

GONW Response to Trafford Core Strategy Interim Consultation on Core Policies L2, L4, L5, W1 and R5

The only comment we wish to make concerns Policy W1. It is unclear how the policy accords with PPS6 as regards the location of new office development.

Firstly, it is said that B1 uses will be focussed in the Regional Centre (Pomona and Wharfside) and the Town Centres. Whilst RS Policy MCR2 says that the Regional Centre of the Manchester City Region should continue to develop as the primary driver providing the main focus for business, retail, leisure, culture and tourism development in the City Region, this needs to be read in the context provided by PPS6 which identifies offices as a town centre use. The Core Strategy office proposals will need to be consistent with national planning policy in terms of the need for the development (PPS6 paragraph 2.39) and the sequential approach (PPS6 paragraph 2.44). Consistency with national policy is a key test of soundness.

Secondly, it is not clear the extent to which office development would take place in other locations outside the Regional Centre listed in W1.3, for example at Trafford Centre rectangle. Again, it will need to be clear how the proposals are consistent with PPS6.

Another issue concerning Policy W1 is that of delivery in relation to the proposed strategic locations. It is assumed that this information is being set out elsewhere in the Core Strategy. There needs to be sufficient evidence to show in principle that the proposals for strategic locations are capable of being delivered. It would need to be demonstrated that the infrastructure could in all probability be provided and that there are probable and timely solutions to any concerns. More detailed delivery information would need to be set out in a subsequent DPD dealing with the allocation of sites.

Councillor Sir Richard Leese, Chair; Phil Robinson, Chief Executive;
Tel: 01942 737917; Email: debra.holroyd@4nw.org.uk

Strategic Planning and Developments
Trafford Council
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Our Reference: DP 46

Your Reference: CS/Core Policies

21st December 2009

Dear Mr Smith,

Consultation –Trafford MBC – Core Policies.

Thank you for consulting 4NW on the above document. The following represent officer level comments on the Options document.

As you will be aware, the Regional Spatial Strategy for the North West of England¹ was published on 30 September 2008. The plan replaces the previous RSS (formerly RPG13).

In addition to the published RSS, consideration should be given to the current Partial Review. The draft submission document contains two new policies (L6 and L7) proposed for inclusion in the RSS that deal with the accommodation needs for Gypsy & Traveller, and Travelling Showpeople communities, and a revision to an existing RSS policy (Policy RT2) covering specific matters on Regional Car Parking Standards².

You will no doubt be aware of the recent Royal Assent for the Local Democracy, Economic Development and Construction Act³ which sets out the Government's plans for each region to develop a Regional Strategy. It is intended that the Regional Strategy will in time replace the RSS and the Regional Economic Strategy (RES). The legislation identifies that the Secretary of State will in due course direct which parts of the current published RSS and RES in each region will be deemed to form the Regional Strategy. An important point to note is that the Regional Strategy will be part of the development plan.

¹ North West of England Plan, Regional Spatial Strategy to 2021
http://www.nwrpb.org.uk/documents/?page_id=4&category_id=275

² <http://www.northwestplanpartialreview.org.uk/> (website for submission version of the draft Partial Review). See also the Examination in Public website managed by the Panel Secretary at http://www.planning-inspectorate.gov.uk/pins/rss/north_west_gypsy_and_traveller/index.html

³ http://www.opsi.gov.uk/acts/acts2009/pdf/ukpga_20090020_en.pdf (See Part 5 of the Act)

The regional agencies are already developing the Regional Strategy for the Northwest

To keep updated on Regional Strategy progress please visit the website <http://www.nwregionalstrategy.com/> and register to receive the regular email newsletters.

Comments - Economy

Interms of policy W1 we note this now includes a figure for new employment land and a breakdown of where it will be located (table W1) rather than saying 'that enough will be provided to meet the RSS', we welcome this improvement to the policy.

