORD CITIZENS ADVICE BUREAU
SALFORD COUNCIL FOR VOLUNTARY SERVICE
SALFORD DISABILITY FORUM
SALFORD PEOPLES FORUM
SALFORD PRIMARY CARE TRUST
SPORT ENGLAND
SUSTAINABILITY NORTH WEST
TENERIFFE ST ESTATE AND TENANTS RESIDENTS ASSO
THE BROUGHTON TRUST
THE VICTORIAN SOCIETY
TRAFFORD MBC
UNITED UTILITIES
UNIVERSITY OF SALFORD

Appendix C

PLANNING CONSULTANTS –ADVISED OF THE CONSULTATION EXERCISE BY LETTER
DATED 27TH JUNE 2005

AFFORDABLE HOUSING SOLUTIONS
ARUP
AUSTIN-SMITH LORD
BARDEN PLANNING CONSULTANTS LTD
BARTON WILMORE PARTNERSHIP
BDP PLANNING LTD
BE GROUP
BOLTON EMERY PARTNERSHIP
BROADWAY MALYAN PLANNING
CALDERPEEL
CLIFF WALSINGHAM AND CO.
COLIN BUCHANAN & PARTNERS
CORK TOFT PARTNERSHIP
COUNTRYSIDE CONSULTANTS
CUNNANE TOWN PLANNING
DEVELOPMENT PLANNING PARTNERSHIP
DIALOGUE
DONALDSONS
DPDS CONSULTING GROUP
DR MALCOLM BELL LTD
DTZ PIEDA CONSULTING
EDAW LTD
ENVIROS ASPINWALL
G L HEARN PLANNING
GILLESPIES
GL HEARN
GOUGH PLANNING SERVICES
GVA GRIMLEY
HIGMAN AND CO
HULME UPRIGHT
IRONSIDE FARRAR
JACOBS PLANNING & ECOLOGY
JAMES BARR
JOHN ROSE ASSOCIATES
KENYON & CO.
KING STURGE
LAMBERT SMITH HAMPTON
LENNON PLANNING LTD
LUDLAM ASSOCIATES
MCDYRE & CO
MICHAEL CUNNINGHAM PLANNING
MICHEAL COURCIER & PARTNERS
NATHANIEL LICHFIELD & PARTNERS

OSCAR FABER
PARKMAN
PEACOCK & SMITH
PHILIP ROTHWELL DEVELOPMENT SERVICES
POT OF GOLD LTD
ROGER TYM & PARTNERS
SCOTT WILSON
SHEPPARD ROBSON
STEVEN ABBOTT ASSOCIATES
STRUTT AND PARKER
TAYLOR & HARDY
TAYLOR YOUNG
TECPLAN
THE PLANNING BUREAU
TOM COLE
TOWN PLANNING CONSULTANCY
WALTON & CO
WOOD FRAMPTON
WS ATKINS PLANNING CONSULTANTS

APPENDIX D

SCHEDULE OF RESPONSES TO CONSULTATION DRAFT

Chap	Para	Policy No.	SUBJECT	Organisation	REP	Summary of representation	Council's Response	Proposed Changes
			General	Central Salford Urban Regeneration Company	41	<p>Central Salford URC is currently in the process of putting together a Strategic Vision & Regeneration Framework for Central Salford, which should be finalised later this year.</p> <p>The SPD and the Vision & Regeneration Framework should be aligned. This is no more evident than at the Meadows, which is a key site in both documents. It is important that the URC is deeply involved with any future proposals for this area.</p>	<p>Agree that the SPD and emerging Vision and Regeneration Framework should be aligned. However, the SPD is due to be adopted before the wider Framework is completed and some divergence in detail may be unavoidable.</p> <p>The council is satisfied that the SPD and emerging Framework are broadly compatible and contain no significantly different approaches to the regeneration of the area.</p> <p>Both the city council and Countryside Properties PLC are committed to working in collaboration with the URC to develop detailed proposals for Crescent Meadows and other key sites, in accordance with both the SPD and Framework.</p>	No change.
			General	Central Salford Urban Regeneration Company	82	In general, support the intentions expressed by the draft SPD.	Support noted.	No change

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			General	Countryside Properties PLC	49	Strongly support the production of the document and the contents therein.	Support noted.	No change.
			General	Environment Agency	30	Overall support the objectives and issues outlined in the SPD, in particular the recognition that the River Irwell represents a key asset in the regeneration of Lower Broughton.	Support noted.	No change.
			General	North West Regional Assembly	58	Supports the production of the SPD to provide detailed guidance for the regeneration of the Lower Broughton Area of Salford.	Support noted.	No change
			Sustainability Appraisal	North West Regional Assembly	61	Welcomes the use of the integrated Appraisal Toolkit and the priorities of AfS(2004) in informing the objectives of the Sustainability Appraisal of the SPD and think these have been applied appropriately to the sustainability objectives. The SA provides a thorough, robust assessment of the options considered.	Support noted.	No change.
			General	Northwest Development Agency	47	No comment on the detailed content of the draft SPD, but question whether some of the policies do actually supplement existing policies. The SPD appears instead, to offer a new set of more detailed and specific policies for the Lower Broughton area and although the Draft SPD is termed a	The council are satisfied that the document does generally comply with the statutory limitations on the scope and content of SPDs. The document tries to differentiate between the emerging strategic vision, as described for context in paragraph 6, and design policies	No change.

Chap	Para	Policy No.	SUBJECT	Organisation	REP	Summary of representation	Council's Response	Proposed Changes
						<p>"Design Code", some of the policies clearly go beyond design issues and would appear to be more appropriate for inclusion in the forthcoming Lower Broughton Area Action Plan.</p> <p>The reasoned justifications to several Draft SPD policies indicate that they are supplementing a large number of UDP policies. Instead of explaining how the Draft SPD policy is supplementing these policies, the reasoned justifications thus tend to flag up "linkages" to them.</p> <p>Wish to see a sharper focus on design issues within the SPD and a clearer exposition of how its policies expand upon those in the development plan.</p>	<p>that do not allocate sites and this does create some ambiguity. A number of detailed changes to the draft are proposed that address potential conflicts.</p> <p>It is agreed that any conflict would be avoided by the preparation of the intended Lower Broughton Area Action Plan. However, statutory procedures mean that this later document would not be adopted for several years. There is an urgent need for policy support for the current regeneration of Lower Broughton and this document is intended to provide such advice, within the limitations of the SPD format.</p>	
			General	Red Rose Forest	7	Support the production of this SPD for Lower Broughton and consider the consultation process is robust.	Support noted	No change
1			Policy context	North West Regional Assembly	60	Accept that the draft SPD reflects the policy thrust of the Regional Spatial Strategy, which is part of the local development framework. However, suggest that specific reference be made to the RSS (in particular policies DP3, UR1, UR2	Agreed that reference should be included to policies DP3, UR1 and UR10. However, while policy UR2 should be quoted in the future Area Action Plan, it has limited application to design issues.	First sentence of paragraph 1.3 amended: "The SPD provides design guidance specifically for the Lower Broughton area of Salford, expanding on the policies of the Regional Spatial Strategy, the

