

Comments

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

Comment by	Manchester Friends of the Earth (Dr Ali Abbas)
Comment ID	94
Response Date	24/03/11 23:51
Consultation Point	10 Objective 4 Centres (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 are aware of serious concerns regarding the retail needs study which underpins this section. Detailed research in Chorlton showed that the study does not adequately take into account small, independent businesses, thus overestimating the amount of retail provision that is required. We welcome the support for the independent sector in policy C2, but the policy could be even more explicitly worded to support the local economy and locally-owned businesses which retain wealth in communities and have a much bigger benefit than national/multinational retail companies for providing jobs and skills. In policy C4, we recognise that there may be food access issues in Newton Heath but are disappointed that the proposed remedy is a medium-sized supermarket rather than creating a vibrant and flourishing local food economy of benefit for community health, wellbeing and the environment - for example through local markets, food co-ops and provision of space for community growing and allotments. In policy C5, support for additional retail development in Rusholme should be qualified to specifically promote locally-owned and culturally-appropriate shops. The retail assessment for Levenshulme in policy C6 is referred to as having identified potential for a medium scale supermarket. However, the analysis showed that the real potential for the local economy and for provision is in supporting the independent sector. The assessment is also out of date with a medium-sized fresh grocery store having opened on Stockport Road in the northern part of the district centre and a new regular market starting up. The district centre already has a large Tesco store and any further provision would have a serious impact on the emerging independent sector.

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 new retail needs assessment must be undertaken, using a methodology that adequately takes small, independent businesses into account, in order to provide a credible evidence base for the policies in this section.

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	Osborne Clarke (Mr John Sturt)
Comment ID	246
Response Date	24/03/11 16:52
Consultation Point	Policy C 1 Centre Hierarchy (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.

On behalf of ASDA StoresLtd: Policy C1 - Centre Hierarchy sets out the network of the City Centre, District Centres and Local Centres that the Council wishes to maintain over the plan period to encourage the vitality and viability of the City Centre. This includes designating Baguley as a new District Centre. Although ASDA do not object to this designation and the improvement in retail provision for the residents of the Wythenshawe Spatial Area to the west of the M56, ASDA request that the City Council ensure that this does not result in an increase in retail provision of a scale that will negatively impact upon the vitality of the larger Wythenshawe Town Centre which forms the main shopping and civic centre for the Wythenshawe Spatial Area. This is particularly important as Wythenshawe Town Centre becomes more accessible to residents of Baguley following the arrival of the Metrolink to this area of the City. Paragraph 10.12 of the Core Strategy notes the five main out-of-centre shopping destinations in Manchester. ASDA support the recognition of these centres and the support for opportunities that arise to improve the retail environment of these centres and any impact they may have on neighbouring residents.

Comment by	DPP (Mr Mark Aylward)
Comment ID	241
Response Date	23/03/11 16:19
Consultation Point	Policy C 1 Centre Hierarchy (View)
Status	Processed
Submission Type	Letter
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.

Comments on behalf of Tesco Stores Limited: We support the retail hierarchy, and the inclusion of a diverse number of centres at both the District and Local Tier. The recognition given to the need for additional convenience retail in the City Centre is welcomed by Tesco. We seek further clarification however, on Eastland District Centre. Policy C 1 does not highlight Eastlands as a new District Centre, whilst paragraph 10.25 refers to the centre as newly established. We request that the boundaries of this District centre are made clear, as well as justification as to why this (out-of-centre retail development) would properly fulfil the requirements of a District Centre as set out in PPS4 Annex B. Without sufficient justification, we feel this could be inconsistent with National Policy.

Comment by	Turley Associates (Mr Greg Dickson)
Comment ID	224
Response Date	22/03/11 14:06
Consultation Point	Policy C 1 Centre Hierarchy (View)
Status	Processed
Submission Type	Email
Version	0.2
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: As you will be aware there is a Sainsbury's Supermarket located at Higher Blackley Retail Park and having regard to the current range of services and facilities that are available there Sainsbury's previous representations sought to identify the Retail Park as a District Centre. Sainsbury's remain of the view that the Higher Blackley Retail Park should be recognised as a District Centre, given its high level of accessibility and the way it relates to the local walk-in catchment and serves the Blackley 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.

On this basis, Sainsbury's object to the proposed settlement hierarchy and request that Higher Blackley Retail Park be identified as a District Centre within the Submission draft of the Core Strategy. The changes to the Core Strategy that are proposed by Sainsbury's will ensure that Higher Blackley Retail Park is resilient to future economic change and contribute to the sustainable network of shopping centres in Manchester.

Comment by	Emery Planning Partnership (Mr John Coxon)
Comment ID	105
Response Date	23/03/11 13:11
Consultation Point	Policy C 1 Centre Hierarchy (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

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.

We support the general centre hierarchy in particular the identification of Harpurhey as a District Centre. The policy should also recognise that there is a series of parades of shops and smaller centres that also play a role in meeting local needs.

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 relation to all 3 reps: In summary, we consider that changes are required to the above policies in order to: · Recognise the differing roles of Harpurhey and Cheetham Hill and the differing requirements for retail provisions. · Identify the full extent of the retail requirement for Harpurhey. · Replace the 250sqm threshold for retail impact assessments. · Recognise the need for new shops to meet local needs.

Comment by	Jones Lang LaSalle (Mr James Sheppard)
Comment ID	88
Response Date	24/03/11 19:25

Consultation Point	Policy C 1 Centre Hierarchy (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 fully support the ambition of Policy C1 that services should be provided as locally as possible to minimise the need to travel by car and maintain the vitality and viability of Manchester's centres. We also support the view that District Centres have an essential role in providing key services to the City's neighbourhoods, including shopping, ensuring that residents can access services easily. To further highlight the importance of large scale convenience provision in District Centres, we would advocate the elevation of the following statement in Paragraph 10.14 of the supporting text, into written Policy C1: "Larger retail stores can strengthen a centre's retail offer and perform an important anchor role, increased linked trips and pedestrian activity".

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	Citybranch Ltd (Citybranch Limited Citybranch Citybranch)
Comment ID	73
Response Date	24/03/11 16:42
Consultation Point	Policy C 1 Centre Hierarchy (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? 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 Policy C1 in setting out a clear retail hierarchy for Manchester along with its recognition of the essential role District Centres have in providing key services to the City's neighbourhoods. Citybranch considers that this Policy could be strengthened further by integrating the provisions of the text at paragraph 10.11 into the main body of the Policy itself to provide a clear message, in line with National Planning Policy in the form of PPS4 (Planning for Sustainable Economic Growth), that existing District Centres should be the main focus for retail development and service provision outside the Regional 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	Osborne Clarke (Mr John Sturt)
Comment ID	247
Response Date	24/03/11 16:56
Consultation Point	Policy C 2 District centres (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 ASDA Stores LTD: Paragraph 10.14 of the Core Strategy specifically recognises the important role larger retail stores can have in District Centres through performing an anchor role, facilitating linked trips and increasing footfall. ASDA support the inclusion of this recognition in the Core Strategy. Policy C2 - District Centres of the Core Strategy identifies that an additional 20,000 sq m of additional convenience goods floorspace and 15,000 sq m of additional comparison goods floorspace will be provided in the City's District Centres up to 2027 whilst respecting the centre hierarchy. The Policy also sets out a number of criteria that development in District Centres should aim to achieve including that development should: • Prioritise delivery of key visitor services including retail ensuring that retail remains the principal use in District Centres; • Promote the development of employment opportunities for local people; • Promote choice and competition; and • Remedy deficiencies in areas with poor access to facilities. ASDA support the aspiration of the Council to ensure that development in District Centres achieves the above four objectives. This will ensure new development in and around District Centres contributes positively to their health and vitality and to the positive role they have in serving their local communities.

