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STRATEGIC PLANNING AND DEVELOPMENTS			
29 AUG 2008			
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Action by			
Ans			
Copied to			

Trafford MBC  
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C/o Strategic Planning & Developments  
1<sup>st</sup> Floor, Waterside House  
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Greater Manchester  
M33 7ZF

27 August 2008

Dear Sir / Madam,

Please find enclosed Greater Manchester Chamber of Commerce's response to the draft Trafford DPD1: Core Strategy: "Preferred Options", July 2008. The response was developed in consultation with the Chamber's Building & Development Committee and members of Trafford Local Chamber Council.

Greater Manchester Chamber of Commerce welcomes the opportunity to share its views on the emerging Development Plan for Trafford. As the UK's largest Chamber of Commerce with over 5,300 members and a further 11,000 serviced customers, we represent the biggest and best cross section of businesses in Greater Manchester and indeed the North West. We are therefore pleased to provide feedback on this document and would welcome all further opportunities to discuss the document, our comments and future amendments to the strategy in full detail.

Please direct all future communications on this matter for the attention of Richard Critchley, Policy Manager for Planning (0161 237 4037).

Yours Sincerely,

Angie Robinson  
Chief Executive



**Trafford DPD1: Core Strategy: Preferred Options**

On behalf of our membership, Greater Manchester Chamber of Commerce requests that you take into consideration the following observations to the draft Trafford DPD1: Core Strategy: Preferred Options.

**General response to key elements of the Preferred Options**

Trafford has a long history as an important business location, containing one of the largest industrial parks in the county. As such, the Borough has a reputation as a vital source of flexible employment land, a key draw for large investors to the region. The Chamber wishes to see this protected, however, without appropriate supporting data on need and projected demand for employment land, it has not been possible to identify a preferred spatial option from the three suggested within the document. Each could potentially have positive as well as negative implications for business and the future development of the Borough, in particular in relation to industrial/employment land supply.

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It is felt that the three options are overly rigid and show limited variety, which will hamper the economic and regeneration potential of the Borough. The Chamber's following comments do not, therefore, reflect a preference for any of the three options but provide feedback on issues raised by each, as well as our recommendations.

**Employment Land**

A key concern for the Chamber is the protection and enhancement of the business environment within Trafford. The three Spatial Options will each lead to a loss of employment land, potentially limiting availability and future supply.

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The Chamber is concerned is Trafford Council have not provided supporting data for the current supply and demand of employment land and future projected needs and there has been no agreement between the Greater Manchester authorities over the distribution of the employment land allocated for the region within policy W3 of RSS for the North West.

ELR  
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(104)

Furthermore, we are disappointed that the initial findings of the Employment Land Review have not been made available to accompany this Preferred Options document, contrary to what is stated in paragraph 7.49.

PAV  
C  
(105)

Without clear supporting data on employment land needs it is not possible to express a preference for one of the Preferred Options. It is also unclear how the economic Sustainability Objectives were assessed without all available information. The Chamber would therefore welcome the opportunity to comment on the document once the Employment Land Review and employment land requirements have been established for the Borough. Furthermore, we would welcome the inclusion of an "Option" which limited the loss of employment land and one, which promotes greater potential for mixed-use development. Without more information, we cannot be confident that the three proposed options offer the most suitable distribution of development for the long-term economic and sustainable development of the Borough.

SA  
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(106)  
C  
(107)

### Clarity of Preferred Options

We would welcome greater clarity and detail on the diagrams accompanying the three options. Whilst we recognise that the diagrams are intended to provide a general indication of location, a number of issues need clarifying to enable constructive consultation:

- It is unclear what or where the areas highlighted to the east of the M60, near Sale Moor and Timperley are intended to indicate, therefore making it difficult to comment on their inclusion.
- According to the key, the diagrams indicate that Sale Moor, Timperley and Hale are towns. We would welcome clarification on this point as this could have huge implications for potential options or development patterns across the Borough.
- It is unclear whether the area of Significant Development to the North and North East of the borough, as indicated in each Option, is intended to cover the Inner Area in full, or just the area covered by the marking. Again, this could have implications for development in this area.

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(108)  
SA  
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(110)

## Trafford Centre area

The Chamber has concerns over proposals for the area referred to on the Options diagrams as the "Trafford Centre". There are various names used to refer to this area throughout the document, including Trafford centre, Trafford Rectangle, Trafford Quays and it is unclear whether they have the same or differing boundary's, however, for the purpose of this response, the Chamber has made the assumption that all three refer to the same area.

SS 123  
O (111)  
SS E  
O (112)

- **Options:** It is disappointing that no option other than "Moderate Development" is provided for the Trafford Centre site. The document appears to indicate that all options available would result in mainly residential and leisure development within the Trafford Centre Rectangle. It is also unclear the justification for such an allocation other than the sites proximity to the Inner Area.

There is significant scope within this area for major inward investment and job creation schemes on both brownfield and Greenfield sites. The Chamber is concerned that residential development would lead to a loss of potential employment land and impinge upon the areas existing industrial and freight forwarding facilities. Public transport to the area is poor and with Trafford Council actively opposing the Transport Innovation Fund proposals and hence many of the associated public transport improvements for this area, it is therefore unclear how the Council wishes to address this situation. The Chamber would therefore welcome the opportunity to explore alternative scenarios, such as "significant", "limited", "no development" or "protected status" for major inward investors and further options for residential, employment, freight and leisure facilities on this site, other than that provided within the document.

- **Industrial uses:** It is recognised that the needs of business are changing therefore the role and function of Trafford Park has to adapt. The Preferred Options document, however, appears to fail to recognise that a significant area in the north east of the Trafford Centre Rectangle is still largely industrial in nature. Without clarity on the precise location and supporting facilities, suggestions to promote residential development in this area are incompatible with the current industrial uses. The Chamber therefore recommends that the sites boundary is redrawn and industrial areas to the northeast are incorporated into the neighbouring industrial Trafford Park Core strategic site.

SS E  
O (113)

- **Rail freight:** The Trafford Centre area contains a rail freight facility, which does not appear to have been recognised or considered within the Preferred Options document. RSS policy RT8 states that plans and strategies should facilitate the

SS E  
O (114)

transfer of freight from road to rail by identifying intermodal freight facilities and encouraging greater use of existing terminals and private sidings. None of the options would support greater use, expansion or development of this facility. There is already limited spare capacity for rail freight facilities within Trafford Park, which does not appear to have been taken into consideration and which could have further implications for the outcomes of the Sustainability Objectives. The Chamber would urge Trafford Council to provide recognition of this important facility and move the site from the area identified as the Trafford Centre Rectangle to the neighbouring Trafford Park Core strategic site under which the options appear to provide greater protection for this use.

- **School/community facility:** Option 2 identifies a potential community facility on what would now be the Trafford Centre car park. It is unclear as to how any community facility would be compatible with the site's current use and location adjacent to a large industrial estate, freight facility and motorway and furthermore, meet any of the sustainability objectives, in terms of access and social inclusion. Measures to improve access and safety to such a facility could have very negative implications for neighbouring industrial uses and could restrict their development and expansion. The Chamber therefore has serious objections to all reference to such a facility on this site.

SO 2  
C  
(115)

### Woodfield Road Strategic Site

The Chamber has concern that each of the three Options would lead to the complete loss of employment land at Woodfield Road and potentially draw investment away from Altrincham Town Centre, identified for Significant Development. This proposal also conflicts with recent Council decisions to refuse applications for residential development on smaller, neighbouring employment sites due to a potential shortage and significant loss of employment land in this area. Without supporting data on the existing and projected need and availability of employment land within the south of the borough, it is not clear what impact the three options will have on local employment opportunities and business investment.

SO 1  
C  
(116)

SO 2  
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(117)

The Chamber would welcome alternative Options, which would allow for employment led regeneration or mixed use development to rejuvenate this site. This could be used to provide a source of local employment and affordable business units, assisting the Council in meeting its environmental and sustainability objectives far better than if the area was solely marked for residential purposes.

## Trafford Park

Trafford Park is a vital source of employment land and job opportunities for the residents of Trafford and Greater Manchester, making a huge contribution to the regional economy. The Chamber fully supports the fact that each of the three Spatial Options identifies Trafford Park as the focus for economic development within the Borough and that the Trafford Park Core is recognised as a Strategic Site for industry and business. The sites size and history enables a flexible working environment, enabling businesses to respond to changing economic demands.

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- **Wharfside / residential development**

There is a pressing need for much greater clarity over the intentions for the Strategic Site referred to as Wharfside and the impact of these plans on existing operations and uses within Trafford Park. The Chamber recognises that part of Trafford Park now forms the Regional Centre and welcomes the potential to build upon the sites tourist attractions.

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It is, however, of concern that all Options would result in significant housing development in an area where no residential accommodation currently exists, physically disconnected from existing communities. Whilst the Chamber does not object to the potential for residential development in this area, it is concerned that such development and any necessary associated infrastructure and community facilities, could potentially restrict industrial development on neighbouring sites, particularly in the Trafford Park Core. Furthermore, little consideration appears to have been given to the rail freight facilities to the south of the Wharfside site. At a time of increasing demand and need for rail freight, this site is already constrained and the Chamber would be wary of any proposals or developments that could potentially constrain the sites future growth.

The Chamber, therefore, would welcome much greater clarification over the impacts of the three Options on the Wharfside site. We would welcome recognition within the documents text of the sites existing uses, clarification on the need and suitability for residential land in this location, recognition of neighbouring industrial and warehousing functions and, where residential development is suggested, greater emphasis on mixed use development, starter units and workshops to encourage local employment and job creation.

## Chamber option recommendations

The Chamber supports a strategy of concentrating development (residential and employment) within the Regional Centre, Inner Area and Altrincham Town Centre, in line with the RSS, to support their existing functions, maximise regeneration benefits, utilise existing facilities and

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available land. The Old Trafford area, already well located in terms of proximity to major employment centres, would benefit from maximum levels of residential development. The Sustainability Objectives come to a negative conclusion of such proposals, however, the Chamber would suggest and encourage the Council to view the plans in an alternative manner. Considering the areas rapid population loss over the previous decades and the dominance of semi-detached and terraced family housing, high-density residential development could help support many of the existing local facilities, businesses and enterprises and enable more people to make the most of opportunities within the nearby regional centre.

SA  
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(121)

Moderate development should be concentrated at Sale, Stretford and Urmston town centres to support the ongoing regeneration of these areas and maximise business opportunities and support existing local traders. Moderate employment development should also be focused at Carrington to make maximise use of available land and provide the needed job opportunities for the nearby area of Partington. Further moderate levels of mixed-use development should be focused in the regeneration areas of Partington and Sale West. This recognises the poor transport links to these areas and hence the need for local job creation, boosting the sustainability objectives of the Borough. Limited development could be directed to district centres to help support local businesses and facilities.

The Chamber feels that the above recommendations would help protect and revitalise existing employment areas and job creation. In addition, findings from the Trafford Strategic Housing Land Assessment would indicate that there is flexibility to provide housing requirements in the Inner Area, town centres and specific regeneration areas, without compromising sustainability or economic objectives

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ACK 13/8

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5 August 2008

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Dear Dennis

### **Core Strategy Preferred Options**

Thank you for consulting us on the Core Strategy Preferred Options. Our comments are set out below. The Core Strategy would appear to be emerging well as a spatial plan and our comments are designed to assist you in drawing up the Publication/Submission versions of the DPD. We are happy to discuss these issues with you further as well as any others that may have arisen during the consultation. We would also wish to discuss any proposed changes to your LDS in the light of new Regulations and new post submission timetable guidance from PINS.

Yours sincerely

Phil Lally  
Senior Spatial Development Manager



# GONW Comments on Trafford Core Strategy Preferred Options Report

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## Introduction Para 1.5

You have referred here to the Core Strategy providing the vision for Trafford up to 2023. The Publication/Submission version will need to refer to the vision being for a 15 year period from the adoption of the Core Strategy, which is likely to be beyond 2023.

## Introduction Para 1.11

You have referred here to a Pre-Submission consultation stage. It should be noted that at the Publication stage prior to submission it is not expected that any major new issues will be raised as these will have emerged earlier in the plan preparation process. The Publication version should effectively be the Council's proposed final version of the plan. It is recommended, therefore, that Full Council approval is sought for the Publication version of the Core Strategy with delegated authority agreed for minor changes to be made prior to Submission. You may wish to consider whether further consultation is necessary prior to publishing the plan, especially given that three preferred options have been consulted on and the Council has not yet indicated which of these it wishes to select. When a spatial option has been selected, it will be possible to provide greater clarity in terms of the strategy and its implementation. It is at this stage that further, perhaps selective, consultation may be useful so that people are clear about what the strategy will contain and to avoid new issues being raised at the publication stage. It is noted that further consultation is intended on the Local Infrastructure Plan which will be helpful.