Table W1 states that 190 ha of new employment land will be developed to 2025/26 and sets out the locations where this will be. We recognise that Trafford's ELR identifies a need for up to 170 ha in the same period which is based on historic take up rates and the use of the Greater Manchester Forecasting Model (GMFM). The ELR also states that there is a supply of 190 ha, which is enough to meet the 170 ha requirement. Whilst we note that the policy allocation is higher than that set out in the ELR, it takes into account the site by site findings of the ELR and is not therefore considered to be out of context.

In summary, given that the policy has been informed by the ELR and related position statement, it is in line with the requirements of RSS policy W3. As per paragraph 6.12 of the RSS, the provision of sub-regional figures will require Local Authorities to work together and in AGMA commissioning the GM position statement (including response to RSS policy W3), this approach is in line with our requirements (assuming that all GM authorities are content with the findings of the final GM position statement of August 2009).

Considering that Carrington has 75 ha of the 190 ha of employment land, further detail on the type of employment development - as has been given for Trafford Park and Broadheath - would be welcomed. It is understood from the strategic location policy in the previous Core Strategy consultation document (August 2008), that the majority of the employment development would be storage and distribution with ancillary business park to support its use, it could be worth stating this in policy W1 / the supporting text.

The inclusion of the statement on B1 uses in the regional centre and town centres is welcomed and in line with RSS Policies W3 & MCR2.

Housing

In terms of Policy L2, we note that the most significant change is the section on affordable housing, which has been significantly expanded in response to our previous comments about the level of detail which was being proposed and was to be delegated to a DPD. RSS Policy L5 requires plans and strategies to set out quotas and thresholds for affordable housing provision along with an indication of the type, size and tenure of affordable housing, and so the proposals in L2 are in line with RSS policy L5.

We note some additional text has been added with regard to older persons accommodation, we welcome this in line with RSS Policy L4.

Transport

In terms of Policy L4, paragraph 3.3 reflects the three accessibility categories defined in the Draft North West Plan Partial Review. We note the parking standards are largely the same and so the policy is inline with RSS RT2.

In our previous response to policy W1, we had concerns with Carrington and Partington in terms of their sustainability due to the limited highway access, this is still the case and it is particularly relevant for Partington, where new housing is the focus of proposals. Both of these sites border the Manchester Ship Canal, and a disused rail line visible on the map has been mooted in the past as a link into Carrington, in light of this (for your information) the DaSTS Study 3: Access to the Port of Liverpool is now looking at increasing the use of the canal for distribution from the Port of Liverpool rather than road, this may increase the opportunity for industrial / distribution uses for Trafford Park (in general) and perhaps for the proposals at Carrington; if the highway access issues we have mentioned above can be resolved.

Environment

Policy L5 – Climate Change is strong but could maximize the role of green infrastructure in mitigating and adapting to climate change. It would be useful if the policy promoted the positive functionality of Gi for example integrating sustainable design such as SUDs. RSS policies DP9 and EM5 emphasise the importance of this approach, we made similar comments in our earlier response at the preferred option stage.

I hope this is of assistance. If you require anything more then please contact me.

Yours faithfully,

Debra Holroyd
Regional Planning Officer

Trafford Council

Core Strategy: Further Consultation on Core Policies L2, L4, L5, W1 and R5, November 2009

Response by APSL (a joint venture between Muse Developments and Royal London Asset Management)

Policy W1

This Policy purports to show how the Council will meet the need, identified in the RSS and in the Greater Manchester Employment Land Position Statement (August 2009), for some 170 hectares of land for employment in the period to 2021. Factually this appears to be incorrect in that Table W1 shows only 128 hectares as available for development in the period to 2021; the balance of 62 hectares is available after 2021 so cannot count towards the requirement for 170 hectares.