Comment by	Citybranch Ltd (Citybranch Limited Citybranch Citybranch)
Comment ID	74
Response Date	24/03/11 16:43
Consultation Point	Policy C 2 District centres (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 promotion of additional convenience and comparison retail provision within the centres specified by the Core Strategy and the overall quantum proposed in Policy C2. Citybranch also support the aspiration to create thriving District Centres and the recognition that residential uses can be appropriate within District Centres if they support its vitality and viability. Residential development within centres can form an important part of the wider mix of uses required in centres to provide levels of footfall and activity outside core shopping hours. Some of the criteria that development in District Centres should aim to meet are also supported, including the provision of a range of visitor services; the efficient use of land including the regeneration of land and premises and the use of multi-storey development; the provision of a range of retailers and shop formats; the promotion of choice and competition; and, the remedying of deficiencies in areas with poor access to facilities. The text of this last criteria should be adjusted slightly to read: "Remedy deficiencies in areas with poor access to retail facilities and wider local services". Citybranch further supports the additional recognition within the supporting text to this Policy that a strong retail offer within a centre can underpin other uses and as such growth of District Centre retail will be encouraged to meet local needs. This text outlines the most appropriate approach to ensure that each District Centre develops in line with the needs of the community it serves. To ensure this approach is made clear, the supporting text to Policy C2 should also contain a more explicit reference to the difference between District Centres at the same level in the retail hierarchy, the varying roles they have in serving their local communities and the varying geographical scale of the communities they serve.

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	Turley Associates (Mr Greg Dickson)
Comment ID	226
Response Date	22/03/11 14:13
Consultation Point	Policy C 2 District centres (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.

On behalf of Sainsbury's Supermarket: In line with the guidance set out in PPS4, Sainsbury's generally agree with the identification of capacity for future retail development to support the vitality and viability of the designated District Centres. Despite this, it is important to ensure that the retail policies are not too restrictive in terms of development in the outer areas which would also benefit from investment and new economic and commercial 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	Osborne Clarke (Mr John Sturt)
Comment ID	248
Response Date	24/03/11 16:58
Consultation Point	Policy C 3 North Manchester District Centres - Cheetham Hill and Harpurhey (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: Policy C3 - North Manchester District Centres - Cheetham Hill and Harpurhey identifies capacity for an additional 1,000 sq m of convenience and 4,000 sq m of comparison goods floorspace within the two centres and that Harpurhey has the potential to accommodate this additional retail floorspace. The accompanying text to this Policy also specifically recognises the important role the ASDA store performs in anchoring this centre. ASDA strongly support the approach of this Policy in seeking to further improve the health and vitality of Harpurhey District Centre above and beyond the ongoing and successful regeneration process in the area. This will further improve the centre's role at the heart of the community and its ability to meet the needs of local residents and provide much needed employment opportunities. ASDA also strongly support the specific recognition of the important role the Harpurhey store performs in anchoring the centre. However, as a result of the key role the Harpurhey ASDA store plays in anchoring the centre and the recent growth in the centre it is important that the store is encouraged to develop so as to continue to successfully fulfil this anchor role, particularly in the context of recent and more modern foodstore developments such as the new Tesco store in Cheetham Hill District and future developments such as the foodstores proposed adjacent to Manchester Fort Shopping Park, in the vicinity of the City Centre and in Newton Heath District Centre, the latter two promoted through the Core Strategy. As such, Policy C3 itself should include specific reference to the importance of the ASDA store in anchoring the centre and Paragraph 10.23 of the supporting text should be adjusted as follows: "Harpurhey is a large, broadly rectangular centre approximately 4 miles from City Centre. Recent investment has significantly enhanced Harpurhey, providing a new market, shops and leisure centre. The retail study found the superstore was trading well, successfully anchoring the centre. Identified capacity for convenience provision will be directed towards Harpurhey to provide additional convenience and comparison floorspace, meeting the needs of new residents and supporting further qualitative improvements to the centre, including improvements to the ability of the existing superstore to continue to function as a strong anchor of the 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.

Paragraph 10.23 of the supporting text should be adjusted as follows: "Harpurhey is a large, broadly rectangular centre approximately 4 miles from City Centre. Recent investment has significantly enhanced Harpurhey, providing a new market, shops and leisure centre. The retail study found the superstore was trading well, successfully anchoring the centre. Identified capacity for convenience provision will be directed towards Harpurhey to provide additional convenience and comparison floorspace, meeting the needs of new residents and supporting further qualitative improvements to the centre, including improvements to the ability of the existing superstore to continue to function as a strong anchor of the centre."

Comment by	Emery Planning Partnership (Mr John Coxon)
Comment ID	108
Response Date	23/03/11 13:18
Consultation Point	Policy C 3 North Manchester District Centres - Cheetham Hill and Harpurhey (View)
Status	Processed
Submission Type	Email
Version	0.2
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:

- . (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 C3 – North Manchester District Centres – Cheetham Hill and Harpurhey Need for 2 Policies 2.3 Policy C3 groups the North Manchester District centres of Cheetham Hill and Harpurhey together. 2.4 Having regard the evidence base, the District Centre of Cheetham Hill and Harpurhey should be considered separately for the following reasons: · Cheetham Hill District Centre falls within Zone 2 of the Manchester City Council Manchester Retail Capacity Update 2010 whereas Harpurhey is considered under Zone 3 of the same study. For consistency with the evidence base we consider that the District Centre should be considered by separate policies. · The Manchester Retail Capacity Study Updated 2010 indicates that these surveys have quite different characteristics which justify a separate policy for each. For example, Zone 2 of the Quantitative need for Additional Retail Floorspace indicates that 40% of the conveniences expenditure arising within the zone is retained in shops locally. Whilst the most popular destination is Tesco at Cheetham Hill, this is the only major foodstore within Manchester that is trading below company average. Those living in Zone 2 also make significant use of City Centre convenience stores with outflows to Asda at Sportcity and Sainsburys at Higher Blackley. By comparison, Zone 2 (Harpurhey and Higher Blackley) has the highest retention of expenditure within the City. 56% of convenience expenditure arising within Zone 3 is retained locally. · Table 15 of the Quantitative Need for Additional Retail Floorspace Report indicates that assuming existing market shares are maintained and that there is £3.6m expenditure in 2015 available to support new development in Zone 3 (Harpurhey and Higher Blackley by 2015) rising to £8.36m in 2020 and £15.66m in 2027. For Zone 2 (Cheetham Hill and Crumpsall) this is much less at £1.09m at 2015 , £2.56 at 2020 and £4.82 at 2027. 2.5 Given the different characteristics of these two District Centres we consider that each should be dealt with by way of a separate policy. At the very least the floorspace requirements for the centres should be clearly defined rather than grouped together (see comments below). 2.6 This change is necessary to ensure that the Core Strategy is founded on a robust evidence base and that the policy is effective. Clarification on retail growth 2.7 Policy C3 states that there is capacity for approximately 1,000 sq m convenience and 4,000sqm comparison retail growth in North Manchester up to 2027 and that the focus for additional floorspace should be in Harpurhey. 2.8 Table 10 of the Manchester Retail Capacity Study Update 2010 sets out the estimates of expenditure growth to support additional retail development assuming market shares are maintained. Table 13 of the Manchester Retail Capacity Study sets out the sales density for large format foodstores, discount/convenience stores and independent retailers. If Table 13 of the Manchester Retail Capacity Study is applied to the estimates of expenditure growth for Zone 2 (Cheetham Hills) and Zone 3 (Harpurhey) it provides the following floorspace requirements for Zones 2 and 3. Zone 2 – Cheetham Hill and Crumpsall Floorspace requirements (sq m net) 2015 2020 2027 Large format foodstores 92 215 398 Discount / convenience stores 180 418 777 Independent retailers 308 717 1331 Zone 3 – Harpurhey / Higher Blackley Floorspace requirements (sq m net) 2015 2020 2027 Large format foodstores 305 700 1294 Discount / convenience stores 594 1366 2523 Independent retailers 1018 2341 4325 2.9 It is assumed that the figure of 1,000 sq m of convenience floorspace identified within the policy has been calculated on the basis of large format foodstores. Whilst we consider Harpurhey and Cheetham Hill should be dealt with separately if the two are taken together, even based on the sale density of a large foodstore the requirement is more like 1,700 sq m net than 1,000sqm net. 2.10 We consider that the policy should be amended to take into account the specific requirements of Harpurhey and Cheetham Hill and the range in floorspace that may be required depending on the particular operator. 2.11 This should be clarified clearly within this particular policy and not just in the explanatory text to Policy C2.

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 all 3 reps: In summary, we consider that changes are required to the above policies in order to: · Recognise the differing roles of Harpurhey and Cheetham Hill and the differing requirements for retail provisions. · Identify the full extent of the retail requirement for Harpurhey. · Replace the 250sqm threshold for retail impact assessments. · Recognise the need for new shops to meet local needs.

Comment by	Osborne Clarke (Mr John Sturt)
Comment ID	249
Response Date	24/03/11 17:01
Consultation Point	Policy C 4 East Manchester District Centres - Eastlands, Gorton, Newton Heath and Openshaw (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.

On behalf of ASDA Stores Ltd: Policy C4 - East Manchester District Centres - Eastlands, Gorton, Newton Heath and Openshaw identifies capacity for an additional 4,000 sq m of convenience goods floorspace and 1,000 sq m of additional comparison goods floorspace in these centres over the plan period. The Policy specifically identifies capacity for a medium-sized foodstore in Newton Heath to provide a key anchor store within the existing District Centre boundary. This element of the Policy is supported although the text should be adjusted slightly to recognise the importance of providing consumer choice in this centre where provision can be improved. The text of the Policy should be adjusted as follows: "In Newton Heath there is additional capacity for a medium sized supermarket to provide a key anchor store, increasing the attractiveness of the centre and providing for increased consumer choice." The supporting text to Policy C4 recognises the strong trading position of the ASDA anchor store at Eastlands District Centre and the success of regeneration in the area. This text also supports a small increase in convenience goods provision at the centre to serve increases in nearby residential population. This text is slightly inconsistent with that of Policy C4 that states "Eastlands has

limited capacity for additional retail development." The text within the body of Policy C4 should therefore be adjusted to read: "Eastlands has a degree of capacity for additional retail development which should be in the form of a small extension to the existing convenience offer to support the growing population in the 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.

The text of the Policy should be adjusted as follows: "In Newton Heath there is additional capacity for a medium sized supermarket to provide a key anchor store, increasing the attractiveness of the centre and providing for increased consumer choice." The text within the body of Policy C4 should be adjusted to read: "Eastlands has a degree of capacity for additional retail development which should be in the form of a small extension to the existing convenience offer to support the growing population in the area."

Comment by	Homes and Communities Agency (Ms Deborah McLaughlin)
Comment ID	168
Response Date	24/03/11 15:07
Consultation Point	Policy C 4 East Manchester District Centres - Eastlands, Gorton, Newton Heath and Openshaw (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 welcome the commitment to create thriving district centres which meet the needs of local communities. The District Centre Development Framework provides a good basis to support the development across Manchester's centres up to 2027. In Policy C4 we are pleased to see the commitment to East Manchester district centres - notably Eastlands and Gorton - where the HCA have been working closely with Manchester City Council to deliver transformational change. We look forward to being able to support input into the planned Site Allocations DPD which will provide further detail on the development of district/local centres.

Comment by	Indigo Planning Ltd (Miss Charlotte Blinkhorn)
Comment ID	293
Response Date	24/03/11 12:48
Consultation Point	Policy C 5 Central Manchester District Centres - Hulme, Longsight and Rusholme (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

Legal compliance

Do you consider the DPD is legally compliant? No

Soundness

Do you consider the DPD is sound? No

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 C5 - Central Manchester District Centres - Hulme, Longsight and Rusholme identifies capacity for 3,000 sq m of additional convenience goods and 1,500 sq m of comparison goods floorspace up to 2027. This includes a moderate increase in provision in Hulme District Centre and a direction of some capacity to Longsight to improve links between the existing ASDA store and the remainder of the centre. The supporting text to Policy C5 also recognises the strong performance of the ASDA foodstores within Hulme and Longsight District Centres. ASDA support the recognition of this strong performance along with the identification of improvements in retailing in Hulme and Longsight District Centres. This would enable these centres to continue to evolve to meet the needs of the surrounding area and to improve the relationship and linkages between facilities in these centres

Comment by	Turley Associates (Mr Greg Dickson)
Comment ID	229
Response Date	22/03/11 16:20
Consultation Point	Policy C 6 South Manchester District Centres - Chorlton, Didsbury, Fallowfield, Levenshulme and Withington (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.

On behalf of Sainsbury's Supermarket Ltd: Sainsbury's agree with the identification of Fallowfield as a District Centre under Policy C6 of the Core Strategy Publication paper. In accordance with PPS4, development proposals for town centre uses within each the identified centres should be given clear support where they are of an appropriate scale and function to that centre.

Comment by	Osborne Clarke (Mr John Sturt)
Comment ID	256
Response Date	24/03/11 11:01
Consultation Point	Policy C 6 South Manchester District Centres - Chorlton, Didsbury, Fallowfield, Levenshulme and Withington (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.