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## Vision Paras 3.1 & 3.2

It is proposed to adopt the Sustainable Community Strategy vision as the overall vision for the Core Strategy. This vision needs to be developed further so as to set out a more locally distinctive spatial vision for the Borough. This could be easily achieved by incorporating the vision for the ten distinct places in Trafford, as set out in section 4 of the document, into the overall vision.

## Strategic Objectives Figure 4

It is recommended that the strategic objectives in Figure 4 and the place objectives in section 4 be integrated into a single set of objectives. This would reflect the integration of the visions recommended above and would avoid repetition. The integrated set of objectives could still retain the place references as set out in Section 4.

## Place Objectives

Whilst the approach towards setting place objectives is helpful and is likely to lead to a good spatial plan, some of the objectives could be described as being largely aspirational, rather vague in terms of outcomes and difficult to measure. For example, TPO2 – 'to create the right conditions for significant, mixed business and residential development in line with its role within the City Region'. What does this actually mean and how will it be measured? Other objectives have similar problems. There is a need to revisit the objectives to address these issues. This is important in terms of the Core Strategy being deliverable and able to be monitored.

## Spatial Options

The commentary on the three spatial options on pages 39 to 58 explains the contribution of each option to the place objectives. It appears to omit any reference to the strategic objectives. The

suggestion above for the creation of a single set of objectives would make it easier to explain how the core policies, when they are drafted, relate to the achievement of the objectives.

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It is explained in para 5.4 that the variation between the options is evident in terms of the quantum and phasing of development. Apart from the table on page 75 that sets out the alternative distributions of housing growth, there is little information about the quantum of development or about its phasing. This needs to be addressed in further work leading up to the publication version of the plan and may be an area where further consultation would be helpful. It needs to be clearer how much development is being proposed, where and when.

### 111 Key Strategic Sites

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Is it proposed to allocate the strategic sites on the proposals map? How is it intended to show the Regional Centre and Inner Area boundaries?

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Information about the proposed scale and phasing of the various types of development on the strategic sites would be helpful as part of the picture referred to above concerning the quantum of development and its phasing. In addition, greater clarity of what is being proposed on these strategic sites is needed. At present, it is difficult to establish the extent to which the proposals are compatible with national planning policy. As an example, on site C Lancashire County Cricket Club, what will the implications be for the existing Stretford Town Hall? What scale of retail development is being proposed and to what extent is it compatible with PPS6? What public transport improvements are being proposed? As regards Site E, Trafford Centre Rectangle, is it appropriate for the whole of the 'Rectangle' to be included as a strategic site given that much of it has already been developed? Should it be the Trafford Quays part of the site that is identified as a strategic site given that this is the area that has yet to be developed? This has implications for the way in which this area is described both textually and diagrammatically. In addition, how much commercial, retail and leisure development is being proposed here and how will the public transport infrastructure be enhanced? Does evidence justify the contemplated scale of development and to what extent is it compliant with PPS6?

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Also, there seems to be no sustainability appraisal of the strategic sites. The implication seems to be that all the strategic sites are compatible with all three spatial options but the evidence for this is not set out.

### 116 Core Policies

#### 116 L1 Housing

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It needs to be clarified what the implications of the GM housing growth point bid are for Trafford and how the proposed further housing growth will be handled in the light of the recent conditions set out by CLG. The proposed level of housing growth needs to be confirmed through the statutory planning process and included in the Local Development Framework. The strategic implications need to be considered in the Core Strategy.

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The core policy will need to set out the distribution of proposed housing development incorporating the information currently in the table on page 75. This can be expressed in terms of percentages of the total amount of development. It is recommended that the policy also sets out the overall target for the amount of affordable housing to be provided reflecting the definition of affordable housing in PPS3. It should also reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured. These matters are dealt with in paragraphs 27 to 30 of

PPS3. It is noted that a development management policy is proposed on affordable housing but this needs to be derived from the core policy.

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L2 Regeneration

The policy refers to encouraging healthier lifestyles through improving access to, and the quality and diversity of, culture, sport and leisure facilities. It should also refer in this context to promoting walking and cycling.

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L4 Accessibility

This policy should also refer to the increased role of walking and cycling. The need for a strategic cycling route network does not seem to have been addressed although it is picked up in the Draft Infrastructure Capacity Assessment (paras 7.23 to 7.25). The need for the provision of safe cycle parking similarly seems to be missing and does not seem to be mentioned in the Infrastructure Plan material. These issues could be picked up further in the Development Management policies.

L5 Climate Change

How have flood risk issues informed the preparation of the Core Strategy especially in terms of the selection of areas for future development? What are the initial findings of the Strategic Flood Risk Assessment and what further work is proposed? It should be noted that it is necessary for the Core Strategy to reflect the Council's strategic approach to flood risk so this approach needs to be clearly explained and the Council will need to explain how it has informed the preparation of the Core Strategy. The PPS25 Practice Guide indicates that the LPA should demonstrate through evidence that it has considered a range of options in conjunction with the flood zone information from the SFRA and applied the Sequential Test, and where necessary the Exception Test, in the site allocation process. This can be undertaken directly as part of the SA.

As regards renewable and low carbon energy generation, to what extent do you have an evidence based understanding of the local feasibility and potential for renewable and low-carbon technologies, including microgeneration, to supply new development in the Borough. The PPS1 Climate Change Supplement at paragraph 26 indicates that, drawing on this evidence-base, the LPA should:

- I. set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is viable. The target should avoid prescription on technologies and be flexible in how carbon savings from low energy supplies are to be secured;
- II. where there are particular and demonstrable opportunities for greater use of decentralised or low-carbon energy than the target percentage, bring forward development area or site-specific targets to secure this potential;

and, in bringing forward targets,

- III. set out the type and size of development to which the target will be applied; and
- IV. ensure there is a clear rationale for the target and it is properly tested.

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W1 Work

Reference is made in paragraph 7.39 to zone masterplans that will articulate the development potential and priorities of economic development potential priority areas. It is said that work is already underway on a masterplan for Trafford Park and that it will feed into the next stage of the Core Strategy. It is unclear what planning status these masterplans will have and what is meant by feeding into the "next stage of the Core Strategy".

How is it intended to identify the Priority Employment Zones set out in Policy W1?

### W2 Town Centre and Retail

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V2  
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The proposal to allow out-of-centre development at the Trafford Centre would seem to be at variance with RSS which says that it would not be appropriate to encourage the expansion of its floorspace. The proposal to allow out-of-centre development at Retail Warehouse Parks would also seem to be at variance with RSS. Planning applications for out-of-centre development can be determined on the basis of national and regional policy.

### R5 Health

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R5  
Reference should be made here to the role of increasing the role of walking and cycling in improving health.

### **Development Management Policies**

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It needs to be demonstrated that the Development Management policies contribute to the achievement of the Core Policies.

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DM1  
Policy DM1 on design and construction should address a wider set of matters related to the issues set out in the spatial portrait and in the Core Policies – see PPS1, especially paragraphs 33 to 39. An example is the need to deal with how design can contribute towards the achievement of healthy, safe and crime free communities. It may also be helpful to deal with the design implications of green infrastructure provision in this DM policy.

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The role of walking and cycling should be addressed in Policy DM7 on accessible, integrated and sustainable transport.

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Further selective consultation on Policy DM8 dealing with planning obligations may be useful prior to the Publication of the plan.

### **Implementation**

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Local  
Paragraph 9.1 refers to the need for a delivery strategy to explain how much development is intended to happen, where and by what means it will be delivered. It is said that the Core Strategy will be supported by a Local Infrastructure Plan and the consultation material included a draft Infrastructure Capacity Assessment. Is further information on implementation intended to be set out in the Core Strategy itself regarding the delivery strategy or will this be contained in the proposed Local Infrastructure Plan? PPS12 at paragraph 4.4 indicates that the delivery strategy should show how strategic objectives will be delivered, whether through actions taken by the Council as the planning authority, or through actions taken by other parts of the Council or other bodies. The strategy needs to set out as far as practicable when, where and by whom these actions will take place - see comments below on monitoring. In addition, links to other strategies need to be explained more fully.

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PD  
Your attention is drawn to PPS12 paragraph 4.11 which says that infrastructure planning for the Core Strategy should include the specific infrastructure requirements of any strategic sites which are allocated in it. These issues do not yet seem to have been addressed.

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### Monitoring

It is not clear from section 10 on monitoring whether the Core Strategy will contain sufficient information regarding monitoring. The approach to monitoring in the adopted Lancaster Core Strategy has much to commend it. Each of the policies contains a list of targets, indicators and milestones and information about who the policy will be implemented by and by what means.

STRATEGIC PLANNING AND DEVELOPMENTS

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GMGU

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**Date** 08th September 2008

**Subject: CORE STRATEGY- PREFERRED OPTIONS**

Dear Mr Smith

Thank you for consulting the Greater Manchester Geological Unit on the above document. Having read through the documentation GMGU have the following comments to make:

**Core Policy Direction L7: Waste**

The proposed policy direction seems to be in line with the approach set out within both national and regional planning policy. As a result the policy direction fits well with the current direction of the Greater Manchester Joint Waste DPD, including the identification of suitable broad locations for future waste management developments within Trafford. However there may be a need, as set out within Planning Policy Statement 10 (PPS10) paragraph 16, to refer to the Greater Manchester Municipal Waste Management Strategy as this is a key document which the Core Strategy must be informed by and in turn inform.

P82  
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It is however interesting to note that the two broad areas identified as potentially suitable locations for future waste management developments, Carrington and Trafford Park, are not highlighted within the earlier section 'Strategic Objectives'. Following a recent telephone conversation with a member of the Strategic Planning Team at Trafford, it is suggested that you may also wish to take account of the potential flood risks to sites alongside the Manchester Ship Canal such as those at Carrington and Trafford Park.

P25-27  
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**Core Policy Direction W3: Minerals**

It may be useful to augment the supporting information with a paragraph on the minerals study undertaken by GMGU in 2007. This can provide a background to minerals policies in LDFs, whether this is through a joint approach at the sub-regional level, or at an individual authority level.

P89  
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The second bullet point of the proposed policy should highlight the fact that the approach to minerals planning across Greater Manchester is still being discussed. For example, 'acknowledge the need for Trafford to make its contribution towards enabling Greater Manchester to meet its sub-regional apportionments, potentially via the preparation of a Joint Minerals Development Plan Document or otherwise through individual policies within Trafford LDF, taking account of the need to define



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The University of Manchester

minerals safeguarding areas and/or areas of search and sites for extraction, storage, processing and transfer.

The preparation of a Greater Manchester Joint Minerals Development Plan Document is being discussed by Chief Executives, however, the decision on whether to prepare a joint plan is yet to be made.

I hope the above is of use to you, but should you have any queries then please do not hesitate to contact me by email or by telephone.

Yours Sincerely

Alethea Faulkner  
Planner (Minerals and Waste)

PO/1040/102 to 125

Your ref:

Our ref: /SGA/Let1

Date: 27 August, 2008

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Dear Mr Smith

## CORE STRATEGY PREFERRED OPTIONS & SHLAA CONSULTATION

Thank you for your letters of 14<sup>th</sup> July 2008 and the opportunity to comment. This letter of response follows on from previous submissions as part of the LDF process and relate generally to both documents currently being consulted upon and it will be clear to you which comments apply to which document:

1. The Vision for Trafford – generally support. Of course, proximity to the heart of the Greater Manchester conurbation (obviously a key focus of RSS) does not, by itself, result in the achievement of this vision, and the Core Strategy must be pro-active in enabling development, investment and regeneration which contributes positively towards these goals. Indeed, there can be drawbacks from this proximity: hope values have been high, sometimes deterring development from being achieved on Brownfield sites. Locations also suffer from congestion and this might deter further investment unless it is addressed. We would not want a lack of investment to result from a too narrowly focussed set of policies;
2. The sub-regional centre of the conurbation is rightly seen as a key economic driver in the RSS and central Manchester/Salford/Trafford has been allowed to regenerate and grow in recent years in order to achieve this. Its success story is welcome but continued growth needs to be managed and accommodated. We fear that a development strategy that focuses upon regeneration areas alone will not achieve continued growth, nor will a strategy of constraint outside of the sub-regional centre.

