

Comments

Manchester's Core Strategy Publication (10/02/11 to 24/03/11)

Comment by	Highways Agency (Lindsay Alder)
Comment ID	22
Response Date	21/03/11 17:04
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Agency would like to reiterate that where we have made comments previously on the proposed options response and where these comments have not been amended, we would look to these changes being made where appropriate. (Comment IDs of comments made at Proposed Option stage are 614 - 655, 661 and 663)

Comment by	Environment Agency (Mrs Helen Telfer)
Comment ID	213
Response Date	24/03/11 12:24
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Re. SA, Para 10.34, p121: Paragraph 10.34 (Page 121) This paragraph should refer to the Core Strategy policy EN14 which has replaced policy En6.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

NO, I do not wish to participate at the oral examination

Comment by	Osborne Clarke (Mr John Sturt)
Comment ID	262
Response Date	24/03/11 11:16
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

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ASDA support the overall provisions of the draft Core Strategy, although have some reservations on the detail and specific wording contained within some of the Policies. Although each of these reservations in isolation do not result in a view that that the Core Strategy is unsound, ASDA wish to reserve their right to appear at the Examination in Public of the Core Strategy to ensure the points raised in this submission are fully considered in the formulation of the final version of the Core Strategy.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

YES, I wish to participate at the oral examination

Comment by	Ballymore Group (Mr Daniel Osborne)
Comment ID	212
Response Date	24/03/11 12:20
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

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BG understands that the main aims and objectives of the Core Strategy are to promote and plan for strategic development. However, at such a time where the development industry is moving relatively slowly and sites remain vacant, it is requested that the Core Strategy includes a policy to support temporary uses on vacant sites. This approach has been adopted in some of the London Boroughs, where Councils have seen the benefit of 'meanwhile' uses on sites that have planning permission and are waiting to be developed. This initiative would help land owners and developers generate incomes from vacant sites, which may mean that the intended end use of such a site may be brought forward quicker and it would also assist MCC ensuring that sites do not remain derelict eyesores or prone to crime.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is requested that the Core Strategy includes a policy to support temporary uses on vacant sites.

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	252
Response Date	24/03/11 10:29
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:-
Overall, PACL and CSC support the general provisions of the Publication version of the Core Strategy

and its Policies and consider that overall it is sound and as such do not intend to appear at the Examination in Public to suggest otherwise. However, we have some specific comments in relation to the wording of some of the particular Policies and supporting text.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	200
Response Date	23/03/11 11:20
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

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Comments made on behalf of the University of manchester Specifically, and relevant to its operational and land interests the University supports the following: Confirmation that the University's campuses along Oxford Road and around Sackville Street (the north campus) are both included within the defined

City Centre (paragraph 2.30, Figure 2.1 and the Proposals Map) and hence also falls within the defined Regional Centre (paragraph 6.2, Figures 7.1 and 8.1, and the Proposals Map);

Comment by	Drivers Jonas Deloitte (Mr John Adams)
Comment ID	151
Response Date	24/03/11 16:00
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

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Comments on behalf of the Universities Superannuation Scheme Ltd:- USS is pleased to note that the key aspirations of the Core Strategy supported at earlier consultation stages remain in place in with the Core Strategy. It is noted that Policies EC1 and CC1 are of particular relevance to the USS. Both policies are supported as they seek to ensure a focus on employment growth within the City Centre and promote mixed use development.

Comment by	Environment Agency (Mrs Helen Telfer)
Comment ID	218
Response Date	24/03/11 12:40

Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

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Do you consider the DPD is sound? Yes

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Re. Infrastructure Delivery Plan, 43 - 49, Section 6: Section 6 Strategic Sites - Manchester Airport Pgs 43-49 The Environment Agency is supportive of compensation and mitigation proposals by Manchester Airport to extend 100 Ha and work with the landowners either side of the Bollin Valley to enhance the ecological diversity within the area to offset the adverse impact of increasing the operational area of the airport. It is important that the river corridor is recognised for its high value in terms of ecological functionality as green infrastructure on a catchment scale. As such, a wide buffer between developed areas and subsequent disturbance is essential. The Environment Agency as part of the Bollin Valley Partnership have put significant investment into improving the fisheries potential by identifying and overcoming barriers to migration. As such a landscape management plan for the river corridor addresses any in channel issues and/or opportunities to increase good ecological potential.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

NO, I do not wish to participate at the oral examination

Comment by	The Theatres Trust (Ms Rose Freeman)
Comment ID	95
Response Date	23/03/11 11:26
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.6

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

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Unsound

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We support the Core Strategy Publication document and find it to be Sound with regard to Policy CC1 which will make provision for a range of economic development uses in the city centre and fringe for

entertainment, cultural and tourism facilities; Policy CC4 where the city centre will be the focus for culture and leisure, and the appearance and accessibility for all cultural facilities will be supported; Policy CC10 which is a general policy for attractive new development in the city centre, although the accompanying text acknowledges the city's cultural heritage of musical and theatre venues that provide vibrancy to the evening economy, which does not seem relevant to this policy. One final comment is that, in our opinion, the document is too long and that many policies could be transferred to a Development Management document (presumably the Development Guide of 2007).

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	British Rail Board (Residuary) Ltd (Mr Mark Seymour)
Comment ID	2
Response Date	11/02/11 13:58
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Web
Version	0.2

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

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Soundness

Do you consider the DPD is sound? Yes

Unsound

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BRBR support the proposals for the future of Manchester as set out in the Core Strategy, and the principles of focusing future high density development on schemes that deliver employment growth and regeneration, while improving sustainability performance and addressing climate change requirements. The strategy identifies the City Centre as a key focus for economic development and indicates that the City Council will support schemes that deliver high quality accommodation and boost inward investment. BRBR has worked with the City Council to develop a Strategic Regeneration Framework (SRF) for Mayfield, identified in the Strategy as a key site within the Eastern Gateway area. The SRF would deliver a high density, mixed use scheme for that area and includes plans for a major office development of around 50,000sqM on the vacant former Mayfield Station site. This development will complement Network Rail plans for Piccadilly Station and provide a catalyst for regenerating the wider Mayfield area and encouraging employment growth. The Mayfield plans, as set out in the SRF, would therefore support the economic growth of Manchester and will play an important part in achieving the Core Strategy's objectives.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	GMPTE (Mr Richard Clowes)
Comment ID	70
Response Date	24/03/11 16:18
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Web
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

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Unsound

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GMPTE supports the overall Spatial Objectives of Manchester City Councils Core Strategy. There is a strong emphasis on development in sustainable locations and access to jobs, education and health services, retail and leisure opportunities by sustainable travel modes making it consistent with the existing Greater Manchester Local Transport Plan 2 and the emerging GM LTP3. In particular Spatial Objective SO5 and Policies T1, T2 and T3 will help to focus development in the most accessible and sustainable locations within Manchester and ensure the promotion of public transport, walking and cycling whilst supporting proposed and future public transport schemes. GMPTE also welcomes the fact that Manchester City Council will continue to work with ourselves and the Highways Agency to identify and prioritise the required public transport and highway infrastructure provision and any necessary mitigation measures to support the sustainable delivery of the Strategic Locations and we welcome the fact that the outcomes of this work will inform the transport evidence base to support the Site Specific Allocations DPD.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Highways Agency (Lindsay Alder)
Comment ID	19
Response Date	21/03/11 16:36
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

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The Agency would wish to reiterate that it is keen to assist the Council with the development of the evidence base, any transport/infrastructure policies, and particularly with assessing the individual and cumulative impacts of the proposed strategic sites, such as Manchester Airport, on the operation and safety of the SRN. As stated in Circular 02/2007, the Agency is able to offer advice, technical support and data to assist in the development of robust evidence and as such the Agency would recommend that that Council takes advantage of this.

Comment by	Natural England (Janet Baguley)
Comment ID	64
Response Date	24/03/11 11:49
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

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We welcome the inclusion of a comprehensive and thorough Non-Technical Summary of the SA Report, which meets the majority of the requirements of the SEA Directive. However, as required by Annex 1 of the SEA Directive, all elements of the Environmental Report (or SA Report in this case) should be summarised, including the likely evolution of the area's environment without implementation of the plan. Although this is addressed within the main SA report, a summary should also be included within the Non-Technical Summary document. Chapter 5 of the full SA Report ("Other Relevant Plans and Programmes") lists the plans and programmes that were reviewed and then sets out the key sustainability issues coming out of the review. Although we welcome the comprehensive list of plans and programmes and the wide ranging environmental issues identified, we are concerned that there is no clear link made between the plans and programmes and the key issues. It is not clear which plans have given rise to which issues, and it would be useful to refer to an appendix fully detailing the outcomes of the review and giving more information about the key points coming out of each plan. In the Baseline Information section, we welcome the clarifications with regards to levels of air pollution in relation to the national average, as requested in our earlier consultation responses (January 2010). However, we are disappointed that the information about Cotteril Clough SSSI has not been expanded to refer to its condition, as we recommended previously (January 2010). We would also like to reiterate our earlier comment that the SSSI status of Cotteril Clough should be made clear in paragraph 6.77 which should read "...such as Boggart Hole Clough and the Cotteril Clough SSSI". We are concerned about the statements made within paragraph 14.2 of Section 14: Conclusions where it is stated that the wording of policies within subsequent DPDs and SPDs could minimise or enhance effects of the Core Strategy, and ensure that adequate provision is made for the protection of the environment. Although we recognise that certain environmental protection issues may be addressed in other plans, it is necessary that the Core Strategy itself puts in place a robust framework for environmental protection and that mitigation through the wording of particular policies is considered within the Core Strategy and not simply deferred to other plans.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by

Environment Agency (Mrs Helen Telfer)

Comment ID	216
Response Date	24/03/11 12:35
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.6

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

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Re. SA, Appendices - Page 267, Blackley Village and Holt Town: A requirement for a Flood Risk Assessment has not been put as a constraint for the strategic housing sites.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Natural England (Janet Baguley)
Comment ID	33
Response Date	23/03/11 15:08
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

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Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We note that the November 2009 version of the HRA report, which we commented on in our response to the Proposed Option consultation (January 2010), has not been updated and so remains the current version in relation to this latest Core Strategy consultation. As we stated in January 2010, we commend the high quality of the report and find it to be clear, concise and comprehensive; however we have a few minor comments to make, as outlined below. We would like to see the Appropriate Assessment stage of the HRA being consistently referred to as such – in places throughout the report, the term is

not used and instead there are references to the 'assessment of potential effects identified through the screening process.' Figure 3, which shows the location of European sites within Greater Manchester, would be better presented at the front end of the report, in order to provide context for the assessment early on. In addition, the boundary of Manchester city should be labelled, as this may not be immediately recognisable to all readers.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	288
Response Date	24/03/11 15:28
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Peel_BC_Rep Infras Plan.pdf
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Bridgewater Canal Company Ltd (BWCC) is part of the Peel Group of companies. The BWCC is the owner of a significant piece of transport infrastructure - the Bridgewater Canal which stretches 39 miles from Runcorn to Leigh, via Castlefield, Manchester. Due to its length and routing, the Canal straddles seven Local Authorities which include Halton, Warrington, Cheshire East, Wigan, Trafford, Salford and Manchester City Council. The latter four Local Authorities are part of the Greater Manchester City Region. Approximately a quarter of the conurbation in the Greater Manchester area is accessible from the Canal by only 10-15 minutes of travel by walking or cycling. Therefore, the Canal towpath is an extremely important off-road piece of travel infrastructure and its enhancement as a shared path pedestrian / cycle facility presents major sustainable transport and also green infrastructure opportunities. The BWCC recognise the potential of the Canal as a multi-functionality green infrastructure. The Bridgewater Canal Trust (BCT) was setup in 1975 in partnership between BWCC and the abovementioned seven Local Authorities. One of the Trust's visions is to maximise the potential of the Bridgewater Canal as an integrated shared strategic cycle and pedestrian network, through the implementation of the Bridgewater Way initiative and improvements to existing routes and public transport facilities in its vicinity. The Bridgewater Way would enhance Greater Manchester's green credentials, can be expected to reduce the region's carbon footprint and support economic growth and regeneration. The Canal also offers excellent recreational and leisure opportunities along its green and blue corridor. BCT also recognise the key challenges in delivering the vision in Core Strategy Development Plan Document in a contracting public spending environment in the foreseeable future. The Bridgewater Way scheme is a partnership scheme. BCT have worked with a number of partners including Sustrans and the National Lottery, and have been supported in the strategies of Trafford, Salford and Wigan in the past. Therefore, BCT think that only continual support and investments thorough this model partnership of public, private and charitable organisations will ensure that this strategic regional project is cost efficient, affordable and deliverable during difficult economic times. As mentioned above, 13 miles of the route have been completed in Halton, Wigan, Salford and Trafford. The connection into Manchester City Centre through Bridgewater Canal green and blue corridor is essential to enable the objective of policy EN9, to create linkages to open spaces outside of the City, to be successful. BWCC / BCT is therefore disappointed that the Bridgewater Way initiative is not recognised in Part Two of the Infrastructure Delivery Plan. Although the 'Canal Connections in East Manchester' has been identified and funding allocated for the scheme, there is no mention of the Bridgewater Way initiative. BWCC / BCT is confident that with the support of Manchester City Council and its existing funding partners, BWCC / BCT will be able to create the linkages from the City Centre to open spaces outside the City Centre.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

BWCC and BCT request that the Bridgewater Way scheme is identified as a clear project / programme within the Infrastructure Delivery Plan with BCT as the Responsible Agency and Manchester City Council as a Delivery Partner, as indicated in the table below. BWCC and BCT also request that the Council allocate funding for the scheme which would be partly matched funded by BCT and its funding partners. Project /Programme Category Responsible Agencies / delivery partners? Location Mechanism(s) / Source(s) of Funding Total Costs (£000s) Delivery Requirement Status /Risk Notes Short Medium Long 2010 2015 2016 2021 2022 2027 Bridgewater Way (Cornbrook Bridge – Castlefield) Canal Bridgewater Canal Trust Bridgewater Canal between Cornbrook Bridge – Castlefield Capital

programme, Bridgewater Canal Trust, charitable organisations 150 Commit ted [See pdf of rep for formatted version of this table]

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

If MCC put forward a proposed change to the CS to address this issue there will no need for BWCC to appear in relation to this matter. However if no change is proposed BWCC would wish to have the opportunity to expand upon this submission.

Comment by	Manchester Women's Design Group (Ms Joan Rutherford)
Comment ID	173
Response Date	24/03/11 15:57
Consultation Point	Manchester Core Strategy (Publication) (View)
Status	Processed
Submission Type	Email
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (2) Effective

Reasons for compliance and soundness

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Under the Sex Discrimination Act 1975 (Public Authorities) (Statutory Duties) Order 2006, the City Council has a legal duty to carry out an Equality Impact Assessment to enable it to understand the impact of its policies on gender equality.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Core Strategy should be the subject of an Equality Impact Assessment in relation to the way its policies affect women. The resulting analysis should be made available for public scrutiny. It should be used to monitor the effectiveness of the policies over time. The Core Strategy should take account of all the relevant issues raised in the document 'Towards the Identification of Gender Issues in the Built Environment' that was produced by Manchester Women's Design Group and referred to Manchester Planning in May 2009.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Natural England (Janet Baguley)
Comment ID	34
Response Date	23/03/11 15:13
Consultation Point	1 Introduction (View)
Status	Processed
Submission Type	Email
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

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Reasons for compliance and soundness

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We would welcome the inclusion of some reference to the Habitats Regulations Assessment (HRA) work that has been carried out in relation to the Core Strategy within the Introduction. Although the completion of the HRA is listed in Appendix 17 (the consultation response form) as one of the checks that the Inspector will make for legal compliance, in this way referring the reader to the report, it would be useful to highlight the HRA work alongside the SA within the Introduction to the Core Strategy and to clarify that the November 2009 version of the HRA report is the latest version accompanying the current consultation.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	127
Response Date	28/03/11 14:21
Consultation Point	2 Manchester Now (View)
Status	Processed
Submission Type	Email
Version	0.8
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of the University of Manchester Specifically, and relevant to its operational and land interests the University supports the following: • Acknowledgement that the City benefits from having major higher education institutions and that these are some of its key assets that drive the economy (Paragraph 2.27) Confirmation that the University's campuses along Oxford Road and around Sackville Street (the north campus) are both included within the defined City Centre (paragraph 2.30, Figure 2.1 and the Proposals Map) and hence also falls within the defined Regional Centre.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	116
Response Date	24/03/11 13:54
Consultation Point	2 Manchester Now (View)
Status	Processed
Submission Type	Email
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

South Manchester/ Challenges Page 23 A number of communities in south Manchester have been totally obliterated by excessive concentrations of (mainly student) HMOs. Community life has all but disappeared in many parts of Withington, Ladybarn and Old Moat. This threat should be explicitly referred to under 'Challenge'. There is clear policy congruity with the Manchester Sustainable Communities' Strategy which recognises the need to protect and sustain communities.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This threat should be explicitly referred to under 'Challenge'.

Comment by	Natural England (Janet Baguley)
Comment ID	65
Response Date	24/03/11 11:52
Consultation Point	2 Manchester Now (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We consider that the first part of this section (the overview of Manchester) focuses heavily on economic and social issues and includes fairly limited background information about Manchester's natural environment. We welcome the references to the character of the city centre (paragraph 2.5) and the description of Manchester's green space, Local Nature Reserves and the Cotterill Clough SSSI (paragraph 2.22). However, overall we feel that environmental issues are strongly overshadowed by description of Manchester's socio-economic characteristics, and we would welcome more detailed description, for example about the character and quality of the townscape/landscape and particular biodiversity assets. We recognise that some more detailed information is provided within the descriptions of the various parts of the city; however we are concerned that socio-economic issues remain strongly at the forefront. Although we recognise the largely urban nature of the plan area, it is equally as important to reflect the value of the natural environment in towns and cities as well as in more rural areas.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	United Kingdom Disabled People's Council (Mr Dave Brown)
Comment ID	11
Response Date	15/03/11 15:31
Consultation Point	2 Manchester Now (View)
Status	Processed
Submission Type	Letter

Version 0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

1. In my representations I will concentrate on South Manchester (2.69) where there has been mistakes re the purported neighbourhoods, in particular (i) the two parts of Chorlton are Chorlton Park and Chorlton Wards, (ii) the Didsbury areas are Didsbury West and Didsbury East Wards and (iii) Withington area is Withington and Old Moat Wards. 2. That Manchester's Local Development Framework/Core Strategy Development Plan Documents should include a) the maintenance of pavements, as they have been considerably damaged by the use of such as roads, and b) that Metrolink should include patronage of disabled people who use mobility scooters and wheelchair users, as well as non-disabled people. In conclusion future documents should be more comprehensive.

Comment by	Ballymore Group (Mr Daniel Osborne)
Comment ID	199
Response Date	24/03/11 11:12
Consultation Point	Figure 2.1 Manchester City Centre (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

BG notes that the Core Strategy divides the City Centre into different character zones, which is supported. Whilst the Central Business District has been identified as being the focus for the largest regional concentration of financial and professional services, it should be acknowledged that other City Centre character areas can deliver these sectors. For example, the Piccadilly Gateway character area holds an important central location and can assist in delivering provision for economic and residential development.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As above.

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	284
Response Date	24/03/11 14:59
Consultation Point	Figure 2.4 Central Manchester Regeneration Area (View)
Status	Processed
Submission Type	Email

Version 0.6

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

There appears to be a drafting error in respect of Figure 2.4 in that the boundary of the City Centre as indicated in this figure does not include the area around St George's Island and Cornbrook and is therefore inconsistent with other figures (for example 8.2 and 8.3) which show the RC boundary as including these areas to the north of Chester Road. The plan should be amended to correct this inconsistency.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by GVA Grimley (Mr Stephen Bell)

Comment ID 188

Response Date 23/03/11 17:40

Consultation Point	4 Core Strategy Vision (View)
Status	Processed
Submission Type	Email
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Manchester University Specifically, and relevant to its operational and land interests the University supports the following: Recognition of the importance of the knowledge-based economy within the Core Strategy Vision (paragraph 4.1);

Comment by	Drivers Jonas Deloitte (Mr John Adams)
Comment ID	149
Response Date	24/03/11 15:44
Consultation Point	4 Core Strategy Vision (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Universities Superannuation Scheme Ltd:- USS continues to support the spatial vision set out for the future of Manchester

Comment by	Natural England (Janet Baguley)
Comment ID	68
Response Date	24/03/11 12:00
Consultation Point	4 Core Strategy Vision (View)
Status	Processed
Submission Type	Email
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

There is much in the Vision that we support, including the recognition of the need to address climate change and the potential role of green infrastructure, as well as the references to sustainable transport. However, as stated in our response to the Refining Options consultation (June 2009), we would like to see the sixth point within the Vision amended to recognise the importance of distinct local character generally, rather than simply in the context of district centres. We are disappointed that this comment has not been addressed. In addition, we remain concerned that the Vision does not make reference to landscape/townscape (which could be referred to as part of the distinct local character, or within the 8th point relating to urban design and environmental quality), as we also commented on in the Refining Options consultation (June 2009). We have some concerns regarding the aspiration to base Manchester's economic growth around the strengthening of Manchester Airport – as we have previously stated (August 2010), we consider aviation to be an environmentally harmful form of transport and we are concerned about the impacts of expanding the role of the airport. This is a recurring theme throughout the Core Strategy and we have made more specific comments where appropriate, namely in relation to Policy MA1: Manchester Airport Strategic Site.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	36
Response Date	23/03/11 15:26
Consultation Point	4 Core Strategy Vision (View)
Status	Processed
Submission Type	Web
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read. Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Manchester City Council has made a commitment through the Access 2000 Strategy to be the most accessible city in Europe and through the Design for Access 2 and Guide to Development policies to promote best practice accessibility standards. It is important to ensure that this emphasis is reflected throughout the Core Strategy. The GM LTP 2 and 3 Strategies and the LTP3 for Manchester also identifies key tasks for Manchester in improving accessibility in transport provision, which currently still offers serious barriers to disabled people, including some older people, and families and young children.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to reflect Manchester's commitment to maintaining and improving access to buildings, facilities, transport and the environment, add elements to 4.1: 4.1 By 2027 Manchester will be: •a successful sustainable and accessible City in the front rank of cities in Europe and the world •a City with

neighbourhoods where people choose to live all their lives because they offer a wide range of quality and accessible housing and an attractive environment •a City which is supported by transport infrastructure which provides sustainable, accessible and efficient links locally

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

MDPAG has a range of evidence and examples showing the need to improve accessibility to buildings, the environment, public spaces, accommodation, retail and leisure provision and transport, all of which are vital to Manchester's economic growth and the independence and social inclusion of residents and visitors.