On behalf of ASDA Stores Ltd: Policy C6 - South Manchester District Centres - Chorlton, Didsbury, Fallowfield, Levenshulme and Withington identifies capacity for an additional 8,000 sq m of additional convenience and 4,500 sq m of additional comparison goods floorspace over the plan period and that this should be directed to Chorlton in the first instance along with enhanced provision in Levenshulme to address the current high levels of leakage. The Policy also seeks more moderate expansion of retailing within the centres of Fallowfield, Withington and Didsbury. ASDA support the suggested improvement of convenience goods retailing in Levenshulme District Centre to prevent leakage through the development of a medium-sized foodstore. This approach will provide an anchor for the centre to act in conjunction with retailers currently present in the centre to reduce leakage to nearby large foodstores thus improving the overall health of Levenshulme District Centre and promoting more sustainable shopping patterns

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	196
Response Date	23/03/11 11:06
Consultation Point	Policy C 6 South Manchester District Centres - Chorlton, Didsbury, Fallowfield, Levenshulme and Withington (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 University of Manchester Specifically, and relevant to its operational and land interests the University supports the following: Support for development of the University's facilities in Fallowfield as a means of improving the balance of uses in the area (Policy C6 and paragraph 10.42).

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	144
Response Date	24/03/11 15:14
Consultation Point	Policy C 6 South Manchester District Centres - Chorlton, Didsbury, Fallowfield, Levenshulme and Withington (View)
Status	Processed
Submission Type	Email
Version	0.2
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.

A specific policy is needed to control the number of licensed premises and takeaways. Consider use of a moratorium or other such restriction. The existing moratorium in Withington has been very successful in retaining the village's retail character, an on-going objective of the Withington Village Action Plan.

Comment by	Withington Civic Society (Mr James Bromfield)
-------------------	---

Comment ID	142
Response Date	24/03/11 15:12
Consultation Point	Policy C 6 South Manchester District Centres - Chorlton, Didsbury, Fallowfield, Levenshulme and Withington (View)
Status	Processed
Submission Type	Email
Version	0.2

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.

10.41 comments that the character of Fallowfield and Withington (suggest addition of north Old Moat and Ladybarn) is reflected by the high student population. This should be expanded to acknowledge the problems that flow from the large student presence e.g. anti-social behaviour, community erosion and the difficult trading conditions created when half the population is in temporary residence.

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	Citybranch Ltd (Citybranch Limited Citybranch Citybranch)
Comment ID	76
Response Date	24/03/11 16:44
Consultation Point	Policy C 6 South Manchester District Centres - Chorlton, Didsbury, Fallowfield, Levenshulme and Withington (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? 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 quantum of retail floorspace proposed to be delivered in South Manchester's District Centres over the plan period. This will ensure all residents of this reasonably wealthy and densely populated area of the City have access to the retail facilities and local services

they need without having to travel significant distances. This will assist in promoting sustainable shopping patterns in the City. Citybranch wishes to express particularly strong support for the direction of this capacity to Chorlton District Centre to support its redevelopment. This will allow the highly accessible centre to grow to successfully serve its large catchment (compared to other District Centres in the City) and provide improved consumer choice for local residents. Citybranch also supports the recognition in the supporting text of the Policy of the high accessibility of Chorlton District Centre and that this will increase following the imminent arrival of the Metrolink.

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	75
Response Date	24/03/11 16:44
Consultation Point	Policy C 6 South Manchester District Centres - Chorlton, Didsbury, Fallowfield, Levenshulme and Withington (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? 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 quantum of retail floorspace proposed to be delivered in South Manchester's District Centres over the plan period. This will ensure all residents of this reasonably wealthy and densely populated area of the City have access to the retail facilities and local services they need without having to travel significant distances. This will assist in promoting sustainable shopping patterns in the City. Citybranch wishes to express particularly strong support for the direction of this capacity to Chorlton District Centre to support its redevelopment. This will allow the highly accessible centre to grow to successfully serve its large catchment (compared to other District Centres in the City) and provide improved consumer choice for local residents. Citybranch also supports the recognition in the supporting text of the Policy of the high accessibility of Chorlton District Centre and that this will increase following the imminent arrival of the Metrolink.

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	Cllr Paul Ankers
Comment ID	26
Response Date	22/03/11 10:24
Consultation Point	Policy C 6 South Manchester District Centres - Chorlton, Didsbury, Fallowfield, Levenshulme and Withington (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: (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.

I fear that we need tougher criteria on the nighttime economy in Chorlton district centre. The clustering of bars & take aways prove a disincentive to the daytime economy. The number of bars has dropped recently due to the economy, but take aways are still prevalent and have given rise to increased parking problems. The Chorlton District Centre Plan reflects this, but this document does not.

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.

I would like to see a cap on bars & take aways, either at the level they are now, or perhaps a percentage based restriction. We are likely to see a transformed district centre and we may see a reduction in shop units, so limiting bars and takeaways to 20% or the district centre units would be robust.

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	258
Response Date	24/03/11 11:06
Consultation Point	Policy C 7 Wythenshawe District Centres - Baguley (West Wythenshawe), Northenden and Wythenshawe Town Centre (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.

On behalf of ASDA Stores Ltd: Policy C7 - Wythenshawe District Centres - Baguley (West Wythenshawe), Northenden and Wythenshawe Town Centre identifies capacity for 5,000 sq m of additional convenience goods and 3,000 sq m of additional comparison goods floorspace over the plan period over and above current commitments in Wythenshawe Town Centre. The Policy seeks to direct this capacity to additional food retail provision at the new District Centre at Baguley and further comparison and convenience provision in Wythenshawe Town Centre to reduce leakage. Although ASDA do not object to the provision of improved retail facilities to serve residents of Wythenshawe to the west of the M56, this increase should be carefully considered so as not to undermine the position of Wythenshawe Town Centre as the main shopping destination for residents of the Wythenshawe area. ASDA support the position of Policy C7 in seeking to improve retail provision in Wythenshawe Town Centre to reduce leakage. Wythenshawe Town Centre is an important retail and civic centre for this area of the City and an important employment provider. It is important that this role is maintained and encouraged so the Town Centre continues to form an important role in the local community and improves its ability to serve local needs.

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	183
Response Date	24/03/11 16:51
Consultation Point	Policy C 7 Wythenshawe District Centres - Baguley (West Wythenshawe), Northenden and Wythenshawe Town Centre (View)

Status	Processed
Submission Type	Email
Version	0.2
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.

Consider that the 2,500m2 convenience retail floorspace figure referred to in paragraph 10.47 should be included within the policy text. Policy C7 is unclear as to how this increase in convenience floorspace would impact on other centres, in particular Timperley District Centre, in accordance with Policy EC5.4 of PPS4.

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.

Consider that the 2,500m2 convenience retail floorspace figure referred to in paragraph 10.47 should be included within the policy text.

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	182
Response Date	24/03/11 16:50

Consultation Point	Policy C 7 Wythenshawe District Centres - Baguley (West Wythenshawe), Northenden and Wythenshawe Town Centre (View)
---------------------------	---

Status	Processed
---------------	-----------

Submission Type	Email
------------------------	-------

Version	0.2
----------------	-----

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 Council supports the regeneration aspirations to improve the quality, and increase the diversity of the shopping environment, in order to create a new District Centre at Baguley. However Policy C7 is unclear as to how the proposed increase in convenience retail floorspace is linked to the provision of the wider range of uses that are also proposed for example healthcare and Council services. How will the policy ensure that these uses will come ahead of any expansion of convenience floorspace?