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Para 3.1  
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Trafford, like Salford and Manchester as well as Tameside and Stockport, offers considerable opportunities for the local economy and wider region, and the Core Strategic Vision must embrace this fully if this opportunity is not to be squandered. The success of the sub-regional centre is not due to a policy of constraint elsewhere and will not be supported by such a policy in the future;

3. We support policies/vision of regenerating relatively deprived areas of Trafford. A policy of restraint elsewhere may be designed to focus development towards such areas but will not achieve the quantitative or qualitative growth benefits that Trafford could otherwise deliver. Whilst Bellway will continue to pursue opportunities for regeneration, we also support the wider economic regeneration of the Borough which will lift the whole of the area's economy. This has been the experience, where pressure built from growth has expanded development into new regeneration areas, as opposed to a policy-led initiative alone;
4. Section 4 of the Core Strategy – we would avoid over-estimating the residential potential of Trafford Park, which is an established and traditional employment area and economic growth generator. The suggestion that it could deliver residential has not been demonstrated in recent years, and the apartment market is in a depressed state. The focus should therefore remain as employment with leisure;
5. A general point – it is difficult to comment on area-specific policy/vision without a draft proposals map or similar, as by its nature the issues are area/land based/specific. This is more a criticism of the LDF system, but does make it harder to make informed comments;
6. Most urban locations referred to (Old Trafford, Stretford, Sale, Urmston, Altrincham) along with others (such as Timperley) are all sustainable locations for new development with good public transport facilities. New development here would accord with sustainable principles and should be supported. Whilst the regeneration of Partington and Carrington is recognised, they are in less sustainable locations at a limb from the main urban area, and therefore do not benefit from the concentration of services available there;
7. Spatial Options – Option 1: we consider this Option to be too restrictive. Clearly RSS supports the Regional Centre and the Core Strategy must accord with this, but Option 1 risks providing a too narrow focus for new development which risks failure to deliver. Option 2 – this is the best of the 3 Options put forward, although has certain areas of potential difficulty which we highlight below. Option 3 – there is the risk, as with Option 1, of failing to deliver required development under this Option.
8. Spatial Options Summary Table – Option 2 refers to significant residential development at Wharfside (750 units) and the Trafford Centre (1,000 units) and elsewhere (eg. Pomona, LCCC) but these are predominantly apartments which, in the present climate (with no indication of any light at the end of the tunnel just yet) will not be built. There is an over-supply of such accommodation across the Regional Centre with values dropping and mortgages not being made available. It would therefore be foolish to fail to recognise this and plan ahead in the hope of a resurrection in the market place, the evidence for which does not exist. These sites will therefore not deliver the residential numbers referred to and, along with other such sites, will therefore result in a shortfall in delivery against RSS targets. With this in mind, serious consideration needs to be given to the capacity/density of sites, their appropriateness for residential use in this

103  
G.C.

104  
P. 28

Sec. 4  
para 4.1  
TPV 0

105  
G.C.

106  
Sec 4  
4.1  
0

107  
P. 33  
G.C.

P. 35.5  
108

P. 39  
41

109  
0

market, and the need for additional sites elsewhere in order to deliver RSS (minimum) housing figures and the growth of Trafford and the sub-region;

- 110  
P.39  
Option 2  
O
- 111  
P.43  
O  
Option 2
- 112  
P.45  
Option 2  
O
- 113  
P.47  
S
- 114  
P.49  
CP2  
GL
- 115  
P.55  
CP2  
S
- 116  
P.57  
CP2  
S
- 117  
P.59  
Para 5.16
- 118  
P.59  
Para 5.17  
O
- 119  
Section 6  
P.60  
O
9. Greenfield land release at the Trafford Centre (Option 2) to accommodate new residential development – this location is not an established living area, reflected by the statement that additional community facilities will be required. It is also removed from the LRT Metrolink system and bus services are provided to generally serve the retail centre alone. We therefore consider this proposal to be problematical and high risk. Along with the difficulties identified elsewhere, this places further pressure on the need to deliver RSS housing numbers on sites elsewhere within the Borough;
10. Option 2 (Stretford) – again, the Summary Table refers to higher density but whether apartment schemes come forward is doubtful. That said, there is a shortfall in larger residential sites in this and other suburban areas required to deliver new housing development, and such sites are needed;
11. Option 2 (Urmston) – investment in the centre of Urmston is to be supported in order to sustain it, given its close proximity to the Trafford Centre. Limited residential development will undermine this, especially when combined with expansion at the Trafford Centre. Urmston is an established residential area and new housing should be supported here, with good access to the rail network;
12. Mersey Valley – agree;
13. Option 2 (Sale) – Sale is well placed for expansion, having good connectivity and needing to support its district centre and function. Sale West is a priority area but there are many sites within Sale which could benefit from redevelopment;
14. Option 2 (Partington) – we generally support green field release in Partington as part of its regeneration and welcome opportunities to discuss sites with the Council, although recognising that values are suppressed in this locality. As a consequence, in order to deliver much needed regeneration, the affordable housing policy requirement might need to be lifted in order to deliver higher value development to diversify the area. Alternatively, to enable development to occur, other allowances should be considered;
15. Option 2 (Carrington) – we support its regeneration and welcome any residential opportunities whilst agreeing that it is primarily an employment location;
16. Para 5.16 – as the Housing Growth Point Bid has been given the green light (or has moved towards such) an allowance for higher growth must now be incorporated into the Core Strategy. In addition to RSS minimum growth figures, an allowance of 20% (minimum) should be introduced. The need for deliverable sites becomes even more important if the growth scenario is to be supported;
17. Para 5.17 – there has been some concerns expressed nationally regarding the Eco-Towns initiative, including that it is unlawful. It is generally being pursued most in the South East in order to deliver Government housing targets as opposed to regeneration objectives, being the priority for Carrington. We therefore have concerns as to the appropriateness of such an approach here;
18. Key Strategic Sites – see comments above. In addition: Site D – realistically, there are few appropriate residential sites in this area. Of the 11 sites identified, it is clear that few opportunities exist for housing that

will actually be delivered, and this is a concern. Other sites must therefore be identified and supported, including elsewhere in Trafford, if targets (including affordable) are to be delivered;

- CS PC  
P. 86.  
para 7.5  
P. 73  
SHAA - para 7.9  
Fig 5
- 120
- 121
- 122
- 123
- 124
- 125
- P. 74  
para 7.12  
P. 76 L1  
L2  
P. 78  
L5 P. 81.
19. Part C policies – Para 7.5 needs to include the Growth Point uplift. Para 7.9 and the SHLAA: existing commitments include a considerable amount of apartments that simply will not be built and therefore an accurate estimate of allowance should be made which will significantly reduce the level of commitments/supply in Trafford. It serves no purpose to do otherwise. The points made elsewhere also relate to the Core Policies;
  20. Para 7.12 – we do not agree with this statement, as the Strategic Sites identified will not, in our experience, deliver the majority of the housing land required, especially after the 20% Growth Point is included and commitments are depreciated accordingly. The Core Strategy must be a realistic reflection and our concerns, as set out above, are realistic and reasonable. This means that other opportunities for residential development must not be unreasonably prejudiced where they can demonstrate sustainable principles and benefits;
  21. Policy L1 and elsewhere re: RSS new housing figures (general point) – these have been confirmed as minimum and not ceiling figures;
  22. Policy L2 – the need to regenerate extends beyond the Priority Areas. The redevelopment of Brownfield sites can make a valuable contribution to regeneration objectives in Trafford (such as vacant sites on key transport corridors);
  23. Policy L5 – we support the non-prescriptive approach, as there are national requirements already in place.

We submit these comments as constructive and seek to secure a Core Strategy that supports both our own aspirations and those shared by the Council, being to deliver real growth and regeneration to Trafford.

Regards.

Yours sincerely

**Simon Artiss**  
**PLANNING MANAGER**  
**simon.artiss@bellway.co.uk**

PO/1041



19 August 2008

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*Your reference CS/PrefOpt*

*Our reference P2110/4/RO*

Dear Dennis

## Core Strategy Preferred Options Consultation

Thank you for inviting our comments on the above consultation.

### General comments:

It is important for all future developments to be located in areas of high accessibility by public transport, and GMPT welcomes the fact that there is a general intent throughout the document to ensure that new development is accessible by public transport. However there is a need to define what is meant by accessible. GMPT has produced a plan for the whole of Greater Manchester showing accessibility zones and I am attaching the plan for Trafford which shows key rail and Metrolink stops with 800 metre 'buffer' zones shown in dark green, and two further 'buffer' zones showing a 250 metre buffer around bus stops with a bus service of at least every 30 minutes and a 400 metre buffer around the stops with a service of at least every 15 minutes. As you are aware, GMPT has identified accessibility standards which it applies to new development and the attached plan reflects these standards. These can be found in paragraph 6.1. in GMPT's 'Land Use Planning and Public Transport' guidance document at the following link: [www.gmpte.com/landuse](http://www.gmpte.com/landuse).

102

Paras  
7.23-7.24  
support

103

Para 7.24  
conclusion

It is suggested that the accessibility plan is used as a tool to guide the location of new development and that all housing, employment and key facilities such as health and education, should preferably be located in areas well served by public transport. Where it is intended to locate new development in areas that are less accessible then policies should be put in place to ensure that public transport is introduced to serve



the new development. Section 4 in GMPTE's 'Land Use Planning and Public Transport' document sets out the type of policies we would like to see included in LDFs in order to increase the use of public transport. There is also a need to ensure that the policies and proposals relating to Trafford in the LTP are reflected in and linked to policies in the Core Strategy.

**Specific comments:**

**Page 11-para 2.23** refers to the 'Joint Project Board' and 'key stakeholders' being 'invited to contribute as appropriate' and para 2.24 refers to consultation with Manchester Airport, the neighbouring authorities and the Highways Agency. It is expected that GMPTE would also be included as a 'key stakeholder' to ensure that the planning of public transport proposals and new developments is integrated.

**Pages 34, 36 & 38** show Options 1, 2 & 3. It may be possible to overlay these plans on GMPTE's accessibility plans if you can provide us with a map showing the proposed development sites in GIS format. This would be a useful way of measuring existing accessibility and identifying those areas which require investment in public transport in the future. Each of the three plans show dotted lines which on Map 1 and 3 are identified as 'Proposed infrastructure extension' and on Map 2 a 'proposed transport extension'. Whilst it is appreciated that these maps are diagrammatic, it is suggested that greater clarity should be given to these proposals on the map.

**7. Core Policies**

**Core Policy Direction L1** This should include reference to assessing future housing sites for accessibility by public transport.

**Core Policy Direction L2** It is to be welcomed that this policy will seek to improve accessibility to key areas. In developing this policy there needs to be discussion as to how this is to be achieved so that new development is well-served by public transport.

**Accessibility, paras 7.24 and 7.25** Similar to the comment in relation to L2, it needs to be made clear as to how some of the less accessible areas identified for new development, e.g. Partington are to become accessible.

**Core Policy L4** This is to be welcomed. There should perhaps be some cross-reference here to Trafford's SPD1 which identifies a number of public transport schemes to be funded through developer contributions.

104  
para 2.23  
comment

105  
Options  
1, 2, 3  
comment

106  
comment

107  
comment

108  
7.24 + 7.25  
comment

109  
L4  
support



110

Para 8.3  
comment

**8. Development Management Policies para 8.3** Includes a principle 'reduction in transport distances', which requires further clarification. I am attaching a note of guidelines that could help achieve this principle in the design of new development.

111

8.29  
comment

**Para 8.29** Travel Plans are an essential tool in terms of ensuring that people are encouraged to use public transport as an alternative to the private car, and it is important to set thresholds as to when they should be attached to new development proposals. The words 'as appropriate' used in the final bullet point needs to be strengthened. It's also important to include a policy which refers to the types of measures to be included in Travel Plans.

112

Draft  
comment

**Development Management Policy Direction DM7** Bullet Point 8 refers to the setting out of principles relating to contributions towards Highway and Public Transport Schemes. This has already been set out to some extent in SPD1 and I would have thought a cross-reference would be appropriate here. In terms of QBCs, it may be appropriate to develop this concept elsewhere in the Borough as well as the A56 Corridor, particularly if areas such as Partington and Carrington are developed.

113

1.24  
comment

As you are probably aware there is modelling work of the Core Strategies being undertaken through Planning Officers Group, the results of which will be feeding into your work. Once this work is concluded it would be useful to have some discussions about the outcomes.

If you have any queries relating to the above then please do not hesitate to contact me.

Yours sincerely

**Rosemary Ollé**  
Senior Land Use Planner  
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Email [rosemary.olle@gmpte.gov.uk](mailto:rosemary.olle@gmpte.gov.uk)

**From:** Rosemary Olle [mailto:Rosemary.Olle@gmppte.gov.uk]  
**Sent:** 12 September 2008 17:42  
**To:** Taylor-Russell, Clare  
**Subject:** RE: Trafford's Core Strategy

Hi Clare

Yes, you're quite right, it should say 8.28.