Chap	Para	Policy No.	SUBJECT	Organisation	REP	Summary of representation	Council's Response	Proposed Changes
						and UR10.		City's Adopted Unitary Development Plan (UDP) and its Draft Replacement UDP." New paragraph added after 1.4: "The SPD will support, in particular, the following policies of the Regional Spatial Strategy: DP3-Quality in new Development UR1 -Urban Renaissance UR10 - Greenery, Urban Greenspace and the Public Realm"
1	1.6		Introduction	Government Office for the NorthWest	19	The draft states that once the Draft Replacement UDP has been adopted, the SPD will be re-adopted by the City Council to supplement a number of policies from the Replacement UDP. All that will need to be revised in the SPD once the Replacement UDP has been adopted is the removal of references to the existing UDP. This is a presentational matter that should not require the "re-adoption" of the SPD. The wording of paragraph 1.6 should be revised to make this clear.	Accepted. Once the final version of the replacement UDP is adopted, the document will be republished, omitting references to the existing UDP.	First sentence of paragraph 1.6 to be amended: "Once the Draft Replacement UDP has been adopted, the SPD will be amended to reflect the new status of the UDP and will supplement the following policies:"
1	1.7		Introduction	Government Office for the NorthWest	21	Paragraph 1.7 and Plan 2 refer to the fact that the Replacement UDP allocates sites within Lower Broughton for redevelopment. This	Accepted.	Paragraph 1.7 and Plan 2 to be deleted. Reference to policy H9/2 to be deleted from paragraph 7.14.3.

Chap	Para	Policy No.	SUBJECT	Organisation	REP	Summary of representation	Council's Response	Proposed Changes
						reference is inappropriate in the context of SPD that will need to be adopted in line with the existing UDP. This should be dealt with in a revision to the SPD, if necessary, once the Replacement UDP has been adopted.		
2	2.6		Area Action Plan	Environment Agency	38	The proposed Action Area Plan should incorporate a policy outlining a set of agreed detailed design principles for new development in Lower Broughton and other similarly affected areas.	It is not appropriate to specify the content of the future document in this SPD. However, it is anticipated that any future Area Action plan for Lower Broughton would include detailed design principles. It would not contain policies applying to other areas at risk of flood.	No change.
5	5.2		The River Irwell	Red Rose Forest	8	Propose amending paragraph to refer to the wider issues of the potential Croal Irwell regional park	The development of a regional park is not a firm proposal. However, it is proposed that reference be made to the wider connections. Paragraph to be amended to refer to the Irwell Valley Sculpture Trail and potential regional park.	Paragraph 5.2 to be amended: " The River Irwell provides 3km of river frontage for Lower Broughton, as well as forming a very distinctive peninsula in the southwest of the area and offers a direct link to the rest of the Irwell Valley and the countryside. Lower Broughton forms the southern gateway to the Irwell Valley Sculpture Trial and footpath and cycle routes running from the regional centre to the West Pennine Moors. Its potential to combine a valuable local amenity

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								<p>with a strategically important landscape, environmental, biodiversity and recreational asset for the area is recognised by its inclusion in the Regional Spatial Strategy as a potential Regional Park resource, providing a focus for recreation, sport and tourism opportunities.</p> <p>“The River is currently hidden from view, underused, and development relates poorly to it, significantly reducing its potential benefits. Both public realm and private realm and private developments need to ensure the river corridor with its associated open space is both welcoming and creates a cohesive feel to link with the rest of the valley upstream.</p>
6			Context	Central Salford Urban Regeneration Company	44	<p>Key streets should be considered as having both a role in Lower Broughton and in the emerging network of boulevards connecting Central Salford. Promoting neighbourhood to neighbourhood interaction will contribute to the success and character of the area.</p> <p>The focus on the main roads of Camp Street, Broughton Lane and</p>	<p>It is agreed that the document should give greater emphasis to the connections between Lower Broughton and surrounding areas of Central Salford. It is proposed that paragraph 6.6 and policy LBDC7 be amended to reflect this.</p>	<p>Paragraph 6.6 to be amended: “The strategic vision aims to develop a hierarchy of streets and pedestrian routes that connect Lower Broughton and surrounding areas of Central Salford, and allow ease of movement within the area. A number of accessibility improvements have been identified in order to support the regeneration of Lower Broughton.</p>

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						<p>Great Clowes Street is in line with the Central Salford Vision. A character description on the potential role of Frederick/Camp Street as the main connector between Lower Broughton and Pendleton should be included.</p> <p>The strategy of developing and managing new blocks and streets around focused public spaces should be clearly indicated in the plan. A hierarchy of existing and proposed street types, in relation to the River Irwell, and neighbourhoods would clarify intentions.</p> <p>The relationship and role of Lower Broughton with adjacent neighbourhoods and future 'bordering' projects i.e.. Greengates, Chapel St., the University should be discussed.</p> <p>Community transit strategy should be discussed, especially neighbourhood to neighbourhood boulevards, pedestrian-priority streets and newly reopened or re-aligned streets.</p>		<p>improving its attractiveness, the way it functions, and the ease of movement, and to help assemble and bring forward attractive development sites. The key improvements are (see Plan 8):</p> <ul style="list-style-type: none"> • The reopening of the historic route of Broughton Lane, from the existing junction with Great Clowes Street through to Camp Street, as a pedestrian-friendly street accommodating two-way traffic (to improve movement, both within the area and as part of the key route to Pendleton shopping city, and to act as a focal point for the area); • The reopening of Clarence Street as a residential street to form an important east-west connection (to better integrate different parts of the area); • The realignment of the southern end of Lower Broughton Road so that it coincides with the current alignment of Sussex Street (to improve integration and create new development opportunities alongside the river);

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								<ul style="list-style-type: none"> • The realignment of Riverside Drive and Meadow Road (to create development opportunities alongside the river); • New pedestrian bridges, and a new vehicular bridge, across the River Irwell (to improve accessibility to and from surrounding areas); • The provision of a continuous riverfront pedestrian and cycle route; and • The introduction of a pedestrian-friendly route that integrates the northern part of the area with the peninsula, Crescent Meadows. And Chapel Street” <p>Policy LBDC7 to be amended: “Development should facilitate the improvement of connections between the different parts of Lower Broughton and to surrounding areas, and help to promote walking and cycling. In particular, it should:</p> <ul style="list-style-type: none"> • Promote access to existing and proposed facilities and services through its layout, with full consideration given to