Comment by	Jones Lang LaSalle (Mr James Sheppard)
-------------------	--

Comment ID	89
-------------------	----

Response Date	24/03/11 19:27
----------------------	----------------

Consultation Point	Policy C 7 Wythenshawe District Centres - Baguley (West Wythenshawe), Northenden and Wythenshawe Town Centre (View)
---------------------------	---

Status	Processed
---------------	-----------

Submission Type	Web
------------------------	-----

Guidance notes

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.

Jones Lang LaSalle proposes to submit a planning application for circa 10,000sqm of convenience floorspace in Wythenshawe Town Centre in 2011. Pre-application discussions with LPA officers is already underway. We strongly disagree to the inclusion of implicit caps on the amounts of convenience floorspace needed as contained within Policy C7 (Paragraph 10.48) of the Core Strategy publication document. It certainly does not reflect the level of occupier demand from food operators to locate within the town centre, or level of expenditure leakage to out of centre stores elsewhere. The retail need and consequent impact should be examined on a case by case basis as part of individual planning applications. Furthermore, under PPS4 there is no requirement to demonstrate retail need. A convenience store development in the order of 10,000 sq m would help to underpin the role of Wythenshawe as a district centre, supporting the centre's vitality and viability.

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	Osborne Clarke (Mr John Sturt)
Comment ID	260
Response Date	24/03/11 11:08
Consultation Point	Policy C 9 Out-of-centre development (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 ASDA Stores Ltd: Policy C9 - Out-of-centre development requires an impact assessment to be prepared for developments of over 250 sq m. Although ASDA do not object to the principle of Manchester City Council wishing to be informed about the potential impacts of town centre uses of a scale below 2,500 sq m, we consider that a local threshold of 250 sq m for the provision of an impact

assessment is an onerous requirement that does not appear to be directly supported by any specific evidence and does not take into account the specific circumstances of a development or its location. Furthermore, given the generally large size and healthy nature of most of Manchester's District Centres, it is difficult to envisage a situation where a development of 250 sq m in the vicinity of any of Manchester's centres would have a significant adverse impact upon that centre. As a result the requirement for impact assessments for proposals of between 250 sq m and 2,500 sq m should be removed

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 requirement for impact assessments for proposals of between 250 sq m and 2,500 sq m should be removed

Comment by	DPP (Mr Mark Aylward)
Comment ID	244
Response Date	23/03/11 16:38
Consultation Point	Policy C 9 Out-of-centre development (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: Concern is raised on the requirement for an impact assessment to be carried out for proposals of more than 250 sq m net floorspace. This is not consistent with national policy (PPS4 EC14.4) which states that impact assessments are required for proposals over 2,500 sq m gross floorspace. We would request that the Council provide fuller justification as to why a lower threshold is applicable in this instance (as is required by PPS4). If a lower threshold is deemed necessary, we would refer the Council to the advice of the Competition Commission and Sunday Trading Laws which dictate that a small store threshold is applied at 280 sq m net and given that, it would appear much more sensible to adopt that standard as opposed to the 250 sq m which appears arbitrary.

Comment by	Prudential Property Investment Managers Ltd (Mr Andrew Foulds)
Comment ID	271
Response Date	24/03/11 11:59
Consultation Point	Policy C 9 Out-of-centre 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 Prudential Assurance Company Limited and Capital Shopping Centres:- PACL and CSC support the approach of this Policy in seeking to carefully manage out-of-centre retail growth to ensure that Manchester's Centres and the City Centre in particular remain the focus for retailing in the City. Although the Policy does not contain a presumption against outof-centre development over 250 sq m, it does seek to ensure the Council is fully informed of what the impacts of such development may be. This approach is also supported.

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	Emery Planning Partnership (Mr John Coxon)
Comment ID	111
Response Date	23/03/11 13:29
Consultation Point	Policy C 9 Out-of-centre development (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

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 C9 – Out-of-Centre development 2.12 Policy C9 sets out the circumstances in which out-of-centre development will be permitted. We have a number of concerns with the drafting of this policy which are set out below: 2.13 First, the policy requires a retail impact assessment for developments of more than 250sqm net. PPS4 states at paragraph EC14/4 that: “An assessment addressing the impacts in policy EC16.1 is required for planning applications for retail and leisure developments over 2,500 sq m gross floorspace or any local floorspace threshold set under Policy EC3.1d not in an existing centre and not in accordance with an up to date development plan.” 2.14 Policy EC3.1d states: “at the local level, consider setting floorspace thresholds for the scale of edge-of-centre and out-of-centre development which should be subject to an impact assessment under EC16.1 and specify the geographical areas these thresholds will apply to.” 2.15 It is not clear why a threshold of 250sqm net has been set across the board for Manchester, this is significantly lower than the threshold in PPS4. There does not appear to be any justification for this in the Core Strategy or the evidence base. As PPS12 requires the Core Strategy to be based on a robust and credible evidence base and as no specific evidence that justifies a lower local threshold has been put forward we consider that a 2.500sqm threshold should be retained in line with PPS4. 2.16 Second, the policy does not clearly set out the application of the sequential approach required by PPS4 for example no reference is made to edge-of-centre sites. We do not consider that the policy is consistent with national policy in this regard. 2.17 Third, in addition to local centres there are numerous parades of shops across Manchester which may not be large enough to warrant a designation as a local centre but play an important role in providing day-to-day shopping for local residents. Policy C9 should be amended to allow for the provision of additional neighbourhood stores within or adjacent to existing parades or shops. Alternatively a separate policy should be provided. 2.18 Policy S2.1 of the adopted Manchester UDP recognised the role of good quality local and convenient shopping facilities and a similar policy should be incorporated into the 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.

For all 3 reps: In summary, we consider that changes are required to the above policies in order to: · Recognise the differing roles of Harpurhey and Cheetham Hill and the differing requirements for retail provisions. · Identify the full extent of the retail requirement for Harpurhey. · Replace the 250sqm threshold for retail impact assessments. · Recognise the need for new shops to meet local needs.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	145
Response Date	24/03/11 15:16
Consultation Point	Policy C 10 Leisure and the Evening Economy (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.

Policy should be proactive not reactive i.e. do not wait for high concentrations of licensed premises and take-aways to occur but instead avoid them in the first place. Consider use of moratoria in vulnerable Centres.

Comment by	Mr Peter Thompson
Comment ID	159
Response Date	23/03/11 12:57
Consultation Point	11 Objective 5 Transport (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.

2.1 Transport, Objective 5, (pages 154-160). Although I accept that this section has to be somewhat general and discursive, the detail all being done by GMITA, I am very concerned by the complete absence of any reference to the need for a rail station at Baguley, on the Chester – Altrincham – Stockport – Manchester line. This would give a useful percentage of the 70,000 “bus trapped” Wythenshawe residents a good east-west public transport link with onward access to the numerous stations on other lines from Stockport. A local residents’ group has been pressing for this station for over a year.