Comment by	Natural England (Janet Baguley)
Comment ID	67
Response Date	24/03/11 11:57
Consultation Point	5 Spatial Objectives (View)
Status	Processed
Submission Type	Email
Version	0.8
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We welcome the inclusion of SO6: Environment which aims to protect and enhance the natural environment, in particular biodiversity, air, water and land quality and green infrastructure. However, we would also like to see reference to the need to protect and enhance landscape/townscape character within this objective.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	37
Response Date	23/03/11 15:45
Consultation Point	5 Spatial Objectives (View)
Status	Processed
Submission Type	Web
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Manchester has specific standards for accessible housing and the environment, identified in Design for Access 2 and accessibility should be specifically stated alongside other national and local standards adopted by MCC in SO3 Manchester also has made specific commitments to improving accessibility in transport, in particular in the LTP3 policy, recognising that there are still serious barriers for disabled people, including older people and for people with young children, and this should be reflected in the Core Strategy in SO5 We welcome the commitment to a City which is inclusive as stated in SO6

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To meet Manchester's specific commitments, change the wording of S03 to read: S03. Housing Provide for a significant increase in high quality housing provision at sustainable locations throughout the City, to both address demographic needs and to support economic growth. The emphasis will be on providing a good range of high quality housing, (in terms of size, type, accessibility, tenure, and price) including affordable housing across the City; to create sustainable lifetime neighbourhoods with high quality accessible environments, good local facilities and with easy access to employment opportunities. To meet Manchester's specific commitments, change the wording of S05 to read: S05. Transport Improve the physical connectivity of the City, through sustainable and accessible transport networks, to enhance its functioning and competitiveness and provide access to jobs, education, services, retail, leisure and recreation. Access to the facilities and opportunities of the Regional Centre and Manchester Airport, from residential areas will be particularly important, as will improving links between the City and city regions across the country via high speed rail links and internationally via Manchester Airport.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

MDPAG has evidence and examples to support the focus on accessibility as decisions over the recent past has shown the need for MCC to ensure compliance with existing policies, strategies and SPDs.

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	257
Response Date	24/03/11 11:06
Consultation Point	5 Spatial Objectives (View)
Status	Processed
Submission Type	Email
Version	0.6

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- Spatial Objective 5 - Transport - PACL and CSC support the desired improvement of the physical connectivity of the City including, in particular, the need to ensure all residents of the City have good access to the facilities and opportunities of the Regional Centre. Manchester City Centre is currently the most accessible place in the City Region as a result of its concentration of economic activity. This symbiotic relationship should be encouraged to ensure the City Centre remains healthy and to ensure that the employment and service opportunities it affords are accessible to all residents of Manchester and the surrounding Local Authorities.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

NO, I do not wish to participate at the oral examination

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	255
Response Date	24/03/11 11:00
Consultation Point	5 Spatial Objectives (View)
Status	Processed
Submission Type	Email
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- Spatial Objective 4 - Centres - PACL and CSC support in principle the provision of a network of high quality centres throughout the City. However, the brief supporting text to this Policy should be adjusted slightly to refer to the retail hierarchy for the City. As such, the revised text should read: "Developments providing additional services and retail will be encouraged in the district centres where such development is consistent with the City's retail hierarchy. Particular emphasis will be given to development that helps to create distinctive local character."

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The revised text should read: "Developments providing additional services and retail will be encouraged in the district centres where such development is consistent with the City's retail hierarchy. Particular emphasis will be given to development that helps to create distinctive local character."

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	254
Response Date	24/03/11 10:56
Consultation Point	5 Spatial Objectives (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- Spatial Objective 2 - Economy - PACL and CSC support this spatial objective in seeking to encourage a significant further improvement of the City's economic performance through the Regional Centre continuing to be the main focus for business, retail, leisure and cultural and tourism development. This approach should result in the continuation and enhancement of the Regional Centre as the economic driver of the Manchester City Region. PACL and CSC would like to stress that the development of the town centre uses within the Regional Centre should be directed towards existing centres as defined by PPS4 (Planning for Sustainable Economic Growth) with the focus on the development of town centre uses within the core of the City Centre, the most accessible location in the City Region, in the first instance.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Osborne Clarke (Mr John Sturt)
Comment ID	242
Response Date	24/03/11 16:19
Consultation Point	5 Spatial Objectives (View)
Status	Processed
Submission Type	Email
Version	0.6

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

On behalf of ASDA Stores Ltd: Spatial Objective 4 - Centres seeks to provide a strong network of distinctive and attractive centres within Manchester through providing local access to services and healthy food. The Objective also provides specific encouragement to developments that deliver additional retail services in District Centres. ASDA support the principle of this objective in seeking to ensure that all residents of Manchester have convenient access to good quality, affordable food. This is a position that the ASDA stores currently located within the City contribute towards achieving.

Comment by	Drivers Jonas Deloitte (Mr John Adams)
Comment ID	150
Response Date	24/03/11 15:54
Consultation Point	5 Spatial Objectives (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Universities Superannuation Scheme Ltd:- USS continues to agree with the strategic objectives in the document, particularly Objectives 1 and 2, which seek to provide a framework

for sustainable development and support a significant further improvement in the City's economic performance.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	118
Response Date	24/03/11 14:01
Consultation Point	5 Spatial Objectives (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

SO6 - Page 31 The natural environment is not being protected. Much of the urban forest and its high tree canopy are disappearing. Joined-up policy, procedures and co-ordinated action are required.

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	99
Response Date	24/03/11 12:01
Consultation Point	5 Spatial Objectives (View)

Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Peel considers that Spatial Objective SO5 is incomplete in its scope because it makes no mention of the need for good quality and sustainable freight and logistics facilities to support existing and new businesses within the city, and thereby, to help contribute to sustainable economic growth. This omission renders the objective ineffective in addressing the accessibility needs within Manchester.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The wording of Spatial Objective SO5 should be amended to include additional words at the end of the first sentence along the following lines: "...and to provide for freight accessibility and logistical support to existing and new businesses in the most sustainable way.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination. If MCC put forward a proposed change to the CS to address this issue there will no need for Peel to appear in relation to this matter. However if no change is proposed Peel would wish to have the opportunity to explain to the Inspector why it is important for the core Strategy to address the freight and logistical needs of business if the City and the City Region is to be able to fulfil the aspirations which have been set out with regard to economic growth.

Comment by	Manchester Friends of the Earth (Dr Ali Abbas)
Comment ID	90
Response Date	24/03/11 23:29
Consultation Point	5 Spatial Objectives (View)
Status	Processed
Submission Type	Web
Version	0.2
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Manchester's Core Strategy and planning policies must facilitate sustainable development and not economic growth at all costs. We are particularly concerned about the implications of the weakening of the national planning system and removal of safeguards for sustainable patterns of development, and that this will lead to high carbon and environmentally damaging development at the local level. The likely absence of a strong national planning framework as a result of the changes to the planning system underway mean that it is more important than ever that local councils set strong policies in their plans to enable sustainable development. We welcome the high priority given to sustainable development and climate change in objective SO1. We also welcome the reference to sustainable transport in objective SO5, but regard the development of Manchester Airport and its road networks and high speed rail as contrary to this. The transport objective SO5 should principally seek to improve public transport, walking and cycling within the city, across the city region and - because of the city's role in the region's economy and for access to jobs - across the wider North West (such as East Lancashire).

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We would like to have the opportunity to present our case for the changes we have proposed.

Comment by	Citybranch Ltd (Citybranch Limited Citybranch Citybranch)
Comment ID	71
Response Date	24/03/11 16:39
Consultation Point	5 Spatial Objectives (View)
Status	Processed
Submission Type	Web
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Citybranch strongly supports the objective of creating thriving District Centres that provide a range of local services in the City of Manchester. The City's District Centres play an important role in meeting the day to day shopping needs of its residents and the larger centres (such as Chorlton) also perform an important economic role providing jobs close to where people live.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Highways Agency (Lindsay Alder)
Comment ID	17
Response Date	21/03/11 16:30
Consultation Point	5 Spatial Objectives (View)

Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We would also re emphasise those comments made with regard to the Spatial Objectives S01-6 and reiterate that if any of the new neighbourhood centres are located to a junction of the Strategic Road Network the Agency would expect to undertake detailed assessment to ensure that the operation and safety of the network is not compromised.

Comment by	Manchester Friends of the Earth (Dr Ali Abbas)
Comment ID	91
Response Date	24/03/11 23:34
Consultation Point	6 Objective 1 Spatial Principles (View)
Status	Processed
Submission Type	Web
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Objective 1 is to "Provide a framework within which the sustainable development of the City can contribute to halting climate change." Policy SP 1 will not meet this objective if it is predicated on growth of Manchester Airport, which would emit an additional 2.3 million tonnes of CO2 per annum by 2030 (in comparison to other emissions in Manchester decreasing by 1.3 million tonnes per annum by 2020). Also, the CO2 emissions per capita target in Table 6.1 (and Table 12.5 on page 183) is insufficient. Taking into account the projected increase in Manchester's population from 447,000 in 2005 to 558,300 in 2020, emissions per capita would have to fall from 7.3 in 2005 to 3.4 in 2020 in order to meet the target in Manchester: A Certain Future to cut emissions by 41%.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove "The growth of" from the second bullet point in policy SP 1. Revise the CO2 emissions per capita target for 2020 in table 6.1 from 4.3 to 3.4 tonnes.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We would like to have the opportunity to present our case for the changes we have proposed.

Comment by	Mr Peter Thompson
Comment ID	165
Response Date	23/03/11 14:29
Consultation Point	6 Objective 1 Spatial Principles (View)
Status	Processed
Submission Type	Email
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The problem I have outlined is ironically nicely (see rep. no. 164) presented on p.32, at "6. Objective 1. Spatial Principles". I consider that the second bullet point of Policy SP1 (which sees Airport expansion as providing the impetus for a second hub of economic activity) undermines the first one which (rightly in my view) sees the Regional Centre, which includes the city centre and poorer inner suburbs, as the

focus for economic and commercial development, leisure and cultural activity, alongside high quality city living. I feel that there is far too much at stake in terms of need for re-generation and amelioration of poorer people's lives in their own areas in this Regional Centre to risk hazarding all that by stating the need for a second hub of economic activity which will surely drain much needed investment from the regional centre to this fringe location.

Comment by	Natural England (Janet Baguley)
Comment ID	66
Response Date	24/03/11 11:54
Consultation Point	6 Objective 1 Spatial Principles (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We are pleased to note that our earlier recommendation has been addressed and that this policy now aims to 'protect and enhance' the natural environment. We also welcome the aspiration for development to be located so as to reduce the need to travel and enable the use of public transport.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	259
Response Date	24/03/11 11:07
Consultation Point	Policy SP 1 Spatial Principles (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- This principle is supported by PACL and CSC, including the prominence afforded to it as the first spatial principle of the Policy although the text should be adjusted slightly to include a reference to retail

development as below. "The Regional Centre will be the focus for economic and commercial development, retail, leisure and cultural activity, alongside high quality city living."

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The text should be adjusted slightly to include a reference to retail development as below. "The Regional Centre will be the focus for economic and commercial development, retail, leisure and cultural activity, alongside high quality city living."

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Citybranch Ltd (Citybranch Limited Citybranch Citybranch)
Comment ID	72
Response Date	24/03/11 16:41
Consultation Point	Policy SP 1 Spatial Principles (View)
Status	Processed
Submission Type	Web
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Citybranch supports the encouragement of economic development of the City's District Centres contained within Core Strategy Policy SP1. However, the Policy should be adjusted slightly to provide more emphasis on the role that the centres that meet local needs can perform in stimulating wider regeneration and thus in underpinning the creation of neighbourhoods of choice as is an objective of Policy SP1.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	38
Response Date	23/03/11 15:50
Consultation Point	Policy SP 1 Spatial Principles (View)
Status	Processed
Submission Type	Web
Version	0.3

Guidance notes

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

6.7 does not reflect the hierarchy of users identified in Manchester City Council's Pedestrian Strategy in which disabled people, including wheelchair and scooter users and disabled people with mobility, sensory, cognitive and other impairments, take priority. This is particularly relevant, in relation to recent proposals around the development of public spaces, including spaces shared by pedestrians and traffic and in relation to new developments, such as the Metrolink extension, which includes the introduction of steps in public routes which previously were barrier free. Constant monitoring and enforcement requires a clarity within the Core Strategy to enable MCC to efficiently implement existing strategies and policies.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend section 6.7 to read 6.7 The final spatial principle relates to the City's transport infrastructure. One of the reasons that Manchester is the right place in which to focus development is because it has a well established transport infrastructure. However, it is important to realise that this is a finite resource. Development needs to make greatest use of existing and planned public transport, and promote the most sustainable means of transport possible (especially access for disabled people and walking and cycling for local journeys).

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To provide evidence to support the changes

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	175
Response Date	24/03/11 16:23
Consultation Point	Policy SP 1 Spatial Principles (View)
Status	Processed
Submission Type	Email
Version	0.3

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Trafford acknowledges the approach proposed in the Manchester Core Strategy, however given the discussions at the Trafford Core Strategy Examination, it is clear that the Regional Centre and Inner Area boundaries need to be transparent and clearly evidenced. Trafford is unclear from the documentation that this process has been undertaken. This is particularly pertinent in respect of the work that Trafford is undertaking, involving the three authorities of Trafford, Salford and Manchester, in order to progress this matter at the resumed Examination into Trafford's Core Strategy.

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	174
Response Date	24/03/11 16:21

Consultation Point	Policy SP 1 Spatial Principles (View)
Status	Processed
Submission Type	Email
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Trafford welcomes the fact that Manchester's Core Strategy proposes a significant allocation for airport related uses through the Airport City concept and that the land requirements that arise out of this proposal appear to be adequately met from within the MCC area, however the Council considers that this should be made clear in the plan. This position complements the economic strategy promoted within the submitted Trafford Core Strategy.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As above.

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	136

Response Date	24/03/11 14:59
Consultation Point	7 Key Diagram (View)
Status	Processed
Submission Type	Email
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Then wording in paragraph 6.13 suggests that the distribution of new housing shown on the Key Diagram is a fixed percentage of the total housing development over the plan period for each of the locations indicated. This is misleading and is inconsistent with the second paragraph of Policy H1 which explains that the distribution shown is an indicative target and that the actual distribution achieved will be dependent on a number of factors.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The paragraph should be amended to make it clear that the percentages of new housing in the various locations as shown in the Key Diagram are indicative targets. A possible revised wording to paragraph 6.13 would be: "The Key Diagram shows the proposed distribution of development across Manchester. A target percentage of residential development in each Regeneration Area....."

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination. If MCC put forward a proposed change to the CS to address this issue there will no need for Peel to appear in relation to this matter. However if no change is proposed Peel would wish to have the opportunity to explain to the Inspector why it is important to have flexibility in the Plan with regard to the distribution of new housing and to avoid the setting, even by implication, of artificial targets or ceilings for the level of new housing in any of the locations deemed suitable to accommodate new residential development.

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	104
Response Date	24/03/11 13:06
Consultation Point	7 Key Diagram (View)
Status	Processed
Submission Type	Email
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Key Diagram indicates a distribution of new housing development which suggests a fixed percentage of the total housing development over the plan period for each of the locations indicated. This is misleading and is inconsistent with the second paragraph of Policy H1 which explains that the distribution shown is an indicative target and that the actual distribution achieved will be dependent on a number of factors.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The notation to the Key Diagram should be amended to make clear that the percentages of new housing development shown in the various parts of the City are indicative targets.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination. If MCC put forward a proposed change to the CS to address this issue there will no need for Peel to appear in relation to this matter. However if no change is proposed Peel would wish to have the opportunity to explain to the Inspector why it is important to have flexibility in the Plan with regard to the distribution of new housing and to avoid the setting, even by implication, of artificial targets or ceilings for the level of new housing in any of the locations deemed suitable to accommodate new residential development.

Comment by	Salford City Council (Mr Paul Walker)
Comment ID	289
Response Date	23/03/11 09:20
Consultation Point	8 Objective 2 Economy and City Centre (View)
Status	Processed
Submission Type	Letter
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policies EC1, CC1, EC4 – EC11 and MA1. It is requested that further detail from the PPS4 Compliance Statement is included within the Core Strategy itself, which currently only provides broad employment site areas. As identified within the Economy and Employment Space Study there are a range of plot ratios at which office developments can come forward and therefore land areas alone do not provide sufficient clarity in respect of the quantum of development being anticipated. In order to give greater clarity to the strategy in this regard, indicative office floorspace figures from the final two pages of the PPS4 Compliance statement should be provided, either within the relevant policies or their reasoned justification. In respect of the floorspace figures within the table referred to above, it would appear that the total office floorspace identified (1,270,469) is less than the total of the individual floorspace figures for each area which seem to total 1,354,200. Some explanation of these differences should be provided. It is also not clear how the three bullets under this table (which total 40 hectares) relate to the remaining requirement for 12.7 hectares of office land. Do they in part refer to the deliverability of some of the identified office locations in the table and in part refer to the unidentified 12.7 hectares?

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Further detail from the PPS4 Compliance Statement is included within the Core Strategy. Give explanation of floorspace and hectares of office land.

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	253
Response Date	24/03/11 10:50
Consultation Point	8 Objective 2 Economy and City Centre (View)
Status	Processed
Submission Type	Email
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- The significant retail attractions of Manchester City Centre are accessible to a large population and as a result attract shoppers and their expenditure from a wide catchment area (as outlined by the Manchester Retail Study published in November 2010). The very high accessibility of Manchester City Centre coupled with its nationally significant retail facilities, of which PACL and CSC's assets form a substantial

and integral part, result to create the busiest shopping destination outside London. The explicit recognition of this within the Core Strategy along with the significant role the City Centre performs within the North-west is supported by PACL and CSC. As a result of this, PACL and CSC believe that Manchester City Council should develop their Core Strategy to protect, and encourage the improvement of the current health and vitality of the City Centre, particularly as the country emerges from recession, to ensure it continues to fulfil its longstanding important retail and economic role through the consolidation and enhancement of the existing Primary Shopping Area as a first priority.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	186
Response Date	23/03/11 17:22
Consultation Point	8 Objective 2 Economy and City Centre (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments made on behalf of the University of Manchester Specifically, and relevant to its operational and land interests the University supports the acknowledgement that the City benefits from having major higher education institutions and that these are some of its key assets that drive the economy (Paragraphs 8.3) and the confirmation that the University's campuses along Oxford Road and around Sackville Street (the north campus) are both included within the defined City Centre and hence also falls within the defined Regional Centre (...paragraphand 8.1)

Comment by	Mr Peter Thompson
Comment ID	162
Response Date	23/03/11 14:06
Consultation Point	8 Objective 2 Economy and City Centre (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

City Centre. With reference to the abovementioned revival of the city's fortunes, I fully support paragraphs 8.18 (p.45), 8.19 (p.46), 8.24 & 8.25 (p.49), Policy CC2 (Retail) on p.51 and Policy CC4 (Visitors, Tourism, Culture & Leisure) on p.56. For all these desirable aims to be achieved, there needs to be in place some mechanism to actively channel any new development schemes which could enhance the city centre economy to the city centre, and also to prevent such schemes from spinning off and locating themselves elsewhere.

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	106
Response Date	24/03/11 13:18
Consultation Point	8 Objective 2 Economy and City Centre (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not:
· (1) Justified
· (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The wording of the "Key Locations" part of the policy suggests that there is a fixed limit or ceiling to the percentage of total employment development that will be granted planning permission in each of the key locations. This is misleading and is inconsistent with the statements made in paragraph 8.6 and Table 6.1 which make it clear both the total 200 ha of land expected to be developed across the city as whole is a minimum figure and that the distribution percentages shown are indicative targets.

This paragraph should be amended. Peel considers that Policy EC1 should also make reference to the need, if existing and new businesses in Manchester are to maintain their competitiveness, for there to be effective access to international markets and efficient systems for the movement of goods in and out of the area. The policy is incomplete in its scope without such a reference but this could be remedied by the inclusion of an additional bullet point within the policy.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1) The "Key Locations" text should be revised as follows: "Key locations for major employment growth and the target percentages of land to developed in each location will be:" 2) An additional bullet point should be added under the heading "Priorities for ensuring continued economic growth include" to read as follows; " Ensuring connectivity to international markets for the import and export of goods to ensure competitiveness in international markets "

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination. If MCC put forward a proposed change to the CS to address these issues there will no need for Peel to appear in relation to this matter. However if no change is proposed Peel would wish to have the opportunity to explain to the Inspector why it is important to have flexibility clearly demonstrated in the Plan with regard to both the total level and the distribution of new employment development and to ensure that provision is made for the effective movement of goods and for business to have access to international markets if the City is to achieve its ambitions for economic growth.

Comment by	Manchester Friends of the Earth (Dr Ali Abbas)
Comment ID	92
Response Date	24/03/11 23:38
Consultation Point	8 Objective 2 Economy and City Centre (View)
Status	Processed
Submission Type	Web
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We welcome the reference in policy CC1 to the need to contribute to 'decentralised low and zero carbon infrastructure' and expect this to be retained in this policy and applied consistently to all other relevant policies in the Core Strategy. In policy CC2, there should be a stronger presumption against development outside the Primary Shopping Area. We welcome support for 'independent retail sector' which should be consistent across the city area (district and local centres) to enable a flourishing local economy. We disagree with the assessment of need for large format retail and instead would like to see more specific and directed support for small retailers and market traders.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We would like to have the opportunity to present our case for the changes we have proposed.

Comment by

Highways Agency (Lindsay Alder)

Comment ID

21

Response Date	21/03/11 16:40
Consultation Point	Economy (View)
Status	Processed
Submission Type	Email
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Highways Agency welcome the point that the Council will continue to work with the Highways Agency and the Greater Manchester Transport Executive to identify and prioritise the required highway and public transport infrastructure provision and any necessary mitigation measures to support the sustainable delivery of the Strategic Locations. The outcomes of this work will inform the transport evidence base to support the Site Specific Allocations DPD.

Comment by	Goodman (Mr Robin Moxon)
Comment ID	232
Response Date	24/03/11 11:52
Consultation Point	Policy EC 1 Employment and Economic Growth in Manchester (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (2) Effective
. (3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Goodman is an international property group, specialising in the development and management of business space and industrial property. Goodman is a market leader in business park development, and owns two strategic employment-led developments in Manchester: Manchester Business Park, a joint venture with Manchester City Council; and Central Park Manchester, a joint venture with Ask Property Developments Ltd. Goodman supports the reference in Policy EC1 Employment and Economic Growth in Manchester to 50ha of land at Manchester Airport and the surrounding area as a key location for employment growth. However, there is no specific recognition of, and reference to, Manchester Business Park, in this Policy and paragraph 8.8. Manchester Business Park sits within the proposed allocation for Airport City and is a substantial site of 35 hectares adjacent to Manchester Airport and close to Junction 5 of the M56, Junction 4 of the M60 and the established residential community of Wythenshawe. The Park has outline planning consent for 675,000 sq ft of B1 floorspace and is already home to PZ Cussons, Regus and Ericsson. Given the size, location and nature of Manchester Business Park, it is appropriate that it is specifically recognised for continued growth, in accordance with the extant planning permission, and as a major asset to Manchester in terms of its future development potential. The Park has an important role to play in the future economic growth of the city as it is able to accommodate large occupiers requiring flexible buildings with large format floorplates, within a short timescale. PPS 12: Local Spatial Planning states that 'Core strategies must be effective: this means they must be: deliverable; flexible; and able to be monitored' In order to be deliverable, Local Planning Authorities 'should be able to state clearly who is intended to implement different elements of the

strategy and when this will happen'. Therefore, in order to ensure the Core Strategy is effective, it is important that Manchester Business Park is recognised specifically in Policy EC1 as a key contributor to the economic role of Manchester. Policy EC1 of the Core Strategy sets out the priorities for ensuring continued economic growth, including 'improving the portfolio of employment premises, by providing a range of employment sites and premises for small, medium and large businesses'. Goodman supports the principle of offering a flexible choice and portfolio of sites to businesses. However, it is important that these sites offer access to a range of amenity facilities to ensure they retain existing businesses and continue to attract new businesses. These supporting and complementary uses would include hotel, leisure and retail uses, which are ancillary to the primary business use. This is particularly relevant to Manchester Business Park. PPS4 was published in December 2009 and states that the Government's overarching objective is one of sustainable economic growth. Policy EC1 of PPS 4 encourages local planning authorities to assess the existing and future supply of land available for economic development, ensuring that existing site allocations for economic development are reassessed against the policies in the PPS, particularly if they are for single or restricted uses. Policy EC1 of the Core Strategy should reflect this and recognise that supporting and complementary uses including hotel, leisure and retail development, which are ancillary to the primary business class use, can be introduced to existing employment areas.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The necessary changes to Policy EC1 (second bullet point of 'Key locations for major employment growth): 'Manchester Airport and the surrounding area, including Manchester Business Park 50ha' The necessary changes to Policy EC1 (third bullet point of 'priorities for ensuring continued economic growth') are set out below: 'Improving the portfolio of employment premises, by providing a range of employment sites and premises for small, medium and large businesses, as well as the consideration of introducing supporting and complementary uses including hotel, leisure and ancillary retail uses, to support the vitality of these sites over the Core Strategy period'. This change will ensure the policy is sound and in line with the overarching objectives of PPS4.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Goodman is the delivery partner for Manchester Business Park, which is a joint venture between Manchester City Council and Goodman. Manchester Business Park represents that majority of the land proposed at Airport City.