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								<p>existing and potential desire lines both within the area and to adjacent areas, including via key road links such as Camp Street, Great Clowes Street and Lower Broughton Road. Such facilities and services include:</p> <ul style="list-style-type: none"> - Salford Crescent Station; - Manchester Victoria Station; - Bus stops on Chapel Street and the Crescent; - Peel Park and the David Lewis Recreation Ground; - Albert Park; - The University of Salford; - Central Salford and Manchester City Centre, via Blackfriars Road; and - The Cambridge Industrial Area; <ul style="list-style-type: none"> • Provide for direct, secure, attractive and uninterrupted pedestrian and cycle routes which provide clear lines of sight and are well lit at night; • Be designed to facilitate easy orientation; • Avoid "dead-ends" wherever practicable; • Promote pedestrian priority

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								<p>and minimise road casualties, for example by use of pedestrian priority measures and 20mph zones for residential streets;</p> <ul style="list-style-type: none"> • Provide frequent pedestrian access points into developments from the street; • Help to improve existing connections by public transport, walking and cycling to adjacent neighbourhoods, Albert Park, the University of Salford and future developments within the Chapel Street area and Cambridge Industrial Area; • Consider the reopening of previously closed roads and appropriate re-alignment of existing roads; • Allow for the provision of new crossings over the River Irwell; • Allow for the provision of a pedestrian-friendly route that helps to integrate the northern part of the area with the peninsula; and • Contribute to the provision of a high quality street environment that integrates the needs of different modes of movement.

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								Provided that a network of safe and attractive pedestrian rights of way linking key features and <i>facilities</i> is established, the city council will support the closure of other existing rights of way, where necessary to assemble a site for development or to design out opportunities for crime. Where traffic impact mitigation and sustainable travel enhancements are to be delivered by development proposals, the size of the financial contribution required will be proportional to the impacts and size of development being sought."
6			Context	Environment Agency	77	There is now an opportunity with this proposed re-development to link a more sympathetically designed riparian corridor with other semi-natural habitats and greenspace initiatives in the locality including the potential Croal Irwell Regional Park.	Accepted. Propose that policy LBDC6 be amended to emphasise this opportunity.	Third bullet point of policy LBDC6 to be amended: "Provide landscaping incorporating native species that will help to attract wildlife to the area as part of a wider strategy to link a more sympathetically designed riparian corridor with other semi-natural habitats and greenspace initiatives in the locality."
6			Strategic vision	Environment Agency	66	The use of a large undeveloped buffer between any new development and the river would create a visually far more attractive	It is not the purpose of this SPD to allocate specific sites for built development or as open space. Much of the area adjacent to the	No change.

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						amenity feature and enable an improved wildlife resource.	river is already developed with housing, which may restrict the scope for creation of new open space. Moreover, the potential benefits of locating new open space in these areas will have to be balanced against the benefits of locating open space in other areas (where it may better address flood storage needs or better meet local recreation needs) and the benefits of built development in these potentially attractive locations.	
6			The Strategic Vision	Red Rose Forest	9	Propose inclusion of an additional paragraph setting the area in the context of the potential Croal Irwell Regional Park.	It is agreed that the context of the potential regional park should be noted, but it is considered that this is adequately addressed by the proposed changes to paragraph 5.2.	No change to this section.
6	6.1-6.5		Context – The Strategic Vision	North West Regional Assembly	57	Paragraphs 6.1-6.5 state that a strategic vision is currently being developed for the area. We feel that this seems to address solely the economic needs and social aspirations of the area. However, it seems that the issues around the protection and enhancement of natural environment in particular are missing from this discussion. In order for the plan to progress in a sustainable manner, we feel that this element should be addressed	Accepted. Although the document as a whole adequately addresses the protection and enhancement of the natural environment, it is agreed that paragraph 6.3 should be amended to give further emphasis to the issue.	Paragraph 6.3 to be amended: "A key element of the regeneration of Lower Broughton will be to reverse the area's loss of population, and to increase it from its current level of around 3,200 residents to somewhere in the region of 7,500-10,000 residents over the next 10-12 years. Suitable land will therefore be developed in line with economic, social and environmental objectives to improve people's

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						in the strategic vision for the area.		quality of life. This will help to create a vibrant, sustainable community that can sustain a comprehensive range of services, as well as supporting the local economy and wider efforts to reinvigorate the inner parts of the conurbation. A range of property types is sought, with the aim of integrating all tenures across the development and creating a sense of 'place' through the use of high quality design which takes advantage of the assets in the area, such as the green space and the river frontage."
6	6.4		Character Areas	BSS Developments	28	The objectors have an interest in a site to the north of Ascension Church. They agree that It is appropriate that the policy seeks the enhancement of the setting of the Church. However, they object to the reference in policy 4 to the provision of open space adjoining the Church and Plan 7 (character areas) which shows an indicative boundary for the open space that includes their site. They submit that the setting of the church and the provision of open space could be achieved by utilising the existing open space to the east of the Church.	This document cannot allocate specific sites for development and, although it is appropriate for the principle of open space around the Church to be specified, it cannot prescribe the boundaries of that open space. The boundaries of the open space will need to be determined in the light of the detailed proposals for this and surrounding sites, an appraisal of views and the potential for flood mitigation. The boundary shown on Plan 7 is only indicative, and could not be verified without more detailed design development. Equally, it is not practical or	Plan 7 to be amended to delete indicative boundaries for new areas of open space.

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						They propose changing policy LBDC4 to specify that the open space should be on the east-west axis of the Church and the deletion of the indicative open space on plan 7.	appropriate to specify in the SPD that the open space should exclude the objector's site or be restricted to the east-west axis. It is agreed that the indicative boundary shown on plan 7 should be deleted.	
6	6.4		Character Areas	Mr & Mrs Anand	40	<p>The objectors have an interest in the site at the north-western corner of the junction of Great Clowes Street and Broughton Lane and intend to apply for planning permission to develop the site for warehouse and distribution uses. They wish to safeguard the ability to develop the site for this purpose and are concerned that this may be prejudiced by proposals for residential or community uses in the area, as described in the emerging Strategic Vision, that may result in future objections to warehousing and distribution on their site.</p> <p>Whilst the objectors broadly support the Regeneration initiatives for Lower Broughton within the Design Code, it is submitted that these long-term initiatives should not stymie inward investment in the area in the short</p>	A planning application for such uses would be determined in the context of the adopted and draft replacement UDPs and other relevant planning policies. This draft UDP does not allocate uses for any particular site and would not influence the decision as to whether such a use were acceptable in this location. The SPD would be a material consideration only in the design of the development, were the use acceptable in principle.	No change.

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						term. The Council should ensure that uses such as a distribution centre can continue to come forward without threat of conflict with residential uses in the future.		
6	6.6		Accessibility	The Ramblers Association	1	Support these improvements, particularly the provision of a continuous riverfront pedestrian and cycle route and the introduction of a pedestrian friendly route that integrates the northern part of the area with the peninsula and Crescent Meadows.	Support noted.	No change
6	6.7		Accessibility	Highways Agency	54	<p>No evidence has been included with the document to support the conclusion that the scale of development proposed will not lead to additional problems of highway capacity or traffic congestion in comparison to existing conditions. This is a concern, given the size of the population increase desired.</p> <p>The intention to consider in more detail the transport implications of the vision as it is developed is welcome. However, it is not clear whether these further assessments will be at strategic level, taking into account the full quantum of regeneration and it's implications,</p>	<p>This document cannot allocate sites for development and does not establish any scale for new development. The information on the emerging strategic vision set out in chapter 6, and particularly the prediction that new development will not cause significant problems of highway capacity and traffic congestion is included to provide context to the design issues. It is not appropriate to include details of traffic forecasts in this document.</p> <p>This document is intended to complement, not duplicate other local development documents. Policy DEV1 of the adopted UDP</p>	No change.