However the most important objection to the policy is its failure to address the objectives which it is designed to achieve. In para 5.1 the objective is set down as: "for Trafford to remain competitive and *contribute to the growth of the economy of the sub-region*". Para 5.3 of the Justification for the policy elaborates on the objective for the City Region and on the central role of Trafford in delivering the objective for the City Region (*our emphasis in italics*):

"Trafford is a fundamentally important part of the City Region economy and a location where the development of significant clusters of economic activity in key economic growth sectors, supported by appropriate infrastructure, will be essential for the Borough to diversify and grow its employment base to properly contribute to the city region, maintaining and improving its competitiveness and developing into one of Europe's premier city regions."

The key words in the objective and the justification, which we have highlighted, carry some important connotations:

- Trafford has a fundamental role to play in the City Region
- That role is to contribute to the growth of the sub-regional economy
- Trafford's role is essential not optional
- The City Region has high ambitions: *"one of Europe's premier city regions"*.

Growth of the city regional economy and becoming one of Europe's premier city regions necessarily means the generation of economic activity that is net additional (at the level of the City Region) to what would have taken place without Trafford's contribution. This in turn means attracting to the City Region business investment which might not otherwise have come to the City Region or retaining business investment that might otherwise have left the City Region.

Whilst the Consultation document sets these objectives and it acknowledges the need for a "range of sites for a variety of employment uses" (W1.1), it fails to relate the sites identified to particular sectors of activity or types of investment. Para W1.3 indicates that "the detail of the employment uses within these places is shown in Table W1". Table W1 makes no reference at all to employment use types. Similarly para 5.6 (Justification) states: "The range of activities to be prioritised and encouraged in each of the Strategic Locations is summarised below". No such summary is provided. Reference is also made (in para 5.6) to the Strategic Locations section of the Plan, but, in relation to Pomona, Wharfside and Altrincham town centre

(the three locations/sites identified for office uses) the Plan merely indicates a possible floor area of B1 use. There is therefore no evidence of how the sites identified will meet a variety of employment uses other than in very broad use classes.

The present consultation (para 5.5) dismisses Davenport Green as an employment site on the ground that the Council has a sufficient supply of suitable and developable employment sites to meet the requirement for 170 hectares. However this finding is not justified; assessment of the candidate sites (for example at Appendix D of the Employment Land Study) has not evaluated sites in terms of their scale, quality and location, to meet different sectors of demand in the market. The sites identified in Policy W1 appear to be justified purely on supply side grounds (they are available and the Council wants to see them developed) without any interrogation of the potential supply from the perspective of the market. Demand is only considered by reference (para 5.4) to a list of growth sectors; the requirements of these sectors or of different types of firm within these sectors are not considered. This is the very unsure foundation on which the Council reaches its "sufficient supply" conclusion and on which it dismisses Davenport Green.

Specifically in relation to Altrincham town centre there are considerable discrepancies between the allocations shown in different documents:

1. the present Consultation shows a total of 10 hectares for employment use
2. the Trafford Employment Land Study (May 2009) shows 2.99 hectares of employment land
3. the Strategic Locations section of the Plan/Core Strategy (29/06/09) shows 10,000 sq.m of office development in the town centre.

Such discrepancies raise serious doubts about the soundness of the evidence base for the Core Strategy. This is important as the land in Altrincham is the only land identified in the south of the Borough/conurbation, where, as we demonstrate below, the demand is concentrated.

Most importantly, in relation to the ambitious objectives for economic development, is the lack of any site that is capable of competing for regionally, nationally or internationally mobile investment, the class of investment that would be capable of delivering net additional employment and economic activity i.e. contributing to the growth of the City Region. This omission is confirmed by the fact that the Council has not identified any of the sites in Policy W1 as Locations for Regionally Significant Economic Development (RSS Policy W2). This may quite properly reflect the fact that the three sites/locations identified for office development are all mixed use sites, which are unlikely to create the quality of environment and profile sought by mobile investment projects.