Comment by	Ballymore Group (Mr Daniel Osborne)
Comment ID	201
Response Date	24/03/11 11:29
Consultation Point	Policy EC 1 Employment and Economic Growth in Manchester (View)

Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy EC1 of the Core Strategy states that one of the key locations for major employment growth is the City Centre, where 33 hectares will be made available for major employment growth. BG supports that provision will be made to facilitate new employment growth, adding to the City Centre's vitality and viability. It is anticipated that Manchester City Council (MCC) will be calling for the submission of site details in an alternative LDF consultation, for developers to submit details of sites that will be appropriate for the delivery of the employment growth.

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	191
Response Date	23/03/11 18:00
Consultation Point	Policy EC 1 Employment and Economic Growth in Manchester (View)
Status	Processed
Submission Type	Email
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Manchester University Specifically, and relevant to its operational and land interests the University supports the recognition of the importance of the University and the wider 'Corridor' to the future of the City in ...Policy EC1 – which expresses the Council's support for 'significant contributors to economic growth and productivity' including 'education' and in paragraph 8.9 which recognises that there is a significant concentration of high technology manufacturing and knowledge-based services that are related to the City's universities particularly within the Corridor.

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	176
Response Date	24/03/11 16:36
Consultation Point	Policy EC 1 Employment and Economic Growth in Manchester (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

It is noted that there has been a PPS4 Compliance Statement which is consistent with the work carried out to support the Trafford Core Strategy. Trafford supports the approach of stating hectares, not floorspace, within this policy. This approach is consistent with Trafford's approach and the supporting evidence base.

Comment by	BBC Pensions Trust Limited ()
Comment ID	79
Response Date	24/03/11 18:23
Consultation Point	Policy EC 1 Employment and Economic Growth in Manchester (View)
Status	Processed
Submission Type	Web
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not:

- . (1) Justified
- . (2) Effective
- . (3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Core Strategy Policy EC1 identifies key locations in the Manchester administrative area for employment growth. Provision is made for Class B1 (a, b and c), Class B2 and Class B8 floorspace. A minimum of 200ha of employment land will be developed over the plan period including 33ha in the City Centre area. Policy EC1 states that in addition to the development of Class B floorspace '...the Council will support other significant contributors to economic growth and productivity, including health, education, retailing, cultural and tourism facilities, mainly in the City Centre and Eastlands'. Policy EC1 is justified in referring to '...other significant contributors to economic growth' as these uses are as important as Class B uses to enhancing economic performance of the City Centre and the wider Manchester area. Paragraph 4 of Planning Policy Statement 4 (PPS4), 2009 'Planning for Sustainable Economic Growth' states that '...economic development includes development within the B Use Classes, public and community uses and main town centre uses'. It is justified for Policy EC1 to include as a priority for achieving continued economic growth, 'Ensuring the social, economic and environmental regeneration of the City' as this is in accordance with the provisions of PPS4. Paragraph 10 of PPS4 states that the Government wants 'new economic growth and development of main town centre uses to be focused in existing centres, with the aim of offering a wide range of services to communities in an attractive and safe environment and remedying deficiencies in provision in areas with poor access to facilities'. Policy EC1 should make it clear that development of all types of employment generating uses, as defined by Paragraph 4 of PPS4, will be supported in principle in the City Centre area, subject to satisfying policy tests.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy EC1 should make it clear that development of all types of employment generating uses, as defined by Paragraph 4 of PPS4, will be supported in principle in the City Centre area, subject to satisfying policy tests. To be robust and consistent with PPS4, Policy EC1 should be explicit that the development of public and community uses and main town centre uses will be encouraged within the City Centre Area, and development of land will not be constrained by protection for Class B uses where such protection is not justified. This is particularly important where there is a deficiency in provision and poor access to facilities, as is the case in the City Centre currently in the food retail sector. Such reference in Policy EC1 will ensure that the policy text accords fully with the provisions of PPS4.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To allow for contribution towards the detailed discussions on employment land and retail strategy.

Comment by	BBC Pensions Trust Limited ()
Comment ID	80
Response Date	24/03/11 18:26
Consultation Point	Policy EC 2 Existing Employment Space (View)
Status	Processed
Submission Type	Web
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not:

- . (1) Justified
- . (2) Effective
- . (3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy EC2 seeks to retain and enhance existing space beyond strategic employment locations. Paragraph 8.12 supporting Policy EC2 states that 'In certain areas the City has experienced pressure on existing employment space for other uses, for example residential'. It is justified for Policy EC2 to specify criteria by which the acceptability of sites for alternative uses will be considered. The three criteria listed are: - Un-viable in terms of business operations, building age and format; - Not compatible with adjacent uses; or - Not suitable for employment having had regard to the Manchester – Salford – Trafford SFRA. A fourth criterion should be added to Policy EC2 to state that existing employment sites will be acceptable for other uses where development proposed is: - Consistent with a policy objective of the Core Strategy including its contribution to wider regeneration priorities. Policy EC 2 should cross-reference Policy EC1 and Policy CC2.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A fourth criterion should be added to Policy EC2 to state that existing employment sites will be acceptable for other uses where development proposed is: - Consistent with a policy objective of the Core Strategy including its contribution to wider regeneration priorities. Policy EC2 should cross-reference: Policy EC1 '...other significant contributors to economic growth' as these uses are as important as Class B uses to enhancing economic performance of the City Centre and the wider Manchester area; and Policy CC2 which states that '...proposals which would result in a cumulative increase in City Centre food floorspace...will be supported providing they are based on a credible strategy to further improve local market share'. If a proposed development is in accordance with Policy EC1 and Policy CC2, then Policy EC2 should not be a barrier to development coming forward. Introduction of a fourth criterion referring to the acceptability of development that is consistent with a policy objective of the Core Strategy will address the current lack of soundness in the text of Policy EC2.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To allow for contribution towards the detailed discussions on employment land and retail strategy.

Comment by	Jones Lang LaSalle (Mr James Sheppard)
Comment ID	85
Response Date	24/03/11 19:16
Consultation Point	Policy EC 2 Existing Employment Space (View)

Status	Processed
Submission Type	Web
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant?	Yes
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Soundness

Do you consider the DPD is sound?	No
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Unsound

Do you consider the DPD is unsound because it is not:	. (1) Justified
	. (3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy EC2 should be re-drafted to allow for more flexibility in relation to alternative uses of employment space within defined district centres. There are overriding benefits for the re-development of vacant / under-used employment sites, for retail (convenience / comparison) and leisure use. This is in accordance with PPS4 requirements. Specifically, Wythenshawe Town Centre includes office space of poor quality, which is vacant or under-used. Local Policy should allow flexibility for change of use and / or redevelopment for retail and leisure development, in accordance with PPS4, especially given the enormous quantity of employment floorspace proposed for 'Airport City' nearby. This view is supported in principle by Paragraph 8.12 which states – "In appropriate situations the policy will allow redevelopment of sites to provide the opportunity for alternative uses of land". and Paragraph 8.13 which states– "Employment land will be judged to be suitable for alternative use if it is unviable (no longer serves the needs of businesses due to its age and the condition of the property) or is not compatible with adjacent uses (the character of an area has changed due to regeneration strategies / market demand).

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As above

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	How Planning LLP (Gary Halman)
Comment ID	210
Response Date	24/03/11 12:08
Consultation Point	Policy EC 2 Existing Employment Space (View)
Status	Processed
Submission Type	Email
Version	0.6

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

On behalf of ITV Granada: There is a tension between this policy, which appears to be of city-wide relevance, and policies which encourage mixed use redevelopment (for example CC1- please see below). Policy EC2 is framed as essentially a protective policy, which presumes against the use or development of existing employment space unless certain criteria are met. There are 3 criteria set out in the policy and elaborated in paragraph 8.13. If these criteria are not met, the presumption is that only employment use of the land will be supported. ITV OBJECT to this policy which is considered to be insufficiently justified and therefore unsound. As presently drafted the policy will unduly constrain the use of existing employment sites (such as ITV's Quay Street campus) for a range of other uses such as residential, leisure, retail, hotel and potentially others, and this approach is inconsistent with other policies in the Plan which support a mixed use approach in such locations (albeit employment led).

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Salford City Council (Mr Paul Walker)
Comment ID	290
Response Date	23/03/11 09:32
Consultation Point	Policy EC 3 The Regional Centre (View)
Status	Processed
Submission Type	Letter
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Notwithstanding the comments made against "Economy and City Centre", Salford City Council welcomes the requirement for offices in the Regional Centre to be in locations which are well connected by sustainable transport to both the city centre and residential areas and that such development must not undermine delivery of employment space within the city centre. Such restrictions should help to ensure that major office development is focused in the most appropriate locations. Figure 8.1 identifies the boundary of the Regional Centre in Manchester, Salford and Trafford. As Salford is still progressing its Core Strategy the boundary of the Regional Centre within Salford could be subject to change. The Core Strategy should therefore be clear, by way of a footnote, that the Regional Centre boundary in figure 8.1 is shown for illustrative purposes only, and the elements within Salford and Trafford will be defined in the relevant Core Strategy.

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	261
Response Date	24/03/11 11:09
Consultation Point	Policy EC 3 The Regional Centre (View)
Status	Processed
Submission Type	Email
Version	0.8

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- Policy EC3 - Regional Centre of the Core Strategy encourages office, employment, residential and large scale leisure uses within this area of the City. This Policy is supported by PACL and CSC as it will encourage development of significant employment generating uses in the most accessible location in the City-Region and facilitate the continued success of the Regional Centre as a driver of Manchester and the North-West's growth. However, the Policy should be adjusted to make clear the distinction between the Regional Centre and the City Centre and that retail and leisure uses, other than the large scale leisure uses identified, should be directed to the City Centre in the first instance. This approach would be compliant with National Planning Policy and enable the continued success of the City Centre as a retail, leisure and cultural destination.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Policy should be adjusted to make clear the distinction between the Regional Centre and the City Centre and that retail and leisure uses, other than the large scale leisure uses identified, should be directed to the City Centre in the first instance

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Ballymore Group (Mr Daniel Osborne)
Comment ID	202
Response Date	24/03/11 11:39
Consultation Point	Policy EC 3 The Regional Centre (View)
Status	Processed
Submission Type	Email
Version	0.10
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy EC3 states that within the regional centre, development for employment generating uses will be encouraged and office developments will be appropriate, providing that they are in locations that are well connected to public transport. In addition, provided that they are of the scale and type of development that does not undermine the delivery of employment space within the City Centre. This policy is supported by the BG. It is important to recognise the key planning policy aims of PPS5, which states that the focus for town centre uses in the first instance should be on existing centres. It would be more helpful if the sequential test for town centre uses was included within the Core Strategy, stating that Manchester City Centre will be the focus for office development.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It would be more helpful if the sequential test for town centre uses was included within the Core Strategy, stating that Manchester City Centre will be the focus for office development.

Comment by	DPP (Mr Mark Aylward)
Comment ID	233
Response Date	23/03/11 15:18
Consultation Point	Policy CC 1 Primary Economic Development Focus : City Centre and Fringe (View)
Status	Processed
Submission Type	Letter
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

On behalf of Tesco Stores Ltd: We support the identification of a variety of uses within the City Centre and City Centre Fringe of Manchester. In particular, we welcome the inclusion of retail development within the definition of economic development, in accordance with National Planning Policy PPS4 – Planning for Sustainable Economic Development. It is unclear however, on the distinction between the range of uses to be located within the City Centre and within the City Centre Fringe. It would appear that retail uses are promoted in the City Centre but not so in the City Centre Fringe. Further clarification is sought on this matter in order for the plan to be considered 'deliverable'.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As above.

Comment by	Ballymore Group (Mr Daniel Osborne)
Comment ID	203
Response Date	24/03/11 11:47
Consultation Point	Policy CC 1 Primary Economic Development Focus : City Centre and Fringe (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The provisions of Policy CC1 are welcomed, BG supports that within the City Centre and the fringe a variety of high quality accommodation types, sizes and foot-plates will be encouraged. In addition, it also supports that the focus for employment growth in the City Centre will predominantly be in B1a high density offices. Piccadilly is identified as a focus for this type of development, which is also welcomed. Each development opportunity should be evaluated on a site by site basis for the quantum, density and type of uses it can deliver. For example, central sites in the Piccadilly Gateway character area, tall buildings providing predominantly a B1a use should be considered appropriate and other uses, such as retail, residential and leisure could also be delivered on such sites in mixed-use schemes.

Comment by	How Planning LLP (Ms Amy James)
Comment ID	152
Response Date	24/03/11 16:17
Consultation Point	Policy CC 1 Primary Economic Development Focus : City Centre and Fringe (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Irish Life Investment Managers:- There is support that the provision of a range of economic development uses, such as retail, leisure, entertainment, cultural and tourism facilities will be encouraged in the City Centre to support the development of a vibrant employment location attractive to businesses, employees and visitors to the City Centre. It is considered that providing a range of different uses within the City Centre is important in attracting future investment and also visitors.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Captial and Regional (Mr Xavier Pullen)
Comment ID	28
Response Date	23/03/11 11:58
Consultation Point	Policy CC 1 Primary Economic Development Focus : City Centre and Fringe (View)
Status	Processed
Submission Type	Web
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Capital and Regional support the general intent of this policy. The City Centre is identified as the strategic economic location and focus of employment growth in the city and sub region. The thrust of the policy is predominately on B1a high density offices, and a number of locations for this form of development are specified. In addition however the policy recognises that a range of economic activities such as retail, leisure, entertainment and culture/tourism uses will be encouraged to support the city as a vibrant employment location and to enhance its attractiveness to visitors. Capital and Regional believe the city centre holds significant potential to accommodate additional retail development requiring large floor plates and having large floor space requirements. The employment generating potential of such uses must be recognised as it is able to contribute positively to the economic wellbeing of the city centre, as well as supporting the Councils objective of enhancing the city's appeal to visitors, employees and other businesses. Capital and Regional support the references in paragraphs 8.24 and 8.26 which highlight the opportunities that exist to extend the commercial core of the city centre, and to better integrate city centre fringe areas in the form of commercially led mixed uses. Great Northern Warehouse is specifically mentioned in the context of the Councils plans for the Civic Quarter. The Civic Quarter is seen in the draft plan as "the next phase of growth in the city centre, providing a natural extension to the existing commercial area". Great Northern holds significant potential to contribute to the Councils plans for the revitalisation of this part of the city centre, in particular for commercial/retail use which would complement the wider plans for major civic/office development and the regeneration of this important edge of city centre area.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by

NWDA (Ms Beverley Doward)

Comment ID	10
Response Date	08/03/11 11:28
Consultation Point	Policy CC 1 Primary Economic Development Focus : City Centre and Fringe (View)
Status	Processed
Submission Type	Letter
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Draft Policy CC 1 indicates that the Oxford Road Corridor is one of five locations within the City Centre where high density office development will be focused. Figures 2.1 and 8.2, both of which show the extent of the City Centre, confirm that this Corridor forms part of the City Centre. Draft policies EC 4, 5, 8, 9 and 10 cover other sub-areas of Manchester outside of the City Centre. EC 8 proposes that the Central Manchester sub-area will provide approximately 14 hectares of employment land. The Oxford Road Corridor is identified as one of the areas where the majority of this provision is anticipated to take place, even though the policy acknowledges that it is 'part of the City Centre and Fringe strategic

economic location'. The draft Core Strategy thus appears to treat the Oxford Road Corridor as part of two different sub-areas. In terms of the Core Strategy's effectiveness, this creates uncertainty as to which policy is relevant (or takes precedence) when development proposals in the Oxford Road Corridor are under consideration.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

For the avoidance of doubt, we suggest that the Oxford Road Corridor is treated as part of one sub-area, rather than appearing under two different sub-area policies. We suggest it is treated as part of the City Centre under draft Policy CC 1. We therefore consider the following changes to be necessary to make the Core Strategy effective: • Modify paragraph 1 of draft Policy EC 8 by moving text relating to the Oxford Road Corridor to Policy CC 1; • Similarly, incorporate the supporting text at paragraph 8.74 within the supporting text to Policy CC 1; and • Amend Figure 2.4, which shows the extent of Central Manchester sub-area, by excluding the Oxford Road Corridor (which is shown as part of the City Centre in Figure 2.1).

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	187
Response Date	23/03/11 17:36
Consultation Point	Policy CC 1 Primary Economic Development Focus : City Centre and Fringe (View)
Status	Processed
Submission Type	Email
Version	0.8

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments made on behalf of Manchester University Specifically, and relevant to its operational and land interests the University supports the following: • Acknowledgement that the City benefits from having major higher education institutions and that these are some of its key assets that drive the economy (Paragraphs 8.23); Policy CC1 – which identifies The Corridor as one of the areas of focus for employment growth;

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	263
Response Date	24/03/11 11:17
Consultation Point	Policy CC 1 Primary Economic Development Focus : City Centre and Fringe (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- Policy CC1 - Primary Economic Development Focus: City Centre and Fringe provides more focus to Policy EC3 by stipulating that the City Centre within the Regional Centre should be the focus for employment growth in the Manchester City Region including a concentration of retail, leisure, entertainment, cultural and tourism facilities. Further to this, the Policy supports new and existing infrastructure in the City Centre to support its agglomeration role. This approach is strongly supported by PACL and CSC and represents the most sustainable way of ensuring the City Centre remains a vital and viable centre of employment and economic activity for the Manchester City Region.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	How Planning LLP (Gary Halman)
Comment ID	214
Response Date	24/03/11 12:26
Consultation Point	Policy CC 1 Primary Economic Development Focus : City Centre and Fringe (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

On behalf of ITV: This policy refers to “surplus Granada lands” within the City Centre part of the policy, and goes on to support a range of economic development uses including retail, leisure, entertainment, cultural and tourism facilities. All the ITV Granada land in the City is to become surplus to requirements and as a result a major redevelopment opportunity in this sustainable edge of city core location arises. ITV SUPPORTS the thrust of this policy, and suggests the full extent of the opportunity is made clear; it is no longer just the surplus/residual land, a reference which assumed Granada’s continued occupation.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	109
Response Date	24/03/11 13:25
Consultation Point	Policy CC 1 Primary Economic Development Focus : City Centre and Fringe (View)
Status	Processed
Submission Type	Email
Version	0.6

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

No

Do you consider the DPD is unsound because it is not:

<input type="checkbox"/>	(1) Justified
<input type="checkbox"/>	(3) Consistent with national policy

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Changes necessary for legal compliance and soundness

The wording of the last sentence of the first paragraph of CC1 should be amended to read as follows:
 “The focus for employment growth in the City Centre will be in B1a high density offices and the Council will give particular encouragement and support for such development in the following locations:...”
 (The word “predominantly” is unnecessary as the policy already says that B1a Development will be the focus)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination. If MCC put forward a proposed change to the CS to address this issue there will no need for Peel to appear in relation to this matter. However if no change is proposed Peel would wish to have the opportunity to explain to the Inspector why it is important that the policy is consistent with PPS4 and that clarity is provided as to its meaning and intended application in relation to the consideration of future planning applications.

Comment ID 265

Response Date	24/03/11 11:25
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Email
Version	0.9

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- Policy CC2 also includes criteria that proposals for retail development outside the Primary Shopping Area must meet should they not be accommodated within the Primary Shopping Area. These include that they should have a positive impact on the built environment; must create strong pedestrian linkages with the existing Primary Shopping Area; be accessible by public transport; and have an acceptable impact on the highway network. These criteria are strongly supported by PACL and CSC however, an additional criteria should be added to this to ensure such development comes forward in a manner that allows the continued health of the existing shopping areas of the City Centre rather than simply transferring the retail heart from its existing location to another. This should reads as follows: "Any such proposal should: • Be carefully considered against its potential impact on the vitality and viability of the existing Primary Shopping Area."

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make

the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

An additional criteria should be added to CC2 to read: "Any such proposal should: • Be carefully considered against its potential impact on the vitality and viability of the existing Primary Shopping Area."

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	DPP (Mr Mark Aylward)
Comment ID	238
Response Date	23/03/11 15:51
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Letter
Version	0.8

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Tesco Stores Ltd: Paragraph 8.32 should be amended to include reference to the working population in addition to the resident population.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As above.