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						or at an individual level for isolated areas. This should be clarified in the document to ensure that any assessment that is carried out takes account of the transport implications for the area as a whole.	and policy A1 of the draft replacement UDP already provide policy guidance on the preparation of transport assessments.	
6	6.8		Open Space	Environment Agency	65	The use of open space areas as compensatory flood storage areas should be emphasised in the Document as being one of their primary functions.	Policy LBDC8 already emphasises this function for open spaces. However, it is agreed that the issue should be re-iterated in chapter 6.	New paragraph after 6.8: "An ancillary, but important function of open space in the area will be to provide water storage capacity in the event of a flood incident."
6	6.8		Open Space	The Ramblers Association	2	Support the proposals, particularly the creation of two new parks (Hough Lane Park and Church of Ascension) the new "village green" between Lower Broughton Road and the River Irwell and a series of other open spaces at strategic locations along the riverside walkway and cycleway.	Support noted	No change
7		LBDC01	Design Statements	Environment Agency	34	Design statements should demonstrate how the development will manage flood risk in relation to other design criteria.	This is accepted. However, the draft policy already requires statements to identify how the proposal responds to the design principles set out in para 7.1, which include minimising the risk and impact of flooding. It is not considered appropriate to give greater emphasis to this issue in the policy.	No change.

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							Mitigating and managing flood risk in respect of new development is also covered in detail by policy LBDC9.	
7		LBDC03	Views	Environment Agency	35	The River Irwell corridor should be seen as excellent riverside development location to which any new residential building should face, avoiding the sharp division between built development and river corridor/greenspace areas.	Agreed that the policy should provide more guidance on the development potential of the riverside, but it is not agreed that avoidance of a sharp distinction is a practical or appropriate design requirement.	New third paragraph to be inserted in policy LBDC3: "The River Irwell frontage should be overlooked by riverside development, whilst maintaining views to the river from other neighbourhoods."
7		LBDC03	Views	The Ramblers Association	3	Agree with this criteria for views and the key features listed; regards having agreeable and interesting views when walking as very important	Support noted	No change
7		LBDC04	Church of the Ascension	BSS Developments	27	The objectors have an interest in a site to the north of Ascension Church. They agree that it is appropriate that the policy seeks the enhancement of the setting of the Church. However, they object to the reference in policy 4 to the provision of open space adjoining the Church and Plan 7 (character areas) which shows an indicative boundary for the open space that includes their site. They submit that the setting of the church and the provision of open space could be achieved by utilising the	This document cannot allocate specific sites for development and, although it is appropriate for the principle of open space around the Church to be specified, it cannot prescribe the boundaries of that open space. The boundaries of the open space will need to be determined in the light of the detailed proposals for this and surrounding sites, an appraisal of views and the potential for flood mitigation. The boundary shown on Plan 7 is only indicate, and could not be verified without more	The indicative boundary shown on plan 7 should be deleted

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						<p>existing open space to the east of the Church.</p> <p>They propose changing policy LBDC4 to specify that the open space should be on the east-west axis of the Church and the deletion of the indicative open space on plan 7.</p>	<p>detailed design development. Equally, it is not practical or appropriate to specify in the SPD that the open space should exclude the objector's site or be restricted to the east-west axis.</p> <p>It is agreed that the indicative boundary shown on plan 7 should be deleted.</p>	
7		LBDC04	Church of the Ascension	Countryside Properties PLC	53	Propose that reference to the rectory be deleted from the policy and various plans. The rectory dates from the 1970's and does not form part of the curtilage of the listed Church building. The rectory building is considered to damage the setting of the Church due to its low quality and run down setting.	Accepted.	<p>Policy LBDC4 to be amended: "Development should enhance the setting of the Church of the Ascension, particularly by: Opening up views to the building, particularly along the key east-west axis; and Providing open space, which would also help to address flood mitigation."</p> <p>Rectory building to be deleted from plans 4, 5, 7 and 9.</p>
7		LBDC05	Archaeology	Greater Manchester Archaeological Unit	39	Generally happy with the Policy, which reflects the results of the archaeological desk based assessment and discussions with ourselves. Comment that the industrial buildings in the south-eastern part of the area, as well as having below-ground industrial archaeological potential, also	<p>Proposed change to wording of policy accepted.</p> <p>Reference to mitigation measures to be included in the reasoned justification.</p>	<p>Final bullet point of policy LBDC5 to be amended: "The south-eastern part of the area, where there are above and below ground remains of industrial archaeological interest."</p> <p>Second sentence of paragraph 7.5.1 to be amended:</p>

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						<p>require archaeological survey of above-ground remains and suggest that the policy be amended.</p> <p>Comment that archaeological mitigation will probably take the form of building surveys, evaluation through trial trenching and subsequent more detailed excavation of significant archaeology that will be destroyed by development ground works. There would follow a programme of post-excavation analysis, report writing, an appropriate level of publication and deposition of archive with Salford Museum. Confirm that they will advise on this process.</p>		<p>“Developers should liaise with greater Manchester Archaeological Unit, who will advise on the type of archaeological mitigation appropriate to each site.”</p>
7		LBDC06	River Irwell	Central Salford Urban Regeneration Company	42	<p>The River Irwell must be envisioned as a continuous, riverfront public realm fronted by an urbane mix of housing and community amenity. Although it is not always part of the Lower Broughton study area, the river should be conceived of as 2-sided in character, acting as a catalyst of change along the entire river corridor. Flooding risks should not be solved by engineering solutions alone and</p>	<p>The city council is satisfied that the policy provides adequate guidance to ensure that riverside development in Lower Broughton contributes to the important role of the river as a network of great public space. It is not the function of this SPD to establish criteria for development on the other banks of the river; that will be achieved by other policy documents.</p>	<p>No change.</p>

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						<p>should be considered as both a public realm and environmental design issue. The Lower Broughton segment of the river should be designed as a vital link along a future River Irwell network of great public spaces.</p> <p>The premier public space along the river, both regionally and locally, is the Meadows. Any future work completed on the peninsula must be conceived in tandem with the Meadows design.</p>		
7		LBDC06	River Irwell	Environment Agency	36	This section of the River Irwell could form a southern gateway to the potential Croal Irwell Regional Park; be an integral part of the Irwell Valley Way and the Irwell Sculpture Trail, and should be seen as an excellent recreational resource for the locality.	It is agreed that reference should be made to wider initiatives. See also proposed changes to paragraph 5.2.	First sentence of policy LBDC6 to be amended: "Development should support the role of this reach of the River Irwell as Central Salford's major recreational, landscape and ecological asset and as the southern gateway to the Irwell Sculpture Trail and any future regional park proposals."
7		LBDC06	River Irwell	Red Rose Forest	11	Proposed amendment of policy to reflect potential Croal Irwell Regional Park.	It is agreed that reference should be made to wider initiatives. See also proposed changes to paragraph 5.2.	First sentence of policy LBDC6 to be amended as shown above.
7		LBDC06	River Irwell	Sport England	29	Support the inclusion of the policy LBDC6, which requires	Support noted	No change.