Regards

Rosie

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---

**From:** Taylor-Russell, Clare [mailto:Clare.Taylor-Russell@trafford.gov.uk]  
**Sent:** 12 September 2008 14:03  
**To:** Rosemary Olle  
**Subject:** Trafford's Core Strategy

Dear Rosemary,

I am currently considering a number of representations made to our Core Strategy. I note that in your representation you make reference to paragraph 8.29, in relation to travel plans. I believe that this should read "8.28". I would be grateful if you could confirm whether or not this is correct in order that we can record your comments correctly.

Regards  
Clare

### ***Clare Taylor-Russell***

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You can find out more about us by visiting [www.trafford.gov.uk](http://www.trafford.gov.uk)

## **Design for Public Transport**

### **1. Access by public transport**

It is important for new development is located within reasonable walking distance of a bus stop, Metrolink stop or railway station. This will ensure equality of opportunity for those people who do not have access to a car, and will also encourage people to use their cars less. Ideally all parts of the development should be:

- within 400m of a bus service running every 15 minutes at all times, or
- within 250m of bus service running every 30 minutes (day) & hourly (eves & Sun),or
- within 800m of a rail/Metrolink station

Where a new development is not considered to meet accessibility standards then a developer contribution should be requested to provide additional bus services to the development site.

Even where a site is reasonably accessible it is important to encourage the use of public transport and developers may be asked to contribute towards the following measures:

- Improvements to public transport infrastructure, e.g. bus stops, or improvements to railway stations
- Contribution to a Quality Partnership where the site lies on a Quality Bus Corridor,
- A buyers / tenants pack including public transport and cycle route information, location maps of nearby services e.g. grocery stores, post office, health facilities, schools etc.
- A “free” one year travel pass included within the purchase price / rental of each unit.
- Personalised Journey Planner
- Internal intranet facility promoting public transport use

### **2. Residential layouts, highway design and bus stops**

#### **2.1. Layouts and highway design**

For large developments, where there is the potential to have a bus route running through the site, the road layout should be wide enough to accommodate a bus service, ideally 7m, and should include a through route. Cul-de-sacs should be avoided where possible.



Where a bus route is provided through a new development, consideration should be given to giving the bus a time advantage over the car, perhaps by providing a bus only link. The same link could be used to give priority to cyclists and pedestrians.

Where bus access to a development will not be via a through route, turn-round facilities will be needed. This does not necessarily require a special facility, as roundabouts are often suitable. GMPTE should, however, be asked to check the dimensions of turning facilities

Design work should generally be based on a 12m long bus, although if the route is only to be used by small buses then the lengths are 7.5m for a mini bus and 10.5m for a midi. The maximum change in gradient from the level should be 1 in 5 (for a 12m bus).

## **2.2 Traffic Calming**

Horizontal deflection measures are preferred for bus routes unless high speeds or accident levels require vertical deflection.

GMPTE is against the use of road humps (including mini humps) on bus routes as these will affect the quality of the journey for passengers, and are unsafe in that they can affect the balance of standing passengers. They are particularly unsuitable for Hail and Ride routes. The use of speed tables should be kept to a minimum, as they require buses to slow down to half the speed of cars.

In general, the following standards should be applied to traffic calming on bus routes:

- Road humps on a bus route should be at a maximum 50-60mm high,
- Speed tables should be a maximum of 75mm high and have a 1 in 20 ramp gradient they should be at least 7m long
- Where chicanes and islands are used, nearby parking should be restricted to allow buses to realign.
- Speed cushions should be no wider than 1,700mm (1,600mm on midi bus routes) and nearby parking should be restricted to allow buses to realign.
- Recycled rubber cushions are preferred

## **2.3 Bus stops**

Bus stops are located to maximise their walking catchments, to ensure regular spacing between stops and to ensure road safety. Moving bus stops to accommodate new development is therefore to be avoided, particularly as finding a new location is often difficult in residential areas.

- If it is considered necessary to move a bus stop, the developer must contact GMPTE at the earliest opportunity, since agreement

is needed from a number of partners, including the Police. The developer must cover the costs of relocation.

- In new residential developments it is wise to locate the sites for bus stops within the planning stage, as this avoids conflict with residents at a later date.
- If additional bus stops or the relocation of existing stops are considered necessary, they should be located at natural focal points, for example a shopping centre or near a road junction. On roads where there is a heavy flow of traffic, they should be situated close to pedestrian crossings.
- On through routes, they need to be erected either side of the road, but not directly opposite as this can cause traffic congestion. They should be staggered so that buses can stop tail to tail and move away from each other when they depart from the stop. The spacing of bus stops will need to take account of the density and type of the development, but as a guide should be 300-400m apart.
- Bus stops should be located so as not to obstruct the footway or cycleway.
- Lay-bys can often cause delays in buses rejoining the carriageway, and should only be used if considered absolutely essential e.g. for safety reasons.
- Provision of the bus stop pole, sign and shelter needs to be made through GMPTE.
- Bus stops should be well lit, both for passenger security and to illuminate the sign. A shelter should be provided wherever possible.
- Paved hard standing areas must be provided at bus stops with kerbs constructed to a height of 150mm. Dropped kerb facilities should be provided near by. Barriers, railings and queue areas should be created where large numbers of passengers are likely to wait.

On QBCs, standards for bus stop design standards have been agreed by all District Councils. These include coloured paving, bus box, raised kerbs and ramp, allowance for Real Time Passenger Information installation and other improvements such as lighting, electricity supply and bins (for further information see Design Guidelines for Bus Stops in QBCs in Greater Manchester, GMPTE, January 2002.

## **2.4 Pedestrian access**

Appropriately located direct pedestrian routes can reduce walking distances to public transport facilities and link the development to other services (other centres, schools, shops and services). There are a number of measures which can increase pedestrian priority and encourage walking, for example:

- Direct, safe routes to public transport facilities (following logical, convenient pedestrian desire lines).
- Buildings located to the 'front' of the site, with parking at the rear. This will minimise walking distances for public transport users and other pedestrians
- Entrances to buildings should be located so as to minimise walking distances to bus stops.
- Pedestrian routes should be well lit.
- Pedestrian crossings/refuges can facilitate access between a development and public transport services.
- Surfaces should be safe, hard topped and level with tactile paving and dropped kerbs.
- Routes should be un gated.
- Landscaping should not impair visibility, and high wooden fences which reduce visibility should be avoided.

GMPTE is aware that conflicts can arise between the desire for direct pedestrian routes and "secure by design" principles and would recommend discussions between the relevant parties to resolve these issues when they occur.

**For any queries please contact Rosie Olle at GMPTE**  
**Tel: 0161 244 1280**  
**Email: [Rosemary.Olle@gmpte.gov.uk](mailto:Rosemary.Olle@gmpte.gov.uk)**

PO/1041



20 August 2008

Mr D Smith  
Manager of Strategic Planning and  
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Trafford MBC  
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Sale Waterside  
Sale  
M33 7ZF

*Your reference SHLAA/02*

*Our reference P2110/4/RO*

Dear Dennis

## **Strategic Housing Land Availability Assessment-Draft Report Consultation**

Thank you for inviting our comments on the above consultation.

I have consulted colleagues in GMPT and I am attaching a plan showing Trafford's potential housing sites in terms of their accessibility to public transport. The plan shows key rail and Metrolink stops with 800 metre 'buffer' zones shown in dark green, and two further 'buffer' zones showing a 250 metre buffer around bus stops with a bus service of at least every 30 minutes and a 400 metre buffer around the stops with a service of at least every 15 minutes. As you are aware, GMPT has identified accessibility standards which it applies to new development and the attached plan reflects these standards. These can be found in paragraph 6.1. in GMPT's Better Plan for Public Transport at the following link: [www.gmpte.com/landuse](http://www.gmpte.com/landuse).

An integrated approach to land use and transportation is essential to reduce the impact of transport on the environment. GMPT would wish to see all new development being focussed on sites that are accessible by modes of transport other than the private car. Where development proposals are not accessible then GMPT would expect a developer to make a financial contribution to improve the local transport infrastructure / network to make the development accessible by a choice of transport mode.

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P14  
3 26  
General



Improving accessibility can be achieved by:

- Locating new development in areas well served by public transport.
- Encouraging residential development on vacant land within walking distance of key transport nodes such as railway stations, Metrolink stops and local bus interchange points.
- Locating residential development close to areas of employment, retail and other essential facilities.
- Ensuring that the policies and proposals relating to Trafford in the LTP are reflected in and linked to policies in the LDF Core Strategy.
- Developing policies which request developer contributions towards public transport improvements.
- Developing policies which state which types of development require Travel Plans.

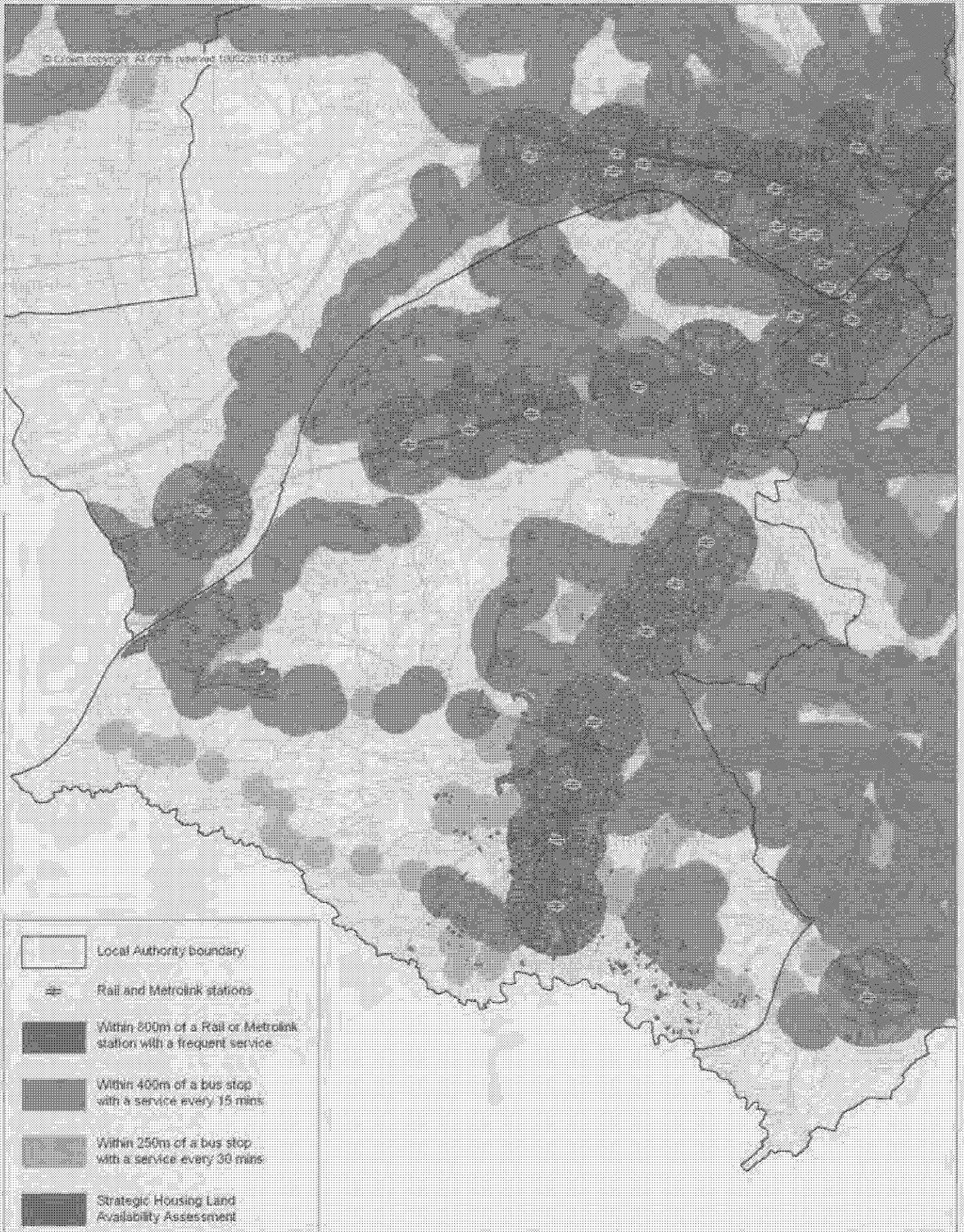
The sites that have been identified in the consultation document are mostly located in areas of high accessibility and therefore GMPTE welcomes this.

If you have any queries relating to the above then please do not hesitate to contact me.

Yours sincerely

**Rosemary Ollé**  
*Senior Land Use Planner*  
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*Email [rosemary.olle@gmpte.gov.uk](mailto:rosemary.olle@gmpte.gov.uk)*

115  
P14  
Para 2.25  
2007



Trafford Strategic Housing Land Availability Assessment, and access to public transport (March 2008 weekday morning off-peak)

Drawn By : wightmnp

Date : 07/08/2008

Scale : NTS

1377a v1

PO/1041

**Doow, Amarjit**

---

**From:** Rosemary Olle [Rosemary.Olle@gmppte.gov.uk]  
**Sent:** 24 September 2008 18:05  
**To:** Strategic Planning; Doow, Amarjit; Hiorns, Rachel  
**Subject:** FW: Trafford's Local Infrastructure Plan Consultation

Thank you for consulting GMPTE on the above consultation document.