Comment by	Jones Lang LaSalle (Mr James Sheppard)
Comment ID	86
Response Date	24/03/11 19:18
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Web
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not:

<input type="checkbox"/>	(1) Justified
<input type="checkbox"/>	(3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy CC2 should also provide for ancillary shopping services, integral to a shopping environment within the Primary Shopping Area (PSA). In particular, A2 (Banks) uses which serve to support PSA's function should be encouraged, so long as they preserve the retail character of the PSA and encourage footfall. Proposed A2 uses should be of a high design quality, further promoting the aesthetics and environmental quality of the PSA. An amendment to this policy, according with the above, is supported by Paragraph 8.32 of the supporting text, which firmly encourages sustainable shopping patterns.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As above

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	BBC Pensions Trust Limited ()
Comment ID	78
Response Date	24/03/11 18:20
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Web
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not:

- . (1) Justified
- . (2) Effective
- . (3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Planning for Uplift in City Centre Retail Floorspace _____

Planning for significant uplift in comparison and convenience retail floorspace in Manchester City Centre is justified as this will ensure that it continues to perform its important function as a regional shopping centre. Comparison Retail Floorspace _____ 70,000 sq. m net additional comparison retail floorspace in the city centre is justified as this is based upon the 'Quantitative Need for Additional Retail Floorspace Update 2010' (produced for the Council and dated November 2010) – referred to hereafter as the 2010 Retail Study. Figure 14 (page 62) of the 2010 Retail Study identifies a requirement for 67,359 sq. m net additional comparison retail floorspace. The approach of Policy CC2 to considering proposals that come forward for new retail floorspace is in accordance with national planning policy on the sequential approach (EC5.2 of Planning Policy Statement 4 (PPS4), 2009 'Planning for Sustainable Economic Growth'). It is justified to state that 'If a proposal comes forward for comparison retail which cannot be accommodated within the PSA, the Council will consider areas beyond the PSA'. Paragraph 8.29 is correct that modern retailing often requires large formats, which may be difficult to accommodate in the established retail core. The Core Strategy is in accordance with PPS4 (EC15.2) in stating that '...it will be appropriate to apply a more flexible approach to site selection' to accommodate the needs of modern retailers. The statement in the policy text that proposals should 'create strong linkages to the primary shopping area, especially on foot' is inconsistent with EC5.2 of PPS4. Convenience Retail Floorspace _____ The 2010 Retail Study is less clear in its advice on the capacity for new convenience retail floorspace in the city centre. Convenience retail capacity is set at a minimum 4,500 sq. m net for the city centre. The Core Strategy does not state explicitly where the 4,500 sq. m net threshold derives from, and the 2010 Retail Study does not quote this figure specifically. In this regard, it is justified to state that '...proposals which would result in a cumulative increase in City Centre food floorspace above this figure will be supported providing they are based on a credible strategy to further improve local market share'. The Core Strategy is justified in promoting new convenience retail floorspace in areas of the city that are regeneration priorities and where there is planned population growth. Reference to Ancoats and New Islington is justified and should for completeness be extended to refer to the Eastern Gateway. The reference at Paragraph 8.29 to large formats required by modern comparison retailing is equally applicable to convenience retailing. Indeed, paragraph 8.31 confirms that large format convenience provision would not normally be appropriate in the retail core as the priority is to maximise opportunities for comparison retail. The text also recognises the potential for foodstore development, to include associated elements which contribute to wider regeneration priorities is important. Uplift in retention of expenditure in the city centre area will be dependent on delivery of a retail foodstore/foodstores of sufficient critical mass to compete with existing large format foodstores outside of the city centre area. As noted, it may not be possible to deliver a foodstore of sufficient scale within the PSA or in an edge-of-centre location and it will be appropriate to apply a more flexible approach to site selection in the convenience retail sector. Addressing city centre capacity and current qualitative deficiency in

provision may require the development of an out-of-centre site of a size sufficient to accommodate a large-format foodstore.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Linkages to the Primary Shopping Area _____ The statement in the policy text that proposals should 'create strong linkages to the primary shopping area, especially on foot' is inconsistent with EC5.2 of PPS4. Whilst EC5.2 of PPS4 states that, for edge-of-centre sites, preference will be given to sites that are well-connected to the city centre, it states that for out-of-centre sites preference will be given to sites that '...have a higher likelihood of forming links with the centre'. There is a subtle but important difference between requiring the creation of strong linkages and a preference for sites that have a higher likelihood of forming links with a centre. Convenience Retail Floorspace _____ Paragraph 5.78 of the 2010 Retail Study states that 'The City Centre...stands out as a location where there is likely to be significant growth in expenditure arising from population growth and at present significant outflows of expenditure'. Paragraph 5.79 goes on to conclude that convenience retail capacity across the entire Manchester administrative area is 25,480 sq. m net at 2027, taking account of a selective increase in market shares. A city centre figure is not given. Policy CC2 should cross-reference the evidence base and clarify the source of the 4,500 sq. m threshold. The statement that new convenience retail floorspace '...should be within the City Centre or as close as possible' is not sound as it is loosely worded and does not reflect the provisions of PPS4. To ensure that the policy text regarding convenience retail floorspace is sound, it should be reworded to reflect the sequential approach to site selection set out in PPS4 (EC5). The principles of EC5 are followed with regard to comparison retail floorspace, as noted above, and this approach should be reflected with regard to convenience retail goods.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To allow for contribution towards the detailed discussions on employment land and retail strategy.

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	268
Response Date	24/03/11 11:53
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- PACL and CSC have some concerns about the extent of the areas identified as indicative Primary Shopping Area Extensions in Figure 8.3 of the Core Strategy. Although the current Primary Shopping Area is compact for a city of Manchester's size and therefore could be potentially expanded without material harm to the existing Primary Shopping Area, the areas identified in Figure 8.3 would effectively double the size of the Primary Shopping Area and could accommodate well in excess of the 70,000 sq m of comparison floorspace identified in Policy CC2. As a result, the supporting text should be adjusted to include a specific recognition that it would not be appropriate to extend the Primary Shopping Area to cover all of the indicative areas identified over the short to medium term and that this development should be phased over the plan period in line with the phasing suggested for the delivery of additional comparison goods floorspace advocated in Policy CC2.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The supporting text should be adjusted to include a specific recognition that it would not be appropriate to extend the Primary Shopping Area to cover all of the indicative areas identified over the short to medium term and that this development should be phased over the plan period in line with the phasing suggested for the delivery of additional comparison goods floorspace advocated in Policy CC2.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	267
Response Date	24/03/11 11:52
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- PACL and CSC support the strong recognition in the supporting text to Policy CC2 of Manchester's importance as a comparison goods shopping destination and as the busiest shopping destination outside London and subsequently, that comparison goods shopping provision needs to expand and improve to maintain this position. PACL and CSC also support the designation of the retail core and Primary Shopping Area as the focus for new comparison goods retail provision and that all opportunities to achieve this within the Primary Shopping Area should be fully realised.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	266
Response Date	24/03/11 11:36
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- Policy CC2 also provides support for the increase in convenience goods provision in and around the City Centre including the development of large format foodstore provision. The provision of improved main food shopping facilities to serve the growing population of the City Centre is supported by PACL and CSC however, we would urge the City Council to ensure such proposals, where in an edge-of-centre or out-of-centre location are considered carefully against any impacts they may have on existing City Centre convenience goods retailers. Manchester City Council should also seek to ensure such developments actively complement the wider retail function of the City Centre rather than creating a separate anchor drawing shoppers from the main retail areas. This should be achieved by including a requirement in the Policy, similar to that included for edge-of-centre comparison retail proposals that the development of a large format foodstore should be in a location accessible by public transport and well linked to the existing Primary Shopping Area by means of easy pedestrian access. Further to this, any foodstore development should not include significant amounts of associated comparison goods units unless these fulfil the criteria within the remainder of Policy CC2.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This should be achieved by including a requirement in the Policy, similar to that included for edge-of-centre comparison retail proposals that the development of a large format foodstore should be in a location accessible by public transport and well linked to the existing Primary Shopping Area by means of easy pedestrian access.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	264
Response Date	24/03/11 11:19
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Email
Version	0.8

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- Policy CC2 - Retail covers the future development of retail facilities in the City Centre and stipulates that an additional 70,000 sq m of comparison goods floorspace will be provided over the plan period. Although the provision of additional retail floorspace within the City Centre is supported in principle by PACL and CSC and in particular the recognition within the Core Strategy that this should be concentrated within the Primary Shopping Area, we have some concerns as to the way in which this additional floorspace could be delivered. 70,000 sq m of additional comparison goods floorspace is a significant increase in a centre even as large as Manchester. To ensure the effects of this floorspace on the existing health of the Primary Shopping Area can be carefully managed, Policy CC2 should provide an indication of how this floorspace should be phased over the period up to 2027. This approach would be consistent with the advice provided in Paragraph 4.13 of the PPS4 Practice Guidance that where the potential exists to expand the role of an existing centre (as is arguably comparable to the provision of 70,000 sq m of additional comparison goods floorspace in Manchester City Centre) this should involve of consideration of the phasing of such development.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy CC2 should provide an indication of how this floorspace should be phased over the period up to 2027.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Osborne Clarke (Mr John Sturt)
Comment ID	243
Response Date	24/03/11 16:28
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Email
Version	0.8
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

On behalf of ASDA Stores Ltd: Policy CC2 - Retail of the Core Strategy covers retail development within the City Centre. It advocates the provision of 70,000 sq m of additional comparison goods floorspace and a minimum of 4,500 sq m of additional convenience goods floorspace over the plan period. The Policy specifically recognises the need to increase the convenience goods market share of the City Centre through the provision of additional large format foodstore floorspace. This approach is strongly supported by ASDA as it recognises the longstanding and increasing need for a facility that fulfils the main food shopping needs of the growing City Centre population without the need for them to travel out to District Centre and out-of-centre locations in Manchester and surrounding Local Authorities. Additional large format foodstore floorspace within the City Centre will encourage more sustainable shopping patterns through reducing the need to travel, provide opportunity for linked trips with the large number of people who regularly visit the City Centre for a number of reasons and help to underpin Manchester's role as one of the UK's premier shopping destinations. However, although ASDA support the Council's view in Policy CC2 that this improved provision should be as close as possible to the City Centre, we consider that the location of this store should support not just the growth of new residential areas such as Ancoats and New Islington but also the growth and consolidation of existing City Centre residential areas, particularly to the North of the City in and around the ring road such as the Green Quarter. This location would also offer an opportunity to provide strong linkages between the new large format foodstore provision and the existing Primary Shopping Area which is located towards the north of the City Centre. As such the text of Policy CC2 should be adjusted slightly to read: "The Council will support the development of food store provision to serve the City Centre, prioritising locations which complement population, including areas of growth, and regeneration priorities, including those identified in Policy EC1. This should be within the City Centre or as close as possible, and should also be in a location which supports the growth and consolidation of existing City Centre residential areas to the north and facilitates the growth of new and emerging residential areas such as Ancoats, New Islington and the Green Quarter." ASDA also support the recognition within the supporting text to the Policy CC2 that additional foodstore provision needs to be in a format that meets shoppers' expectations including providing a store of sufficient scale and with suitable car parking. Furthermore, ASDA also support the desire of the Council to ensure that the delivery of additional foodstore floorspace in the proximity of the City Centre contributes to wider regeneration objectives. This approach will support the continued development of the City Centre and Fringe and their successful integration with the inner areas of the City. The supporting text to Policy CC2 also advocates potential extensions to the existing Primary Shopping Area of Manchester City Centre to the north, north-west and west. ASDA support these extensions as they will enable the continued improvement of comparison shopping facilities in Manchester City Centre which is required to ensure the City maintains and improves its position as the country's busiest shopping destination outside London

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The text of Policy CC2 should be adjusted slightly to read: "The Council will support the development of food store provision to serve the City Centre, prioritising locations which complement population, including areas of growth, and regeneration priorities, including those identified in Policy EC1. This should be within the City Centre or as close as possible, and should also be in a location which supports the growth and consolidation of existing City Centre residential areas to the north and facilitates the growth of new and emerging residential areas such as Ancoats, New Islington and the Green Quarter."

Comment by	DPP (Mr Mark Aylward)
Comment ID	236
Response Date	23/03/11 15:44
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Letter
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Tesco Stores Ltd: In reference to paragraph 8.30 of the policy's supporting text, we consider that wording should be amended to refer to 'larger format' convenience retail

development, as stated in paragraph 8.31. In its current form this phrasing could be deemed to support a significant number of small shops which would ultimately fail to provide the enhanced food shopping offer to achieve enhanced market share. For the purposes of clarity, we consider that wording 'retail core' in paragraph 8.31 should be amended to refer to the 'Primary Shopping Area' as stated in the key for Figure 8.3 to ensure that the Core Strategy is deliverable and effective. In addition to this, we seek further clarification on the reference to the 'wider regeneration framework' mentioned in paragraph 8.31. We feel that it would be regrettable if much needed investment is delayed by the requirement for additional planning guidance (whether through the development plan or otherwise).

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In reference to paragraph 8.30 of the policy's supporting text, we consider that wording should be amended to refer to 'larger format' convenience retail development, as stated in paragraph 8.31. We consider that wording 'retail core' in paragraph 8.31 should be amended to refer to the 'Primary Shopping Area' as stated in the key for Figure 8.3 to ensure that the Core Strategy is deliverable and effective

Comment by	DPP (Mr Mark Aylward)
Comment ID	235
Response Date	23/03/11 15:42
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Letter
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Tesco Stores Ltd: We endorse the use of a minimum threshold of 4,500 sq m net floorspace given in policy CC 2 for future convenience provision in the City Centre. However, it should be recognised that the enhanced market share can only be achieved through the promotion of an anchor food store which should be delivered at an early stage in order to deliver against this objective. We endorse the reference to housing growth in new residential areas at Ancoats, New Islington and to the south of the City Centre.

Comment by	Turley Associates (Mr Greg Dickson)
Comment ID	222
Response Date	22/03/11 13:54
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

On behalf of Sainsbury's Supermarket Ltd: Having reviewed the wording proposed for Core Policy CC2, Sainsbury's would like to re-iterate their broad support for the development of a new foodstore

at a location which supports the growth of new residential areas such as Ancoats and New Islington to facilitate more sustainable shopping patterns in and around the City Centre.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

as above

Comment by	How Planning LLP (Gary Halman)
Comment ID	215
Response Date	24/03/11 12:29
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Email
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

On behalf of ITV Granada: ITV notes the findings of the Councils Retail Study, reflected in this policy, which seeks to provide some 70,000 sq m of additional new comparison retail floor space in the city

centre over the plan period. This focus for this growth, which is on a significant scale, is to be the Primary Shopping Area, followed by accessible locations on the edge of the PSA. This broadly reflects national policy and is SUPPORTED. The Quay Street site is considered to comprise just such an accessible location and lends itself to retail use (food and non food) as part of a mixed use redevelopment of the site. The policy cross refers to CC8 (Change and Renewal) and requires proposals to be in accordance with its provisions, to ensure development delivers the most attractive and usable shopping environment. The guidance of the policy is largely supported, although it should be made clear that these are broad policy criteria rather than tests which must all be met for a scheme to be acceptable.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	How Planning LLP (Ms Amy James)
Comment ID	153
Response Date	24/03/11 16:20
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Irish Life Investment Managers:- Whilst the delivery of retail uses within the Primary Shopping Area is important, we consider that these zones of the City should not be exclusively for retail uses. It is recommended that flexibility is incorporated into any future policies relating to development within the Primary Shopping Area that allows proposals for alternative, non-retail uses to be considered on their individual merits. Services such as banks can generate a level of footfall within an area, as customers to the bank may also decide to visit shops that are located nearby. Therefore, such uses should not be totally excluded from Primary Shopping Areas given their potential for attracting visitors. This is especially important given the current economic climate, where appropriate development proposals should be encouraged to secure investment and active frontages. This will hopefully reduce the possibility of vacant units becoming evident within the Primary Shopping Area, which has the potential to affect the vitality and viability of the centre.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Capitall and Regional (Mr Xavier Pullen)
Comment ID	29
Response Date	23/03/11 12:02
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Web
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Capital and Regional note the findings of the Council's Retail Study, reflected in this policy, which seeks to provide some 70,000 sq m of new comparison retail floor space in the city centre over the plan period. This focus for this growth, which is on a significant scale, is to be the Primary Shopping Area (PSA), followed by accessible locations on the edge of the PSA. This broadly reflects national policy and is supported. The policy cross refers to CC8 (Change and Renewal) and requires proposals to be in accordance with its provisions, to ensure development delivers the most attractive and usable shopping environment. The guidance of the policy is largely supported, although it should be made clear that these are broad policy criteria rather than tests which must all be met for a scheme to be acceptable. Capital and Regional support the thrust of paragraph 8.29 which stresses the need for continued growth in the retail floor space in the city in order to maintain its position in the retail hierarchy. The positive statement that "The Council will promote the growth and improvement of retail provision" could usefully be expressed in the plans' main retail policy (CC2 referred to above) which does not at present contain such a strong statement of support and encouragement. This paragraph rightly recognises that modern retailing often requires large formats which may be difficult to accommodate in the established retail core. Thus a more flexible approach to site selection is seen as appropriate, and Capital and Regional strongly support this realistic approach which will help the city capture new development and retailers which might otherwise be lost as a result of their difficulty in securing an acceptable location from which to trade their particular format. The solution to this dilemma is seen as possible extensions to the PSA to be identified through the emerging Site Specific Allocations Development Plan Document. Whilst this might be one way forward, it is also possible that planning applications in the interim could offer an opportunity to capitalise on latent retailer demand, and the plan should not presume against such development proposals where they are in line with the city's overarching objectives.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	39
Response Date	23/03/11 16:19
Consultation Point	Policy CC 2 Retail (View)

Status	Processed
Submission Type	Web
Version	0.3

Guidance notes

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy CC2 does not include any reference to accessibility for disabled people, including some older people and recent planning decisions and new retail developments have identified the need for rigorous implementation of statutory and local access standards, including best practice where possible, to ensure compliance with local and national policies.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy CC2 should include an additional clause: Retail If a proposal comes forward for comparison retail which cannot be accommodated within the PSA, the Council will consider areas beyond the PSA. Any such proposal should: Be accessible to disabled people

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	How Planning LLP (Gary Halman)
Comment ID	217
Response Date	24/03/11 12:38
Consultation Point	Policy CC 2 Retail (View)
Status	Processed
Submission Type	Email
Version	0.6

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

On behalf of ITV Granada: ITV notes the findings of the Councils Retail Study, reflected in this policy, which seeks to provide some 70,000 sq m of additional new comparison retail floor space in the city centre over the plan period. This focus for this growth, which is on a significant scale, is to be the Primary Shopping Area, followed by accessible locations on the edge of the PSA. This broadly reflects

national policy and is SUPPORTED. The Quay Street site is considered to comprise just such an accessible location and lends itself to retail use (food and non food) as part of a mixed use redevelopment of the site. The policy cross refers to CC8 (Change and Renewal) and requires proposals to be in accordance with its provisions, to ensure development delivers the most attractive and usable shopping environment. The guidance of the policy is largely supported, although it should be made clear that these are broad policy criteria rather than tests which must all be met for a scheme to be acceptable.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	How Planning LLP (Gary Halman)
Comment ID	219
Response Date	24/03/11 12:42
Consultation Point	Figure 8.3 (View)
Status	Processed
Submission Type	Email
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

On behalf of ITV Granada: ITV OBJECT to figure 8.3. It does not appear to be referenced in the text, and certainly does not appear in any of the draft policies. Its purpose is therefore unclear. It purports to identify "Indicative Primary Shopping Area Extensions" although the basis for this and the derivation of the indicative boundaries is obscure. Whilst ITV supports the principle of the City Council looking for ways to expand the city's retail areas, so as to be able to accommodate the scale of shopping envisaged in the Retail Study, it is premature to seek to identify how this might be achieved in the Core Strategy in this way. This is a matter for the DPD to address, based on much more detailed fieldwork than appears to have informed this particular Figure within the Core Strategy. ITV believes the Granada landholding has excellent credentials as a location for retail floor space and if and to the extent this could be regarded as in conflict with the indicative proposals shown on figure 8.3 objection is made on the basis that the approach is insufficiently justified and hence this aspect of the Plan is unsound.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Captial and Regional (Mr Xavier Pullen)
Comment ID	30
Response Date	23/03/11 12:07
Consultation Point	Figure 8.3 (View)
Status	Processed
Submission Type	Web
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Capital and Regional object to the inclusion of Figure 8.3 in the draft plan. It does not appear to be referenced in the text, and certainly does not appear in any of the draft policies. Its purpose is therefore unclear. It purports to identify "Indicative Primary Shopping Area Extensions" although the basis for this and the derivation of the indicative boundaries is obscure.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Whilst Capital and Regional support the principle of the city council looking for ways to expand the city's retail areas, so as to be able to accommodate the scale of shopping envisaged in the Retail Study, it is premature to seek to identify how this might be achieved in the Core Strategy in this way. This is a matter for the DPD to address, based on more detailed fieldwork than appears to have informed this particular Figure within the Core Strategy. Capital and Regional believe Great Northern Warehouse has excellent credentials as a location for major comparison retail floor space and that it should be a candidate for any potential extension of the shopping area which the Council might wish to consider, in support of policy CC2.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	112
Response Date	24/03/11 13:35
Consultation Point	Policy CC 3 Housing (View)
Status	Processed
Submission Type	Email
Version	0.9
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (1) Justified
. (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The wording of the second bullet point of the third clause of Policy CC3 appears to render this part of the policy inconsistent with and more onerous than the related Policy CC7 in that it seems to set a higher test of acceptability with regard to the employment component of mixed use development which includes residential units.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The wording of the second bullet be amended to read as follows: "The residential element of the scheme is of a scale such that the proposals make the maximum reasonable contribution to employment including economic uses such as retail and hotels"

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination. If MCC put forward a proposed change to the CS to address this issue there will no need for Peel to appear in relation to this matter. However if no change is proposed Peel would wish to have the opportunity to explain to the Inspector why it is important to have clear wording in all the policies of the plan and to avoid any potential conflicts which could cause difficulty with regard to future planning applications.

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	100
Response Date	23/03/11 11:59
Consultation Point	Policy CC 3 Housing (View)
Status	Processed
Submission Type	Email
Version	0.9
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments made on behalf of Manchester University The policy states that 'key locations' for residential development within the City Centre will be Castlefield, Piccadilly, the Southern Gateway and the Northern Quarter. Outside of these areas (i.e. sites in The Corridor) must be mixed use and contribute to the economic regeneration of the City and 'of a scale which will ensure that the economic uses on the site, including retail and hotels will be maximised'. As worded, the policy does not permit, in any circumstances, proposals which are entirely in residential or another non-employment use. However, Policy CC7 (Mixed Use Development) does permit such schemes to come forward, provided a 'clear justification' is given for proposals without employment use. To ensure that Policy CC3 is aligned with Policy CC7, the University proposes the amendment of the policy.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Insert a third bullet into the policy which states: 'A clear justification will be required for proposals without any employment opportunities' Reason for revision: to ensure consistency with Policy CC7

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	41
Response Date	23/03/11 16:37
Consultation Point	Policy CC 3 Housing (View)
Status	Processed
Submission Type	Web
Version	0.3

Guidance notes

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

CC3 should include a reference to accessible housing to meet the requirements of Lifetime Homes and where possible, Design for Access 2, to meet the needs identified by the NHS and to ensure that there is sustainable and mixed communities within Manchester. 8.36 should include references to accessibility standards for disabled people, as well as families to meet the national and local standards and include policies adopted to improve accommodation for disabled people and older people and people who require continuing NHS medical support.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

CC3 should be amended to include accessibility: The Council will encourage accommodation of a high standard which offers accommodation which is large enough to suit a range of occupants, in terms of both the number of rooms and their size and accessibility. It is important to recognise the specific access requirements of disabled people in developing and improving accommodation and 8.36 should include references to this as follows: 8.36 It will be necessary that proposals which come forward promote sustainable and mixed communities. This means providing housing options for a range of household types, including the flexibility to accommodate different household circumstances, including families and disabled people. However, the Council recognises that the City Centre is a vibrant environment in which space is at a premium, which means that it may not be the first choice for families. Furthermore, the wider Manchester area, including parts within the City and beyond, offers a range of more traditional neighbourhoods which may be a more obvious choice for families. With this in mind, the Council expects a range of residential units which suits the City Centre's most likely residents, and the proportion of family accommodation provided as part of the overall mix should reflect this consideration. Accessible accommodation for disabled people, both with and without families, should be considered in all new developments to meet the requirements for disabled people working in the City Centre or using City Centre transport facilities to access work opportunities and to have access to key facilities.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To explain and present evidence relating to accessible accommodation

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	40
Response Date	23/03/11 16:24
Consultation Point	Policy CC 3 Housing (View)
Status	Processed
Submission Type	Web
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

CC3 should include a reference to accessible housing to meet the requirements of Lifetime Homes and where possible, Design for Access 2, to meet the needs identified by the NHS and to ensure that there is are sustainable and mixed communities within Manchester.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

CC3 should be amended to include accessibility: The Council will encourage accommodation of a high standard which offers accommodation which is large enough to suit a range of occupants, in terms of both the number of rooms and their size and accessibility.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	35
Response Date	23/03/11 15:15
Consultation Point	Policy CC 3 Housing (View)
Status	Processed
Submission Type	Web
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

MCC has a policy and set of standards relating to accessible housing but there have been well researched and identified problems relating to the provision of accessible housing for disabled people and older people, as well as people who require continuing care from the NHS, particularly in some parts of Manchester where there is not enough suitable accommodation available in the public, voluntary and private sectors.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

CC3 should be amended to read: The Council will encourage accommodation of a high standard which offers accommodation which is large enough to suit a range of occupants, in terms of both the number of rooms, accessibility and their size.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To present evidence and the case for continuing to promote accessibility in housing provision.