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						development to support the role of the River Irwell as Central Salford's major recreational, landscape and ecological asset. Provision of a continuous riverside pedestrian and cycle route with associated open space is supported.		
7		LBDC06	River Irwell	The Ramblers Association	4	Support this policy, particularly bullet points 1 and 3. Regarding the pedestrian and cycle route, we trust that, for the comfort of pedestrians, it will be segregated and also that adequate access points to it will be provided along the route.	Support noted. The extent to which cyclists and pedestrians will be segregated along the riverside route and the number of access points are considered to be matters for detailed design and that it is not appropriate to include further specifications in this document.	No change.
7		LBDC07	Movement	Government Office for the NorthWest	22	Propose change to carry forward the ODPM/HO Safer Places guidance to make streets paths and open spaces safer through good design	Accepted	Second bullet point of Policy LBDC7 to be amended: "Provide for direct, secure, attractive and uninterrupted pedestrian and cycle routes which provide clear lines of sight, are well lit at night and connect to other routes in surrounding areas"
7		LBDC07	Movement	Sport England	31	Walking and cycling should be promoted in the context of existing signed cycle routes, including Greater Manchester cycle routes and quiet roads located to east and west of the area.	Agreed the reference to pedestrian and cycles routes should be amended to refer to the context of established routes and connections to surrounding areas. It is agreed that active travel	Second bullet point of Policy LBDC7 to be amended as shown above.

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						<p>Active travel generally should be promoted through the layout and disposition of uses.</p> <p>Major development proposals should be accompanied by Travel Plans to ensure that the objectives listed are contributed to.</p>	<p>should be promoted. However, this SPD cannot allocate sites; the layout and disposition of uses should be considered in the future Area Action Plan.</p> <p>Policy DEV1 of the adopted UDP and policy A1 of the draft replacement UDP already provide policy guidance on the preparation of transport assessments.</p>	
7		LBDC07	Movement	The Ramblers Association	5	Agree with this policy to facilitate movement between facilities and services, particularly by walking and cycling. To emphasise this very important point, suggest inclusion of additional text in the policy.	Proposed change accepted.	Penultimate paragraph of policy LBDC07 to be amended: "Provided that a network of safe and attractive pedestrian rights of way linking key features and facilities is established, the city council will support the closure of other existing rights of way, where necessary to assemble a site for development or to design out opportunities for crime."
7		LBDC08	Open Space and Adjoining Development	Government Office for the NorthWest	23	Propose change to carry forward the ODPM/HO Safer Places guidance to make streets paths and open spaces safer through good design.	Accepted	Additional sentence to be added to end of first paragraph of Policy LBDC8: "Any paths through open space should be secure, have clear lines of sight and be well lit at night"
7		LBDC08	Open Space and Adjoining Development	Government Office for the NorthWest	70	No evidence has been presented in the draft SPD that an assessment of the existing and future needs of the communities	It is accepted that proposals to develop existing areas of open space will have to be considered in accordance with the approach set	First paragraph of policy LBDC8 to be amended: "All open space in the area should be designed as part of an

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						<p>for open space, sports and recreational facilities has been carried out and how it has informed the draft policy. Given that the policy permits development on existing open space, this needs to be justified in the light of such an assessment.</p>	<p>out in PPG17. This will be carried out as part of an overall open space strategy that ensures that an integrated network of open spaces of an appropriate quality and quantity is provided.</p> <p>It is not appropriate for this SPD to include such an assessment and set out the proposed strategy, as this will be addressed in the proposed Greenspace SPD.</p> <p>On reflection, it is therefore inappropriate for policy LBDC8 to refer to potential development of existing areas of open space. It should be amended to retain only advice on the design of any open space and adjoining development.</p>	<p>integrated network of an appropriate quality and quantity to meet the needs of existing and future residents and to accord with the standards established by the UDP and Greenspace Strategy. New development should help to address the problems of existing open spaces that are poorly configured, neglected, contribute little to the urban scene and attract anti-social behaviour. Any paths through open space should be secure, have clear lines of sight and be well lit at night."</p> <p>Paragraph 7.8.1 to be amended: "Lower Broughton currently has a large amount of open space, but this functions poorly because of its poor management, configuration and the lack of overlooking. The regeneration of the area potentially offers the opportunity to rearrange land uses so that the open spaces function more effectively and contribute to the recreational needs of the area established through the emerging GreenSpace Strategy; however, built development on any existing areas of open space will only be permitted if supported by a robust</p>

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								assessment of local needs, in accordance with PPG17 and the UDP. It is important that any retained or new open space, and surrounding development, is designed to support the overall regeneration of the area, for example through overlooking that can discourage anti-social behaviour and encourage the use of open spaces. This policy supplements Adopted UDP Policies DEV1, DEV2, DEV4, R1, R2 and R3 and Draft Replacement UDP Policies ST11, DES1, DES4, DES11, R1 and R2.”
7		LBDC08	Open Space and Adjoining Development	Red Rose Forest	12	Can see there are some benefits in the net loss of open space if it forms part of an overall strategy and results in higher quality greenspace. However, an overall strategy for an integrated network of high quality open space doesn't actually exist at present and the Salford Greenspace Strategy will not provide the detail necessary. Propose the production of a Lower Broughton Green Infrastructure Plan that links the major open space developments noted with smaller sites via street greening initiatives such as Green Streets.	It is accepted that proposals to develop existing areas of open space will have to be considered in accordance with the approach set out in PPG17 and Salford's Greenspace strategy. This will be carried out to ensure that an integrated network of open spaces of an appropriate quality and quantity is provided. It is not appropriate for this SPD to include such an assessment and set out the proposed strategy, as that would require site-specific locations. On reflection, it is therefore inappropriate for policy LBDC8 to refer to potential	First paragraph of policy LBDC8 and paragraph 7.8.1 to be amended as shown above.