This same requirement (to accommodate mobile business investment) was identified at the time that the Council identified Davenport Green as "a strategic high amenity employment site on 36.4 Ha (90 acres) of land within a 135.6 Ha (335 acre) estate..." (Proposal E14 of the Unitary Development Plan, May 1996; revised and adopted with identical proposals for Davenport Green in April 2004). In recognition of the ability of the site to attract an appropriate quality of investment and in order to protect it for such purposes, the allocation was limited "to companies of national or international importance whose occupation of the scheme would give rise to substantial new employment activities which would otherwise be lost to Greater Manchester".

As recently as September 2007 the Secretary of State directed, **in response to a Trafford BC request**, that Policy E14 Major High Amenity Site – Davenport Green

(amongst others) be "saved" beyond the statutory transitional period of three years, pending production of the Core Strategy. The UDP remains the Development Plan until the Core Strategy is adopted.

Manchester's failure to become one of Europe's premier city regions has been recognised in the recent Manchester Independent Economic Review. We reviewed that evidence and that of NESTA ("Manchester Modern, Manchester's Journey to Innovation and Growth", September 2009) in the "Submission on Behalf of APSL" to the Council's "Further Information Required for Strategic Locations & Sites", dated 3rd December 2009. Key points from these reports are:

1. Manchester "must compare itself with successful second cities around the world: Melbourne, Barcelona, Lyon, Osaka, Shanghai. By that measure Manchester still has a long way to go."
2. The central goal of the Northern Way and other regional economic strategies to reduce the disparity between GVA in the sub-region and the UK is clearly not being achieved.
3. The role of the Airport in driving up productivity and in giving the city region vital international connectivity is stressed in the MIER
4. The Report (MIER) in Recommendation 4 (page 28) "recommend(s) that planning policy should be reviewed to acknowledge the reality of economic demand and permit more expansion of suitable business premises in those parts of the city region where demand is strongest. Broadly this demand seems to be stronger in the south, although such locations are found elsewhere in the city region."

The message is very clear: Trafford Council were correct in their decision to allocate Davenport Green in 1996 and the need for a nationally competitive site in the south of the City Region is stronger than ever, in spite of the successful regeneration that has taken place in parts of the City Region. Altrincham town centre is the only location in the south of the City Region in which the Council is proposing a strategic site for mixed use including offices/B1; it is not a serious competitor for nationally mobile investment.

The Council makes some acknowledgement of the role of industrial, commercial, warehousing and storage development in association with Manchester Airport, but only in the Justification (para 5.8). It states that the appropriateness of proposals will be determined in relation to the provisions of RSS Policy RT5. This latter policy opens with recognition of the economic driver role of the Airport: "Plans and strategies should support the economic activity generated and sustained by the Region's airports, in particular, the importance of Manchester Airport as a key economic driver for the North of England..." It refers to the need for Manchester Airport to prepare a Master Plan, which has already been done and which shows an arc of development to the north of the Airport including Davenport Green as a development site.

RT5 goes on to suggest that airport plans and strategies should examine the scope for relocating and/or developing activities off-site, a definition that would embrace Davenport Green and which has been followed in the Airport's Master Plan.

We suggest that this part of the Justification (para 5.8) be made part of the Policy W1 itself as it is a new line of policy and not a justification for what is in the Policy.

Other Concerns

We have a number of other concerns about Policy W1:

1. Pomona Island was not considered in the site assessments which supported the Employment Land Study (Appendix D), however it is considered in Policy W1 as a focus for employment uses, with 8,000 sq m of office space proposed (p.89 of the Core Strategy Further Consultation). We are therefore concerned that the site has not been subject to an appropriately rigorous assessment.
2. Para W1.3 in relation to Trafford Park refers to the need to improve the public transport infrastructure to link the location with surrounding residential and commercial areas. This has been a concern for at least 25 years and it has not been addressed satisfactorily in spite of the area having been the subject of a very successful Urban Development Corporation investment and development programme. This demonstrates again the inconsistent treatment of sites in that, in para 23.10 of the Core Strategy Further Consultation Final Report, Davenport Green is dismissed (amongst other factors) because "It is in an inaccessible location with limited public transport access"; there is no recognition of the public transport measures that would be delivered through a s.106 agreement by the developer and which have been agreed with the Council.