Comment by

Peel Holdings (Management) Limited (Mr David Thompson)

Comment ID	285
Response Date	24/03/11 15:05
Consultation Point	Policy CC 3 Housing (View)
Status	Processed
Submission Type	Email
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The wording of the first entry in Table 8.1 is inconsistent with the first sentence of the policy which states that the number of residential units proposed in the City Centre is a minimum figure. This inconsistency should be removed to avoid any confusion arising in the application of the policy. It is also unclear why the figure given in Table 8.1 (of 16,720 units) is different to that in the first part of the policy which refers to a minimum of 16,500 units.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The wording of the relevant entry in Table 8.1 should be amended to read as follows: "Delivery of at least 16720 residential units"

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

If MCC put forward a proposed change to the CS to address this issue there will no need for Peel to appear in relation to this matter. However if no change is proposed Peel would wish to have the opportunity to explain to the Inspector why it is important to have flexibility clearly demonstrated in the Plan with regard to both the total level and the distribution of new housing development and to avoid any suggestion that the figures in the plan should be used as maximum or ceiling figures.

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	42
Response Date	23/03/11 16:54
Consultation Point	Policy CC 4 Visitors - Tourism, Culture and Leisure (View)
Status	Processed
Submission Type	Web
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Currently less than 10 hotels meet the minimum national accessibility guidance and do not meet local accessibility standards, and there is no visitor information available to meet the requirements of disabled people, coming as visitors or for business or conference to Manchester. Manchester City Council's policies promote the accessibility of the city but the core strategy should reflect the need to promote these policies in this area. Many cultural and leisure facilities also have serious barriers which exclude disabled people, including many older people.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Core Strategy should draw attention to the accessibility policies of the Manchester City Council and include this element in the proposals for this sector. CC4 should be amended to include: Visitors - Tourism, Culture and Leisure The City Centre will be the focus for culture and leisure in the City Region. Proposals to improve the appearance, use or accessibility for all of cultural facilities and visitor attractions will be supported. The improvement of facilities for business visitors will also be supported. The following section should also be amended: 8.38 The availability of hotel rooms is important to support conference events, as well as other visitor-oriented activities. It is also vital that the quality of hotel provision enhances the reputation of the City to visitors. The Council will use the planning process as an opportunity to improve the quality of hotel developments, including the accessibility of hotel rooms and facilities for disabled people. Development in the City Centre which improves facilities for visitors, including Manchester residents, will be promoted. In order that the existing visitor attractions can reach their potential it is also important that the City Centre has the infrastructure to accommodate the necessary volume of visitors. Hotels have become an increasingly important use across the city, and these will be particularly important in the City Centre. New hotel development which contributes to the quality of the City Centre hotel offer will be supported. Proposals for new hotels outside of the City Centre will be supported where they support visitor-oriented development, are accessible for disabled people and where the Council is confident that they will be deliverable.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To provide evidence if necessary, to support the focus on improving accessibility in this sector

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	269
Response Date	24/03/11 11:57
Consultation Point	Policy CC 4 Visitors - Tourism, Culture and Leisure (View)
Status	Processed
Submission Type	Email
Version	0.6

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Prudential Assurance Company Limited and Capital Shopping Centres:- Policy CC4 - Tourism, Culture and Leisure stipulates that the City Centre will be the focus for culture and leisure in the City Region. PACL and CSC support this approach along with the recognition in the accompanying text to the Policy of the growth and importance of tourism and leisure to the City focused on the City Centre.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

NO, I do not wish to participate at the oral examination

Comment by	Natural England (Janet Baguley)
Comment ID	69
Response Date	24/03/11 12:03
Consultation Point	Policy CC 5 Transport (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We welcome the inclusion of a policy aiming to improve public transport provision; however we are disappointed that this policy does not address the issue of transport to and from Manchester Airport. In our response to the Core Strategy Proposed Option (January 2010) we highlighted the importance of coupling support for the growth of Manchester Airport with a policy commitment to expand and improve public transport services for those travelling to and from the airport. Although a number of other policies in the Core Strategy (e.g. EC9, EC10 and MA1) touch on this issue, we are disappointed that the opportunity to fully address it within this specific transport policy has not been taken.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	43
Response Date	23/03/11 17:37
Consultation Point	Policy CC 5 Transport (View)
Status	Processed
Submission Type	Web
Version	0.2

Guidance notes

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound?

No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

There is a great deal of evidence showing that transport providers are not effectively consulting with disabled people and their organisations to deal with complaints, to support inclusive design for new transport provision and to identify access barriers. It is important that issues specifically related to access for disabled people are identified in the Core Strategy as disabled people often have no choice in the mode of transport they use. Without identifying these specific issues, transport providers often ignore access barriers and invest in unsustainable and inaccessible provision which affects the economic and social development of Manchester and are likely to remain barriers for many years ahead. It is more cost effective for transport providers to consult and deliver inclusive design and services at the early stage of development and review. Manchester has recently fallen behind other UK cities in the provision of accessible transport services and recent decisions have made pedestrian routes related to the Metrolink extension inaccessible, have excluded many disabled people from Metrolink, have continued to exclude many disabled people from buses and taxis and have continued to exclude some disabled people from key public spaces including Piccadilly Gardens through the design and provision of tram rails and lack of appropriate controlled crossings. The provision of blue badge spaces and drop off spaces within 50 metres of disabled people's destinations is required under the Equality Act and the Design for Access 2 standards and through other legislation and guidance to meet the specific requirements of many disabled people. 8.41 includes references to walking and cycling and should also include access for disabled people, including wheelchair and scooter users, people with sensory impairments and learning disabled people. This would meet the policies in the Pedestrian Strategy and ensure that Key Routes, and other pedestrian highways, used in prioritising maintenance and development as part of the strategy agreed for the Commonwealth Games and utilised by the Planning Department, MEDC and Highways since then, are retained as elements of the City Council's policy. The Council's Key Routes strategy, which identified pedestrian priority routes within the Retail Core, should be included and expanded.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

CC5 should be amended to reflect the importance of accessible transport provision for Manchester and the key role of transparent and open consultation with disabled people. Transport The Transport Strategy for Manchester City Centre will be delivered to ensure that transport is managed in a way which supports the projected growth of the City Centre. Developers should work with public transport providers to ensure that users, including disabled people, are able to access development by sustainable means, especially taking account of times when developments are likely to be busiest. Proposals will be supported that improve pedestrian safety and accessibility, improve air quality and increase the scope for accessible public realm improvements, for example improvements to: •remove buses and private cars from St Peter's Square •create a new pedestrian priority zone initially the area bounded by Deansgate, Peter Street / Oxford Street, Portland Street, Piccadilly North, Manchester Arndale, Corporation Street and Exchange Square •close Victoria Street in the Medieval Quarter to traffic other than buses and create a new public realm around the Cathedral and Chethams. The Council will seek to ensure that development includes adequate parking provision for cars and bicycles, including blue

badge holders. This should be based on the parking standards described in appendix B. The Council will also ensure that all public space developments will avoid shared spaces, where there are not clear physical boundaries between traffic and pedestrians, including access for delivery vehicles. The Council will also ensure that all new pedestrian zones, the removal of buses and private cars from areas of Manchester or routes into and out of Manchester, will not disadvantage disabled people who need to access facilities by car or be dropped off near to their destination. The Council will ensure that sufficient accessible parking spaces for blue badge holders are provided within 50 metres of their destination at all new pedestrian zones. 8.41 should be amended to ensure that access for disabled people is supported in any pedestrian policies: 8.41 The Council will also work to ensure that cycling and walking are attractive options, and access for disabled users of pedestrian routes, considering conditions on the roads, paths and cycleways and the potential need for facilities within the City Centre. Alongside this, enhanced gateways and improved pedestrians facilities within developments and the creation of pedestrian priority routes through the retail core area will further enable movement into and across the City Centre. Section 8.42 should be amended: 8.42 The effectiveness of the transport network into and around the City Centre is important so that the opportunities created in the centre can be accessed by people living elsewhere in the City Region. It is particularly important that job opportunities are available to people in the City's most deprived neighbourhoods, and so accessible public transport, and accessible cycling and walking links to the Inner Areas need to be strengthened.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To provide evidence to support the inclusion of accessibility issues

Comment by	Ballymore Group (Mr Daniel Osborne)
Comment ID	204
Response Date	24/03/11 11:50
Consultation Point	Policy CC 6 City Centre High Density Development (View)
Status	Processed
Submission Type	Email
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

In light of comments on Policy CC1 (rep no. 203), Policy CC6 is supported by BG.

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	193
Response Date	23/03/11 10:58
Consultation Point	Policy CC 6 City Centre High Density Development (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of the University of Manchester Specifically, and relevant to its operational and land interests the University supports the following: Support for high density development within the City Centre in order to maximise site opportunities (Policy CC6);

Comment by	Ballymore Group (Mr Daniel Osborne)
Comment ID	205
Response Date	24/03/11 11:59
Consultation Point	Policy CC 7 Mixed Use Development (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

In light of comments on Policy CC1 (rep no. 203), Policy CC7 is supported by BG.

Comment by	How Planning LLP (Ms Amy James)
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Comment ID	154
Response Date	24/03/11 16:28
Consultation Point	Policy CC 7 Mixed Use Development (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Irish Life Investment Managers There is support for the acknowledgment that a range of uses should be considered for all sites, as it is important to encourage development in the current economic climate to maintain active frontages within the City Centre.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

NO, I do not wish to participate at the oral examination

Comment by	How Planning LLP (Gary Halman)
Comment ID	220
Response Date	24/03/11 12:47
Consultation Point	Policy CC 7 Mixed Use Development (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

On behalf ITV Granada: This policy encourages mixed use development within the City Centre, and in this respect is SUPPORTED. The tension with policy EC2 has been highlighted above. The second bullet point supports residential development as part of schemes which include employment but continues that "the Council must be satisfied that proposals make the maximum reasonable contribution to employment and a clear justification will be required for proposals without employment opportunities". ITV OBJECT to this aspect of the policy as it is unduly restrictive and imprecise: the policy test of a "reasonable contribution" to employment is too open to wide interpretation and gives no meaningful guidance to potential applicants or developers on what might or might not be reasonable. It is unjustified and therefore unsound.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

NO, I do not wish to participate at the oral examination

Comment by

Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)

Comment ID

44

Response Date

23/03/11 22:00

Consultation Point

Policy CC 8 Change and Renewal ([View](#))

Status

Processed

Submission Type

Web

Version

0.2

Guidance notes

Please tick the sections of the guidance that you wish to read.

☒ Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant?

☒ Yes

Soundness

Do you consider the DPD is sound?

☒ Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

MDPAG welcomes the commitment to partnership working, particularly as some of the access barriers at developments such as Spinningfields and in the retail core could have been avoided had there been consultation with disabled people's access groups at an earlier stage. We support proposals for good quality inclusive design to enhance the experience of people in Manchester and the economic future of the city.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	The Theatres Trust (Ms Rose Freeman)
Comment ID	96
Response Date	23/03/11 11:46
Consultation Point	Policy CC 10 A Place for Everyone (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy CC10 Comment - Our only criticism of the policies concerns Policy CC10 - the policy as written is not clear about what it seeks to achieve. There is an inconsistency between it and the accompanying text and a lack of clarity. We suggest the policy is deleted and the content re-distributed to other policies if necessary.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	45
Response Date	23/03/11 22:04
Consultation Point	Policy CC 10 A Place for Everyone (View)
Status	Processed
Submission Type	Web
Version	0.2

Guidance notes

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

MDPAG fully supports the policy CC10 and 8.55 and 8.56 and commits to continuing support for the City Council in furthering these proposals.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	mr martyn coy
Comment ID	52
Response Date	24/03/11 11:44
Consultation Point	Policy EC 4 North Manchester (View)
Status	Processed
Submission Type	Web
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

.	Introduction
.	Legal Compliance
.	General advice

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Support the importance attributed to the waterways in creating a sense of place and attracting investment as Inland waterways and canals as locations for development can play a vital role as catalysts for regeneration. Inland waterways are successfully being used as tools in place-making and place-shaping; in re-branding; in confidence-building; in attracting and generating investment; and in improving the quality of life in areas undergoing transformational change through regeneration, renewal and growth.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	mr martyn coy
Comment ID	53
Response Date	24/03/11 11:44
Consultation Point	Policy EC 5 East Manchester (View)
Status	Processed
Submission Type	Web
Version	0.3

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Support policy as will promote development that creates links and improves access to the canal network, enabling greater use and enjoyment of the towing path by pedestrians and cyclists for recreation and leisure, which will provide health benefits to the local community. This will also encourage the use of the towing path as a commuter route, making greater use of sustainable transport infrastructure and helping to reduce congestion on the local road network.

Comment by	Ask Goodman (Mr David Burkinshaw)
Comment ID	189
Response Date	24/03/11 17:49
Consultation Point	Policy EC 6 Central Park Strategic Employment Location (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

in order to complement the existing large scale B1 office uses already located in this area. This is especially important in the current economic climate because the office sectors traditionally targeted have been badly affected by the economic downturn and are unlikely to generate any meaningful office occupier activity at Central Park in the short term. In order to ensure that development continues on the northern part of Central Park, it is important that AG have maximum flexibility in order to support a range of employment uses on site.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy EC6 should be re-worded in order to allow a full range of employment uses including B-class uses as well as A1, A3, and D1 supporting uses at Central Park North, in order to allow the creation a vibrant Business Park providing for the needs of all of those working at the site. Alternatively, the distinction between Central Park North and Central Park South should be removed in order to allow a variety of employment uses to locate anywhere on the site. This will allow for the extant planning permission to be implemented (on the part of the site to which it relates) and provide maximum flexibility for potential tenants of the site.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Ask Goodman wish to reserve the right to speak (or nominate our Agents to speak on our behalf) at the Examination in order to ensure that the representation made here is fully understood, since we consider that our previous response setting out the same points (made in September 2010) was not correctly interpreted.

Comment by	mr martyn coy
Comment ID	54
Response Date	24/03/11 11:45
Consultation Point	Policy EC 6 Central Park Strategic Employment Location (View)
Status	Processed
Submission Type	Web
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Support the incorporation of the Rochdale Canal in creating a sense of space for the Central Park Strategic Employment Location. The canal is a unique feature for this location and future development should fully consider the incorporation of the canal at its heart.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	GL Hearn on behalf of KPMG LLP (Mrs Emma Jones)
Comment ID	125
Response Date	23/03/11 14:19
Consultation Point	Figure 8.4 Central Park Strategic Employment Location (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (1) Justified
. (3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Figure 8.4 Central Park Strategic Employment Location (and also as referred to in Policy EC6) should be deleted as it is inconsistent with national policy in PPS12, nor justified by a robust and credible evidence base. PPS12 paragraph 4.1 states that locations for strategic development should be indicated on a key diagram and paragraph 4.5 makes it clear that the core strategy should make clear spatial choices about where development should go in broad terms [our emphasis]. Paragraph 4.7 provides further guidance on the distinction between identifying strategic locations and sites, stating that: 'in general the core strategy will not include site specific detail which can date quickly. Where core strategies allocate strategic sites, they must include a submission proposals map. It may be preferable for the site area to be delineated in outline rather than detailed terms' It is considered that the identification of Central Park Strategic Employment Location on an OS base with site specific boundaries is contrary to this advice within PPS12. The identification of the broad area shown in the Key Diagram (Figure 7.1) for the Strategic Employment Location is adequate for the purposes of Policy EC6, which does not seek to make site specific allocations. The supporting text in paragraph 8.67 states that Central Park Strategic Employment Location was identified in the Economy and Employment Space Study (EESS). This is incorrect as the EESS does not identify a site which corresponds with the boundary included in Figure 8.4. Therefore, the inclusion of this figure is not justified as there is no robust and credible evidence base for including site specific boundaries for Central Park. This would also be consistent with the approach taken for the Strategic Housing Location which is shown on Figure 9.1 as a general location without defined boundaries on an OS base. If the boundary of the Central

Park Strategic Employment Location is to be defined as shown in Figure 8.4, the inclusion of sites should be tested. By way of example, with specific reference to the Former Jacksons Brickworks site on Ten Acres Lane, this site is not identified for employment uses in the EESS, rather it is identified as a potential site for housing within the Manchester Strategic Housing Land Availability Assessment (SHLAA). Whilst a mixed-use development may be the solution on this site it should not be specifically included within the Central Park Strategic Employment Location. The inclusion of part of the Former Jacksons Brickworks site within the proposed boundary is so site specific as to preclude meaningful future choices to be made.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

not identify a site which corresponds with the boundary included in Figure 8.4. Therefore, the inclusion of this figure is not justified as there is no robust and credible evidence base for including site specific boundaries for Central Park. This would also be consistent with the approach taken for the Strategic Housing Location which is shown on Figure 9.1 as a general location without defined boundaries on an OS base. If the boundary of the Central Park Strategic Employment Location is to be defined as shown in Figure 8.4, the inclusion of sites should be tested. By way of example, with specific reference to the Former Jacksons Brickworks site on Ten Acres Lane, this site is not identified for employment uses in the EESS, rather it is identified as a potential site for housing within the Manchester Strategic Housing Land Availability Assessment (SHLAA). Whilst a mixed-use development may be the solution on this site it should not be specifically included within the Central Park Strategic Employment Location. The inclusion of part of the Former Jacksons Brickworks site within the proposed boundary is so site specific as to preclude meaningful future choices to be made.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Former Jacksons Brickworks site is a key vacant site and its future use for housing will make a significant contribution to the regeneration objectives of the area.

Comment by	Environment Agency (Mrs Helen Telfer)
Comment ID	167
Response Date	24/03/11 14:59
Consultation Point	Policy EC 7 Eastlands Strategic Employment Location (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

In conclusion, we feel that the Core Strategy meets the tests of soundness as prescribed in Planning Policy Statement 12 for those issues which lie within our remit. However we feel the plan could be improved by considering the following: Policy EC7 – Eastlands Strategic Employment Location (Page 72) Whilst we support reference to the 'importance of waterways and canals...in creating a sense of place' it is unclear what this policy means in its interpretation. For clarity we would recommend that further explanation of this is provided within the policy justification.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by mr martyn coy

Comment ID 55

Response Date 24/03/11 11:45

Consultation Point Policy EC 7 Eastlands Strategic Employment Location ([View](#))

Status	Processed
Submission Type	Web
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant?	Yes
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Soundness

Do you consider the DPD is sound?	Yes
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Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Ashton Canal runs through the heart of this site and we support that the DPD acknowledges the role the canal can make in creating a sense of place and attracting investment.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	NO, I do not wish to participate at the oral examination
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Comment by	DPP (Mr Mark Aylward)
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Comment ID	240
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Response Date	23/03/11 16:00
Consultation Point	Policy EC 8 Central Manchester (View)
Status	Processed
Submission Type	Letter
Version	0.8

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . Not specified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Tesco Stores Ltd: Point 1 is unhelpful because it fails to distinguish the advice in respect of the City Centre and the City Centre Fringe. As drafted, it would appear inconsistent with the guidance of Policy CC 1, and could therefore be considered unsound.

Comment by	Indigo Planning Ltd (Miss Charlotte Blinkhorn)
Comment ID	292
Response Date	24/03/11 09:48
Consultation Point	Policy EC 8 Central Manchester (View)
Status	Processed
Submission Type	Letter

Version 0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? No

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (1) Justified
. (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Marlyand Securities Ltd and Maple Industrial Ltd:- Policy EC8 informs that new employment land in the Central Manchester area will be provided in existing employment and economic development areas along Stockport Road and Hyde Road, amongst other areas. This focus does not align with the Central Manchester Strategic Regeneration Framework (CMSRF), the East Manchester Strategic Regeneration Framework (EMSRF) and the Ardwick Local Plan, all of which promote a mix of uses along the Hyde Road Corridor to secure regeneration. For example, the Arwick Local Plan seeks to secure major mixed residential and employment investment along Hyde Road corridor and also refers to Hyde Road for the identification of potential new local centres to provide for the deficiency in local shops and services and also to create a sense of place. The Ardwick Local Plan proposals for employment and enterprise are not focused on Hyde Road Corridor. Furthermore, the EMSRF promotes residential led mixed use regeneration along Hyde Road including major residential redevelopment in West Gorton and a mixed use corridor along Hyde Road in Gorton Central. As currently drafted, EC8 is unsound as it directly conflicts with the approved regeneration strategies and may frustrate the delivery of regeneration objectives.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Therefore, in order to be deliverable and justified, Policy EC8 should be revised to align with other approved strategies and policies in the Manchester district. The policy should state that some existing employment sites will be suitable for alternative land uses and development including commercial, residential and retail uses. This revision to the policy will also provide flexibility to ensure the policy is effective and deliverable. Given the uncertain economic times, some existing employment sites may not be deliverable for ongoing employment provision taking into consideration, amongst other matters, the viability of the building and business operations and general economic life of certain types of sites. The suggested revision to the policy will make the Core Strategy deliverable by providing flexibility to allow changes of use/redevelopment where existing uses are no longer viable or sustainable.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	177
Response Date	24/03/11 16:38
Consultation Point	Policy EC 8 Central Manchester (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The policy is consistent with Trafford's Core Strategy, particularly the Strategic Locations, which seek to improve orbital connectivity between residential neighbourhoods and employment locations such as Trafford Park. The Council considers that the reference to "Trafford" should in fact be to "Trafford Park", in order to be consistent with the justification text.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Council considers that the reference to "Trafford" should in fact be to "Trafford Park", in order to be consistent with the justification text.

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	192
Response Date	23/03/11 10:53
Consultation Point	Policy EC 8 Central Manchester (View)
Status	Processed
Submission Type	Email
Version	0.8

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Manchester University Specifically, and relevant to its operational and land interests the University supports the following...Recognition of the importance of the University and the wider 'Corridor' to the future of the City in Policy EC8 which expects a large proportion of employment land to be provided within The Corridor, including economic development related to the universities. The University supports the policy's objective to create a positive sense of place at the interface of the health and education institutions along Oxford Road and the residential areas using design and public realm and Paragraph 8.74 – which recognises that the vision for the area is for a step change in economic activity in the period to 2020

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	178
Response Date	24/03/11 16:41
Consultation Point	Policy EC 9 South Manchester (View)
Status	Processed
Submission Type	Email
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Trafford supports that part of EC9 which seeks to improve orbital connectivity between residential neighbourhoods and employment locations such as Trafford Park (bullet point 2 in the policy).

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	119
Response Date	24/03/11 14:05
Consultation Point	Delivery Strategy (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Planning applications should have regard to District Centre Action Plans (and other such plans) e.g. the Withington Village Action Plan. Otherwise, these Plans will be 'toothless'.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Local Action Plans should be included in the Delivery Strategy at page 79.

