

GREATER MANCHESTER RESPONSE TO RS2010 DRAFT PART 1 CONSULTATION

This is Greater Manchester's (GM) response to the RS2010 Draft Part 1 consultation. It focuses on those issues that are of importance to GM and ensuring that the RS2010 accurately reflects the role of the Manchester City Region within the North West, particularly in the light of the recent Statutory City Region (SCR) designation.

This response has been prepared following extensive consultation with GM partners and stakeholders to ensure that it represents an accurate GM position. The response begins by first setting out some general observations on the Regional Strategy (RS), which are followed by more specific comments on each of the sections.

GM will be seeking to address some of the issues raised in this response through some of the structures established in the Statutory City Region process, such as the Joint Commissioning Board and the Senior Officials Group meetings.

1. GENERAL COMMENTS ON THE DRAFT REGIONAL STRATEGY PART 1

- 1.1 The draft RS contains much that GM agrees with and supports. We agree that the outcome of RS2010 needs to be long term, sustainable economic growth and this is also the overarching vision for the GMS. Delivering productivity growth and increasing the competitiveness of the region are key to achieving this and these are priorities that the government has said that regional strategies must address. The MIER findings also support this and raising productivity and competitiveness are also central to the GMS.
- 1.2 Indeed many of the issues identified in the RS are also key to the Greater Manchester Strategy (GMS). The transition to a low carbon economy is a particularly important issue that both documents recognise as being one of the biggest global challenges over the next 20 years. GM therefore agrees that responding to climate change should set the overall context for the RS.
- 1.3 GM also agrees with the need to prioritise issues, especially given that we are entering into a period where less public expenditure will be available. It is crucial that we look to invest where sustained transformation can be achieved. However, although it is stated that it 'cannot be a Strategy about everything' (pg 4), it appears to be an 'equal measures' document, attempting to give something to everyone.
- 1.4 The region needs to be braced for the oncoming public sector cuts and the RS needs to clearly acknowledge the likelihood that everyone will be operating in a much tighter spending climate, and what that means for RS and the region more broadly. Value for money will be essential. It is crucial that the RS recognises that there will be need for significant public sector reform and that the public sector will need to think more carefully about prioritising investment in this new era. Such decisions need to be evidence-based and start from the point of what produces the greatest return. The tighter financial climate will also increase need for even greater partnership working.
- 1.5 The consultation document asks some fundamental questions about how much development should there be, where should it go; what are the roles of different places, which are not then addressed by the strategy. The answers to these

questions are critical to the development of the strategy and it is difficult to see how any strategy could be developed in the absence of a view on scale, location of development. This prioritisation of issues is clearly something that will need to be addressed as part 2 of the strategy / implementation plan are developed. However it is a concern that the high level strategy sets a framework which gives rise to unintended outcomes when the detail of Part 2 is unknown. This makes responding to the document in any meaningful way difficult at this stage. The Sustainability Appraisal states that 'There is little indication in Part 1 of the scale of any activity which is likely to take place..... quantification of impacts has been impossible' (pg 66). This is a serious weakness of the document.