This document seems to be more of an assessment of existing infrastructure rather than about the needs, options, priorities, delivery mechanisms and costings for what will need to be done in the future to support the Core Strategy. Section 13 which is entitled the Next Steps will be a critical part of the process and it is important that GMPTE, as one of the key partners, is involved in future discussions.

It would be useful to identify the implications of each spatial option on traffic congestion, and on public transport patronage. For example GMPTE needs to know whether the planned increased capacity of Metrolink will meet the infrastructure requirements of the Core Strategy and what further public transport improvements are required. The process for identifying local infrastructure requirements also needs to link with the development of Corridor Action Plans, since these will provide an explicit means of linking transport investment to wider economic and spatial priorities. It is intended that the monitoring of Corridor Action Plans will in turn feed back into LDF and LAA monitoring.

In terms of the factual evidence contained within the document, GMPTE has got specific comments as follows:

**Para 7.3:**

GMPTE is responsible for the maintenance of the Metrolink track and stations. The network has recently benefited from track renewals, structure upgrades and platform upgrade works costing around £25M. This is part of a £102M package to upgrade the existing Metrolink system, funded thus - £58 contribution from central government and £44M funded by GMPTE.

Some of the other improvements in the planning stages and expected to be completed in 2009 are:

- Renewal of Altrincham Overhead Line equipment
- New Ticket vending machines
- Eight new trams to form double units for each direct service.
- Replacement of City Centre track
- Stop improvements and platform upgrades
- Extension of Queens Rd depot for stabling and maintenance of new LRV'
- Passenger information displays

**Para 7.4.**

The railway lines through Trafford are:

- 'Mid Cheshire' from Manchester via Stockport and Altrincham to Chester, and
- 'CLC' (formerly Cheshire Lines Committee) from Manchester via Urmston and Warrington to Liverpool.

**Para 7.5.**

The most recently published ticket sales data (2005-07) gives the following for the Trafford stations:

MUFC Halt 62,000pa Trafford Park 32,000pa Humphrey Park 18,000pa Urmston 202,000pa Chassen Road 27,000pa Flixton 63,000pa Navigation Road 41,000pa Altrincham 217,000pa Hale 77,000pa  
Total 739,000pa Therefore Urmston represents 27% of passengers and Altrincham 29% of

passengers.

**Para 7.6.**

The 382 passengers for heavy rail is from a sample of stations, whereas the 3,489 passengers for Metrolink is from all stations. For Metrolink Trafford is the total for the service, whereas for heavy rail Trafford is only a small part of the whole. The total use of the services is many times the Trafford contribution. Although utilisation of assets should be improved Trafford is unlikely to contribute significantly to this objective. Indeed if the assets are to be used to best advantage on the patronage figures above Trafford Park, Humphrey Park, Chassen Road and Navigation Road should probably have their service levels reduced to enable trains to run faster so that journey times are quicker and reliability improved for the majority and, consequently, passengers numbers overall increased. The PTA, however, considers overall benefits, not just utilisation of assets, and therefore looks at future land use developments as well as bland ticket sales / passenger count data.

**Future rail proposals:**

Urmston station will be improved under LTP2 (CCTV, real time information, seats, shelters, etc) and TIF will provide funding for Flixton and Hale stations to be improved. There are also proposals to redevelop Altrincham Interchange (including the rail station) and MUFC Halt. The latter involves moving the station to a new location to the east, to enable Liverpool - Manchester trains to stop in both directions. This would give interchange with Metrolink at Trafford Bar and Pomona, as well as access to local buses, White City, Pomona Island, local employment and the Old Trafford stadia. Both of these schemes are currently dependant on TIF funding. Network Rail proposes to improve infrastructure to reduce journey times between Liverpool and Manchester. This may also bring benefits for the local heavy rail services

As you are probably aware there is modelling work of the Core Strategies being undertaken through Planning Officers Group, the results of which will feed into your work. Once this work is concluded it would be useful to have some discussions about the outcomes.

Regards

Rosie

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# THE EMERSON GROUP

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1<sup>st</sup> Floor Waterside House  
Sale Waterside  
Sale  
M33 7ZF

STRATEGIC PLANNING AND DEVELOPMENTS	
29 AUG 2008	
Rec	
Action by	
Ans	
Copied to	

Our ref: NS/Planning

27 August 2008

Dear Sir

## RE: TRAFFORD LDF – CORE STRATEGY PREFERRED OPTIONS CONSULTATION.

Thank you for your letter dated the 14<sup>th</sup> July 2008 seeking our views on the above emerging Development Plan Document.

The issues identified within the Preferred Options document appear comprehensive, therefore at this stage only a small number of additional comments are submitted for the Authorities consideration.

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p. 35  
CR 2  
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With regard to the 3 spatial options identified by the Council, it is believed that Option 2 is the better suited to deliver local, regional and national planning objectives. Whilst the importance of the north of the Borough and its relationship with the Regional Centre is identified it is also positive to see that Option 2 acknowledges the importance of Altrincham as the Boroughs principle town and also the other town centres such as Sale and Stretford. It is vital that these town centres continue to be promoted by the Council for appropriate growth, development and redevelopment in accordance with National Planning Policies. Towns such as Altrincham and Sale not only provide essential facilities serving the local community but also act as significant destinations for the sale of comparison goods and the location of small to medium sized businesses. The Council should seek to improve and strengthen the retail provision in the Boroughs town centres and facilitate and enable further employment opportunities in the Borough through growth and expansion of office space whether it be new development or an existing employer seeking to expand their operations.

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With regard to the identified Core Policies, Policy W1 states that the Council will develop policy that will restrict the change of use or redevelopment of employment sites and premises which are suitable for or capable of adaption to modern operational requirements.

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DIRECTORS: PE JONES (CHAIRMAN)  
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Whilst it is acknowledged that the objective of this policy is to prevent the loss of valuable employment land to alternative uses, such as housing for instance, the phrasing of any such a policy should be carefully considered. This is because in certain instances, small scale changes of use or redevelopment of existing employment buildings can create positive impacts and better serve the local community.

In recent years, increasingly frequent requests are being encountered by businesses falling within D1 medical, D1 educational, A2 and certain Sui Generis use classes to take up floorspace in properties that had traditionally accommodated B1 office uses. This is particularly common in office buildings in well accessed central locations, similar to a number of office properties located in Sale and Altrincham along the A56 corridor. In the formation of any policy regarding change of use, the Council should carefully consider the acceptability of smaller scale changes of use and how these may benefit local communities through the provision of enhanced local services.

Finally, with regard to the Development Management Policies identified, Policy DM1; Design and Construction, paragraph 8.5 states that the Council will consider how to meet the national and regional targets in relation to the Code for Sustainable Homes targets ahead of the scheduled national program.

It is felt that such a requirement would be too onerous on developers given that problems are presently being encountered by the house building industry in general in adapting to the CFSH and in meeting the lower levels of The Code. Combined with the present economic downturn, the deliverability of housing schemes could be compromised by additional onerous requirements such as this and it is recommended the Council, and the other Greater Manchester Authorities, consider adopting a uniform approach with regard to the CFSH requirements, in line with national guidelines and the Regional Spatial Strategy.

I trust that the above comments will be carefully considered by the Authority as it commences further work on the Core Strategy.

Should you have any questions regarding the above comments, please do not hesitate to contact me.

Yours faithfully

**Nick Scott**  
**Planner**

**THE  
EMERSON  
GROUP**

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DM1  
P 97  
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**Trafford's Core Strategy Preferred Options  
Comment Form – July 2008**

**Comment Sheet**

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy Preferred Options report	x	Page Number	88
Core Strategy summary broadsheet		Paragraph Number	
Sustainability Appraisal		Policy Direction reference	W2
Equality Impact - Initial Assessment		Vision Reference Number	
Other document, (please specify)		Objective reference number	
		Spatial Option Reference	
		Strategic Site Reference	
		Map/Figure Reference Number	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?				
Support	x	Object		General Comment

Please continue on a separate sheet if required

**Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.**

We welcome the identification of Altrincham as a location where comparison retailing should be enhanced and encouraged by the RSS and Trafford Council and that the town centre is expected to be the primary focus for retail development. Altair has been identified as a key strategic site in the Core Strategy - Preferred Options however, considerable investment has been made to and continues to be made to the Stamford Quarter. This site is within the established town centre and is linked to the rest of the town centre via George Street. It is not a stand alone development like the Altair scheme. The benefits of the Stamford Quarter redevelopment should be recognised as they are succeeding in drawing shoppers back to the town centre who have previously been drawn to the Trafford Centre.

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

## Trafford's Core Strategy Preferred Options Comment Form – July 2008

### Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy Preferred Options report	x	Page Number	30
Core Strategy summary broadsheet		Paragraph Number	4.1
Sustainability Appraisal		Policy Direction reference	
Equality Impact - Initial Assessment		Vision Reference Number	AL02
Other document, (please specify)		Objective reference number	
		Spatial Option Reference	
		Strategic Site Reference	
		Map/Figure Reference Number	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?				
Support		Object	x	General Comment

Please continue on a separate sheet if required

**Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.**

It would be not be viable to restrict the level of private market housing permitted in Altrincham town centre or its environs.

Policy MCR 3 of the RSS seeks to sustain and promote economic prosperity consistent with the environmental haracter of the area and the creation of attractive and sustainable communities by allowing residential development to support local regeneration strategies and to meet identified local needs (particularly for affordabel housing), in sustainable locations which are well served by public transport".

The RSS policy does not restrict levels of private market housing but encourages all residential development that meets local needs. It is therefore wrong for the Council to to restrict the economic growth the RSS is trying to promote.

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

**Trafford's Core Strategy Preferred Options  
Comment Form – July 2008**

**Comment Sheet**

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy Preferred Options report	x	Page Number	30
Core Strategy summary broadsheet		Paragraph Number	4.1
Sustainability Appraisal		Policy Direction reference	
Equality Impact - Initial Assessment		Vision Reference Number	AL01
Other document, (please specify)		Objective reference number	
		Spatial Option Reference	
		Strategic Site Reference	
		Map/Figure Reference Number	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?				
<b>Support</b>	x	<b>Object</b>		<b>General Comment</b>

Please continue on a separate sheet if required

**Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.**

We welcome the Council's vision to sustain and promote Altrincham town centre as the principle town centre of the Borough.

A considerable level of investment has been put into the phased redevelopment of the Stamford Quarter to improve and upgrade the shopping facilities in this part of the town. This has succeeded in attracting visitors and shoppers back to the town who have previously been drawn to the Trafford Centre.

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

**Trafford's Core Strategy Preferred Options  
Comment Form – July 2008**

**Comment Sheet**

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy Preferred Options report	x	Page Number	25
Core Strategy summary broadsheet		Paragraph Number	3.3 and 3.4
Sustainability Appraisal		Policy Direction reference	
Equality Impact - Initial Assessment		Vision Reference Number	
Other document, (please specify)		Objective reference number	
		Spatial Option Reference	
		Strategic Site Reference	
		Map/Figure Reference Number	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?				
Support	x	Object		General Comment

Please continue on a separate sheet if required

**Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.**

We welcome the Council's strategic objective to promote Altrincham town centre as the principle commercial centre of the Borough.

A considerable level of investment has been put into the phased redevelopment of the Stamford Quarter to improve and upgrade the shopping facilities in this part of the town. This has succeeded in attracting visitors and shoppers back to the town who have previously been drawn to the Trafford Centre.

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

27 August 2008  
EM.5028



D Smith Esq.  
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www.daltonwarnerdavis.co.uk

**By Email**

Dear Mr Smith

**RE. STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT  
DRAFT REPORT  
LAND ALLOCATION SS18**

We acknowledge the above land allocation for our site at 47-676 George Street, 3-15 Cross Street and 48-50 Stamford New Road and welcome the inclusion of the site within the Council's Strategic Housing Land Availability Assessment.

At this time we are not able to offer any further information on the site other than that originally submitted in January 2008 (see attached). The site is however located in central Altrincham on the edge of the Stamford Quarter and close to the Altrincham interchange. The Stamford Quarter is currently undergoing a phased redevelopment to improve the quality of the shopping environment in this part of the town centre and these properties form part of our Client's future plans for this part of the town centre.

When we do have further information we will forward it to you for inclusion in your report.

If you have any queries, please contact me at this office. I would be grateful if you would acknowledge receipt of this letter.