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	179
Response Date	24/03/11 16:44
Consultation Point	Policy EC 10 Wythenshawe (View)
Status	Processed
Submission Type	Email
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We support the aspiration to increase the economic opportunities at Wythenshawe and improve the connectivity between the Roundthorn Industrial Estate and both the Airport and wider motorway network. However, within the Trafford Core Strategy there is a proposal to delete the employment allocation at Davenport Green and return the land to the Green Belt. The Council would therefore have significant concerns should any future Manchester LDF document identify the requirement for a highway link to be made to the M56 through this area of proposed Green Belt. The Council considers that this statement requires further clarification in the Plan. This is consistent with our position expressed to you in 2008 and 2010.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make

the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Council would therefore have significant concerns should any future Manchester LDF document identify the requirement for a highway link to be made to the M56 through this area of proposed Green Belt. The Council considers that this statement requires further clarification in the Plan.

Comment by	Jones Lang LaSalle (Mr James Sheppard)
Comment ID	87
Response Date	24/03/11 19:19
Consultation Point	Policy EC 10 Wythenshawe (View)
Status	Processed
Submission Type	Web
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not:

- . (1) Justified
- . (3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We support Manchester City Council's ambition that the majority of economic development will be focused on: 3. "Existing employment sites along: "East Wythenshawe Development Corridor – Sharston Industrial Estate (B8), Atlas and Concord Business Parks (B1) and Ringway Trading Estate (B8)". However, we disagree that Wythenshawe Town Centre is appropriate for substantial office development as it is no longer attractive for occupiers, especially given the significant employment proposals (including B1) which are likely to come forward through the development of Airport City.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As above

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	CPRE: Lancashire Branch (Mr David Clarke)
Comment ID	295
Response Date	14/04/11 15:59
Consultation Point	Policy EC 11 Airport City Strategic Employment Location (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

CPRE maintains that Manchester City Council is wrong to include aspirations to build the SEMMMS roads in its Core Strategy because it is not supported by national government policy or the NW RSS and it is not compliant with other policies in this Core Strategy. As part of the Comprehensive Spending Review of October 2010, the Coalition Government reassessed all the pending road schemes (Highways Agency and Local Authority) and prioritised them against four criteria (public value for money, strategic value, deliverability and non-monetised impacts) in the document 'Investment in Highways Transport Schemes', October 2010 published by the Department for Transport. Only one North West scheme (A556) was considered suitable for the key list of forthcoming schemes to start before 2015 and none were amongst those considered appropriate for review as schemes to start work post 2015. The SEMMMS network of roads, which includes the A555 Manchester Airport Western Link Road that lies within Manchester City's boundaries, were not even mentioned. Nor are they mentioned in the extant NW RSS which drew away from the previous policy of listing aspirational schemes. The NW RSS was very much governed by its Spatial Principles of promoting sustainable communities, sustainable economic development and environmental quality, making best use of existing resources and infrastructure, marrying opportunity and need, managing travel demand, reducing emissions and the need to travel, increasing accessibility, mainstreaming rural issues and adapting to climate change. The Manchester Core Strategy has in its vision "meeting the challenge of climate change ... and continuing to deliver sustainable development" (Chapter 4, p. 29) and, in addition to its primary spatial objective to "provide a framework within which the sustainable development of the City can contribute to halting climate change" its 'Transport' spatial objective (SO5) is: "Improve the physical connectivity of the City through sustainable transport networks". (Chapter 5, p. 30). Also, most importantly, its 'Environment' spatial objective (SO6) is: "Protect and enhance both the natural and built environment of the City and ensure the sustainable use of natural resources, in order to mitigate and adapt to climate change, support biodiversity and wildlife, improve air quality and land quality..." and it goes on to promise to "promote healthy, low carbon lifestyles". ((Chapter 5, p.31). It is incomprehensible how building a network of roads could meet these objectives and not promote unsustainable lifestyles, cause more road traffic movements, worse air quality, an increase in greenhouse gas emissions and further impact on Green Belt. The key point to make here is that the case for the SEMMMS roads has yet to be proved through any planning processes. It is no longer sufficient, as it used to be, to simply declare that they are required. The supporting papers to this Core Strategy do not include a robust case for the SEMMMS roads. Reference to them should be removed. The 'Guide to Development in Manchester', adopted in April 2007, is described as: "effectively a hybrid document acting as both a Supplementary Planning Document and guidance", although with an explanation that "It is worth noting, however, that the entire document has been the subject of a formal consultation and Sustainability Appraisal". (Introduction, para. 5., p. ii). The leader of Manchester City Council, Sir Richard Leese, declares in the foreword "We are an ambitious city aiming to be the greenest, most inclusive, most accessible city in the UK" (para. 2., p.i), a declaration which is re-enforced under the banner on 'Environmental Standards' where it says: "The Council is committed to making Manchester 'the Greenest City in Britain'", a statement which goes on to declare the Council's commitment to tackling climate

change. It states: "Climate change is the biggest challenge facing the future sustainability of the City and new developments play an important part in Manchester's ability to meet UK national and Kyoto commitments for tackling climate change". (Para. 4.1, p. 19). These commitments in a statutory planning document were further re-enforced in December 2009 by the publication of an action plan for tackling climate change and air quality Manchester: A Certain Future". The primary goals of the action plan are "to reduce our carbon emissions drastically over the coming decade, promote and develop green infrastructure, promote business practice that is both green and profitable and engage with the public". Manchester City Council's www.manchesterclimate.com website). The action plan's number one goal is "To reduce the city of Manchester's emissions of CO2 by 41% by 2020 from 2005 levels". It is not apparent to CPRE how this could be achieved if the Council persists in supporting the network of roads known as SEMMMS. It should drop its aspirations for these in line with its declared commitment to tackling climate change.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The supporting papers to this Core Strategy do not include a robust case for the SEMMMS roads and it is apparent they are not a key part of current government policy.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To give further evidence as to the unsustainability of building the SEMMMS roads.

Comment by	Goodman (Mr Robin Moxon)
Comment ID	234
Response Date	24/03/11 15:39
Consultation Point	Policy EC 11 Airport City Strategic Employment Location (View)
Status	Processed
Submission Type	Email
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (2) Effective
. (3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Goodman supports Policy EC11 Airport City Strategic Employment Location and the identification of the area to the north of Manchester Airport as a significant opportunity for employment development in Manchester. In line with Goodman's representations on Policy EC1, there is, however, no specific recognition to Manchester Business Park. The majority of land identified in Figure 8.6 represents Goodman's land interest in Manchester Business Park, and land which benefits from an extant planning permission for 675,000 sq ft of B1 floorspace. Given the size, location and nature of Manchester Business Park, it is appropriate that it is specifically recognised for continued growth in accordance with the extant planning permission and as a major asset to Manchester in terms of its future development potential. As set out in the representations on Policy EC1, PPS 12: Local Spatial Planning states that 'Core strategies must be effective: this means they must be: deliverable; flexible; and able to be monitored' In order to be deliverable, Local Planning Authorities 'should be able to state clearly who is intended to implement different elements of the strategy and when this will happen'. Therefore, in order to ensure the Core Strategy is effective, it is important that Manchester Business Park is recognised specifically in Policy EC11 in supporting the economic role of Manchester. Policy EC11 states that 'the area is suitable for high technology industries, logistics, offices, warehousing and ancillary facilities'. Goodman supports the principle of offering sites with flexible business uses to support different sectors and clusters, and the inclusion of ancillary uses. However, it is important that the policy defines ancillary uses. To allow Manchester Business Park and the wider area included in the Airport City Strategic Employment Location to support the Council's economic development objectives, retain existing businesses and continue to attract inward investment into the future, a mix of uses which are supportive of the primary Business use, should be supported. These ancillary uses would include hotel, leisure, retail and crèche uses, which are ancillary to the primary business use at Manchester Business Park. The benefit of including these uses is illustrated by our successful parks at Hatfield, Oxford and Gloucester, which have delivered an accelerate rate of development and the associated benefits of economic development and job delivery. It is to be noted that these ancillary uses are employment generating and would support rather than prejudice the continued performance of this Strategic Employment Location. This is justified by policy EC1 of PPS4, which encourages local planning authorities to assess the existing and future supply of land available for economic development,

ensuring that existing site allocations for economic development are reassessed against the policies in the PPS, particularly if they are for single or restricted uses. Goodman contends that this must be clearly and explicitly recognised in Policy.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The necessary changes to Policy EC11 (first paragraph) are set out below: 'The area to the north of Manchester Airport, including Manchester Business Park, is a significant opportunity for continued employment development in Manchester. The development of this location will be promoted as the core of a wider Airport City opportunity, promoting functional and spatial links with nearby parts of Wythenshawe to maximise the catalytic potential of the airport to attract investment and increase economic activity'. The necessary changes to Policy EC11 (second paragraph) are set out below: 'The area is suitable for high technology industries, logistics, offices, warehousing and ancillary facilities, including ancillary hotel, leisure, retail and crèche uses, which are supportive of the primary employment use'. These changes will ensure the policy is sound and in line with the overarching objectives of PPS4.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Goodman is the delivery partner for Manchester Business Park, which is a joint venture between Manchester City Council and Goodman. Manchester Business Park represents that majority of the land proposed at Airport City.

Comment by	Mr Peter Thompson
Comment ID	164
Response Date	23/03/11 14:21
Consultation Point	Policy EC 11 Airport City Strategic Employment Location (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Economic expansion around the Airport. I find para 8.86 (at around p. 84) to be quite at odds with all of the plans for the city centre's long term economic growth and prosperity. 8.86 describes "Airport City" as an "edge of centre location for office uses, due to its transport connexions". I consider this paragraph to be unsound both because the public transport connexions into the Airport are nowhere near as good as the City Centre's connexions to all outlying areas, and also because the thrust of 8.86 undermines the economic health of that city centre (see 2.3.1, above). I see the Airport's economic role as gathering in from places all over the world income and spending power, then helping that to get to the city centre economy, instead of seeming to use it to grow its own activities. Is there a need for a hotel at Area 4 (Land within & adjacent to Junction 5, M56) as shown on page 88 ? The city centre strategy requires good quality hotels there, and of course people to fill them. I fully accept that Wythenshawe has an employment problem, but the present approach seems to see the Airport as the sole solution. My para 2.1 draws attention to the unbelievable fact of a virtual town of 70,000 people not having a railway station when one could have been provided as long ago as 1992 when that line was re-opened to passenger trains. I do not deny that the Airport brings considerable economic and employment benefits to Wythenshawe and also to quite a wide area beyond it; my point is that Wythenshawe's problems need to be tackled on various fronts, one of which is good and fast public transport to a wider range of employment locations; another would be to help small business start-ups in Wythenshawe. Instead the impression seems to be given that the Airport is the answer to everything.

Comment by	Environment Agency (Mrs Helen Telfer)
Comment ID	169
Response Date	24/03/11 15:11
Consultation Point	Policy EC 11 Airport City Strategic Employment Location (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

In conclusion, we feel that the Core Strategy meets the tests of soundness as prescribed in Planning Policy Statement 12 for those issues which lie within our remit. However we feel the plan could be improved by considering the following: Policy EC11 – Airport City Strategic Employment Site (Page 82) Baguley Brook which is a designated 'Main River', flows through the centre of this Strategic Site. There is no reference to the protection or enhancement of this watercourse as part of the Policy wording. We suggest that as part of this policy, specific reference is made to the need to protect this wildlife corridor.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Salford City Council (Mr Paul Walker)
Comment ID	291
Response Date	23/03/11 09:40

Consultation Point	Policy EC 11 Airport City Strategic Employment Location (View)
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Status	Processed
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Submission Type	Letter
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Version	0.3
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Guidance notes	
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Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

It is important that the primary focus on the Regional Centre for office development is maintained to ensure its role as the primary economic driver is protected and enhanced. To this end Salford City Council supports the requirement in Policy EC11 for development at Manchester Airport to support the overall vision of the Core Strategy and complement the role of the Regional Centre and other centres in Greater Manchester.

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	180
Response Date	24/03/11 16:47
Consultation Point	Policy EC 11 Airport City Strategic Employment Location (View)
Status	Processed
Submission Type	Email
Version	0.3

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We support the sentiments of this policy which are capable of meeting the investment needs of the City Region.

Comment by	Manchester Friends of the Earth (Dr Ali Abbas)
Comment ID	93
Response Date	24/03/11 23:46
Consultation Point	Manchester Airport (View)
Status	Processed
Submission Type	Web
Version	0.1
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

As stated in our submission to the pre-publication partial consultation, the rationale behind the predicted increase to 45 million passengers per annum is flawed as it does not take into account the latest economic and environmental developments, or the distinction between different types of passenger. We have previously submitted evidence that the proposed expansion of Manchester Airport will have no net benefit for the city region's economy, and it clearly contradicts the core strategy's objective on sustainable development and cutting carbon emissions.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy MA 1 should not support the growth of Manchester Airport to accommodate 45 million passengers per annum by 2030, any expansion of the developed area, or any changes to the Green Belt boundary.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We would like to have the opportunity to present our case for the changes we have proposed.

Comment by	Manchester Airport (Mr John Twigg)
Comment ID	250
Response Date	22/03/11 17:01
Consultation Point	Policy MA 1 Manchester Airport Strategic Site (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Thank you for providing Manchester Airport with the opportunity to comment on your Publication version of the Manchester Core Strategy. This letter provides Manchester Airports Group's (MAG) response to the consultation with regard to the approach to manage the expansion of the Airport set out under Policy MA1 and Airport development management issues in Policy DM2 and DM3. We fully support Manchester City Council's approach to the development of the Airport in particular its designation of

the Airport as a Strategic Site, the extensions to the Airport Operational Area and the amendments to the Green Belt boundary in areas around the Airport. We consider that the approach taken by the City Council in the Core Strategy provides the most appropriate planning framework to accommodate the operational expansion of the Airport to meet the role set out in national aviation policy. The Core Strategy is consistent with the cascade from national policy, through regional economic, planning and transport strategy, through to local implementation and delivery. The Core Strategy provides the necessary planning framework for the Airport's long-term growth, redevelopment and environmental mitigation. It will enable the Airport to invest and grow in a comprehensive and co-ordinated manner. That in turn provides much needed certainty for the Airport, local people, other public bodies, transport operators and investors. This will enable the Airport to further develop as an important economic asset for the City and the whole of Greater Manchester, and also to contribute further to local regeneration, employment and economic activity, especially in Wythenshawe. We consider that the approach that has been taken in respect of the growth and development of the Airport has been carefully considered and is supported by a comprehensive evidence base. We believe that the Core Strategy prepared by Manchester City Council is both legally compliant and that it meets the necessary test of 'soundness'. Should any issues relating to growth and development of the Airport and the approach taken by the City Council in the Core Strategy be included in any forthcoming Examination in Public, we strongly request that the Airport Company be invited to participate. This is because of the national importance of the Airport, and the knowledge and understanding of detailed and complex airport planning and development matters that we are able to provide.

Comment by	Mr Peter Thompson
Comment ID	163
Response Date	23/03/11 14:16
Consultation Point	Policy MA 1 Manchester Airport Strategic Site (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Manchester Airport. I am most concerned by the airport's proposals to expand on to a considerable area of Green Belt land, and also by heavy emphasis on economic development around the Airport. Airport expansion. I could not find any discussion in the Core Strategy of the congestion, health, noise and pollution impacts upon the population living around the Airport to be caused by the aviation and road traffic movements which would result from 45 million passengers per year (mppa) using the Airport by 2030 (p.87). Neither does there seem to be any discussion of this figure of 45 mppa, save that it was reduced from 50 mppa; it is blandly accepted as a given, despite the considerable controversy surrounding the world aviation industry and its various environmental impacts. Nor seems there any discussion of any possible problems with the availability and price of aviation fuel supplies by 2030. I would stress that I favour the Airport in its present form, and indeed fly from there from time to time in preference to any other airport. I am concerned that its expansion plans could be over ambitious and as such involve too much irrecoverable loss of Green Belt land.

Comment by	Mr Jeremy Williams
Comment ID	103
Response Date	23/03/11 12:53
Consultation Point	Policy MA 1 Manchester Airport Strategic Site (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Jeremy Williams.doc
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: ☐ Not specified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Core Strategy is unsound. The principal tests of 'soundness' that are not satisfied with respect to proposed Policy MA1 show that significant evidence that militates against expansion of capacity at Manchester Airport has been systematically ignored. 1. The actual results of the consultation engagement process, on the Council's own admission, have not been acted upon in order to derive a proper, evidence-based, policy (p. 11, Manchester Core Strategy Consultation Statement – February 2001), and whilst it is known that 2. The Council believes any proposed expansion of capacity at Manchester Airport is unsustainable, it has chosen to ignore this inconvenient fact (para 2.35, "Refining Options for the Core Strategy"). With regard to unsoundness item 1, it is clear that the Council has chosen to completely disregard the results of its own community consultation, which reported that, "the first option for taking forward development at the Airport (retaining the Airport within the Greenbelt and not altering the Airport Operational Area) was the preferred option for people who gave a view on this topic" (p. 11, "Manchester Core Strategy Development Plan Document Consultation Statement" – February 2011). The Core Strategy asserts (para 8.102), also without providing any evidence, that, "the expansion of Manchester Airport is an exceptional circumstance". On the Council's own admission (para 12.67 of the Core Strategy), "the most significant component of Manchester's Green Belt includes Manchester Airport and land around it", so any notion that the existing built up area around the terminals, which para 8.104 of the Core Strategy says, "should be removed from the Green Belt as it does not serve a Green Belt function and will continue to be a focus for development" would only be correct, if there were already a non-evidence-based, Council presumption in favour of development. If this were shown to be the case, this would clearly be contrary to the express wishes of the community consultees (p. 11, "Manchester Core Strategy Development Plan Document Consultation Statement" – February 2011) and would demonstrate that this proposed policy is unsound. The proposed expansion of Manchester Airport is not an exceptional circumstance, nor is it appropriate to review the extent of the Green Belt in this area. The apparent need for proposed expansion is simply a unilateral view expressed by the Council, which quite deliberately ignores Community Consultation (p. 11, "Manchester Core Strategy Development Plan Document Consultation Statement" – February 2011) and which arbitrarily asserts, without any meaningful evidence, that expansion is "necessary and exceptional". Neither of these propositions is evidence-based or justified and they are therefore unsound. With regard to unsoundness item 2, further negative effects on the local air quality are associated with the proposed expansion of the airport (p. 98, "Manchester Core Sustainability Appraisal Report"). In addition, para 11.41 of "Manchester Core Sustainability Appraisal Report" acknowledges that, "airport operation is associated with a release of a number of pollutants, affecting local air quality. This includes: NO₂ and NO_x produced by road vehicles, aircraft and boiler houses; PM₁₀ emitted by road vehicles, aircraft and construction processes; Volatile Organic Compounds can originate from aircraft refuelling, spillages, fuel depot and paint". Although the report suggests that, "cleaner technologies may reduce the predicted negative effects against SA Objective 11 (air quality) to some degree in the longer term", "this is likely to be offset by increased frequency of flights and the predicted level of expansion", so, basically, this particular view is also unsound, because there is no justification for the predicted impact increased frequency of flights and/or the predicted level of expansion. Para 11.41 of "Manchester Core Sustainability Appraisal Report" notes that, "apart from the growth in air traffic supported by the airport expansion, any proposed expansion of the airport capacity will also result in higher levels of road traffic and associated transport related GHG emissions, as well as higher levels of GHG emissions from the airport operation activities", so it is clear that the Council's consultants are well aware of the potential negative impacts of any airport expansion, as are the community consultees with respect to carbon emissions (p.7, "Manchester Core Strategy Development Plan Document Consultation Statement" – February 2011), even if the Council choose not to be. As well as a predicted, but as-yet, unquantified, impact on air quality, the proposed growth of Manchester Airport, is already recognised to be likely to have negative effects against SA objective 3 (health) by increasing the level of noise and air pollution

for those people living in the airport vicinity, despite the aim of the objective to reduce environmental disparities. The airport expansion is also likely to have negative effects against SA objective 18 (contribution to climate change) (p. 102/103, "Manchester Core Sustainability Appraisal Report"). Para 10.51 of the "Manchester Core Sustainability Appraisal Report" reported that the least sustainable sites were considered to be: • ES 2: Central Park; • ES 7: Roundthorn; and • ES 8: Manchester Airport. Item 3 on p. 399 in "Manchester Core Sustainability Appraisal Report Appendices" notes that, "aircraft noise is one of the most significant impacts of an airport on local communities. The noise impact of Manchester airport is likely to significantly increase with a planned increase in the airport capacity, particularly if this comprises activities such as Maintenance Repair and Overhaul and engine testing as these would lead to a physical expansion in the location of noise sources. In addition, increased frequency of aircraft movement, plus construction and then operation of additional airport infrastructure and associated development will increase the general level of activity, trip generation, noise nuisance and emissions". p.102 of "Manchester Core Sustainability Appraisal Report Appendices" observes that, "growth of the airport activities will affect the tranquillity levels of the locality" and p.99 of the "Manchester Core Sustainability Appraisal Report Appendices" reports, in relation to that, "aircraft noise is one of the most significant impacts of an airport on local communities and para 11.140 of "Manchester Core Sustainability Appraisal Report" concedes that, "the effect of the proposals at the airport is likely to increase noise pollution for those living within the current 57dBA noise contour of Manchester Airport". Thus it is apparent that Manchester City Council will be well aware that any increase in the frequency and volume of air traffic may be expected to affect the health of the population living in the vicinity of the airport, which may be affected via an increase in both noise and air pollution. It is apparent that the Council is well aware that, as drafted, "global rates of air traffic are unsustainable in the long term" (para 2.35, "Refining Options for the Core Strategy") and that, on the advice of its consultants, one of the least sustainable sites is Manchester Airport (Para 10.51, "Manchester Core Sustainability Appraisal Report"), so, on the Council's own admission, this part of the proposed Core Strategy is unsustainable and, therefore, unsound.