- 1.6 As a regional strategy, with a clear focus on building sustainable economic growth, RS2010 should fully emphasise the importance of boosting productivity, particularly in labour market terms. This is critical to reducing the GVA gap between the North West and the Southeast – which has consistently widened – as well as boosting the efficiency of its labour market, and enhancing the benefits. We would have expected a clearer expression on the draft Strategy of a more integrated approach to planning and investments in housing and public transport and connections to people, goods and services to the jobs and markets that actually exist and where there is the most potential for more growth.
- 1.7 A key issue for GM is how we ensure that GMS is embedded within the RS and what exactly that means. The GM section (one of 5) does not fully recognise the existence of the “Greater Manchester Strategy”. We question the approach of putting what we think are central regional aims in a small spatial section. There is no evidence that the GMS Priorities have been taken into account more broadly in the way the Strategy has been formulated. Where there is overlap, such as in moving towards a low carbon economy, it is not evident that this has derived from GMS. Yet, GMS and the robust evidence base behind it, was explicitly agreed both with central government and with the NWDA itself, as it was agreed that GMS would be taken forward as part of the RS. The clear direction of government policy means that RS should demonstrate much clearer linkages and consistency with the objectives of Manchester, given its Statutory City Region status. The Strategy for example, does not embrace the analysis that deprivation is the product of a ‘lack of independence’ and the role of public services to support the well-being of people and to improve their own life chances. This is the basis of the groundbreaking SCR agreement between GM and Government. Fundamentally, the Strategy fails to acknowledge the difference and national significance of our SCR status which is a major omission and weakness. We would have expected an analysis of how RS can be used to support the delivery of GMS.
- 1.8 To address this, much work still needs to be done to agree the mechanisms / structures that should be put in place to ensure the ongoing alignment of the two documents. The draft RS states that “it has been agreed as part of the Manchester Statutory City Region (SCR) process that GMS should be embedded in RS2010”. Thus GM will be seeking to ensure that RS2010 supports its objectives for growth and regeneration. This will include devolving responsibility for funding decisions to the most appropriate spatial level (given our SCR and ESB status).
- 1.9 The Strategy as currently drafted is too ‘inward looking’ and does not consider properly the linkages between the north west region and other regions in the UK. The MIER for example provided evidence that the relationship between Manchester

and Leeds city regions was the most significant in terms of boosting sustainable economic growth, however this does not appear in the document until the last page, and appears an afterthought. The Strategy needs to be more outwardly focused and to consider how places within the region interact with places both within and outside of the north west.

- 1.10 The Strategy fails to sufficiently recognise the significance of the Regional centre as a major and unique asset for the region as a whole, and as a critical building block of any future strategy. Apart from being the biggest existing concentration of employment in the region it also contains many of the assets on which future success depends – for example Media City which is of national importance, Sport City which has an acknowledged international role and function and The Corridor which is an exceptional opportunity. The strategy also needs to recognise the lead role Manchester has in particular sectors and markets and the fact that Manchester is an internationally recognised brand.
- 1.11 MIER also set out Manchester’s potential as a significant engine of national growth. Hence, a central aim of RS2010 should be to help the North West’s primary asset realise its ambitions through the GMS. This could be done in a way that has wholly positive effects on other parts of the North West.
- 1.12 The Summary of Places and Sub-regional Forecasting Work (attached as an annex to the consultation document) also confirms the importance of GM to the region. It states: “GM contains almost 40% of North West GVA and is the central driver of the North West economy. In labour markets terms, 38% of the region’s jobs are in Greater Manchester.....” GM feels that the pivotal role it plays and the contribution it makes to the wider regional economy must be better reflected within the RS.
- 1.13 It is important that RS2010 places the region in the best position to contribute to the UK’s future economic growth as we emerge from recession, in the interests of the nation as a whole, but also for the people of the North West. That economic growth has to be a means to an end, bringing social and environmental benefits to the region, and enabling the region’s many advantages and opportunities to be maximised. In that context, GM has the key role to play in the region, complementing and assisting the contributions of other sub-regions. GM considers that the option of working with the grain of the market on concentrating economic growth on the Manchester city-region to drive economic growth in the North should be considered. The agglomeration potential of GM as outlined in the MIER clearly makes it a critical component of increasing the NW’s GVA.
- 1.14 GM agrees that the strategy cannot be about everything that happens in the NW. The RS should seek to provide an investment framework that adds value and must focus on where it makes sense to address issues at a regional level based on what the evidence says. Similarly, agreement is required as to those things, which are best taken forward at a sub regional level. Sub regional priorities do not generally have statutory footing, and so where this may be the case it must be clearly assigned. Local plans also do not necessarily fit with RS and there needs to be broader agreement about how we link activity at different spatial levels. For example, RS may include aspirations that can’t be implemented in the districts’ core strategies until they are revised in three years time. There is also a need to ensure more synergy between national, regional and sub-regional policy. The RS cannot only work from the top (i.e. Regional level) down. Given that the GMS and core

strategies are already in place, RS should have far more regard to these existing strategies. There is a need to work together better at different spatial levels and in a coordinated way to ensure that the plans and strategies complement one another and lead to synergy rather than conflict