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	143
Response Date	24/03/11 15:14
Consultation Point	11 Objective 5 Transport (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: (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 paragraph 11.3 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 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.

An additional bullet point should be added to the wording of paragraph 11.3 on the following lines:
“ensure that good accessibility for freight transport and the necessary sustainable logistics support is provided”

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

Comment ID

50

Response Date	23/03/11 23:25
Consultation Point	11 Objective 5 Transport (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:

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.

11.4 should recognise that there are serious barriers for disabled people in the use of public transport, including the use of buses, coaches, taxis, Metrolink and local rail, identified through consultations, complaints to providers and research, including mystery shopping activities commissioned by the city council. There are also limitations in the door to door services provided for disabled people in relation to reliability, timing and range of journeys. LTP3 for Manchester identifies a need to make transport accessible for disabled people and it is proposed that this commitment is included in 11.10. The importance of an accessible transport infrastructure and services is also vital in supporting the role of Manchester as a destination for visitors and residents and for businesses, education, culture, events and tourism. It is also important that Manchester compares well or better than other UK cities. Currently it has more access barriers than other cities, particularly in relation to access to Metrolink for mobility

scooter users, for scooter and wheelchair users on buses and in relation to real time information for buses, coaches and Metrolink trams and in the limited provision of drop-off areas near to bus and coach stations and rail stations. Information is inconsistent at rail stations and there are serious access barriers for some disabled people at some city centre and local rail stations.

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 to 11.2: 11.2 The existence of an efficient, comprehensive and sustainable transport system, accessible to disabled people, is an essential element in supporting the city and in particular the Regional Centre as the key economic driver for the north of England. Amendments to 11.10 to ensure the identification and commitment to improve accessibility through partnership work: 11.10 The Council will continue to work with the Highways Agency and the Greater Manchester Passenger Transport Executive (GMPTA) to identify and prioritise the required highway and public transport infrastructure provision and any necessary mitigation measures to support the sustainable and accessible delivery of the Strategic Locations. 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? 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 and examples of transport provision that exclude or disadvantage disabled people.

Comment by	Highways Agency (Lindsay Alder)
Comment ID	18
Response Date	21/03/11 16:34
Consultation Point	11 Objective 5 Transport (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 also welcomes the reference to the agreed “concordat” between the Agency, AGMA and other parties, in the Chapter 11, Objective 5 Transport and is particularly supportive of the reference to the requirement for the impacts of planned schemes, such as the expansion of the airport, on the operation of the SRN.

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	115
Response Date	24/03/11 13:51
Consultation Point	Policy T 1 Sustainable Transport (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

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 Policy T1 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 policy ineffective in addressing 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.

Policy T1 should be revised with by means of two amendments as follows: 1) The first sentence of the policy should be amended to read: The Council will seek to deliver a sustainable, high quality and integrated transport system. To encourage modal shift away from the private car and to public transport, cycling and walking, to provide for the needs of businesses for good quality freight access, and to prepare for carbon free modes of transport, the council will support proposals that :-“ 2) An additional bullet point should be added on the following lines: • Safeguard and promote the improvement of the road, rail and water freight transport network and associated intermodal freight transport facilities in order to assist in the sustainable and efficient movement of 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:

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	Homes and Communities Agency (Ms Deborah McLaughlin)
Comment ID	170
Response Date	24/03/11 15:13
Consultation Point	Policy T 1 Sustainable 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

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.

HCA supports the encouragement of a modal shift away from car based transport and policies which promote sustainable transport and the introduction of green travel plans within Objective 5.

Comment by	Manchester Disabled People's Access Group (Ms Felicity (Flick) Harris)
Comment ID	51
Response Date	23/03/11 23:40
Consultation Point	Policy T 1 Sustainable Transport (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.

We support the commitment in T1 to improve access for disabled people and to improve and develop the Trans Pennine Trail, which is currently accessible for disabled people and families as well as cyclists.

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 Goodman (Mr Robin Moxon)

Comment ID 237

Response Date 24/03/11 15:44

Consultation Point	Policy T 2 Accessible areas of opportunity and need (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: . (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 T2 states that outside of Manchester city centre, all new development should provide appropriate car parking facilities, taking account of the guidance in appendix B, which reflects policy in the Regional Strategy (RS). Applying this guidance to Manchester Business Park, a 'business park' located outside of the City Centre or District Centre, would impose a maximum of 1 car parking space per 35 sq m of floorspace. Appendix B of the Core Strategy proceeds to state that: 'standards for car parking are maximums and may be subject to a further reduction when consideration is given to accessibility of the particular site'. Goodman disagrees with the principle of the proposed policy because it needs to be more flexible and growth orientated. Manchester Business Park has grown and prospered largely because of the 'out of town' ability to accommodate hi-tech, financial and pharmaceutical businesses, which demand large floor plate buildings with an appropriate level of car parking provision and set within a campus environment. Major inward investors select business park locations as they are able

to satisfy pre-let/pre-sale development requirements within short time periods, whilst also avoiding the constraints of city centre locations. Policy T2 should not fetter the future growth of this form of development, especially in difficult economic times. Parking restraint in this way has the potential to create a two-tier market and stifle new development. Manchester Business Park has an extant planning permission which allows for 1 car parking space per 20 sq m of floorspace, which is a material planning consideration and must be maintained to present Manchester Business Park as a viable alternative to the City Centre. Using standard travel to work and employment density assumptions, applying a maximum standard of 1 space per 35 sq m of floorspace to Manchester Business Park, would only permit approximately 44% of trips to be made by private car drivers. This would require an extremely challenging shift from current travel patterns and one that our transport consultants are not aware has ever been achieved at any comparable sites. From Goodman's experience of managing business parks throughout the UK, this restraint could lead to issues such as off-site car parking in neighbouring areas and to companies selecting alternative locations. It is of critical importance that Policy T2, in setting out the purpose behind the standards, makes clear that the development must be commercially viable and must reflect the availability of alternatives to single car occupancy. Policy EC18 of PPS4 (Application of car parking standards for non-residential development) states that: 'local parking standards should apply to individual planning applications unless the applicant has demonstrated (where appropriate through a transport assessment) that a higher level of parking provision is needed and shown the measures proposed to be taken (for instance in the design, location and operation of the scheme) to minimise the need for parking'. This PPS4 policy does include the ability for car parking standards to be applied flexibly so as to be able to respond to material considerations. Goodman is suggesting that whilst parking standards apply, they should be applied flexibly, with each development being considered on a case by case basis. To allow Manchester Business Park and the wider area included in the Airport City Strategic Employment Location to play a crucial role in the achievement of Core Strategy economic development objectives and continue to attract inward investment into the future, a flexible approach to on-site car parking provision must be recognised in Policy. This is in line with an approach of 'development management' (as opposed to 'development control') where the emphasis is on positive outcomes of the process, rather than solely focusing on exact requirements for planning applications.