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							development of existing areas of open space. It should be amended to retain only advice on the design of any open space and adjoining development.	
7		LBDC08	Open Space and Adjoining Development	Sport England	33	<p>It is not clear what benefits may be considered to outweigh loss of recreational land. It is recommended that an assessment is made in terms of equivalence for sport and recreation, in line with Sport England's adopted planning policy objective 5. A wider judgement relating to benefits would be difficult in practice (given that value is subjective) and should not be used to justify the loss of open space, contrary to principles of PPG17. An assessment of value should include consideration of the potential value of land for sport and physical activity, as well as that of its existing use. This is especially relevant given the number of new residents envisaged.</p> <p>Whilst a framework is set for open space, a number of sites being identified within Plans 4 and 5 and listed within paragraph 6.8, it is not clear at this stage the extent and types of facility that will be brought</p>	<p>It is accepted that proposals to develop existing areas of open space will have to be considered in accordance with the approach set out in PPG17. This will be carried out as part of an overall open space strategy that ensures that an integrated network of open spaces of an appropriate quality and quantity is provided.</p> <p>It is not appropriate for this SPD to include such an assessment and set out the proposed strategy, as that would require site-specific locations.</p> <p>On reflection, it is therefore inappropriate for policy LBDC8 to refer to potential development of existing areas of open space. It should be amended to retain only advice on the design of any open space and adjoining development.</p>	First paragraph of policy LBDC8 and paragraph 7.8.1 to be amended as shown above.

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						forward within these spaces. A clear strategy for open space, based on the application of PPG17's typologies of open space as proposed by Urban Green Spaces Taskforce, or a variation of it, is recommended. The GreenSpace Strategy and Urban Open Space Strategy should combine as a robust assessment of existing and future needs of the community, used to derive open space standards and provide general principles for the planning of new sport and open space facilities within the area.		
7		LBDC08	Open Space and Adjoining Development	Sport England	76	The relationship of policy LBDC8 to the draft replacement UDP policy H8 relating to open space provision associated with new housing should be clarified.	Policy on the provision of open space in new housing is adequately set out in the UDP. It is not the purpose of this SPD to duplicate other local development documents.	No change.
7		LBDC08	Open Space and Adjoining Development	Sport England	75	Sport England support the inclusion of design criteria within the policy relating to enclosure of open spaces and the provision of active frontages to ensure overlooking and encourage use.	Support noted.	No change.
7		LBDC08	Open Space and Adjoining Development	The Ramblers Association	6	Propose reference to "Salford's Rights of Way Improvement Plan" as an example of an overall strategy that might support	On reflection, it is inappropriate for policy LBDC8 to refer to potential development of existing areas of open space. It should be amended	First paragraph of policy LBDC8 to be amended: "All open space in the area should be designed as part of an

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						development of existing open space.	to retain only advice on the design of any open space and adjoining development. There is, therefore, no need to refer to other documents that may support development of existing open space.	integrated network of an appropriate quality and quantity to meet the needs of existing and future residents and to accord with the standards established by the UDP and Greenspace Strategy. New development should help to address the problems of existing open spaces that are poorly configured, neglected, contribute little to the urban scene and attract anti-social behaviour. Any paths through open space should be secure, have clear lines of sight and be well lit at night."
7		LBDC09	Flood Risk	Environment Agency	64	The importance of managing residual flood risk through good design should not be underestimated. The document should give this greater emphasis.	It is agreed that greater emphasis should be given to the issue of residual flood risk. It is proposed that this be addressed by amending the reasoned justification to the policy.	New sentence to be added after second sentence of paragraph 7.9.1: "In particular, new development should be designed to take account of the residual flood risk in the event that flood defences are overtopped or breached."
7		LBDC09	Flood Risk	Environment Agency	69	Support such a large scale development assessing the feasibility of incorporating Sustainable Urban Drainage, which includes a flexible series of options for reducing the damage of our freshwater resources such as green roof options.	Support noted.	No change.
7		LBDC09	Flood Risk	Environment	37	Future applications submitted	Policy EN16 of the Draft	No change.

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				Agency		within the Lower Broughton area must be accompanied by a Flood Risk Assessment for the proposed site. This assessment must be in accordance with the principles of the Strategic Flood Risk Assessment and the Lower Broughton Flood Risk Assessment.	<p>Replacement UDP already requires development in the area to be accompanied by a formal flood risk assessment. This document is intended to supplement, not duplicate other local development documents.</p> <p>The city council is currently completing a strategic flood risk assessment which will be published to help preparation of individual assessments. An area specific assessment for Lower Broughton is being prepared by Countryside Properties PLC to support their emerging plans for the area, but this has no formal status. The reasoned justification already makes sufficient reference to this document.</p>	
7		LBDC09	Flood Risk	Red Rose Forest	13	Suggest amended wording to clarify terminology used for drainage systems and to add reference to use of green roofs.	Accepted.	<p>Second sentence of final bullet point in second paragraph of policy LBDC9 to be amended: "This could involve discharge attenuation and on-site storage in the sewer systems, or the use of sustainable urban drainage systems (SUDS)."</p> <p>First sentence of third paragraph of policy LBDC9 to be amended: "Sustainable urban drainage</p>

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								systems could, for example, incorporate the use of open space, roof rainwater collections systems, grass roofs, grass swales, porous paths/driveways/car parks/roadways with underground storage, wet and dry ponds, wetlands, and permeable conveyance systems."
7		LBDC10	Density of Development	Government Office for the NorthWest	24	Policy lacks sufficient clarity. It should refer to the guidance on housing densities set out in PPG3.	The city council require all new development to meet minimum density standards, in all parts of the city, in accordance with the advice in PPG3. The purpose of this SPD is to provide design advice that is specific to Lower Broughton, not to duplicate guidance that applies across the city.	No change.
7		LBDC10	Density of Development	Sport England	32	Given the numbers of new residents considered, Sport England would recommend that the Sport Facility Calculator is used to derive estimates of the level of demand for built community sports facilities (swimming pools, sports halls and indoor courts, indoor bowls, rinks etc) and where appropriate promote such land uses in a co-ordinated way within the local area.	This SPD cannot specify the uses to be developed in the area. Allocation of sites for specific uses is an issue that should be addressed in the future Area Action Plan.	No change.

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7		LBDC11	Housing	Central Salford Urban Regeneration Company	46	<p>Housing direction, type and phasing should take into consideration the anticipated demand for housing across the regional centre, which is at risk of over-building. Opportunities exist in Lower Broughton to capture some of the large family housing market, which is currently under-supplied in the region. Provision of amenity spaces required for large family-oriented housing should also be discussed.</p>	<p>The number, types and phasing of new housing in Lower Broughton will be developed in accordance with the Regional Spatial Strategy, UDP and the proposed housing market SPD. It is not appropriate to include such detail in a SPD.</p> <p>It is agreed that there is a good opportunity for Lower Broughton to capture some of the large family housing market. This aspiration is reflected in the emerging strategic vision described in chapter 6.</p> <p>Policy on the provision of amenity spaces required for large family-oriented housing is adequately set out in the UDP. It is not the purpose of this SPD to duplicate other local development documents.</p>	No change.
7		LBDC11	Housing	Government Office for the NorthWest	25	<p>Suggest referring to the need for affordable housing as some residents being decanted out of clearance areas have difficulty in paying for new homes. There may also be merit in referring to the need for quality residential development to underpin economic regeneration.</p>	Accepted.	<p>First paragraph of policy LBDC11 to be amended: " Residential development should contribute to the provision of a balanced mix and range of property types with Lower Broughton that:</p> <ul style="list-style-type: none"> Creates an attractive location and housing offer for a range of residents;