- 1.15 The 'Atlantic Gateway' concept is identified as a key spatial issue which RS2010 needs to address but it is unclear what is meant by this in practice. It is premature to include Atlantic Gateway as a key spatial concept influencing statutory strategy as though this is a given when there are clearly several outstanding issues regarding its purpose and content. The 'Atlantic Gateway' should be identified as one of the key spatial outstanding questions on which views are sought rather than presented as fact – until the detail of what it actually means is clearly understood and accepted. AGMA has submitted a separate response to the Atlantic Gateway consultation but we would reaffirm here that we are concerned that this proposal is being developed separately to the RS2010 consultation process. The RS2010 consultation process should be the means whereby the Atlantic Gateway concept is fully tested.
- 1.16 There seems to be an overemphasis on a sectoral approach to the economy, which the MIER did not recommend, and too little on putting in place the conditions to support economic growth particularly in terms of improved transport infrastructure and increasing the number of highly skilled and talented workers. In addition the document appears to allocate each sub region with a particular priority sector however, in reality, a number of them are important to the Manchester City Region as well as the other sub regions.
- 1.17 The RS needs to actively seek to build on, and to mainstream, good practice delivered through local schemes such as NDCs, ERDF/ESF or WNF-funded activity.
- 1.18 The RS does not engage with other neighbouring plans and organisations in the North, like Yorkshire Forward. More broadly it must make greater reference to the other key regional and national strategies that compliment or are integral to its delivery.
- 1.19 The RS is also weak on guidance for and engagement with the private sector. It needs to address the issue of securing and harnessing private sector resources in order to increase prosperity and promote sustainable development.

2. SECTION A (CONTEXT)

- 2.1 Given the timescale of the strategy, the Vision (pg 13) should be firmer than the existing 'well on the way to' phrasing. It should be to have 'made a transition to' a low carbon economy rather than 'well on the way to...'
- 2.2 On the list of outcomes (pg 14), there is no mention of inward investment so perhaps in the section on "making the region attractive to the private sector" the first line could be expanded to read 'increase levels of enterprise, trade **and investment**'. If that was included then an indicator to measure this might be the number of inward investment projects.
- 2.3 On the list of indicators (pg 15), when referring to Levels of skill the word 'NVQ' should be taken out. Therefore where it speaks of using indicators for NVQ Level 2 and NVQ Level 4 performance, it should just read Level 2 and Level 4. GM also

believes that Level 3 performance should also be included as an indicator. Also under this list indicators and the 'patents applied or granted' it may be useful to look at the number of 'design right' certificates issued too.

3. SECTION B (THE STRATEGY)

- 3.1 Overall, GM feels there could be more linkage between these strands. The cross cutting nature / interrelationships between the strands also needs to be better reflected. For example, with the second strand on international competitive advantage and regional distinctiveness international connectivity needs to link to the digital connectivity agenda to meet the low carbon objectives. Similarly, with the final strand on housing and infrastructure:
- Point b (digital connectivity) has obvious implications for the first low carbon strand
 - Point c (infrastructure) should highlight external as well as internal connectivity
 - Points d and e (infrastructure) - it's not clear what the difference between these 2 points is. Nor is it clear whether digital infrastructure is being included as critical infrastructure or not (it should be).

4. SECTION C (SPATIAL IMPLICATIONS)

- 4.1 The 'sub regional' section treats sub regions as one homogeneous mass. It just replicates the submissions of districts and states that the RS needs to 'ensure that key sub-regional priorities' are reflected. Whilst sub regional strategies are clearly important, the RS should not simply 'reflect' what is in them but should make a judgement as to which of the sub regional priorities are of regional significance. There is no overview of the different role and function of each sub region and the contribution each makes to the success of the North West. There is also no discussion on "sense of place" and this section does not identify any linkages between the sub regions. The importance of the Manchester city region is also underplayed as outlined previously.
- 4.2 The RS also needs what is meant by 'functioning economic unit' - Manchester's influence extends well beyond the city region.