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 T2 (third main bullet point) are set out below: 'Within the City Centre, provides a level of car parking which reflects the highly accessible nature of the location, as well as the realistic requirements of the users of the development. Elsewhere, all new development should provide appropriate car parking facilities, taking account of the guidance in appendix B, which reflects policy in the Regional Strategy (RS). In all parts of the City proposals should have regard to the need for disabled and cycle parking, in line with appendix B. If the RS is revoked the Council will continue to use these standards when applying this policy. Standards are set for two different area types: • District Centres • Areas not within the City Centre or District Centres DELETE (These car parking standards are maximums.) The Council expects the circumstances of each proposal to be taken into account to establish what level of parking is appropriate'. The necessary changes to Paragraph 11.16 are set out below: '11.16 The Council recognise that parking is an essential facility for many developments, but will ensure that the level of parking complements its commitment to sustainable transport, through reducing emissions and congestion. ADD (Car parking) DELETE (The) standards ADD (are set out) in appendix B DELETE (are maximums, and) , ADD (however), the Council will consider whether there are any circumstances, related either to the site or the operation of the development, which warrant DELETE (a lower) ADD (an alternative) level of parking. This assessment should consider issues including the accessibility of the location and the potential for nearby uses to share facilities. The guidance on parking standards does not apply to the City Centre. This is the most accessible location in Greater Manchester, but it is also one which accommodates a complex variety of development. Whilst the appropriate level of parking is always likely to be lower than in other parts of the City, the range of circumstances across City Centre sites means that each case may be different

and standards specific to the City Centre are not appropriate. The necessary changes to Section 15 Appendix B Parking Standards (first paragraph) are set out below: 'All development must provide the appropriate parking standards as highlighted below. Standards for disabled people, cycle and motorcycle parking are minimums. Standards for car parking are ADD (set out in Table 15.1, however, the Council will consider whether there are any circumstances which warrant an alternative level of parking) DELETE (maximums and may be subject to a further reduction when consideration is given to accessibility of the particular site'.) These changes will ensure the policy delivers appropriate flexibility, 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	Trafford MBC (Mr Dennis Smith)
Comment ID	184
Response Date	24/03/11 16:53
Consultation Point	Policy T 2 Accessible areas of opportunity and need (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.

Support is given to the priority given to providing all residents access to strategic employment sites including links between North Manchester residents and key employment locations, including the City Centre, Central Park, Salford Quays and Chadderton Industrial Estate and Trafford Park. This complements the approach taken in the Trafford Core Strategy.

Comment by	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	117
Response Date	24/03/11 13:58
Consultation Point	Policy T 3 Strategic Integration (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: (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 Policy T1 is incomplete in its scope because it makes no mention of the proposal which is included in the Greater Manchester 2011 Local Transport Plan (Draft Long Term Strategy) for the extension of Metrolink (or a suitable and credible alternative public transport connection) through Trafford Park to the Trafford Centre and, potentially, across the Manchester Ship Canal into Salford. Although this extension does not as yet have the necessary funding identified the LTP does indicate that the Greater Manchester Authorities will seek to develop such a connection by 2020; i.e. within the plan period of the Core Strategy. Accordingly this omission renders the Core Strategy ineffective in dealing with all of the key elements of an enhanced public transport strategy for the City and the City Region.

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 T3 should be revised by means of the insertion of additional wording at the end of the first bullet point along the following lines: • South Manchester and the Airport, and through Trafford Park and potentially across the Manchester Ship Canal to connect with the existing Eccles line. An additional item should also be included in the Delivery Strategy Table in respect of the TraffordPark extension.

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 include a reference to this long standing proposal which is identified in the LTP for Greater Manchester.

Comment by	Trafford MBC (Mr Dennis Smith)
Comment ID	185
Response Date	24/03/11 16:55
Consultation Point	Policy T 3 Strategic Integration (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 support the alignment of the Metrolink routes, in particular the Council welcomes the single route shown to the airport.

Comment by	Homes and Communities Agency (Ms Deborah McLaughlin)
Comment ID	172
Response Date	24/03/11 15:22
Consultation Point	Place Making and Sustainable Design (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.

HCA encourages policies which include appropriate renewable energy targets and we welcome positive steps within LDDs to achieve local sustainability targets.

Comment by	Blackley Mere Developments Ltd ()
Comment ID	81
Response Date	24/03/11 18:31
Consultation Point	Policy EN 1 Design Principles and Strategic Character Areas (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:

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.

Objection: The policy should add that developers should seek to maximize the re-use of previously developed land within both Northern and Irk Valley Character Areas to reflect PPS1 and PPS3 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.

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	Homes and Communities Agency (Ms Deborah McLaughlin)
Comment ID	171
Response Date	24/03/11 15:15
Consultation Point	Policy EN 1 Design Principles and Strategic Character Areas (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.

HCA supports the emphasis on high quality design and the creation of a well designed sustainable environment. The use of Design and Access Statements is a useful step in the planning process.

Comment by	Natural England (Janet Baguley)
Comment ID	31
Response Date	23/03/11 13:38
Consultation Point	Policy EN 1 Design Principles and Strategic Character Areas (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 welcome the development of this policy since the Proposed Option consultation, and we are pleased to see that the policy now refers explicitly to the need for development to have regard to local character in line with the 11 strategic character areas. It is assumed that these were identified through the city's Character Study, referred to as forthcoming in the Proposed Option version of the Core Strategy but it would be useful to clarify this within the supporting text to the 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? NO, I do not wish to participate at the oral examination

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	190
Response Date	23/03/11 17:51
Consultation Point	Policy EN 1 Design Principles and Strategic Character Areas (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 the University of Manchester 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 EN1 – that states that new development in The Corridor needs to reflect the significant scale and form expected from major institutions and that opportunities will exist for more innovative and contemporary built forms, having regard to historic context. The University also supports the policy's reference to a requirement for balance between built form and open space which allows for easy movement through and across the Corridor.

Comment by	mr martyn coy
Comment ID	57
Response Date	24/03/11 11:45
Consultation Point	Policy EN 1 Design Principles and Strategic Character Areas (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.

6. Central Arc Character Area Support the aim to use the canals to create a distinctive urban environment and enhance access through the city. A significant proportion of the waterways network lies within one or more of the Government's intervention areas for regeneration, housing renewal, and growth. There is a strong correlation between underperforming waterways and these key intervention areas and the most deprived districts. 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.

Comment by	Ballymore Group (Mr Daniel Osborne)
Comment ID	206
Response Date	24/03/11 12:03
Consultation Point	Policy EN 2 Tall Buildings (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 EN2 is supported by BG.

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	197
Response Date	23/03/11 11:09
Consultation Point	Policy EN 2 Tall Buildings (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 made on behalf of Manchester University Specifically, and relevant to its operational and land interests the University supports the following: Identification that sites within and immediately adjacent to the City Centre are, in principle, suitable locations for tall buildings (Policy EN2);

Comment by	Longden & Cook (Mr Peter Townley)
Comment ID	16
Response Date	25/02/11 12:25
Consultation Point	Policy EN 3 Heritage (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.