Yours sincerely

**EMMA MANN**

em@daltonwd.co.uk

Direct line 020 7489 4890

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Appendix 2  
p.104  
Support



K Dalton FRICS	Associates	Consultants
A M Davis FRICS IRRV	G Denning B Eng Hons MSc MRICS	A J N Warner FRICS Dip TP
N P Draper FRICS IRRV	G Eaton BA Hons Dip TP MRTPI	N W Johnson FRICS
N M Fennell BSc MRICS	C Girdham BSc Hons MTP MRTPI	L R Mason FRICS
RJ Greeves BSc Hons MRICS	E Mann BA Hons Dip TP MRTPI	
K Rushe BA TP Dip TP MRTPI		



## Trafford Council

### Strategic Housing Land Availability Assessment

#### Site Suggestion Form

##### 1. Contact Details

Please provide full contact details in the space provided. This information is required should the Council need to contact the respondent for further information:

<b>Name:</b>	Emma Mann	<b>Agent (if applicable)</b>	
<b>Organisation:</b>	Dalton Warner Davis LLP	<b>Organisation:</b>	
<b>Address:</b>	21 Garlick Hill London	<b>Address:</b>	
<b>Postcode:</b>	EC4V 2AU	<b>Postcode:</b>	
<b>Tel:</b>	020 7489 4890	<b>Tel:</b>	
<b>Fax:</b>	020 7248 4743	<b>Fax:</b>	
<b>Email:</b>	em@daltonwd.co.uk	<b>Email:</b>	

##### 2. Site Details

In this section please provide details of the site you are putting forward for the Council to consider for residential use. Please provide as much information as possible and include a location plan in order for the Council to clearly identify the site. Please Note: The Council will be unable to accept site suggestions which are not accompanied by a location plan

<b>Site Address:</b>	47-67 George Street, 3-15 Cross Street and 48-50 Stamford New Road Altrincham			
<b>Size of site: (if Known)</b>				
<b>Please indicate whether the site is:</b>	Greenfield <input type="checkbox"/>	Brownfield <input checked="" type="checkbox"/>	Mixed <input type="checkbox"/>	Unknown <input type="checkbox"/>

<b>What is the current use of the land? (e.g. retail, employment, recreation, vacant)</b>	Retail on ground floor with offices and store rooms over
<b>What are the predominant surrounding land uses?</b>	Town centre uses, Class A1, A2, A3 on ground floor with offices and store rooms over.
<b>Please describe the character of the surrounding area</b>	The site is located with in the primary shopping area of Altrincham on the corner of George Street, Cross Street and Stamford New Road. The area comprises a mix of town centre uses located in properties that vary in age and style.
<b>Please provide any other information relating to the site</b>	The site adjoins the western boundary of the Stamford Quarter shopping centre which currently has outline planning permission for phased redevelopment. Phase 1 has been completed and Phase 2 is currently undergoing construction.

**Please provide an estimation of when you think the site would be available for residential development**

0-5 years	6-10 years	11-15 years	16 years plus
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please provide reasons for your answer:**

The scheme will be part of the ongoing redevelopment of the Stamford Quarter

<b>Have there been any Planning Applications on the site (please give as much detail as possible)</b>	There have been no major applications for this site. However, it adjoins the western boundary of the Stamford Quarter shopping centre which currently has outline planning permission for phased redevelopment. Phase 1 has been completed and Phase 2 is currently undergoing construction.
---	--

<b>Please provide details of the number of residential units that you consider could be accommodated on the site (please give reasons)</b>	Amount unknown at this stage
<b>Please provide any additional information:</b>	The residential referred to as part of these representations is part of long term plans for an overall refurbishment of this part of George Street, Cross Street and Stamford New Road

### 3. Site Constraints

In this section please provide details of any known constraints associated with the site which may impact on the site being brought forward for residential development

	Yes	No	Unknown
<b>Access/ Infrastructure constraints</b>		X	
<b>Ground conditions</b>		X	
<b>Flood Risk</b>		X	
<b>Hazardous Risks</b>		X	
<b>Pollution or Contamination</b>		X	
<b>Impact on landscape features (protected trees, planting of amenity value)</b>		X	
<b>Is the site within a Conservation Area?</b>		X	
<b>Impact on Listed Buildings (other buildings with historic or local importance)</b>	X		
<b>Topographical constraints</b>		X	
<b>Negative impacts on prospective residents</b>		X	
<b>Known planning constraints</b>		X	

**Where there are known constraints what action do you consider could be undertaken in order to overcome them? (e.g. investment, new infrastructure, environmental improvement, removal of policy constraint)**  
 The site is adjacent to a conservation area and a listed building. Any redevelopment of this site would pay due consideration the listed building and conservation area.

**Please provide details of any other known constraints not included above which may impact on the site being brought forward for residential development:**

N/A

#### 4. Site Ownership

In this section please provide details of the ownership of the site. This section is particularly important in assessing whether the site is considered to be available for development.

		Yes	No
<b>Do you or your organisation own the site?</b>		X	
<b>If you do not own the site do you know who the owner is?</b>			
<b>Please could you provide the following details for the landowner(s)</b>			
<b>Name:</b>		<b>Name:</b>	
<b>Organisation:</b>		<b>Organisation:</b>	
<b>Address:</b>		<b>Address:</b>	
<b>Email:</b>		<b>Email:</b>	
<b>Telephone:</b>		<b>Telephone:</b>	
<b>To your knowledge are there any ownership issues with the site (e.g. ransom strips, legal, tenancies or operational requirements)</b>			
No			
<b>Please provide any additional information in order to support the suggested site and help the Council to assess the land in question.</b>			

Please continue on a separate sheet if necessary

<b>STRATEGIC PLANNING AND DEVELOPMENTS</b>			
29 AUG 2008			
Rec			
Action by			
Ans			
Copied to:			

PO/1055/-  
ACK 28/8

LDF Team  
c/o Strategic Planning and Developments  
Trafford Council  
1<sup>st</sup> Floor, Waterside House  
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Sale  
M33 7ZF

Email: andrew.johnston@dtz.com  
Direct Tel: +44 (0)161 235 7638  
Direct Fax: +44 (0)161 834 2055

Our ref: 07/06268-8  
Your ref:

27 August 2008

**POST AND EMAIL**

Dear Sir/Madam

**Development Plan Document 1: Core Strategy – Preferred Options – July 2008**

We have been instructed by Brixton plc to submit representations in relation to the above document. Our client is a major landowner in Trafford Park and their portfolio includes 23 properties covering over 3 million sq ft of industrial/warehouse accommodation. Brixton realises the local and regional importance of Trafford Park and seeks further investment and development opportunities.

Our representations will follow the format of the published document and should be read in conjunction with previous submissions to the Core Strategy Issues and Options Paper and New Land Use Allocations DPD in 2007.

**Part A – Page 2**

**Trafford in the Region – Page 9**

We agree with the explanation in paragraph 2.7 that Trafford is an important centre for industry and business, however Trafford Park does need to be recognised not only for manufacturing and service sector jobs, but also distribution as well.

In principle we are in agreement with the boundaries proposed, however we do suggest amendments to Wharfside (page 61 of the document) and Trafford Centre Rectangle (page 64 of the document). Please refer to Appendices 1 and 2 attached to this letter for our recommended changes. These areas, particularly the Regional Centre, should be the focus for residential development to achieve a significant increase in population to support major regeneration activity and the creation of sustainable

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mixed communities.

Brixton supports comments made in paragraph 2.19:

*'The Trafford Park core industrial area continues to have a very significant role to play in the economy of the region and more specially in terms of achieving a significant improvement in the performance of the sub-regional economy.'*

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### **Trafford in Focus – Trafford Park – Page 12**

Brixton agree with the broad spatial profile for Trafford Park identified on page 13 and support the recognition that the area will play a vital role within Trafford and the sub region. In the Key Issues section under 'LIVE', there should be a more explicit link between the opportunities for sustainable residential development as part of wider mixed-use developments in the Wharfside area and the significant job opportunities that exist at developments nearby in Mediacity:uk, Salford Quays and the Trafford Centre.

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It is estimated that Mediacity:uk alone will deliver £1.5 billion to the regional economy and create employment opportunities for 15,500 people. The development will incorporate the existing Lowry Centre and Imperial War Museum and be a creative hub on the Salford/Trafford waterfront. It is essential that there are flexible policies in place to ensure that the Wharfside area is able to capitalise from this significant investment through creating sustainable mixed-use high quality developments including new housing, which will reduce the need to travel and support the regeneration of the area.

We agree with bullet two of the LIVE section, that:

*"Much of the Park is poorly accessible by public transport. Improving access to the area as a whole needs to be a priority, particularly from areas with low car ownership."*

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However we would also request that associated social infrastructure and community facilities are identified as key priorities to support new residential and mixed-use development.

### **Part B – Page 24**

#### **Figure 4: Strategic Objectives – Page 25**

SO3 – We suggest that this is revised to include reference to the potential for diversification of uses in Trafford Park, including high-quality mixed-use developments with new housing in Trafford Wharfside and around the Trafford Centre.

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SO7 – We suggest that this is reworded to include specific reference to improving public transport linkages to Trafford Park that is identified in all three spatial options as an area of significant development, despite having poor access by public transport (acknowledged in the spatial profile on page 13).

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### **The Vision and Objectives for Trafford's Places – Page 28**

Brixton largely supports the vision for Trafford Park identified in table 4.1, however, we feel that it should be expanded further to include the potential for diversification of uses in Trafford Park, including high-quality mixed use developments, with new housing in Trafford Wharfside. An expanded vision like this would better reflect the aspirations of the 7 'Place Objectives' identified in the column immediately adjacent.

Brixton broadly supports the Place Objectives for Trafford Park including proposals to create significant mixed business and residential development in line with its role within the City Region. However, we do raise some concern in relation to TPO7 and we request that 'the re-use or redevelopment of unused, under-used and derelict land' is carefully considered by the Council in order to protect employment uses within the Trafford Park Core Areas and there is a qualitative assessment to assess the most appropriate land use.

### Spatial Options – Page 32

As a general comment on the preferred spatial options, Brixton welcomes proposals for the significant development of Trafford Park identified in all three options. Clearly the future growth of Trafford Park is of local significance and vital to the prosperity of the Region as a whole.

Of the three options proposed, Brixton most strongly supports **Option 3 – Inner Area Priority Strategy**.

This spatial option promotes growth within the Regional Centre and Inner Areas, in line with RSS guidance. Prioritising economic and residential development in these areas will enable the existing and future potential of Trafford Park and the improvement of its role within the regional and local economy to be fully achieved. This option would also ensure that mixed-use development is provided within the Inner Areas, thus ensuring the positive impacts of regeneration and economic growth are distributed throughout the Regional Centre in accordance with the RSS.

Brixton further support Option 3 because it would reduce the need to release Greenfield land during the plan period to meet housing targets and prioritise housing development in existing centres and in doing so represent the most sustainable form of growth. However this view is contrary to the broad sustainability objectives pie chart illustrated below paragraph 5.19 and we question the credentials of this chart and its subsequent value. We request that further evidence to support this sustainably pie chart is provided as part of the Core Strategy document, perhaps in the form of an appendix.

Trafford Park offers the opportunity to deliver a significant number of new jobs on brownfield land, with immediate availability of a large workforce on its doorstep and has excellent transport links to the motorway, rail and air. For these reasons we believe that the Council should aim to create at least 60% of new jobs through regenerating the central area of Trafford Park as a high quality, competitive and modern day business location.

While the main text for Spatial Option 3 on page 39 refers to 60% of Trafford's new jobs being created in Trafford Park, the summary on page 40 cites just 55%. This inaccuracy is should be clarified.

Brixton disagree that high residential densities in Trafford Park should necessarily put pressure on the existing community facilities and will reduce opportunities for family accommodation. Local community will be improved through investment via s106 agreements attached to new residential planning consents and the mix of housing types can be configured to address housing need identified in the Councils latest Housing Needs Assessment.

We request that this spatial option includes a greater commitment by the Council to improve transport infrastructure to Trafford Park to enhance accessibility by public and private transport means. In particular, better public transport accessibility to Trafford Park from the Regional Centre, other Inner Areas and Regeneration areas (Old Trafford and Gorse Hill) would help to address issues identified in Core Policy Direction L2: Regeneration and Core Policy Direction L4: Accessibility.

***Option 1: Inner Area/Selected Regeneration Area Priority Strategy and Option 2: Inner Area/Wider Regeneration Priority Strategy – Pages 33 & 35***

While Brixton acknowledge the significant development for Trafford Park identified in both of these options, we believe that they both fail to deliver the critical mass of development proposed in Option 3 that will help Trafford to fulfil the potential of Trafford Park.

It is essential that the Council focus development and regeneration investment in a few key locations. Option 1 and Option 2 will result in resources being 'spread too thinly', diluting their impact.