5. SECTION D (STRATEGIC OPTIONS)

- 5.1 Government has clearly acknowledged the MCR as an engine of national recovery and growth. Yet, there is no evidence that this has been recognised in the identification and evaluation of the strategic options. This is a fundamental flaw and it is crucial that the role MCR has to national recovery and future growth is explicitly identified.
- 5.2 It is also difficult to distinguish between the 'options' and many elements that are emphasised in one option could be easily incorporated into the others . The options are attempting to be all things to all people, and do not sufficiently consider the role of different places within the region or the links to other regions. This consideration is essential to ensuring that RS2010 provides a meaningful framework to inform strategic decision making and prioritisation. For example, developing a low carbon economy is an important regional priority that will have different applications in different parts of the sub-region. Equally, the GM approach to skills may be very

different to that taken by Lancashire. The Sustainability Appraisal (pg 66) states 'it is not clear to what extent the options will influence the content of the Part 1 Strategy' and, 'It is also not clear for some issues to what extent they will or will not be addressed by each of the options, as not every option discusses the same set of issues'. It is highly questionable what purpose this section serves or how it will help to develop the strategy. The SA concludes that 'It is recommended that in revising Part 1 further work is undertaken on developing and testing realistic and reasonable alternatives' as the current approach to options does not fulfil the requirements of the SEA Directive. Clarification is required as to when and if this is likely to happen. This also raises the question of timescale for the production of Part 1 and Part 2 in July as clearly there should a consultation process on the options prior to the production of Part 1 and 2 for formal consultation in July.

- 5.3 Tensions between the strategic options also need to be resolved. The opportunity cost of doing one thing rather than another is not mentioned. For example, the tension between the low carbon agenda and economic growth is difficult to resolve and not developed in the paper (also between developing high-skilled versus low-skilled and place versus people).
- 5.4 GM believes that the city regions should be the fundamental building blocks for any RS as this is where more future growth will occur and where the greatest opportunities to link economic potential with need also take place. We support spatial options that focus development in areas that are highly accessible by public transport, since this offers the greatest potential to encourage a shift away from car use and to reduce CO₂ emissions. It also enables the best use to be made of existing infrastructure. Options 1, 3 and 4 have the potential to achieve this.
- 5.5 Spatial options involving development in areas that are not highly accessible by public transport may need to be supported by significant investment in infrastructure and services in order to meet objectives in terms of reducing congestion and carbon emissions. This investment is unlikely to be available from existing funding sources in the foreseeable future. Since the transport implications of Option 2 have not been identified at this stage, it is not possible to assess whether it would be deliverable without additional funding sources.
- 5.6 Option 1 is the current policy approach in RSS which prioritises the regional centres and inner areas of the two city regions. We support the continued focus on the two city regions.
- 5.7 Option 2 would appear to be the 'Atlantic Gateway' option, as it "would focus investment and development principally in and between the Liverpool and Manchester city regions (including Warrington and the northern parts of east and west Cheshire)" (pg 55). This could be read as effectively leading to a coalescence of the two city regions rather than simply improving links between them and coordinating activity within them. This could redirect investment away from the Manchester City region and towards Warrington and North Cheshire, with Warrington potentially becoming a much larger node of activity that begins to compete with the Regional Centre. Furthermore, RS2010 needs to acknowledge the wider role which Manchester plays in the north of England and in particular the links with the Leeds City Region, as identified in recent Northern Way research.

- 5.8 This option has a lower provision of housing (70%) in the priority area; highlights the need for selective greenfield' development although no indication is given as to where this would be; further work is needed to determine this. This option highlights that there are 'substantial reserves of brownfield land suitable for development in the areas between Liverpool and Manchester whilst 'closer to the regional centre, brownfield land should be used for green infrastructure to mitigate climate change' Option 2 demonstrates a clear shift away from development in the core of the conurbation as there is a strong focus on greening of land close to the Regional Centre and development of 'brownfield land ' between the two city regions as well as the need for some greenfield development.

