

**REPRESENTATIONS:**

**TBC DOCUMENT CD.12.4 ("LIVING CHANGES DOCUMENT")**

**TBC DOCUMENTS CD.12.104.1 AND CD.12.104.2 – SUSTAINABILITY APPRAISAL  
ADDENDUM REPORT AND APPENDICES**

**7 OCTOBER 2011**

**ROYAL LONDON ASSET MANAGEMENT**

**Summary**

- 1 RLAM supports each of the proposed changes (S300.120, S300.121, S300.119 and S300.118) and the SA report at CD.12.104.1/104.2 subject to two minor, yet important, amendments for clarity. RLAM commends the Council's approach in responding to changes to national planning policy and to representations made.
- 2 These representations in respect of suggested changes S300.120, S300.121, S300.119, S300.118 and in respect of CD.12.104.1/104.2 are conditional upon the Core Strategy containing the wording for W1 and R4 as set out in these suggested changes, together with the two minor changes proposed in these representations. In the event that W1 and R4, the proposals map or key diagram, are proposed in any other form/wording then RLAM relies upon its earlier representations on the Core Strategy.

**Suggested change S300.120 – W1 – Economy**

- 3 RLAM supports the proposed wording of Policy W1 and its Justification, subject to one change of wording, as follows. We suggest one change of wording to assist in clarity: Policy paragraph 1.12 delete the word "*listed*" in line 3 and replace with the word "*identified*" to make it clear and beyond any doubt that the exception for W1.3 developments includes Davenport Green.
- 4 It has been suggested by CPRE (oral evidence to Hearings 29/9/11) that development for employment at Davenport Green is contrary to the Regional Spatial Strategy and the spatial development priorities in the RSS. However, in the context of the very different

economic conditions now prevailing (recognised in the Ministerial Written Statement and the Budget Statement, March 2011), there is new evidence that requires those priorities to be reconsidered:

- (a) The Manchester Independent Economic Review (April 2009, The Review, Recommendation 4) and its recommendation that land for economic development should be made available where the demand is, namely in the south of the conurbation.
- (b) The finding of the Greater Manchester Large Employment Sites Study that there is a strategic gap in the supply of land for employment in the south of the conurbation (CD 12.75, page 9 and Letter from Sir H Bernstein, CE of Manchester City Council accompanying 8/2011 Consultation by KPMG on EZ boundaries, first paragraph).
- (c) The fact that the south of the conurbation was chosen in March 2011 as the best location in Greater Manchester in which to locate the EZ for the city region, an EZ that is expressly designed to deliver net additional economic activity and jobs to the city region, and to be complementary to other development opportunities in the conurbation.

**Suggested change S300.121 – R4 Green Belt, countryside and other protected open land**

5 RLAM supports the proposed wording of Policy R4 and its Justification.

**Suggested change S300.119 – Key Diagram**

6 RLAM supports the suggested change to the Key Diagram, the denoting of Davenport Green by a pink square, which appropriately reflects policies W1 and R4 in respect of Davenport Green.

**Suggested change S300.118 – Proposals Map**

7 RLAM supports the proposals map which reflects revised policies W1 and R4 (S300.120 and S300.121) subject to one change, as follows. The plan is difficult to read by using pale green to denote Davenport Green. It is hard to distinguish from the Green Belt. Similarly, it should not be left white or a colour hardly distinguishable from white, so that it is clearly distinguished from the adjoining land which has no specific policy designation. We ask that pink is used to distinguish clearly the land from the Green Belt. Use of the same colour as the Key Diagram will be consistent and help to avoid confusion.

**Suggested change CD.12.104.1 and CD.12.104.2 – Sustainability Appraisal Addendum Report and Appendices**

- 8 RLAM welcomes the Addendum Report as an appropriate addition to the SA in providing a summary of the process and additional commentary. Because there is no new assessment work, there is no need to comment in detail. We regard it as helpful that the report records that the appraisal of amended policies W1, R4 and proposal at Davenport Green achieve very positive results against the majority of sustainability objectives. The SA results therefore support, and are consistent with, the policy wording now proposed, including provision for Davenport Green within W1 and R4, and the Addendum Report makes this clear.

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