Trafford Park has the ability to create jobs, generate new business and attract further investment to the area acting as a catalyst for the wider Borough. The LDF for Trafford should therefore focus significant development in Trafford Park as identified in Option 3 to benefit the wider Borough.

**Key Strategic Sites – Site B – Wharfside – Page 61**

We request that the description is reworded to include specific reference to the suitability of Trafford Wharfside to include new housing as part of wider mixed-use developments. Brixton support proposals 'to promote significant, mixed business and residential development in the Wharfside area' as identified in the Place Objectives. We propose the boundaries of Trafford Wharfside are extended to a more logical and physical boundary to Europa Way in the east and Bridgewater Canal to the south. Our proposed change is enclosed at Appendix 1 and shows an amended plan from page 61 of the report.

**Key Strategic Sites – Site D – Trafford Park Core – Page 63**

Brixton agrees with extent of Trafford Park Core identified on the plan on page 63 and also with the wording describing this area to be the principal location for distribution and employment in the Borough with a focus on industrial, storage/distribution facilities and as an amendment, should also include office parks as appropriate.

**Key Strategic Sites – Site E – Trafford Centre Rectangle – Page 64**

We agree with the wording in respect to the Trafford Centre Rectangle, however the boundary should



be extended further to the west, as this will generate a good waterside development opportunity. Our proposed change is enclosed at Appendix 2 and shows an amended plan from page 64 of the report.

### Core Policy Direction L1: Housing – Page 76

In July 2008 the Government announced that Greater Manchester (including Trafford) had been awarded Growth Point Status and the annual housing requirement within Trafford has increased from 578 to 694 units per annum. The Preferred Options Core Strategy identifies a number of strategic sites that the Council consider will deliver the majority of the required housing land albeit this does not include the 20% increase resulting from the new Growth Point Status. In order to meet these increased numbers and the criteria set out in PPS3 to ensure additional growth, it will be essential for the Council to identify key sites and create flexible policies that will promote new housing as part of mixed use development in Trafford Wharfside.

Paragraph 7.8 only touches upon the potential implications of the Growth Point Bid for Greater Manchester if it were successful. Now that Growth Point Status has been awarded this section of the Core Strategy and subsequent tables referring to housing numbers should be revised to take account of the increased housing requirements for Trafford.

Brixton welcome proposals for Trafford to prepare a Strategic Housing Land Availability Assessment (SHLAA) alongside the Preferred Options document (paragraph 7.6). We have submitted a separate response to the draft SHLAA, including 4 key sites owned by Brixton with the potential to deliver new sustainable housing, which should be incorporated within wider mixed use developments. However, one key criticism of the Trafford Draft SHLAA is that it is limited to the Borough boundary and has not been undertaken over the wider housing market as emphasised in the RSS Proposed Changes.

In paragraph 7.11, Brixton agree that future housing growth should be concentrated within the Regional Centre, Inner Areas and Regeneration Areas in line with national and regional planning guidance. The Regional Centre (including Trafford Wharfside) and Inner Areas (including Trafford Park) offer good access to jobs, public transport, community services such as shops and schools, and health facilities.

The table on page 75 illustrating housing numbers for strategic sites should be amended to take account of the 20% increase in housing requirements for Trafford following the award of Growth Point Status in July 2008.

In paragraph 7.14, Brixton agree that future housing should be concentrated on previously developed land. In the case of new residential development in Trafford Park this should mean that brownfield sites in Trafford Wharfside are brought forward first, ahead of less sustainable Greenfield sites in Trafford Quays and elsewhere in the Borough. Such an approach would help to meet the RSS target that at least 80% of development should be on previously developed land.

### Core Policy Direction L2: Regeneration – Page 78

Brixton supports the intention to develop policy that will 'improve accessibility to key sources of

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employment such as Trafford Park' as identified in bullet 3, in the table on page 78.

Improvements to public transport access to Trafford Park, supported by Brixton in Spatial Option 3, would significantly improve accessibility to jobs for the deprived areas of Old Trafford and Gorse Hill.

126

### **Core Policy Direction L3: Mixed Use – Page 79**

As well as the issues already identified, we suggest that Trafford develops a policy that will encourage mixed-use development on previously developed land ahead of Greenfield sites in line with national and regional planning guidance.

127

### **Core Policy Direction L4: Accessibility - Page 80**

Brixton welcomes the aim to improve existing transport links and promote sustainable modes of transport. As part of this Core Policy Direction, we request that Trafford further investigate the potential to extend the Metrolink through Trafford Park to Trafford Centre through public sector funding. Such an initiative would significantly improve linkages between the Regional Centre, Inner Areas and Regeneration Areas such as Old Trafford.

128

There is no reference to the discussions currently underway in Greater Manchester to introduce Congestion Charging. As stated in previous correspondence to the Council, Brixton disagree with proposals to introduce a congestion charge. Whilst we agree that in central areas this may serve to reduce congestion i.e. in the City Centre (the inner ring), much of the areas in the outer ring are poorly served by public transport and therefore to penalise those who travel by car is unsustainable and unfair. Congestion charging should not be introduced in the outer ring without radical changes to the improvement of and provision of new public transport, including a commitment by the Council to extend the Metrolink through Trafford Park.

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### **Pollution – Page 81**

In point 7.32, policy should allow flexibility for non-compliant areas where higher value uses are required to support remediation.

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### **WORK – Page 84**

#### **Core Policy Direction W1: Economy – Page 87**

The preparation of a series of zone 'masterplans' for employment areas in Trafford is supported by Brixton and in future we request to be more actively involved in the development of the Trafford Park Masterplan, given Brixton's strategic land holdings.

131

Trafford Park is of regional significance and as such has a major role to play in the Region's economy. Robust policies should be developed which seek to protect existing employment sites in the 'central' area of the Park and in addition allow for their expansion, consolidation and intensification so they can

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continue to make significant contributions to the economy.

LDF policies also need to identify a hierarchy of employment designations. Brixton acknowledges that the Council is currently undertaking an Employment Land Review and request that this considers each employment site on an individual basis and its role and function within the wider hierarchy. A sufficient level of policy protection should be afforded to each site accordingly.

Policies should identify the preferred location for new employment sites and safeguard such sites for employment development. These sites should be identified through your current Employment Land Review and brought forward through the Sites Allocations DPD. The allocation of new employment sites should be based upon a robust review of employment land which considers the existing and forecast supply and demand of employment land, including a qualitative assessment of existing allocated and non-allocated employment sites in terms of suitability, location, etc to ensure the most suitable sites are retained/protected for future employment use. This will also serve to identify those sites (if any) which are no longer considered suitable for employment use and which would be better released for other uses. However, it is necessary to ensure that the release of such sites does not prejudice overall employment land supply and demand and that their redevelopment does not threaten the continued employment function of existing sites.

#### Part D – Page 107

A comprehensive delivery strategy will be essential for the successful implementation of the Core Strategy. Brixton request that progress against the Core Strategy Objectives is monitored on a regular basis through the Annual Monitoring Report, which will calculate annual housing and employment completions. Subsequent annual housing and employment targets for Trafford should be amended to reflect any shortfall or oversupply of such development.

Paragraph 9.6 states that the next stage of the Local Infrastructure Plan work will be aimed at identifying required infrastructure to support development. We request that Trafford Park, earmarked for significant development in all three Spatial Options, is identified as the number one priority for infrastructure improvement (including transport, social and community facilities) to support new development and to assist businesses growth in Trafford Park.

We have submitted a separate response to the draft SHLAA, including 4 key sites owned by Brixton with the potential to deliver new sustainable housing. However, we are concerned that the Trafford Draft SHLAA is limited to the Borough boundary and has not been undertaken over the wider housing market as emphasised in the RSS Proposed Changes.

#### Summary

Brixton welcome proposals for the significant development of Trafford Park and supports Option 3 of this document. We share the Councils vision that Trafford Park remains the premier location for industrial and distribution uses in Greater Manchester and while continues to expand and diversify into specific growth sectors including Financial Professional Services and ICT/Digital New Media.

Trafford Wharfside should be the location for new high quality housing that will form part of

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sustainable mixed-use developments well connected to initiatives in Mediacity:uk, Salford Quays and Manchester United FC.

Our client is keen to be involved in the preparation of Trafford's LDF and welcome the opportunity to work with Trafford Council to fulfil the development potential of Trafford Park and the surrounding area. We therefore request that these comments are taken into account during the preparation of the Core Strategy and that we continue to be informed of future LDF consultations.

We look forward to hearing from you in due course and would be obliged if you would confirm receipt of this letter.


Yours sincerely

A handwritten signature in black ink, appearing to read 'Andy Johnston', is positioned above the printed name and title.


**Andy Johnston**  
**Development Consultancy**

Encs.

Cc Adam Coulston Brixton Investments Ltd

SITE	DESCRIPTION	CONTRIBUTION TO OBJECTIVES
<p>B. Wharfside</p> 	<p>Mixed area within the Regional Centre incorporating western end of Trafford Park. Split into 2 distinct parts.</p> <ul style="list-style-type: none"> <li>mediachy.uk location for high quality mixed-use development centred around digital, media and tourism industries;</li> <li>Manchester United stadium promote enhancements for this world-class sporting destination.</li> </ul>	<p><b>Strategic Objectives:</b> SO1, SO2, SO3, SO6, SO7</p> <p><b>Place Objectives:</b></p> <ul style="list-style-type: none"> <li>Promotes significant, mixed business and residential development in the Wharfside area.</li> <li>Provision of high quality mixed-use development within the Regional Centre.</li> <li>Creates a vibrant, diverse location for digital and media industries at mediachy.uk</li> <li>Consolidates and builds upon the key tourist attractions such as Manchester United located in the Wharfside area.</li> <li>Improves the transport infrastructure serving the area to enhance accessibility by both public and private transport means.</li> </ul>

Trafford Core Strategy

SITE		DESCRIPTION	CONTRIBUTION TO OBJECTIVES
<p>E Trafford Centre Rectangle</p>		<p>Mixed commercial, retail and leisure area with potential to improve sustainability through residential led mixed-use development and enhancement of public transport infrastructure</p>	<p><b>Strategic Objectives:</b> SO3, SO6, SO7, SO10</p> <p><b>Place Objectives:</b></p> <ul style="list-style-type: none"> <li>• Promotes significant mixed business and residential development in the Trafford Centre Rectangle area</li> <li>• Improve the transport infrastructure serving the area to enhance accessibility by public transport</li> </ul>

Trafford Centre Rectangle



<b>STRATEGIC PLANNING AND DEVELOPMENTS</b>	
29 AUG 2008	
Rec	
Action by	Direct
Copied to	Direct

LDF Team  
 c/o Strategic Planning and Development Team  
 Trafford Council  
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 Sale Waterside  
 Sale  
 M33 7ZF

andrew.johnston@dtz.com  
 Tel: +44 (0)161 235 7638  
 Fax: +44 (0)161 834 2055

Our ref: 07/06268-8

Your ref:

26 August 2008

**POST AND EMAIL**

Dear Mr Smith

**Strategic Housing Land Availability Assessment- Draft Report- July 2008**

We have been instructed by Brixton plc to submit representations in relation to the above document. Our client is a major landowner in the Trafford Park area and their portfolio includes 22 properties covering over approximately 3 million sq ft of industrial/warehouse accommodation. Brixton realises the local and regional importance of Trafford Park and seeks further investment and development opportunities.

Our representations will focus upon the suitability of Trafford Wharfside to accommodate new housing as part of high quality mixed use development and includes the submission of 4 sites with residential potential, which are all owned by Brixton. As part of the latest round of consultation for the Strategic Housing Land Availability Assessment (SHLAA), we request that these sites are identified by the Council as having potential for development for new housing.

Brixton have also submitted a formal response to the Core Strategy Preferred Options and this representation should be read in conjunction with comments made in that letter and previous submissions to the Core Strategy Issues and Options Paper and New Land Use Allocations DPD in 2007.

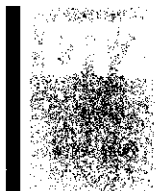
**Trafford Wharfside**

The area is dissected by Wharfside Way (A5081) and extends to approximately 80 ha (196 acres). Wharfside Way adjoins Chester Road (A56) which leads to Manchester City Centre, less than 2 miles to the east.

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LA84  
MAP 2  
P136  
6/2007

The red outline referring to Trafford Wharfside (Site LA84) illustrated in Map 2 on page 156 is incorrect and conflicts with the plan for the same area shown on page 61 of the Core Strategy Preferred Options Document. We request that the plan is amended to show the true extent and full development potential of Trafford Wharfside.

139

To the north of the site is Salford Quays and the site for the new Mediacity:uk development. This area is largely characterised by commercial, retail, leisure and residential uses. The industrial core of Trafford Park is immediately to the west, while further to the east and south of the site are the priority regeneration areas of Old Trafford and Gorse Hill.