6.0 DETAILED COMMENTS ON THE FOUR STRANDS

6.1 Strand 1: Capitalise on the opportunities of moving to a low carbon economy and address climate change

- This strand needs to be embedded in the RS as a whole and must underpin the activities to be detailed in the strategy
- This section does not seem to mention or address the role of the city region process and pilots. It should include a specific reference and list as an action, the designation of GM as a Low Carbon Economic Area for the built environment, and reference, in line with its national designation as the focus for the North west' s work in addressing the built environment challenges of a shift to a low carbon economy.
- The emphasis on the NWCCAP is of concern. The ability for sub regions to determine their own targets in line with national policy must be maintained in any regional strategy, as should an emphasis on tailoring measures to sub regional needs.
- Although GM is happy to work with the NW to ensure its plans and expected emissions trajectories are incorporated into a regional target setting process, it does not expect targets to be imposed based on national research.
- Similarly, the importance of sub regional differentiation is acute in relation to climate change, where the challenges faced by each sub region differ due to economy, topography and culture. An indicator that the NW's primary role in this regard should be to work with the sub regions to ensure that their unique needs and challenges can be met should act as a golden thread through this section. Substantial research by Tyndall, national government, the Environment Agency, DEFRA and the NWDA itself has highlighted the importance of planning and executing action at the spatial level of coherent travel to work areas, and distinguishing between the priorities and needs of coastal, inland, urban, rural and other typologies.
- Similar to the issue above, the national pilot to put in place a city regional energy group should be signposted as a key initiative in developing the region's understanding of energy infrastructure challenges, and improving partnership working.

- Similarly, sub regional plans and strategies such as the GMS's low carbon Strategic Priority should be cited alongside other voluntary plans such as the NWCCAP.

6.2 Strand 2: Build on our sources of international competitive advantage and regional distinctiveness

- Pg 21 - Areas for action – this ought to include something explicit about realising the opportunities presented by the business support system to increase the international trading links of firms within the region, as well as something about supporting key emerging sectors/industries with potential, such as low carbon, to become internationally competitive.
- Pg 21 - MediaCityUK is talked about as though it isn't in the Manchester city region but somehow floats across the whole region.
- Pg 22 - Should reference more explicitly support and need for international research collaboration between Manchester Universities and their international counterparts – it mentions links with international companies but not HEI's.
- Pg 22 - Areas for action – Although GM agrees with the penultimate bullet point, an additional point is needed about promoting a "culture of enterprise" or "enterprising behaviour" building on the best of enterprise education within the region's schools and colleges, as well as the National Enterprise Academy located in Manchester and the region's Universities (alternatively something along these lines would work equally well in Areas for action, P.26).
- Pg 22 – Areas for action – the third bullet point mentions accessing global innovation networks – leveraging global alumni and university partnerships as well as opportunities through transnational collaborative R&D projects are important here.
- Pg 23 - International connectivity - Should talk more about intermodal connectivity i.e., desirability of having High-Speed Rail directly connected to Manchester Airport to facilitate better connectivity to NW, London and Europe. This is currently an aspiration for Manchester Airport and a successful model for airports in Europe. GM supports the development of High Speed rail connections to London and Europe, however as the MIER evidence demonstrated, HS rail links to the Leeds City region would offer significant economic benefits to the north and should be at least given equal priority.
- This section does not consider the contribution of tourism & culture to the economy, as a generator of skills, confidence, creating a sense of place. It focuses solely on 'how many people they bring into the region'. The value of the visitor economy also needs to be highlighted more strongly throughout the document, particularly in relation to business tourism, which hardly features at all.