Harrison, David

From: Denise Oliver [D.Oliver@envirolinknorthwest.co.uk]
Sent: 18 December 2009 09:56
To: Strategic Planning
Subject: Trafford Core Strategy interim consultation - Representation

Dear Sir / Madam

18/Dec/09

Please find below a representation on the Trafford Core Strategy interim consultation on behalf of Envirolink Northwest. Please could you confirm receipt by return email:

Envirolink Northwest is a not-for-profit organisation funded by the Northwest Regional Development Agency; our role is to support and develop the energy and environmental technologies and services sector within the region. Part of this role is to support the development and implementation of renewable energy technologies across the region, not only to support existing environmental technology businesses, but also to increase the amount of indigenous renewable energy generation. This contributes to both furthering the economic development of the North West and reducing our regional carbon dioxide emissions.

Policy L5: Climate Change

We support the inclusion of Core Policy L5 and commend the Council's commitment to ensuring new development reduces its carbon footprint through sustainable construction and utilising low/zero carbon infrastructure which will ensure a more holistic approach to carbon abatement.

However, the 'on-the-ground' actions required to conform with the carbon emissions reduction target framework contained in the policy will require further clarity; therefore we would encourage the council to begin work on the accompanying Sustainability SPD as soon as possible to ensure that it can quickly become operational once the Core Strategy is adopted. This will ensure developers fully understand the measures required to adhere to the carbon reduction targets and equip the case officer with the sufficient assessment information to implement the policy, therefore avoiding any unnecessary delays when future planning applications are submitted.

Other Comments

Whilst policy L5 fully addresses the requirement to integrate renewable energy generating equipment into new development, it does not address how stand-alone commercial renewable energy applications will be handled.

It is recommended that the Core Strategy includes a local criteria based policy which supports stand alone renewable energy installations in the Borough, where they contribute towards meeting and exceeding the minimum renewable energy targets set out in the RSS, and where there are no significant unacceptable effects which cannot be mitigated or are not outweighed by the national and regional need for renewable energy development or the wider environmental, social and economic benefits that the scheme may bring.

The emerging evidence base should also be used to determine the local criteria against which the council will assess commercial renewable energy proposals; this would provide clarity to developers and ensure that significant impacts are addressed.

Thank-you for the opportunity to comment on the emerging Core Strategy; we appreciate the Council's consideration of Envirolink views and would be happy to discuss our comments further should the Council wish to do so.

18/12/2009

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Planning & Building Control Services
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M33 7ZF

Our ref: SO/2006/000285/OR-
03/IS1-L01
Your ref:
Date: 23 December 2009

Dear Sir/Madam

**TRAFFORD CORE STRATEGY
INTERIM CONSULTATION ON CORE POLICIES L2, L4, L5, W1 AND R5**

Thank you for referring the above consultation to the Environment Agency.

Overall we have no objections to the policies as suggested, however we would like to make the following additional comments to those made previously.

With regards to Policy L5 and the issue of flood risk, we support the approach taken and this policy may be further informed once the Strategic Flood Risk Assessment has been (SFRA) finalized.

This is particularly important with regards to the identification of critical drainage areas within the borough where there may be more stringent requirements for flood risk assessments and reduction of surface water run off to greater standards than PPS25 requires.

We note that the policy makes reference to guidance for developers on surface water as part of a sustainability SPD. We would seek that any requirements from the SFRA are outlined within this.

I trust you will find these comments useful, should you wish to discuss anything in further detail please do not hesitate to get in touch.