Comment by	Natural England (Janet Baguley)
Comment ID	60
Response Date	24/03/11 11:36
Consultation Point	Policy MA 1 Manchester Airport Strategic Site (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

As detailed in our previous consultation responses (January 2010, August 2010), we consider aviation to be an environmentally damaging mode of travel and we are concerned about the impacts of the aspiration to strengthen Manchester Airport as a base to support the economic growth of the city. This is a recurring theme throughout the Core Strategy, and we would like to reiterate our previous comments that the local environmental impacts of the operation and expansion of the Airport should be fully addressed and benefits for the natural environment maximised. As we stated in our response to the Pre-Publication Partial Consultation (August 2010), we are supportive of the inclusion of the fifth bullet point in this policy, which aims to minimise any adverse impacts on areas of biodiversity and landscape importance, in particular Cotterill Clough SSSI. However, we are disappointed to note that our recommended amendment to the supporting text (paragraph 8.98 in this version of the Core Strategy, paragraph 8.8 in the Pre-Publication version) has not been addressed and we would like to reiterate our advice that compensation measures should be considered as well as mitigation measures. Compensation measures would involve creating replacement habitat that both provides the same ecological functions and is located as close as possible to that to be lost or damaged. While this may be possible for areas of the local Sites of Biological Importance (Ponds Near Runway and Cotterill Clough SBIs) that will be lost, we are very concerned that an area of ancient woodland will be lost in the airport expansion, as this cannot be recreated.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Cheshire East Council (Mr Stuart Penny)
Comment ID	15
Response Date	21/03/11 09:52
Consultation Point	Policy MA 1 Manchester Airport Strategic Site (View)
Status	Processed
Submission Type	Web
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Cheshire East Council supports the City Council's approach to dealing with growth at Manchester Airport detailed in Policy MA1 of its Publication Core Strategy document, including the proposals for amending the Green Belt boundary at the site.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	181
Response Date	24/03/11 16:48
Consultation Point	Policy MA 1 Manchester Airport Strategic Site (View)

Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

In respect of paragraph 8.104 "The overall integrity of the wider Green Belt will remain unchanged and the exceptional; circumstances put forward to support the amendments are unique to the airport, they do not set a precedent, and cannot be used to support other small scale incremental changes elsewhere in Greater Manchester". Whilst the Council acknowledges this statement, the Council has for sometime experienced development pressure in the Timperley Wedge for both residential and commercial development. The Council would therefore have significant concerns should this proposed amendment to the Green Belt boundary result in an increase in such development pressure, which ultimately could seek to undermine the Timperley Wedge. It is not clear whether the impact of the proposed change on the Timperley Wedge has been fully considered. If it has been considered, and found that there would be no impact, the Council requests that specific reference should be made in paragraph 8.104 that the proposal cannot be considered to set a precedence for development in the Timperley Wedge.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is not clear whether the impact of the proposed change on the Timperley Wedge has been fully considered. If it has been considered, and found that there would be no impact, the Council requests

that specific reference should be made in paragraph 8.104 that the proposal cannot be considered to set a precedence for development in the Timperley Wedge.

Comment by	Rambler's Association (Manchester & High Peak) (Mrs Janet Cuff)
Comment ID	3
Response Date	27/02/11 12:48
Consultation Point	Policy MA 1 Manchester Airport Strategic Site (View)
Status	Processed
Submission Type	Email
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . Not specified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The policy is unsound as the growth specified does not take sufficient account of the developments regarding climate change which have taken place since The Future of Air Transport White Paper was published in 2003. The following are relevant: - The Climate Change Act 2008 - The Energy and climate change section of the Coalition Government's Programme for Government 2010: "The Government believes that climate change is one of the gravest threats we face and that urgent action at home and abroad is required. We need to use a wide range of levers to cut carbon emissions, decarbonise the economy and support the creation of new green jobs and technologies. We will implement a full programme of measures to fulfil our joint ambitions for a low carbon and eco-friendly economy. We will push for the EU to demonstrate leadership in tackling international climate change, including by supporting an increase in the EU emission reduction target to 30% by 2020." - The Transport section of the Coalition Government's Programme for Government 2010: "We need to make the transport sector greener and more sustainable, with tougher emission standards." - The High Court judge's finding in 2010 in the case brought against the Government's decision to give BAA permission for the third runway at Heathrow: he ruled that the decision was flawed as it did not take into account the most recent evidence on climate change and economics.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	CPRE: Lancashire Branch (Mr David Clarke)
Comment ID	294
Response Date	14/04/11 15:14
Consultation Point	Table 8.2 (View)
Status	Processed
Submission Type	Email
Version	0.10
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound?

No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

CPRE does not accept that air travel is sustainable. We do acknowledge that an implied modest revision of the Green Belt in the vicinity of Manchester Airport was flagged up in the NW RSS (RDF 4) but transport policy RT5 made it quite clear that this was to provide for operational functions at the airport. We have a particular issue with the scale of what is proposed and we would consider it entirely inappropriate to use Green Belt land for purposes such as airport car parking. The evidence base to support the Core Strategy Policy MA1 includes a Green Belt review – The Manchester Airport Group, Local Development Framework Evidence Base: Green Belt Review, July 2010 (Entec). In this document it states that 'Land West of A538 (Oak Farm)' plays an important role in checking urban sprawl and goes on to describe the effects of releasing this parcel of land. "Should development be seen to spill across these roads, then it would have an adverse impact upon the openness of the site, with development introducing sprawl. The land is therefore considered to serve a Green Belt function of restricting urban sprawl." (Table 4.1, p. 36 & 37). This clearly goes against the primary aim of Green Belts as addressed in PPG2 (Planning Policy Guidance 2) "The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness." (Para. 1.4, p.5). PPG2 goes on to list the essential characteristics of Green Belts which are their permanence (Para.2.1, p.7) and that they play an important role in protecting the countryside (Para. 1.4, p.5). Exceptional Circumstances are required to alter the Green Belt boundary and CPRE believes this does not exist in the case of Area E – Land west of A538, subsequently we would like this parcel removed from the proposed Green Belt alteration. The Exceptional Circumstances that the Green Belt review refers to, to support the boundary change are driven purely by economic growth and assumptions that the airport is 'required' to grow and has a duty to fulfil this 'required need'. The reasons given for Exceptional Circumstances to remove areas from the Green Belt are listed (numbered below), the sentences are taken from the Local Development Framework Evidence Base: Green Belt Review, July 2010 (Entec) and the Manchester Core Strategy (Publication): 1. National policy support in the Air Transport White Paper for the growth of MA. 2. The extension areas are required to implement national policy. Following the Heathrow 3rd runway case where Judge Carnwath ruled on 26 March 2010, amongst other things, that the Government's entire aviation policy should now be reviewed to take into account the implications of the 2008 Climate Change Act. The judge found that the claimants' submissions added up, in his view, to a powerful demonstration of the potential significance of developments in climate change policy since the 2003 Air Transport White Paper. They were clearly matters which would need to be taken into account under the new Airports National Policy Statement. Therefore the national policy that is relied on to show exceptional circumstances is out of date and in need of revision. 3. The significant benefits arising from airport operations and its growth to the whole of the North-West of England. 4. Evidence and debate as part of the preparation of the North West RSS supports local Green Belt boundary change to accommodate the growth. 5. There is long standing policy support of the Airport being a special case within the Green Belt. CPRE would also point to bullet point no. 1 of Manchester's Core Strategy Policy SP 1 which says: "The Regional Centre will be the focus for economic and commercial development" (p. 32) and Spatial Objective 2 (SO2 Economy) which states: "The Regional Centre will continue to be the main focus for business, retail, ... to further develop its role as the main employment location and primary economic driver of the City region" (p. 30). There is a real danger that if unfettered growth is allowed at the airport, it would detract from this primary economic goal for the city centre. Certainly, the panel of leading planning inspectors who sat in judgement at the NW RSS Examination in Public were concerned about setting

up an imbalance. They said in their March 2007 Report of the Panel into the Examination in Public, October 2006 –February 2007: “we have not indicated the airports as particular centres for growth though operational development will clearly take place on a substantial scale. In general, however, their edge of town locations and surrounding Green Belts do not fit with our spatial principles for most forms of development” (par. 4.68, p. 53), further stating that “They (the region's airports) should not be identified as nodes for major economic growth” (Par. 7.48). We would also question whether the airport policy complies with NW RSS policies DP3 (Sustainable Economic Development), DP 4 (Make Best Use of Existing Resources and Infrastructure) and DP 9 (Reduce Emissions and Adapt to Climate Change). CPRE would also point to the government’s ‘Plan for Growth’ published along with the budget in March this year. Although this is primarily focused on achieving economic growth (and, regrettably, also envisages some weakening of the planning system) it says “The Government expects that a very significant proportion of development will continue to take place on previously developed land” and the document is uncategorical in its attitude towards areas with special designations. It says: “This policy change does not affect the Government’s commitment to maintain the Green Belt, Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty and other environmental designations”. (para. 2.21, p. 45, Plan for Growth, HM Treasury & Dept. for Business, Innovation & Skills, March 2011). As far as Policy EC 11 (Airport City Employment Location) is concerned, Professor John Whitelegg produced a report for CPRE North West Regional Group which pointed out that Benchill, one of the most deprived wards in the country, was immediately adjacent to Manchester Airport but the residents of Benchill did not choose to take up the employment opportunities it offered. (The Economics of Aviation, March 2003). He argued that placing employment opportunities next to area in need of employment was no automatic panacea for solving unemployment problems.

6. A number of the identified uses require direct runway access and can not be located elsewhere. “Whilst ancillary uses (eg hotels, offices and car parking) could be located outside Green Belt, these are uses which are specifically related to the Airport” (Green Belt Review, p.42). CPRE believes the proposed use for Area E – Land West of A538 of car parking and operational facilities can be located outside of the Green Belt and does not constitute exceptional circumstances.

7. Despite being developed, operational restrictions mean that essentially certain areas will remain open. The proposed use for Area E – Land west of A538 is for car parking, operational and cargo facilities. This use will be detrimental to the openness of the Green Belt in a location that is most sensitive to change due to the close nature of Hale Barns and the Green Belt acting as a buffer from the Airport.

8. There is a precedent of previous decisions at Manchester Airport and at other regional airports for amendments to the Green Belt. This does not constitute Exceptional Circumstances. In addition, we would point to the Manchester Core Development principle of “Minimise emissions, ensure efficient use of natural resources and reuse previously developed land wherever possible” (Policy SP 1, p.33) with which the proposal for a large development at the airport does not comply. Area E – Land west of A538 is also the most susceptible to environmental damage, as identified in the Green Belt review but also dismissed within the Core Strategy as an ‘avoidable consequence’. CPRE feels this is an unacceptable response and the potential damage can be avoided if Area E is removed from the boundary change. “A local SBI (Ponds Near Runway) may be subject to some development and a small area of Cotterill Clough SBI and Ancient woodland outside the SSSI will be lost, but this is an unavoidable consequence of the airport’s expansion, appropriate mitigation measures will be prepared and implemented before this development commences” (Core Strategy Publication, Para. 8.98, p. 91). Any loss of Ancient Woodlands is strongly discouraged via National Policy. PPS9 states “Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as a SSSI). They should not grant planning permission for any development that would result in its loss or deterioration unless the need for, and benefits of, the development in that location outweigh the loss of the woodland habitat (Para. 10, p.6). The Natural Environment and Rural Communities Act 2006, section 40 (1) stipulates that “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.” CPRE believes losing an area of Cotterill Clough SBI, Ancient Woodland and developing on the site is contrary to this duty because of the key ecological receptors on site E - Land west of A538.

Sites and Habitats • Sunbank Wood and Ponds (SBI) • Ancient semi-natural woodland (UKBAP) • Plantation (LBAP) • Ponds (UKBAP) • Running water (UKBAP) • Species-poor hedgerows (UKBAP) • Neutral grassland (LBAP) Species • Great crested newt (Habitat Regs.) • Bats (Habitat Regs.) potential • Otter (Habitat Regs.) potential • Water vole (WCA) potential • Native bluebell (WCA) • Adder (WCA) potential • Badger (PBA) • Common toad (UKBAP) • Birds (WCA nesting, UKBAP) (Environmental Evidence Study, Part 1 Baseline Study, Para. 3.6.15, p61).

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Exceptional circumstances are required to alter the Green Belt boundary and CPRE believes this does not exist in the case of Area E – Land west of A538, subsequently we would like this parcel removed from the proposed Green Belt alteration.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To give further evidence on why the release of Green Belt at and around this location is not justified and why the continuing expansion of Manchester Airport needs careful consideration.

Comment by	Homes and Communities Agency (Ms Deborah McLaughlin)
Comment ID	160
Response Date	24/03/11 14:02
Consultation Point	9 Objective 3 Housing (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We welcome the emphasis given to creating high quality housing at sustainable locations and the commitment to green standards including the Code for Sustainable Homes. The forthcoming SPD in relation to new residential design guidance, will be a useful addition to MCC's planning documents and the HCA looks forward to being able to support input into this document. The chapter also highlights the need for making appropriate provision for a wide variety of different housing needs, including gypsies and travellers. We welcome the recognition that a wide range of housing types is a key element of providing for a sustainable balanced community. The reuse of vacant housing and emphasis on brownfield sites within the document is also of great value.

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	113
Response Date	24/03/11 13:44
Consultation Point	Policy H 1 Overall Housing Provision (View)
Status	Processed
Submission Type	Email
Version	0.8
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Comment by	GL Hearn on behalf of KPMG LLP (Mrs Emma Jones)
Comment ID	126
Response Date	23/03/11 14:27
Consultation Point	Policy H 1 Overall Housing Provision (View)
Status	Processed
Submission Type	Email
Version	0.15
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not:

- . (1) Justified
- . (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy H1 states that within the Inner Areas in North and East Manchester densities will be lower but generally over 40 units per hectare. The policy continues to state that outside the Inner Areas the emphasis will be on increasing the availability of family housing therefore lower densities may be appropriate. However, there is also a requirement for family housing within the Inner Areas, for example as required by Policy H4 for East Manchester. It is considered that the requirement for densities to be generally over 40 units per hectare is not effective as it would not be sufficiently flexible to ensure the

provision of family housing within the Inner Area of East Manchester. Policy H1 states all proposal for new development must [our emphasis]:

- Contribute to creating mixed communities by providing house types to meet the needs of a diverse and growing Manchester population, including elderly people, disabled people, people with special needs, BME communities, Gypsies and Travellers and Travelling Showpeople.
- Reflect the spatial distribution set out above which supports growth on previously developed sites in sustainable locations and which takes into account the availability of developable sites in these areas.
- Contribute to the design principles of Manchester's Local Development Framework, including in environmental terms. The design and density of a scheme should contribute to the character of the local area. All proposals should make provision for appropriate usable amenity space, including high density development (in which this could be in the form of balconies, as well as shared open spaces such as green roofs). Schemes should make provision for parking cars and bicycles (in line with policy T2); and the need for appropriate levels of sound insulation.
- Address any deficiencies in physical, social or green infrastructure through developer contributions where this is not sufficient to support the proposed development.
- Prioritise sites which are in close proximity to centres or high frequency public transport routes.
- Take account of any environmental constraints on a site's development (e.g. flood risk through the Manchester-Salford-Trafford Strategic Flood Risk Assessment, or other statutory designations). The use of the word 'must' is unsound as it is not justified, nor effective for all development proposals to meet all of the criteria listed. For example, taking the first criteria, no robust and credible evidence base is presented that justifies the requirement for all development to provide house types to meet the needs of elderly people, disabled people, people with special needs, BME communities, Gypsies and Travellers and Travelling Showpeople. Neither is it the most appropriate strategy for all development to include housing to create mixed communities including the needs of those listed in the policy. It would not be effective, as providing house types for all those listed is not flexible and is unlikely to be deliverable.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete 'densities will be lower but generally over 40 units per hectare' and replace with 'densities will be lower but generally over 30 units per hectare' Delete the word 'must' and replace with 'should take account of potential need to'

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? YES, I wish to participate at the oral examination

Reasons for participation at oral part of examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Former Jacksons Brickworks site is a key vacant site and its future use for housing will make a significant contribution to the regeneration objectives of the area.

Comment by	Blackley Mere Developments Ltd ()
Comment ID	77
Response Date	24/03/11 18:16
Consultation Point	Policy H 1 Overall Housing Provision (View)

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

NO, I do not wish to participate at the oral examination

Comment by	Planning Potential (Mr Stuart Slatter)
Comment ID	274
Response Date	24/03/11 14:07
Consultation Point	Policy H 1 Overall Housing Provision (View)
Status	Processed
Submission Type	Email
Version	0.8
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Wrengate Limited:- We support assessment of the type, size and tenure of the housing mix on a site by site basis, influenced by local housing need and economic viability. However whilst my client supports additional family housing, there is concern an over emphasis will not be productive in meeting other identified tenure shortages that may arise over the plan period. My client would suggest amending the text as follows: "The need to diversify the housing stock in mono-tenure areas by increasing the availability of family housing and other tenures, with an identified shortage, to meet the needs of people living within, or wishing to move to Manchester"

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

My client would suggest amending the text as follows: "The need to diversify the housing stock in mono-tenure areas by increasing the availability of family housing and other tenures, with an identified shortage, to meet the needs of people living within, or wishing to move to Manchester"

Comment by	Mr Peter Thompson
Comment ID	161
Response Date	23/03/11 13:59
Consultation Point	Policy H 1 Overall Housing Provision (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Housing, Policy H1 (p.96). I support the plan to provide 90% of new dwellings on previously developed land. There is no mention of the need to use green field land for the remaining 10%; if these too can

be provided without moving on to undeveloped land, then this would be a major move to a sustainable city community.

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	194
Response Date	23/03/11 11:00
Consultation Point	Policy H 1 Overall Housing Provision (View)
Status	Processed
Submission Type	Email
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Manchester University Specifically, and relevant to its operational and land interests the University supports the following: Recognition that the City Centre is an appropriate location for purpose built student accommodation (Policy H1)

Comment by	Planning Potential (Mr Stuart Slatter)
Comment ID	275
Response Date	24/03/11 14:12
Consultation Point	Policy H 1 Overall Housing Provision (View)

Status	Processed
Submission Type	Email
Version	0.9
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Wrengate Limited:- Policies H3 to H7 - Indicative Housing Distribution: My client objects as detailed in our previous representation to the percentage caps set out in the above policies. This is not considered appropriate in seeking the delivery of much needed housing, given the growth across the city will not necessarily follow forecast trends, and thus supply would need to represent demand. Greater flexibility is sought as supported by national guidance, to direct the delivery of new housing to be provided in the greatest numbers to central and inner city areas, yet delivering significant and high quality housing in the remaining parts of the city. The wording of these policies should make clear that the percentages and densities are indicative and will remain flexible in order to take into account future localised housing needs.

Comment by	Planning Potential (Mr Stuart Slatter)
Comment ID	273
Response Date	24/03/11 13:16
Consultation Point	Policy H 1 Overall Housing Provision (View)
Status	Processed
Submission Type	Email
Version	0.8

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Wrengate Limited:- My client supports the approach of Manchester City Council in continuing to base housing targets on the targets previously set at the regional level. It is considered that whilst there is uncertainty surrounding Regional Spatial Strategies, the background material used to formulate the housing targets remains relevant to Manchester City Council. The general approach which seeks to maintain flexibility in particular to reflect changes to market conditions is also supported; however this is not made overly clear in proposed policy H1. My client would suggest amending the text as follows: "Approximately 60,0000 new dwellings will be provided for in Manchester between March 2009 and March 2027, however the Council wish to maintain a flexible approach to the delivery of housing, in particular reflecting changes to market conditions."

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

My client would suggest amending the text as follows: "Approximately 60,0000 new dwellings will be provided for in Manchester between March 2009 and March 2027, however the Council wish to maintain a flexible approach to the delivery of housing, in particular reflecting changes to market conditions."

Comment by	Sport England (Mr Paul Daly)
Comment ID	221
Response Date	24/03/11 13:53

Consultation Point	Policy H 1 Overall Housing Provision (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The aim to “Address any deficiencies in physical, social or green infrastructure through developer contributions where this is not sufficient to support the proposed development” is supported. However, the wording is somewhat unclear and would benefit from revision. That is to say that the policy wording indicates that there has to be a deficiency in infrastructure and infrastructure is not sufficient to support the development. It is unlikely, however, that one of these criterion could be met independently. If there is an existing deficiency, for example, then it is difficult to envisage a situation where new residential development would not worsen the deficiency. The second point to make is that there could be an existing surplus of a given type of infrastructure, but that the additional need generated by the residential development might outweigh the surplus. It is unclear from the wording whether a contribution could be sought in such circumstances. Thirdly, the policy makes reference only to developer contributions in terms of addressing infrastructure needs. It appears to exclude on site provision of infrastructure to address need. I would recommend that the policy wording be amended to: “Address any existing

deficiencies in physical, social or green infrastructure, or future deficiencies that would arise as a result of the development, through developer contributions or on site provision.”

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)

Comment ID 46

Response Date 23/03/11 22:13

Consultation Point Policy H 1 Overall Housing Provision ([View](#))

Status Processed

Submission Type Web

Version 0.3

Guidance notes

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

MDPAG welcomes the commitment to providing more housing for disabled people but would question the use of the phrase "people with special needs" as this used to be used to describe disabled people. It may be more appropriate to use the term "people with specific support requirements", especially if it refers to people who are not disabled people but require support for other reasons.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	mr martyn coy
Comment ID	56
Response Date	24/03/11 11:45
Consultation Point	Policy H 2 Strategic Housing Location (View)
Status	Processed
Submission Type	Web
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? Yes

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Support Paragraph 9.13 which states that canal side locations are appropriate to higher density residential development.

Comment by	NWDA (Ms Beverley Doward)
Comment ID	9
Response Date	08/03/11 11:03
Consultation Point	Policy H 2 Strategic Housing Location (View)
Status	Processed
Submission Type	Letter
Version	0.9
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy H2 proposes that the area to the east and north of Manchester City Centre will be a strategic location for future housing development. However, unlike the strategic employment locations (shown in Figures 8.4, 8.5, 8.6 and 8.7), the Core Strategy provides no indication of its general extent. Policy H2 does not state how many dwellings will be provided in the strategic housing location. The delivery strategy at Table 9.2 does, however, contain a figure of 16,580 residential units. The strategic housing location covers parts of the City within the North and East Manchester sub-areas which are the subject of housing policies H3 and H4 respectively. The delivery strategies for these policies, as set out in Tables 9.3 and 9.4, indicate that 11,840 dwellings will be provided in North Manchester whilst 18,280 dwellings will be provided in East Manchester. What is not sufficiently clear is whether these figures include the 16,580 dwellings to be provided in the Policy H2 strategic housing location.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To make Policy H2 clearer, and therefore more effective, we suggest that: • an illustrative diagram showing the general extent of the strategic housing location is added to the supporting text; and • a footnote is added to the Delivery Strategy at Table 9.2 to clarify whether the 16,580 dwellings to be provided within the strategic housing location form part of the dwelling targets for North and East Manchester as set out in Policies H3 and H4.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Highways Agency (Lindsay Alder)
Comment ID	20
Response Date	21/03/11 16:37
Consultation Point	Policy H 2 Strategic Housing Location (View)
Status	Processed
Submission Type	Email
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Highways Agency welcome the point that the Council will continue to work with the Highways Agency and the Greater Manchester Transport Executive to identify and prioritise the required highway and public transport infrastructure provision and any necessary mitigation measures to support the sustainable delivery of the Strategic Locations. The outcomes of this work will inform the transport evidence base to support the Site Specific Allocations DPD.

Comment by	GL Hearn on behalf of KPMG LLP (Mrs Emma Jones)
Comment ID	156
Response Date	23/03/11 12:23
Consultation Point	Figure 9.1 Indicative Housing Distribution (outside the City Centre) (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Status	Processed
Submission Type	Letter
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Tesco Stores Ltd: We endorse the policy for new housing in East Manchester, in particular in Ancoats and New Islington.

Comment by	Planning Potential (Mr Stuart Slatter)
Comment ID	276
Response Date	24/03/11 14:24
Consultation Point	Policy H 6 South Manchester (View)
Status	Processed
Submission Type	Email
Version	0.8
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Wrengate Limited:- As set out in our response to policy H1, whilst we support additional family housing to meet an identified need our client is keen to ensure that the plan retains sufficient flexibility in order to meet future needs of the local community. In line with this view our client would suggest that policy H6 is amended as follows: "Outside the district centres priorities will be for housing which meets identified shortfalls, including family housing and provision that meets the needs of elderly people."

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Our client would suggest that policy H6 is amended as follows: "Outside the district centres priorities will be for housing which meets identified shortfalls, including family housing and provision that meets the needs of elderly people."

