

From: [Name removed under the Data Protection Act]
Sent: 07 April 2006 13:11
To: [Name removed under the Data Protection Act]
Subject: Comment on RSS

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As requested please find below my initial comments upon Draft RSS. and I have tried to cover purely a few issues, however, I am assuming that it is not envisaged that the combined government response would not preclude us from making additional representations particularly on detailed issues.

We have engaged one of our call-off consultants to carry out some broad brush analysis of the potential impact associated with (W2) the Broad Locations for Regionally Significant Economic Development and also the Distribution of Regional Housing Provision. There are a number of concerns that the potential sites do not necessarily comply with Policy DP1. I will keep you informed on progress on this and how we may wish articulate any concerns.

It is stated in Key Issues and Challenges that "a high quality, modern, well integrated efficient transport system is essential to support the competitiveness of the North West.....". The "integrated efficient transport" theme recurs throughout the document, and is covered within the RSS objectives RTS policies. The last sentence of para 10.2 highlights the need for transport providers to work together, however, the document does not clearly outline how this integration can be delivered. Mechanisms do exist at a local level but a Region/ City Region level this is not as apparent. This is of concern for the HA given that its network crosses numerous boundaries. The ultimate would be that the transport networks and be operated and developed lock in step with the regions aspirations for growth, it is not clear on how this can be achieved.

Policy DP1 the Regional Development Principles is a fundamental to shaping of emerging detail from Regional, Sub-Regional Policy Framework and then LDFs. DP1 needs to be more robust to safeguard our position in dealing with LDFs. Also given the need for general conformity to RSS more precision within DP1 would make this test easier.

DP1 makes reference to the reduction of transport emissions in relation to greenhouse gases but not does not draw out the issue of air quality, (which has climbed higher up the agenda).

It is good to see that there is greater emphasis on demand management on the highway network, as opposed to providing increased capacity (RT2). Air quality is reference as a potential pre-condition but the issue is not developed. RT6 also includes reference to demand management, alternative modes and strategic park & ride as part of an integrated package to reduce reliance on the private car. The use of demand needs to be developed so that it is not viewed in isolation and can be fully integrated solution working with a series of

complementary measures involving other bodies and organisations, to deliver area wide solutions.

Policies relating to Airport and Port expansion (RT3 & 4) have been modified to limit opportunities for development beyond existing boundaries. There is still a need to understand from the emerging Airport Master Plans the surface access demands. There should be a stronger link between the Airport Master Plans and the RTS so that increases in airport activity go lock in step with improvements to surface access arrangements.

The policies of RSS would appear now to be better linked (than earlier drafts) to those of the Regional Transport Strategy. For example Policy W1 makes specific reference to the policies and priorities of RTS as part of the selection process for regionally significant employment sites, as a result the submitted draft accords more favourably with the aspirations of the HA's new approach to the planning system:

- Reduces the need or potential demand for travel, particularly by motor car
- Minimises the need or potential demand for travel by car to and from development sites
- Mitigates the potential demand for travel by car to and from development sites through the implementation of a travel plan
- Manages the traffic impact on the trunk road network through the implementation of technical control to control the flow and movement of vehicles to and from the development site; and,
- The provision of additional highway capacity (through the construction of new road space) will only be supported in exceptional circumstances.

If you have any questions or concerns please can, I will provide copy of our more detailed response next week.

Regards,

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