Yours faithfully

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Planning Liaison Officer

Direct dial 01925 543363

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Direct e-mail helen.telfer@environment-agency.gov.uk

End

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e-letter



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Our ref: P2110/4.1.4/09/001

Your ref:

Contact: Rosie Ollé
 Senior Land Use Planner

Direct line: 0161 244 1280

Email: rosemary.olle@gmpte.gov.uk

Date: 17 December 2009

Dear Sir / Madam,

Core Strategy: Further Consultation on Core Policies L2, L4, L5, W1 and R5

Thank you for sending a copy of the above consultation to GMPTE. We would like you to consider our comments regarding the 'Parking Extract of Policy L4 – sustainable transport and accessibility'.

GMPTE supports the principle of using maximum parking standards to encourage a modal shift to more sustainable modes of transport.

We note that paragraph 3.3 defines three types of accessibility categories and that the parking standards are related to these three types. Trafford MBC's SPD1 includes an accessibility plan in Appendix 4 which also shows three different types of accessibility in the Borough. We have already suggested that these are used to guide the location of new development and that all housing, employment and key facilities such as health and education, should be located in areas well served by public transport. The three types of accessibility defined in SPD1 are different to those being proposed in paragraph 3.3. and therefore, for clarification purposes, we consider that there should be some cross-referencing and clarification of these different definitions to enable a clearer understanding of 'accessibility categories'.

If you require any further information please contact Rosie Ollé on the above extension / email.

Yours sincerely

Adam Goulcher
 Interim Transport Strategy Director

Harrison, David

From: Suzanne Waymont [suzanne.waymont@tameside.gov.uk]
Sent: 17 December 2009 10:33
To: Strategic Planning
Subject: Trafford Core Strategy: Interim Consultation on Core Policies L2, L4, L5, W1 and R5

Dear Sir/madam

Thank you for your consultation on the revisions to the above policies in Trafford's Core Strategy.

With regard to policy L5, unfortunately the amended policy has not addressed the issues raised in our letter of the 5th August. We would remind you of one of the key principles of PPS1 that "local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change – through policies which... take climate change impacts into account in the location and design of development". This includes maintaining links between sites and providing space for species and habitats to adapt to climate change.

Yours sincerely

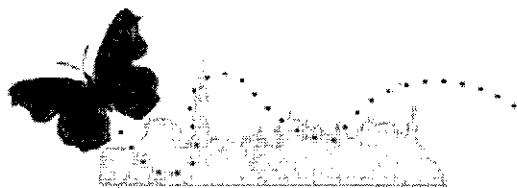
Suzanne Waymont

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1173

Harrison, David

From: Barry King [Barry.King@gmltp.co.uk]
Sent: 16 December 2009 15:34
To: Strategic Planning
Cc: Roy Newton
Subject: Consultation on Core Strategy Policies L2, L4, L5, W1 and R5.

I have reviewed the above new and revised policies and GMJTT's only comments are in respect of Policy L4 (Sustainable Transport). It is noted that the parking standards that you intend to adopt follow very closely those that have been submitted as part of the partial review of RSS as are the three accessibility area types. AGMA in their response to the partial review were concerned about the application of these area types to a conurbation like Greater Manchester. Also that the suggested questionnaire was also inappropriate and that the application of both could have unintended consequences.

Rather surprisingly the EIP panel (which sits in March 2010) despite the lack of any substantive objection to the policy have decided to examine issues surrounding Regional Parking Standards including:

- Whether inclusion of standards for residential development is appropriate.
- Whether it is appropriate to extend regional parking standards to a wider range of uses.
- The division of areas into accessibility categories (A, B and C).
- Clarifying the use of the accessibility questionnaire.
- Whether standards for the disabled, cycles, motor cycles and coaches are appropriate.

I also understand that the Panel feels that there may be errors in the proposed Table 8.1 and have asked 4NW to produce a paper to deal with this and the issues identified above.

It is likely that the final form of the RSS may be different to the current draft. In the light of this it may be appropriate for you to add a "health warning" to the supporting text to Policy L4 as you are most likely to be publishing your Core Strategy before the approval of the partial review of RSS.

I trust that you find the above comments useful.

Barry King
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Telephone 0161-244-1166

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