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								<ul style="list-style-type: none"> • Meets the needs of existing residents; • Enables people to remain in the area as their needs change; • Supports the aim of integrating all tenures across the area; • Meets the affordable housing needs of the area; • Provides family housing of different sizes; and • Underpins economic regeneration.”
7		LBDC11	Housing	Northwest Development Agency	78	Policy relates to the mix of house types and tenures in residential development; this clearly goes beyond design issues and would appear to be more appropriate for inclusion in the forthcoming Lower Broughton Area Action Plan. Government Office for the North West is best placed to advise on the appropriate balance between DPD and SPD policies.	<p>The policy does not prescribe a specific mix of house types and tenures; this will be the subject of a later policy document. The policy is intended to provide guidance as to the character of housing development in so far as it contributes to the overall regeneration of the area, which is considered to be a material design issue.</p> <p>The council is satisfied that the policy, as drafted, is appropriately included within the SPD.</p>	No change.
7		LBDC12	Broughton Lane	Northwest Development	79	The policy concerns the location of retail, community and employment	It is agreed that both this policy, policy LBDC13 and paragraph 6.5,	Paragraph 6.5 to be deleted.

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				Agency		uses, as well as their design; this clearly goes beyond design issues and would appear to be more appropriate for inclusion in the forthcoming Lower Broughton Area Action Plan.	<p>as drafted, are inappropriately specific as to the potential location of retail, community and employment uses.</p> <p>It is proposed that policies LBDC12 and LBDC13 be combined and revised to give more general design advice as to the character of any such uses and that paragraph 6.5 be deleted.</p>	<p>Policy LBDC12 and paragraph 7.12.1 to be revised:</p> <p>"Retail and Community Uses</p> <p>The provision of retail and community uses should be focussed on streets and junctions at key locations in the neighbourhood. Such development should:</p> <ul style="list-style-type: none"> • Be designed as a vital part of the streetscape, connecting neighbourhoods; • Create high quality public realms and local landmarks, with particular attention to the sensitive location and design of parking facilities; • Demonstrate a clear strategy as to the mix of uses in each location and their relationship with adjoining residential areas, and; • In the case of new buildings that house shops or community facilities, face directly onto main streets. <p>Paragraph 7.12.1 to be revised: "The design of the existing local centre, and particularly the precinct at Mocha Parade, does little to create an attractive focus for the area. Mocha Parade does not</p>

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								satisfactorily address secure by design issues, presents unattractive frontages to Great Clowes Street and the River and relates poorly to other facilities in the area. The redevelopment of much of the existing centre would therefore be supported. It is also likely that some facilities will be developed in other locations, to meet local needs and specific users requirements. In this case, it is important that they should be designed so as to maximise their benefits to the wider area. This policy supplements Adopted UDP Policy DEV1 and Draft Replacement UDP Policies DES1, DES2 and DES3."
7		LBDC12	Broughton Lane	Central Salford Urban Regeneration Company	43	<p>Community retail strategy should be focused on streets and junctions at key locations in the neighbourhood, avoiding isolation. Retail should also be conceived of as a vital part of the streetscapes connecting neighbourhood to neighbourhood. Parking strategies should be clearly established in order to avoid the creation of low quality public realms.</p> <p>A clear strategy to the mix of use and housing type in the retail areas</p>	<p>Both this policy and policy LBDC13, as drafted, are inappropriately specific as to the potential location of retail, community and employment uses.</p> <p>It is proposed that policies LBDC12 and LBDC13 be combined and revised to give more general design advice as to the character of any such uses.</p> <p>It is agreed that the revised policy should reflect some of the issues</p>	Policy LBDC12 and paragraph 7.12.1 to be revised as described above.

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						should be defined. The desired scale and housing relationship within the retail areas should also be noted.	raised. Further detail would require guidance as to the distribution of uses on specific sites, which would be inappropriate in a SPD. However, this is an issue that could be addressed in the proposed Area Action Plan.	
7		LBDC12	Broughton Lane	Mr & Mrs Anand	81	The objectors have an interest in the site at the north-western corner of the junction of Great Clowes Street and Broughton Lane. To allow Broughton Lane to be 'periodically closed to traffic to accommodate special events' would seriously inhibit their business from the proposed distribution centre. Such closure would severely restrict any business, be it retail, commercial or industrial if its principle access was from Broughton Lane.	The section of Broughton Lane to which the policy is intended to refer is currently closed to vehicular traffic. The re-opening of the street, even with occasional closures, would be a benefit to local businesses. No existing business or site would be adversely affected by such temporary closures, as they currently do not have access to the street. It is proposed that paragraph 6.6 be amended to clarify which section of Broughton Lane is referred to and that policy LBDC12 be amended to exclude site-specific details.	Revised policy omits site-specific reference to Broughton Lane. First bullet point of paragraph 6.6 to be amended: "The reopening of the historic route of Broughton Lane, from the existing junction with Great Clowes Street through to Camp Street, as a pedestrian-friendly street accommodating two-way traffic (to improve movement, both within the area and as part of the key route to Pendleton shopping city, and to act as a focal point for the area);"
7		LBDC13	Mocha Parade/Great Clowes Street	Central Salford Urban Regeneration Company	80	There should be more description of the proposed 'local centre' at the junction of Great Clowes Street and the River Irwell, as to the	The policy, as drafted, is inappropriately specific as to the potential location of retail, community and employment uses.	Policy LBDS13 to be combined with policy LBDC12. Subsequent policies and

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						intent and character of community space and use along the river.	Further detail would require guidance as to the distribution of uses on specific sites, which would be inappropriate in a SPD. However, this is an issue that could be addressed in the proposed Area Action Plan.	paragraphs to be renumbered.
7		LBDC14	Cambridge Riverside	Central Salford Urban Regeneration Company	71	There is some concern with the proposal to locate residential apartments along the Cambridge Riverside frontage with the justification that this area is close to the City Centre, particularly when there is currently an oversupply of apartments in the planning pipeline. We would be most supportive of family orientated housing in this prime location.	<p>The number, types and phasing of new housing in Lower Broughton will be developed in accordance with the Regional Spatial Strategy, UDP and future policy on the housing market. It is not appropriate to include such detail in supplementary planning guidance.</p> <p>The development of family housing on Cambridge Riverside is not excluded by any policy in the draft SPD. Nevertheless, the council consider that there is a strong case for allowing residential apartments in the Cambridge Riverside area, in view of the size and configuration of the potential development sites and the character of neighbouring uses. However, policy LBDC11 would ensure that development of the area would include a range of property types and tenures.</p>	No change.