MCC summary of representation:- Longdon & Cook on behalf of the Manchester Diocesan Board of Finance is concerned to ensure that there is sufficient provision within the Core Strategy to allow proposals to be considered to ensure the long term survival of church buildings which have been forced to close. Sufficient flexibility in the Core Strategy is required to allow for appropriate alternative uses

of these buildings to ensure that listed buildings are not lost, as happened to the former church building on Upper Brook Street.

Comment by	Withington Civic Society (Mr James Bromfield)
Comment ID	147
Response Date	24/03/11 15:22
Consultation Point	Policy EN 3 Heritage (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.

Invaluable, irreplaceable historic buildings outside Conservation Areas are being lost. An effective policy is needed to reverse this disappointing trend. Consider a proactive approach to 'listing' involving community groups.

Comment by	GVA Grimley (Mr Stephen Bell)
Comment ID	198
Response Date	23/03/11 11:11
Consultation Point	Policy EN 5 Strategic Areas for low and zero carbon decentralised energy infrastructure (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 made on behalf of the University of Manchester Specifically, and relevant to its operational and land interests the University supports the following: Recognition of the opportunity for The Corridor to have a major role in achieving an increase in the level of decentralised, low and zero carbon energy supply (Policy EN5);

Comment by	GL Hearn on behalf of KPMG LLP (Mrs Emma Jones)
Comment ID	157
Response Date	23/03/11 12:28
Consultation Point	Policy EN 5 Strategic Areas for low and zero carbon decentralised energy infrastructure (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
- . (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.

Paragraph 33 of PPS1 Supplement states that policies relating to local requirements for decentralised energy supply to new development or for sustainable buildings should demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by PPS3, and does not inhibit the provision of affordable housing. No such evidence has been put forward to justify that the policy is deliverable or flexible. Policy EN5 has been formulated to assist the Council achieving a local carbon reduction target which is significantly over and above the national target and this raises concern that the requirements of Policy EN5 will be overly onerous and inhibit housing proposals from coming forward. It is considered that, as the policy is not justified by appropriate evidence to demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development, it is unsound as it is inconsistent with national policy in PPS1 Supplement, not justified by a robust and credible evidence base and not effective as it is not flexible and may not 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.

The Council should demonstrate that the requirements of Policy EN5 are not overly onerous and do not inhibit housing proposals from coming forward.

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	82
Response Date	24/03/11 18:37
Consultation Point	Policy EN 6 Target Framework for CO2 reductions from low or zero carbon energy supplies (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

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.

Paragraph 33 of PPS1 Supplement states that policies relating to local requirements for decentralised energy supply to new development or for sustainable buildings should demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by PPS3, and does not inhibit the provision of affordable housing. No such evidence has been put forward to justify that the policy is deliverable or flexible. Policy EN6 has been formulated to assist the Council achieving a local carbon reduction target which is significantly over and above the national target and this raises concern that the requirements of Policy EN6 will be overly onerous and inhibit housing proposals from coming forward. It is considered that, as the policy is not justified by appropriate evidence to demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development, it is unsound as it is inconsistent with national policy in PPS1 Supplement, not justified by a robust and credible evidence base and not effective as it is not flexible and may not 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.

The Council should demonstrate that the requirements of Policy EN6 are not overly onerous and do not inhibit housing proposals from coming forward.

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	Peel Holdings (Management) Limited (Mr David Thompson)
Comment ID	120
Response Date	24/03/11 14:07
Consultation Point	Policy EN 6 Target Framework for CO2 reductions from low or zero carbon energy supplies (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
- . (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.

Peel considers that Policy is unsound and in need of major revision. In Peel's view the policy as worded is too detailed complicated and onerous and is incapable of implementation as a result. Peel's concerns in particular relate to: • the proposed imposition of CO2 reduction targets over and above those which apply nationally, for which no proper justification has been made out; • the policy is overcomplicated and will require developers to incur significant costs and delay in the preparation of scheme proposals and planning application submissions and will, as a result, act as a deterrent to development in the City; • the proposed basis on which projects are defined as being within a specific Target Area is unsound and would not provide a proper basis for the proper assessment of the realistic potential for development project to achieve connectivity to renewable energy facilities. It should be noted that, at a recent session of the Examination Hearing into the Trafford Core Strategy, the Planning Inspector has advised Trafford Council that she would have to find the equivalent policy (Policy L5) in the Trafford CS unsound because it is not effective, is unclear and of questionable justification. The Inspector has invited the Council to rewrite both the policy text and its justification. Given that the wording of Policy EN4 is very similar to parts of Trafford's Policy L5 it is considered that Manchester's policy is also in need of major revision.

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 EN4, its justification and the Explanatory Notes at Appendix A all need to be subjected to a fundamental review and substantial revision to make the policy much more simple to understand and apply. In addition whilst Peel does not question that the Council should aspire to work with partners to achieve the highest levels of carbon reduction in new developments where the circumstances favour this, the policy should be revised such that targets which are higher than those which apply nationally should not be a requirement of all development proposals as currently worded.

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 be 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 be involved in the discussion of this draft policy and to set out its very significant concerns both with regard to the wording and the justification of the policy .

Comment by	mr martyn coy
Comment ID	58
Response Date	24/03/11 11:46

Consultation Point	Policy EN 7 Energy Infrastructure opportunities (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 use of commercial waterways for biofuel delivery where possible.

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 Friends of the Earth (Dr Ali Abbas)
-------------------	--

Comment ID	230
Response Date	24/03/11 11:35
Consultation Point	Policy EN 7 Energy Infrastructure opportunities (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.

In policy EN 7, any proposals for provision of a biomass/biofuels facility must undergo a rigorous sustainability assessment and should only be considered if there is a negative net greenhouse gas balance when production and transportation of the fuel (including land use changes) are taken into account, if fuel production does not divert land from food production, if there is no negative impact on local air quality, and if the plant does not encourage unsustainable resource use by diverting waste from recycling, re-use or composting.

Comment by	mr martyn coy
Comment ID	59
Response Date	24/03/11 11:46
Consultation Point	Policy EN 8 Adaptation to Climate Change (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. Waterways are supporting climate change, carbon reduction and environmental sustainability initiatives by: - assisting in the mitigation of flood risk; - playing a role in urban cooling; - providing sustainable transport; - supporting biodiversity and forming ecological corridors; and - contributing to regional and local renewable energy targets through onshore hydro-electric power and the use of canal and dock water for heating and cooling buildings.

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 Sport England (Mr Paul Daly)

Comment ID 225

Response Date	24/03/11 14:08
Consultation Point	Green Infrastructure and Environmental Protection (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.

Paragraph 12.60 states that the open space, sport and recreation study sets local standards for quality, quantity and accessibility for all types of open space, sport and recreation provision. However, table 12.7 which follows this statement does not include standards for indoor sports / built facilities for sport. On examination, it transpires that the open space, sport and recreation study only includes a quality standard for indoor sports facilities. Although I recognise that the study does consider quantity, quality and accessibility for a range of indoor sports facilities the statement in paragraph 12.60 is factually incorrect as there are no local standards for quantity and accessibility. Whilst I do not consider the content of paragraph 12.60 such that it would render the core strategy unsound, I would recommend

changing the wording to: "The study set local standards for all types of open space, sport and recreation 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