- The emphasis on a sectoral approach and cluster development ignores the opportunity for innovation through cross-sectoral connectivity and knowledge-transfer between business areas. Cluster and supply-chain development within sectors is important, but it is widely recognised that most innovation happens at the edges and interface between sectors. More emphasis is needed on cross-sectoral connectivity and collaboration for knowledge-based economic development. For example - between biomedical and digital technology sectors, and sports and new media etc.
- The sports opportunity for GM and the wider region should not be limited to attracting events and the visitor/tourism value but also the opportunity for indigenous, local economic development through the 'business of sport'. There are important sporting assets within the region's HEIs which should be leveraged and also opportunities for innovative technology developments around Sport City and Mediacity:uk. There is an unrealised business opportunity to capitalise on hosting of high-profile international events, building internationally competitive competencies and market propositions. Development of sports and cultural offers provide important community engagement and regeneration opportunities.
- Strengthening the impact of the region's universities and their interaction with businesses (local, national, and international) through increased knowledge exchange and student engagement is central to knowledge-based economic development. This can include, Knowledge Transfer Partnerships, Innovation Vouchers, collaborative R&D projects, graduate placements and internships, provision of specialist facilities to businesses, spin-out and incubation facilities, IP management, relevant skills and business training etc.
- In order for any type of university-business interaction to be effective, an intelligent brokerage service must be in place to ensure the correct alignment between the absorptive capacity of the business and the offer of support from the university. This means moving away from programme based approaches (such as number of KTP's) to intelligent market solutions for the company's requirements. It is also important to acknowledge the wider impact which can be leveraged through student engagement and alumni networks.
- Internationalisation of businesses - businesses need greater understanding of international market opportunities, capacity building, and support in developing 'international' offer. International networks and support through UKTI, Business Councils and HEIs are under-utilised at present.
- Building international trade links through Manchester Airport: city-city routes, business routes, business travel provision, and support for Airport City development and position of the Airport as a key innovation hub for the city-region.

6.3 Strand 3: Release the potential of our people and tackle poverty

- Pg 25/26 - This section is weak on enterprise. While it rightly states that it is concerned with the potential of people and communities as a major source of competitive advantage, it needs to set out explicitly (with regard to enterprise and people/communities) the regional strengths that the strategy is seeking

to develop and build upon, as well as any emerging groups which, with support, could also contribute to the competitiveness of the region. This then needs to be translated into some action on pg 26 (women and ethnic minorities would perhaps be the big two here).

- Pg 28 – GM considers that the extensive and entrenched deprivation found within the conurbation should be a specific focus within RS2010 and does not agree that they should be one of many areas of ‘focus’. These areas have been recognised at a national level through the designation of HMR Pathfinder status and, in the case of GM, the establishment of two URC’s. Evidence from the MIER shows that whilst much good work has been carried out in these areas, in general, the poorest areas of our conurbations have benefited least from the sustained period of economic growth experienced over the last 10-15 years and that these are the neighbourhoods most vulnerable during a downturn.
- Pg 29 – Although mentioned in the areas of potential action, the supporting text in section d, does not reference the labour market inequality of ethnic minorities and women. Some additional text is needed to justify the action. The size and age profile of ethnic minorities in GM, and consequently their potential impact on the competitiveness of the GM economy and hence the region, can't be overstated - roughly 50% of the NW ethnic minority population lives in GM.
- This strand should be more focused around multi-agency approaches to tackling deprivation, rather than just mentioning physical regeneration and economic growth. This is raised in the 'social exclusion, deprivation, ill health and inequality' section (pg 29) but it shouldn't necessarily be seen as distinct from the ‘regeneration and communities’ section that precedes it.
- Multi-agency approaches will also be most critical in supporting integration of IB claimants into the workforce. The myriad of national, local and third-sector agencies involved in the delivery of programs for this segment of the population need to be better coordinated, with resources directed to where they can have the most impact. Indeed, this reality is reflected in a number of pilots now under way as part of the SCR agreement between government and GM and which are aimed at making the system more accessible and responsive from the perspective of clients.
- Health, well being and social inclusion issues need to be better addressed. The NHS and the broader health contribution to other areas to other areas (e.g. tackling worklessness and improving employability) also needs to be developed.
- The importance of skills and in particular early-years is not prominent enough or focused enough.