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7		LBDC15	Public Art	Government Office for the NorthWest	20	The SPD cannot be adopted whilst it includes this policy if it does not supplement an existing UDP policy.	Policy LBDC15 supplements policies DEV1 and DEV2 of the Adopted UDP.	The reasoned justification to policy LBDC15 (paragraph 7.15.4) to be amended: "This policy supplements Adopted UDP Policies DEV1 and DEV2 and Draft replacement UDP Policy DES3."
7		LBDC15	Public Art	Red Rose Forest	14	Propose amendment of policy to refer to the Irwell Sculpture trail.	Accepted.	Policy LBDC15 amended: "The provision of works of art, craft or decoration should form an integral part of the design of new developments, where the development would have a significant visual impact by virtue of its scale, location or number of visitors. In particular, works of public art should be located along the River Irwell to complement the Irwell Sculpture Trail, in main areas of public open space and within the focal points such as Mocha Parade."
7	7.1		Design Guidance	Red Rose Forest	10	Propose amendment to the design principles to reflect the Croal Irwell Regional Park.	Accepted with minor changes.	Final bullet point of paragraph 7.1 to be amended: " Identity – create a unique place of quality within Greater Manchester at the southern gateway to the River Irwell and potential future Regional Park."

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	Omission		Architectural Quality	Government Office for the NorthWest	26	It would be helpful to emphasise the importance of achieving high standards of architectural quality for all types of development. There seems to be only one limited reference to this at present in Policy LBDC13.	<p>The importance of achieving high standards of architectural design is stressed in paragraphs 2.11 – 2.15 of the document. It is the purpose of the SPD to ensure that all new developments meet these standards, by clearly setting out the key design issues.</p> <p>To give further emphasis, it is proposed that paragraphs 1.3 and 7.11 are amended.</p>	<p>First sentence of paragraph 1.3 to be amended: “The SPD provides design guidance specifically for the Lower Broughton area of Salford, expanding on the policies of the city’s Adopted Unitary Development Plan (UDP) and its Draft replacement UDP, with the aim of ensuring that all new development achieves high standards of design quality”</p> <p>First sentence of paragraph 7.1.1 to be amended: “It is important that new developments achieve high standards of design quality and that planning applications provide sufficient information for the city council to determine whether they are acceptable in design terms.”</p>

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Omission			Ecology	Environment Agency	68	<p>We understand that ecological matters will be the subject of a City wide Supplementary Planning Document on Biodiversity. Nevertheless this substantial regeneration project offers significant opportunity for enhancing the site's ecological, landscape, recreational value, therefore the issues need to be addressed at the earliest opportunity. A summary of such opportunities would be removing current fish movement obstructions such as Adelphi Weir, removing current built encroachment of the river reducing existing invasive species, creating new native marginal, grassland or woodland habitats, new native landscaped riverside zone, creating new safe riparian walkways along the Irwell, new linking greenspace areas or flood storage areas with the river corridor, and where feasible, removing any redundant and unsightly hard bankside revetment along the river.</p>	<p>It is agreed that the regeneration of Lower Broughton offers significant opportunity for enhancing the ecological, landscape and recreational value of the area. The proposed SPD on Biodiversity will provide policy advice that will apply to Lower Broughton and it is not appropriate to duplicate such policies.</p> <p>It is agreed that this document should provide further information on the local ecological issues that should be taken into account in the design of new development.</p> <p>It is not appropriate to include site specific proposals or policies in this SPD. However, these issues should be considered in the proposed Area Action Plan.</p>	<p>Paragraph 1.6 to be amended to include: "ST13 Natural Environmental Assets EN7C Nature Conservation Sites of Local Importance EN7E Protection of Species"</p> <p>New paragraphs to be added to chapter 4: "Ecological Interest 4.11 A section of the River Irwell which forms the western and southern boundaries of Lower Broughton has been identified as a Grade B, Site of Biological Importance by the Greater Manchester Ecology Unit. The ecological importance of this section of the river is mainly because it provides a feeding site for wintering birds such as tufted ducks and goldeneye. Other wintering birds include little grebe and mute swans. Unfortunately the river is canalized for much of this stretch, so the bankside vegetation is generally poor in ecological terms, and there is much Japanese Knotweed, Himalayan Balsam and giant hogweed.</p> <p>4.12 Initial surveys have found that bats (common pipistrelle) occur within the area. They mainly seem to be using the trees and greenspace for feeding and foraging, but may also be using some buildings for roosting".</p> <p>Reference to biodiversity to be added to paragraph 5.2</p>

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			Ecology	Red Rose Forest	15	Propose addition of policy on the subject of biodiversity.	However, it is agreed that detailed site-specific advice on biodiversity should be included in this document. However, it is not agreed that a new policy is required.	Paragraph 1.6, 6.8 and 7.1 to be amended and new paragraphs 4.11, 4.12 and 5.15 to be added, as shown above.
			Flood defence structures and banks	Environment Agency	63	Support the opening up of the river frontage in order that the River Irwell be "accessible to all". However it is important that future proposals do not adversely affect the existing flood defence structures and banks. Detailed designs will need to take this issue into account and must not compromise maintenance routes and access points. Safe access should also be an important consideration.	Agreed that the document should refer to the need to protect the flood defences. Propose adding text to policy LBDC6	Additional paragraph to be added to policy LBDC6: " Development should: <ul style="list-style-type: none"> • Not adversely affect the existing flood defence structures and banks; and • Allow for safe access to the riverbanks and, where appropriate, the river, taking into account the impact of fluctuating river water levels on what constitutes safe access. Existing maintenance routes should not be compromised, unless an appropriate alternative is provided."

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			Information Boards	Greater Manchester Archaeological Unit	62	Identify an opportunity to create information boards on key archaeological sites, to create a riverside heritage trail and even a popular booklet, so that the incoming and existing community can understand and enjoy the archaeology and history of their local environment, thereby providing a sense of place and stimulating educational aspirations.	It is accepted that measures to improve interpretation of the archaeology and history of the area would be valuable and this will be considered as detailed plans are developed. However, it is considered that this issue is too detailed to justify its inclusion in a planning policy document on design.	No change.

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Omission			Sustainable development	Environment Agency	67	In an attempt to achieve sustainable development we would suggest that such a major and high profile regeneration project should demonstrate high standards of excellence in the built environment and design which is environmentally-friendly and energy-efficient. The Design Guidance should provide a stronger message more specific on the need to achieve sustainable development through the use of sustainable construction techniques, energy and water minimisation, sustainable drainage systems and the satisfactory management of residual flood risk.	<p>Paragraph 7.1 identifies sustainable development as one of the design principles forming the framework for the UDP and design statements submitted in response to policy LBDC will need to address the issue.</p> <p>It is not considered appropriate to include specific requirements in this document. The draft replacement UDP contains policies relating to resource conservation. These policies will apply to development in Lower Broughton. It is not the purpose of the document to duplicate other local development documents. There are no sustainable development issues that are unique or specific to Lower Broughton that warrant the inclusion of area-specific policies.</p>	No change.