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	101
Response Date	23/03/11 12:20
Consultation Point	Policy H 6 South Manchester (View)
Status	Processed
Submission Type	Email
Version	0.14
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments made on behalf of Manchester University As the City Council is aware, and as is recognised in the Manchester Student Strategy, there may be a desire by the University to develop further and/or replace purpose-built student accommodation at the existing Fallowfield campus. There is the distinct prospect that this could comprise only residential accommodation and not other uses. Policy H6 states that high density development in South Manchester will only be appropriate within the district centres (including Fallowfield) and as part of mixed use schemes. It further states that outside the district centres, priorities will be for family housing and provision that meets the needs of elderly people, with schemes adding to the stock of affordable housing. The Fallowfield campus sites (including Owens Park and related halls of residence including Allen Hall, Oak House and Ashburne Hall) all fall outside of the district centre defined on the Proposals Map. Whilst the University recognises that purpose-built student housing is addressed specifically elsewhere (in Policy H12), it considers that that there would be greater clarity on the potential for the Fallowfield campus to accommodate high density student accommodation if an appropriate amendment was made to the supporting text of Policy H6 (paragraph 9.27). This would also ensure greater alignment with Policy H12's prioritisation of university-led purpose-built student accommodation over other schemes and Policy C6's recognition that the University has proposals to develop this part of its estate.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Paragraph 9.27 – Add to the end of the paragraph: ‘The Council also recognises the large university-owned student accommodation estate in Fallowfield and the important contribution it makes to the District Centre and wider economy of South Manchester. The ambition for redevelopment of the University’s estate is dealt with separately under Policy C6 and Policy H12.’ Reason for revision: to provide clarity on the potential for the Fallowfield campus to accommodate student housing and to ensure consistency with Policy H12 and Policy C6

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	47
Response Date	23/03/11 22:21
Consultation Point	Policy H 6 South Manchester (View)
Status	Processed
Submission Type	Web
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

MDPAG suggests the inclusion in H6 of a commitment to housing for disabled people as well as elderly people in South Manchester, particularly as there are many health services available in the area and accessible local centres.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Changes to the wording in H6 to include housing for disabled people: Outside the district centres priorities will be for family housing and provision that meets the needs of elderly people and disabled people, with schemes adding to the stock of affordable housing.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Planning Potential (Mr Stuart Slatter)
Comment ID	277
Response Date	24/03/11 14:33
Consultation Point	Policy H 8 Affordable Housing (View)
Status	Processed
Submission Type	Email
Version	0.5
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments on behalf of Wrengate Limited:- My client supports the amendment to the above policy allowing greater flexibility of the targets over the plan period. The inclusion of vitality and viability in determining exemptions or lowering of the 20% target for sites of 0.3ha and above or where 15 or more dwellings are proposed is supported.

Comment by	Homes and Communities Agency (Ms Deborah McLaughlin)
Comment ID	166
Response Date	24/03/11 14:45
Consultation Point	Policy H 8 Affordable Housing (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policies in relation to affordable housing are supported by the HCA. We suggest that within Table 8.1 your reference to Registered Social Landlords should refer to Registered Providers. In the current economic climate, there may need to increase viability testing on smaller sites and support the reference to this on potential sites. Viability testing for large sites should occur at trigger points such as the approval of phased reserved matters, so that housing delivery can respond both to current needs and to current market conditions. We would have expected some references to current Government initiatives aimed at making the housing market more accessible to a wide range of households, such as the Affordable Rent model.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We suggest that within Table 8.1 your reference to Registered Social Landlords should refer to Registered Providers. We would have expected some references to current Government initiatives aimed at making the housing market more accessible to a wide range of households, such as the Affordable Rent model.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	121
Response Date	24/03/11 14:10
Consultation Point	Policy H 8 Affordable Housing (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

There is a huge shortage of affordable family housing in south Manchester. Little new provision is delivered. Section 106 Policy needs to be maximised, particularly in light of public expenditure cuts. As drafted, Policy H8 is weak and places too much emphasis on justification for relaxing the policy. Developers should not be exempted simply because they have not properly assessed the true developments costs of a site and have paid too much money for it.

Comment by	Traveller Law reform Project (Mr Steve Staines)
Comment ID	24
Response Date	22/03/11 09:48
Consultation Point	Policy H 9 Accommodation for Gypsies and Travellers and Travelling Showpeople (View)
Status	Processed
Submission Type	Web
Version	0.8
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not:

- . (1) Justified
- . (2) Effective
- . (3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Whilst we welcome the inclusion of the policy and its general thrust of setting out criteria and of the intention to identify sites according to need in a Site specific Allocations DPD there are a number of points which in our view render the policy unsound. Specifically: Whilst we recognise and support the intention to ensure that new sites have access to services we are concerned that the second criterion may rule out sites which are affordable and available because they are not in or near existing settlements. Given the difficulties which finding sites may encounter a more reasonable approach is needed. The last two criteria could give rise to prejudice based NIMBY objections. Manchester should be mindful that the main barrier to the construction of Traveller sites is public and official prejudice. We consider the statement about impact of 'other disturbance' and 'neighbour privacy' to be to be contrary to the guidance of Circular 1/2006) and an invitation to express those prejudices through the planning process. They should therefore be deleted. Para 9.39 We are glad that this recognises the need for a total of 60 pitches for Gypsies and Travellers. However the proportion between residential and transit provision does not reflect the examination in Public, conducted in March 2010, and released under a FOI request. Having examined the evidence base the Panel report concluded (recommendation 3.8) that residential pitch provision should be increased by 5 and transit provision reduced accordingly. Although the government intends to abolish regional spatial strategies the Panel Report carries considerable weight as it is the only independent examination of the evidence base. We suggest that the council commits itself to finding land for sites for 55 residential pitches and 5 transit pitches. This we believe would reflect the evidence base more effectively.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Second criterion - replace this with "Any new site should have reasonable access to local services." This will make the policy more effective in finding needed sites. 2. Fourth criterion - delete 'and other disturbance'. 3. Fifth criterion - delete - reference to latest guidance by Government will be sufficient. 4. 9.39 - refer to EiP Panel report and commit council to making provision for 55 residential and 5 transit sites. Reflect this in Delivery Strategy which does not make any distinction. This will ensure conformability with independently tested evidence base.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

NO, I do not wish to participate at the oral examination

Comment by Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)

Comment ID 48

Response Date	23/03/11 22:35
Consultation Point	Policy H 10 Special Needs and Supported Housing (View)
Status	Processed
Submission Type	Web
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

☐ Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? ☐ Yes

Soundness

Do you consider the DPD is sound? ☐ No

Unsound

Do you consider the DPD is unsound because it is not:

☐ (2) Effective

☐ (3) Consistent with national policy

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

MDPAG is concerned at the use of the term "special needs" as this term is not recognised within the social model of disability, agreed by the City Council in the Disability Equality Scheme (Disability Discrimination Act). Additional support needs is a better way of expressing the requirements of some disabled people. MDPAG is also concerned that there is an implication that disabled people's accommodation may be "detrimental to the residential character of the area". This suggests that disabled people may be excluded from certain areas and this is likely to be considered discriminatory. It is possible that local people who may have a limited understanding of the issues may object to certain developments, and it is suggested that other priorities should also be taken into consideration.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To ensure that this section reflects the positive commitment to disabled and older people's accommodation elsewhere in the Core Strategy and to meet the Disability Equality Duty for public authorities, it is suggested that the first and third elements are removed: Proposals for accommodation for people with additional support needs will be supported where:-

- There is not a high concentration of similar uses in the area already.
- Where it will contribute to the vitality and viability of the neighbourhood.
- Where there would not be a disproportionate stress on local infrastructure such as health facilities.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	122
Response Date	24/03/11 14:13
Consultation Point	Policy H 11 Houses in Multiple Occupation (View)
Status	Processed
Submission Type	Email
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

10% of households' should read '10% of properties'.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

10% of households' should read '10% of properties'.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	135
Response Date	24/03/11 14:58
Consultation Point	Policy H 11 Houses in Multiple Occupation (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraphs 9.49 and 9.56 - A city-wide Register of C4 (and other) HMOs will be necessary.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	131
Response Date	24/03/11 14:51
Consultation Point	Policy H 11 Houses in Multiple Occupation (View)
Status	Processed
Submission Type	Email
Version	0.5

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Avoid loop-hole for areas inundated by HMOs: if a landlord can show lack of market interest (which would be quite likely in such a street), then s/he could argue for permission to convert.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	124

Response Date	24/03/11 14:19
Consultation Point	Policy H 11 Houses in Multiple Occupation (View)
Status	Processed
Submission Type	Email
Version	0.8

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Add a 4th bullet point to include "Any other property whose usage falls within Class C4 or HMO sui generis" (to replace the paragraph that follows the bullet points). 9.47 - All actual HMOs should be counted. There could be many which fall outside the three categories (which is why a 4th bullet-point is required, as above).

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Add a 4th bullet point to include "Any other property whose usage falls within Class C4 or HMO sui generis" (to replace the paragraph that follows the bullet points).

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	139

Response Date	24/03/11 15:05
Consultation Point	Policy H 11 Houses in Multiple Occupation (View)
Status	Processed
Submission Type	Email
Version	0.4

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 9.51 - Need a strategy to avoid and reverse blight if significant numbers of HMOs fall and stand empty.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	137
Response Date	24/03/11 15:01
Consultation Point	Policy H 11 Houses in Multiple Occupation (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 9.50 - In either case the HMO requires planning permission.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	134
Response Date	24/03/11 14:55
Consultation Point	Policy H 11 Houses in Multiple Occupation (View)
Status	Processed
Submission Type	Email
Version	0.4
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 9.46 - Greater clarity needed on what a more restrictive approach would be.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	132
Response Date	24/03/11 14:53
Consultation Point	Policy H 11 Houses in Multiple Occupation (View)
Status	Processed
Submission Type	Email
Version	0.3
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The 10% threshold is welcome; experience shows that once 20% is reached, long-term residents start moving out.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	123
Response Date	24/03/11 14:16
Consultation Point	Policy H 11 Houses in Multiple Occupation (View)
Status	Processed
Submission Type	Email
Version	0.7
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Clarify 100 metre measurement criteria e.g. where exactly do you measure from? What if the boundary runs through a property?

Comment by	National Landlords Association (Ms Carolyn Uphill)
Comment ID	7
Response Date	08/03/11 15:41

Consultation Point	Policy H 11 Houses in Multiple Occupation (View)
Status	Processed
Submission Type	Email
Version	0.14
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We do not believe that Housing Policy H 11 provides a balanced approach to the housing needs of either students or other sharers. Furthermore we believe that the pursuit of these policies will disadvantage young professionals/recent graduates who will ultimately be dissuaded from the view that Manchester is a good place to study. Students attend the highly regarded universities of Manchester to attain both an education and life experience. Part of this experience is that growing up which comes with taking responsibility for managing their own accommodation. While students have traditionally lived in Hall's for their first year, when they arrive alone as newcomers to the area, the vast majority wish to spend their subsequent years in a house with the friends they have made. Reducing the number of houses available will not remove this desire but will increase demand for the available properties. Whilst some students do act irresponsibly, from time to time, this is not true for them all. The majority of students actually benefit from the life experience of living in the community, in a house for which they are responsible; and society, which includes the local community, benefits from the maturity they gain. The proposal to effectively prevent all further growth of shared housing, which will ultimately lead to a decline through natural wastage, and to expand the provision of purpose-built accommodation only will have the following consequences:

- Students who want to share with their friends will populate all the available shared houses to the exclusion of young professionals who do not have access to loans and may be driven away from Manchester
- This will also exclude recipients of LHA benefits who, under new changes, will need to share up to the age of 35, from any chance of sharing near to the job opportunities of the city centre.
- Many students chose Manchester for their studies with a view to remaining in the city when they graduate. If this becomes more difficult, because young professionals are in competition with students to find accommodation, and cannot easily get mortgages to buy their

own properties, Manchester may become a less attractive place to study. • Those families/individuals who own properties in student dominated areas, such as Victoria Park and Fallowfield, will find the value of their properties reduced/ and possibly un- saleable as the principal buyers in these areas are investors. Most family buyers will continue to opt to live in areas further afield, where properties do not attract an HMO potential premium, have gardens and are primarily residential areas. • Students, having tended to move closer to the universities in recent years, will begin to take up shared housing places further afield, in the leafy suburbs, in order to achieve their object of living together as a group and so to deprive other sharers of this option. • Private halls, unable to attract all the students to live in them, may resort to letting to more peripatetic tenants, reduce rents and in effect become hostels. Preventing the development of more shared housing in areas where this is predominant will not turn these areas into family suburbs.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- We believe that a much more balanced approach would be to designate areas in which shared housing will be allowed to develop and only restrict it in areas where it is not already the norm. - The council should designate areas where planning permission would be granted thereby reducing the spread of shared housing into the outer suburbs.

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	138
Response Date	24/03/11 15:03
Consultation Point	Policy H 12 Purpose Built Student Accommodation (View)
Status	Processed
Submission Type	Email
Version	0.8
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Comment ID	110
Response Date	23/03/11 13:24
Consultation Point	Policy H 12 Purpose Built Student Accommodation (View)
Status	Processed
Submission Type	Email
Version	0.8
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (1) Justified
. (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments made on behalf of Manchester University The University notes paragraph 9.57's acknowledgement that 'the universities and their students make an important contribution to the economy of the City'. It accepts that given the increase in proposals for purpose-built student housing over the past decade the Core Strategy should have a specific policy which deals with this form of development. It however requires clarification or amendment to the following part of the policy: Criterion 9 – as currently drafted: 9. There is currently a potential oversupply of student bedspaces in purpose built accommodation in the planning pipeline when matched against demand from both the projected

growth in student numbers to 2014/15 (using a mid range growth scenario assumption) and latent demand from students living in the general rented sector. Therefore developers will be required to demonstrate that there is a need for additional student accommodation in terms of waiting lists for existing places, or that they have entered into a formal agreement with a University, or another provider of higher education, for the supply of bedspaces. The University has a number of concerns over this part of the policy: a) the Core Strategy is intended to cover the period from 2012-2027. The reference to 'currently', 'potential' and 'projected growth in student numbers to 2014/15' will quickly become out-dated as time passes on – indeed it could be out-of-date by the time the Core Strategy is adopted as the position statement is derived from the May 2009 Manchester Student Strategy. If such a position is to be used in the short term by the Council, then the policy and/or supporting text should explain how this alleged 'oversupply' will be used/revised/updated in later parts of the Plan period after 2014/15; b) An explanation should be provided of why a 'mid range growth scenario' has been used; c) The assessment of 'need' for additional accommodation should not be limited to a consideration of whether there is a waiting list for existing places (it is unclear whether this means places in University accommodation, private halls of residence or both forms) and whether a University will contract to occupy the proposed bedspaces. This definition of need does not take into account latent demand from those who may be in private rented housing who wish to occupy purpose-built student housing; d) The policy does not define whether developers are required to secure 'formal agreement' with a University for some (if so, what proportion?) or all of the proposed bedspaces to successfully fulfil the terms of the policy; e) It is unclear how this criterion (9) will be weighed in the balance with the statement at the start of the policy which states priority will be given to 'universities redevelopment plans or which are being progressed in partnership with the universities' – as currently worded it appears that schemes directly involving universities (either as landowner or as a tenant) will not be required to demonstrate 'need'. Consequently, the University considers that the criterion could be improved by shortening it and moving the context and the explanation of 'need' to the reasoned justification.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amendments: Revise the 9th criterion to read: 9. Developers will be required to demonstrate that there is a need for additional student accommodation or that they have entered into a formal agreement with a University, or another provider of higher education, for the supply of all or some of the bedspaces. Insert into paragraph 9.60 The consideration of the 'need' for additional student accommodation which developers should undertake should include, but not be limited to, waiting lists for existing places (both University and privately-owned stock) and an appraisal of schemes in the planning pipeline (under construction, with permission and current applications). Reason for revision: to clarify the circumstances when 'need' should be proven and some of the considerations to be included in the demonstration of need

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	49
Response Date	23/03/11 22:49
Consultation Point	Policy H 12 Purpose Built Student Accommodation (View)

Status	Processed
Submission Type	Web
Version	0.2

Guidance notes

Please tick the sections of the guidance that you wish to read. . Soundness

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy H12 does not currently include a commitment to provide a percentage of accessible accommodation units for disabled students. To ensure that this section is consistent with the commitments made for accommodation for disabled people, it is suggested that a similar commitment to encourage inclusive design and accessible accommodation based on Design for Access 2 standards is made in this policy.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Include an additional number in H12 Proposals should include an agreed proportion of accessible accommodation for disabled students and staff and that all common facilities are accessible to disabled students, disabled staff and disabled visitors.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	195
Response Date	23/03/11 11:03
Consultation Point	Policy H 12 Purpose Built Student Accommodation (View)
Status	Processed
Submission Type	Email
Version	0.7

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments made on behalf on Manchester University The University also supports the broad approach to managing the delivery of new purpose built student accommodation (Policy H12). It does however have some detailed comments which are subject of individual representations.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	141
Response Date	24/03/11 15:10
Consultation Point	Policy H 12 Purpose Built Student Accommodation (View)
Status	Processed
Submission Type	Email
Version	0.6
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Purpose-built student accommodation should avoid existing areas with 10%+ HMOs

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	140
Response Date	24/03/11 15:08
Consultation Point	Policy H 12 Purpose Built Student Accommodation (View)
Status	Processed
Submission Type	Email

Version 0.3

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Purpose-built student accommodation should cater for a range of needs, from first year to final year students and post-graduates

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	114
Response Date	23/03/11 13:43
Consultation Point	Policy H 12 Purpose Built Student Accommodation (View)
Status	Processed
Submission Type	Email
Version	0.6

Guidance notes

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (1) Justified
. (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments made on behalf of Manchester University The University notes paragraph 9.57's acknowledgement that 'the universities and their students make an important contribution to the economy of the City'. It accepts that given the increase in proposals for purpose-built student housing over the past decade the Core Strategy should have a specific policy which deals with this form of development. It however requires clarification or amendment to the following part of the policy: Criterion 10 – as currently drafted 10. Applicants/developers must demonstrate to the City Council that their proposals for purpose built student accommodation are deliverable. The City Council will not support proposals that are speculative, where there is a possibility that planning permission will not be implemented. The University appreciates that the City Council wishes to see schemes which gain planning permission to be subsequently implemented and accordingly accepts the first sentence of criteria 10. However, there will be often be cases, particularly in the current economic climate, where development proposals are genuinely viable and deliverable but where end occupiers / developers / management companies cannot be specified or are not known at the time of the submission of an application. Equally, there are often instances where the certainty of having secured planning permission is essential to securing end users – i.e. that it demonstrates to prospective occupiers/purchasers that the development can be delivered and a potentially substantial 'risk' obstacle has been overcome.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amendment: Delete the second sentence of the 10th criterion, which starts with 'The City Council...'
Reason for revision: to enable the criterion to be reasonable

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

NO, I do not wish to participate at the oral examination

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	102
Response Date	23/03/11 12:43
Consultation Point	Policy H 12 Purpose Built Student Accommodation (View)
Status	Processed
Submission Type	Email
Version	0.8
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: . (2) Effective

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Comments made on behalf of Manchester University The University notes paragraph 9.57's acknowledgement that 'the universities and their students make an important contribution to the economy of the City'. It accepts that given the increase in proposals for purpose-built student housing over the past decade the Core Strategy should have a specific policy which deals with this form of development. It however requires clarification or amendment to the following part of the policy: First paragraph – which currently states: 'Priority will be given to schemes which are part of the universities' redevelopment plans or which are being progressed in partnership with the universities, and which clearly meet Manchester City Council's regeneration priorities'. It is unclear whether 'part of the universities redevelopment plans' is intended to mean schemes which i) involve the university promoting the student housing scheme for occupation by itself, and/or ii) involves a redundant part of the university estate that is being promoted by a third party for student housing. It is also unclear exactly what is meant by 'being progressed in partnership with the universities'. This could be read to mean a student housing scheme being promoted by a 3rd party on redundant university land or could be read as being led by a 3rd party developer promoting a non-university owned site for a development that could (at least in part) be occupied by students under a contract with a university.

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amendment: Add a paragraph after paragraph 9.59 as follows: 'Priority will be given to schemes which are part of the universities' own plans for additional or redeveloped accommodation (which involve surplus university-owned land and/or which are being progressed by developers with a university contracted to occupy the accommodation) and which clearly meet Manchester City Council's regeneration priorities'. Reason for revision: to clarify the interpretation of the first paragraph of the policy

Comment by	National Landlords Association (Ms Carolyn Uphill)
Comment ID	8
Response Date	08/03/11 15:58
Consultation Point	Policy H 12 Purpose Built Student Accommodation (View)
Status	Processed
Submission Type	Email
Version	0.9
Guidance notes	

Please tick the sections of the guidance that you wish to read.

Introduction

Legal Compliance

Soundness

General advice

Unsound

Do you consider the DPD is unsound because it is not:

Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We do not believe that Housing Policy H 12 Purpose-Built Student Accommodation provides a balanced approach to the housing needs of either students or other sharers. Furthermore we believe that the pursuit of these policies will disadvantage young professionals/recent graduates who will ultimately be dissuaded from the view that Manchester is a good place to study. Students attend the highly regarded universities of Manchester to attain both an education and life experience. Part of this experience is that growing up which comes with taking responsibility for managing their own accommodation. While students have traditionally lived in Hall's for their first year, when they arrive alone as newcomers to the area, the vast majority wish to spend their subsequent years in a house with the friends they have made. Reducing the number of houses available will not remove this desire but will increase demand for the available properties. Whilst some students do act irresponsibly, from time to time, this is not true for them all. The majority of students actually benefit from the life experience of living in the community, in a house for which they are responsible; and society, which includes the local community, benefits from the maturity they gain. The proposal to effectively prevent all further growth of shared housing, which will ultimately lead to a decline through natural wastage, and to expand the provision of purpose-built accommodation only will have the following consequences: • Students who want to share with their friends will populate all the available shared houses to the exclusion of young professionals who do not have access to loans and may be driven away from Manchester • This will also exclude recipients of LHA benefits who, under new changes, will need to share up to the age of 35, from any chance of sharing near to the job opportunities of the city centre. • Many students chose Manchester for their studies with a view to remaining in the city when they graduate. If this becomes more difficult, because young professionals are in competition with students to find accommodation, and cannot easily get mortgages to buy their own properties, Manchester may become a less attractive place to study. • Those families/individuals who own properties in student dominated areas, such as Victoria Park and Fallowfield, will find the value of their properties reduced/ and possibly un- saleable as the principal buyers in these areas are investors. Most family buyers will continue to opt to live in areas further afield, where properties do not attract an HMO potential premium, have gardens and are primarily residential areas. • Students, having tended to move closer to the universities in recent years, will begin to take up shared housing places further afield, in the leafy suburbs, in order to achieve their object of living together as a group and so to deprive other sharers of this option. • Private halls, unable to attract all the students to live in them, may resort to letting to more peripatetic tenants, reduce rents and in effect become hostels. Preventing the development of more shared housing in areas where this is predominant will not turn these areas into family suburbs.

Changes necessary for legal compliance and soundness

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We believe that a much more balanced approach would be to designate areas in which shared housing will be allowed to develop and only restrict it in areas where it is not already the norm. The council should designate areas where planning permission would be granted thereby reducing the spread of shared housing into the outer suburbs.