6.4 Strand 4: Ensure the right housing and infrastructure

- This section needs to reference the city region pilots, i.e. the establishment of the GM Energy Group, the climate adaptation and resilience network, and the designation of GM as the low carbon economic area for the built environment.

Substantial information has already been shared and jointly agreed regarding these pilots, which need to feature as priority actions, for GM to pilot on the region (and UK's) behalf as agreed with Government.

- GM agrees that improving connectivity is key. Outlying areas need to be connected to the jobs and opportunities at the conurbation core.
- Infrastructure must serve the whole conurbation and not just the core.
- GM welcomes the recognition of the importance of the pathfinder areas in the two city regions, however this reinforces our point above about the deprived communities within the conurbation being a particular focus for the RS.
- It is important that new housing should be well located in relation to existing public transport. If this is not the case, it will be difficult to reduce CO₂ emissions given that transport is a major (and growing) source.
- Pg 31 (first bullet point) - it is important that new housing should be well located in relation to public transport. If this is not the case, it will be difficult to reduce CO₂ emissions given that transport is a major (and growing) source.
- Pg 31 Areas for action - should include ensuring that new, and where practicable, existing housing developments are made resilient to climate change, and that improving the resilience of existing housing stock to climate change should be routinely considered as an issue in area regeneration and new developments in existing housing areas.
- Pg 33 (b. Digital connectivity) 1st bullet – there is no definition of what medium and long-term means - State aid defines short-term in NGA as 3 yrs; BT are looking to rollout 40% coverage by 2012; Digital Britain talk about the final third not being covered by 2017 - this is an area where it should be possible to put real timescales in - it is also apparent that other countries have already made major investments and the UK at present is lagging - it should be an immediate priority for the strategy - an initial focus on the city regions will realise the biggest immediate benefits for the NW and UK.
- Pg 33 (b. Digital connectivity) 2nd bullet - whilst no-one would deny that MediaCityUK will be a critical component of NGA, particularly in Manchester city region it is not clear why this is the one and only immediate opportunity. There is much activity already going on in NGA for example the Corridor project in Manchester.
- Pg 33 (b. Digital connectivity) 3rd bullet - the NGA strategy set out here should ensure that the NW is as good as anywhere else in the UK and up to international standards, but there's nothing in here that is revolutionary and/or will result in the NW leading the UK - on this basis London will be and remain the leading location for NGA.
- More broadly on digital connectivity, the RS needs to be said about the need to connect rural and deprived communities to the internet and to bring them into the digital age. Current plans are too focussed on the centre without enough thought for those in the outlying areas

- In particular for housing, it is essential that GM's designation as a Low Carbon Economic Area and the domestic retrofit component of this work be profiled with some detail in this section, as a direct mechanism for housing stock transformation.
- Pg 34 Areas for action – on housing should contain an additional action to develop a transport framework that 'is resilient to climate change and the needs of a low carbon economy'. This section should reference that part of the city region pilot for GM includes a low carbon transport workstream which seeks to 'Enhance the role of transport infrastructure in enabling sustainable lifestyles, and develop an integrated approach to transport network and demand management across all modes that optimises use of the network, provides users with a full range of affordable low carbon transport options, and reduces their need to travel'.
- Pg 35 Areas for action – on critical infrastructure should contain an additional action understanding and planning for other extreme weather events such as heat waves, high winds and shifting patterns of use. This could either be an expansion of the flooding action area or appear in its own right.
- Pg 36 Areas for action – on green infrastructure needs to be rephrased to include the importance of adapting the type, nature and location of green infrastructure to support the needs of communities in a changing climate, and act as a buffer to extreme weather events. As a minimum, this could be reflected by adding the word 'adapting' into the existing text. - repairing, protecting, **adapting** and managing our landscape and biodiversity etc

7 CONCLUSION

- 7.1 RS2010 is an important document. GM is primarily concerned that the RS2010 accurately reflects the role of the Manchester City Region within the North West, particularly in the light of the recent SCR designation. RS2010 must support the continued growth and success of Manchester as the economic engine for the north of England and the best route to growth and prosperity in the NW.