### Residential Development

140

New high quality housing as part of sustainable mixed use developments at Trafford Wharfside would assist Trafford to meet national and regional housing targets, which have recently increased following publication of the Regional Spatial Strategy Proposed Changes and Greater Manchester receiving Growth Point status. This status has increased the annual housing requirement by 20%, from 578 to 694 units per annum, 80% of which should be on previously developed land.

Trafford Wharfside is already identified in all three spatial options of the Core Strategy Preferred Options document to deliver significant residential development (between 750-1100 new units) over the plan period.

141

### Sustainability

In terms of sustainability Trafford Wharfside is previously developed, located on the edge of Manchester City Centre and immediately adjacent to Salford Quays and Trafford Park, all of which provide excellent accessibility to jobs, social amenities and transport infrastructure. Existing nearby local services include:

Primary School	Gorse Hill Primary School, Burliegh Road, Stretford	0.7 miles
Secondary School	Stretford High School, Great Stone Road, Stretford	0.7 miles
Post office	Exchange Quay Post Office	0.8 miles
Metro link Stop	Manchester to Eccles, via Salford Quays	0.7 miles
Convenience Store	Co-op, Taylors Way, Stretford	0.7 miles
GP	Gorse Hill Medical Centre, Chester Road, Stretford	0.7 miles
Hospital	Hope Hospital	1.7 miles

\*Approximate distances supplied by 'Upmystreet.com'

As part of the redevelopment of Trafford Park and the regeneration of Old Trafford/Gorse Hill (identified in the Core Strategy Preferred Options), major investment will be directed to this area to improve and provide new community infrastructure to support new residential and employment development.



142

## SHLAA

Trafford Wharfside (Site LA84) is discounted from the overall supply pending an Employment Land Review as outlined in Appendix 6 on page 7 of SHLAA, which is due for completion in October 2008. However, given that Trafford Wharfside has been identified in the Core Strategy to deliver significant new housing, the SHLAA consultation, which forms an essential element of the Core Strategy evidence base, should be postponed until the Employment Land Review is complete. Pending the results of that Review, Trafford Wharfside should be identified for potential residential development in order for the Core Strategy to be in conformity with a robust evidence base as required by PPS12. If Trafford Wharfside is not considered suitable for residential development, the Core Strategy Preferred Options Document is significantly flawed and the LDF process should be restarted.

143

## Submitted sites owned by Brixton with potential for housing

We request that the Council consider the following sites owned by Brixton in Trafford Wharfside for residential use:

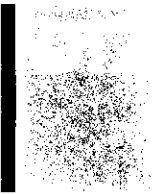
- 3 Wharfside Way (6.7 acres) – see attached proforma A
- 9 Wharfside Way (2.4 acres) – see attached proforma B
- Elevator Road (3.77 acres) – see attached proforma C
- Trafford Gateway (1.04 acres) – see attached proforma D
- Trafford Point (15.94 acres) – see attached proforma E
- Circle South (8.35 acres) – see attached proforma F
- 26 Europa Way (7.43 acres) – see attached proforma G
- Canalside (2.69 acres) – see attached proforma H
- Europa Triangle (1.12 acres) – see attached proforma J

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## Summary

Trafford Wharfside is suitable for sustainable mixed-use developments, including new high quality housing, which would contribute towards meeting Trafford's Regional Spatial Strategy annual housing requirement. The 4 sites submitted by Brixton should be identified by the Council as having potential for development for new housing to help meet this target and achieve the objectives set out in the Core Strategy Preferred Options document to build between 750 and 1100 new homes in Trafford Wharfside over the next 15 years.

Our client is keen to be involved in the preparation of Trafford's LDF and welcomes the opportunity to work with Trafford Council to fulfil the development potential of Trafford Wharfside and the surrounding area. We therefore request that these comments are taken into account during the preparation of the SHLAA and that we continue to be informed of future LDF consultations.



We look forward to hearing from you in due course and would be obliged if you would confirm receipt of this letter.

Yours sincerely

**Andy Johnston**  
**Development Consultancy**

Encs.

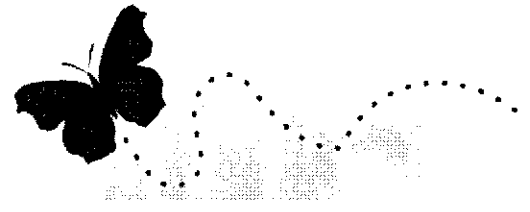
Cc Adam Coulston Brixton Investments Limited

## Greater Manchester Ecology Unit

Ryecroft Hall, Manchester Road, Audenshaw  
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Email: [gmeu@tameside.gov.uk](mailto:gmeu@tameside.gov.uk)  
Telephone: 0161 3719171

Principal Ecologist:  
Derek Richardson MIEEM



## Greater Manchester Ecology Unit

LDF Team  
c/o Strategic Planning & Developments  
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Sale Waterside  
Sale  
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Your ref : CS/PrefOpt  
Our ref : SW/3/F/12/9  
Doc ref : SW/SW18-1  
Contact : Suzanne Waymont  
Date : 18<sup>th</sup> August 2008

Dear Sir/Madam

### CORE STRATEGY PREFERRED OPTIONS CONSULTATION

Thank you for your consultation on the above document. The Unit's comments are detailed below:

#### PART B

P32 38  
102  
**Spatial options**

In terms of impact on nature conservation and biodiversity, it is difficult to judge which option would be the least harmful due to the broad nature of the options. Concentrating development in the Trafford Park and Old Trafford areas (Option 1) may have slightly less impact on Trafford's biodiversity than the other options but the true nature of any impacts cannot be assessed with more specific details. In addition, whichever option is chosen there will be a need to incorporate biodiversity enhancement measures into any development proposals in line with the requirements in PPS9.

P32 38  
103  
We welcome the intension to protect existing areas of biodiversity interest in Urmston (Options 1 and 2), Mersey Valley (all options), Trafford's Rural Communities (All options) and Carrington (Options 1 and 2). However, it is of concern that all three options appear to have significant negative effects on the environment and would expect the impacts of the proposals to be more balanced if the Local Development Framework is to be truly sustainable.

Given the known biodiversity interest on the site, we welcome the proposal to revert the land at Davenport Green to Green belt (paragraph 5.18).

P63  
104  
**Key Strategic Sites**

Site D – This area includes Trafford Park Lake and the Bridgewater Canal, important nature conservation sites in an area of otherwise limited biodiversity interest. It is therefore important that this interest is protected.

GMEU provides an ecological advisory service to and on behalf of the ten district councils of Greater Manchester  
The Unit is attached to Tameside as lead authority.

BOLTON, BURY MANCHESTER, OLDHAM, ROCHDALE, SALFORD, STOCKPORT, TAMESIDE, TRAFFORD,  
WIGAN.

106  
Site G -

While we welcome the proposal for this area to provide a greenspace resource, it is important that the site provides real high quality biodiversity gain, if targets in the Greater Manchester Biodiversity Action Plan are to be met.

107  
Site H -

Although two of the three preferred options refer to safeguarding areas of nature conservation importance within the Carrington area, the area shown on the map and the accompanying text does not appear to reflect this. Aside from the SBIs at Carrington and Partington, already affected by development, the area includes the "Shell Pools" nature reserve/SBI, which is of at least county importance for birds and therefore should be protected from both direct and indirect effects of development.

## PART C

### Core Policies

#### Core Policy Direction L5

While this policy direction is largely welcome, if it is to be truly holistic it needs to include wording for providing space for species and habitat adaptation to climate change.

#### Core Policy Direction R1

While this policy direction is welcome, any policy, once formulated, should define what is meant by "urban and countryside assets" and this should include Sites of Biological Importance (SBIs). It would also need to be ensured that the final wording of any policy complies with Regulation 37 of The Conservation (Natural Habitats, &c.) Regulations 1994.

### Development Management Policies

PPS9 states that "Plan policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development". We would therefore suggest that biodiversity enhancement measures either be included in DM1 or have a separate Development Management Policy similar to that of built conservation.

If you have any queries relating to these comments, please contact me again.

Yours sincerely

SUZANNE WAYMONT M.I.E.E.M  
SENIOR ECOLOGIST

GMEU provides an ecological advisory service to and on behalf of the ten district councils of Greater Manchester  
The Unit is attached to Tameside as lead authority.

---

BOLTON, BURY MANCHESTER, OLDHAM, ROCHDALE, SALFORD, STOCKPORT, TAMESIDE, TRAFFORD,  
WIGAN.

0161 941 5077

PC/1070/102

## Trafford's Core Strategy Preferred Options Comment Form – July 2008

### Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy Preferred Options report	✓	Page Number	33
Core Strategy summary broadsheet		Paragraph Number	
Sustainability Appraisal		Policy Direction reference	
Equality Impact - Initial Assessment		Vision Reference Number	
Other document, (please specify)		Objective reference number	
		Spatial Option Reference	
		Strategic Site Reference	
		Map/Figure Reference Number	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?			
Support	✓	Object	General Comment

Please continue on a separate sheet if required

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.
<p>Our preference for Option 1 remains. Whilst prioritising the Regional Centre, Inner Areas and Aldrich Town Centre, it also gives a reasonable balance of activity in other areas in Trafford. The extra activity proposed for Aldrich Town Centre in Option 2 could lead to unacceptable traffic and infrastructure problems.</p>

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

0161 941 5077

P0/1070/103

## Trafford's Core Strategy Preferred Options Comment Form - July 2008

### Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form

#### What are you commenting on?

Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.

Document	Section
Core Strategy Preferred Options report	Page Number 30
Core Strategy summary broadsheet	Paragraph Number
Sustainability Appraisal	Policy Direction reference
Equality Impact - Initial Assessment	Vision Reference Number AL06
Other document, (please specify)	Objective reference number
	Spatial Option Reference
	Strategic Site Reference
	Map/Figure Reference Number
	Other (including omissions and suggestions for alternative approaches)

Do you support, oppose or have general comments about this specific part of the document?

Support	Object	General Comment
<input checked="" type="checkbox"/>		

Please continue on a separate sheet if required

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

In support of this objective we would like there to be in place a sustainable Housing Restraint Policy similar to that of recent years. This has helped to retain the character of areas which are an asset to Trafford, and been successful in encouraging regeneration of areas needing economic improvement.

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

0161 941 5077

PO/1070/104

### Trafford's Core Strategy Preferred Options Comment Form – July 2008

#### Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy Preferred Options report	✓	Page Number	97
Core Strategy summary broadsheet		Paragraph Number	8-6
Sustainability Appraisal		Policy Direction reference	
Equality Impact - Initial Assessment		Vision Reference Number	
Other document, (please specify)		Objective reference number	
		Spatial Option Reference	
		Strategic Site Reference	
		Map/Figure Reference Number	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?			
Support	✓	Object	General Comment

Please continue on a separate sheet if required

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

It would be helpful if the Conservation Area Guidelines were updated to bring them into line with recent PPG's and RPG's.

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

PO/1074 /



ENGLISH HERITAGE

NORTH WEST REGION

STRATEGIC PLANNING AND DEVELOPMENTS			
04 AUG 2008			
Rec			
Action by			
Ans			
Copied to:			

Trafford Council  
 LDF Team  
 Attn Dennis Smith  
 First Floor  
 Waterside House  
 Sale Waterside  
 Sale  
 M33 7ZF

Your ref:  
 Our ref:  
 Telephone: 0161 242 1423

ACK 13/8

31 July 2008

Dear Mr Smith,

**DPD1: Core Strategy: Preferred Options**

102 I refer to your letter dated 14<sup>th</sup> July 2008 consulting English Heritage on the above document. English Heritage welcomes your approach of planning for the Borough on the basis of distinct character areas which will help ensure that policies are interpreted and implemented in a locally specific way. The Greater Manchester Historic Landscape Characterisation Project will be to provide information on the key characteristics of the historic environment and this should be supplemented by conservation area appraisals for the Borough's 21 conservation areas.

103 The spatial profiles of the character areas make some level of reference to the historic environment as do the key issues; however I consider that greater reference could be made to conservation areas and any key issues which would flow from their appraisal.

104 The Vision for Trafford and the Strategic Objectives are supported. Whilst the translation of these to Place Objectives makes some reference to the historic environment as for example for Altrincham, I do not get an overall idea of how the significance of the historic environment and how it may contribute to the future of each place. This would however be covered to some extent by Core Policy Direction R1 supplemented by Development Management policy Direction DM2.

**Spatial Options**

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 106  
 107 The sustainability appraisal of the spatial options in terms of the historic environment (E9) gives a set of mixed messages. It appear that Option 1 will incur the least direct harm to the historic environment but that other options for greater levels of development may potentially deliver enhancement through planning gain. I remain however unsure about the specific impacts of the 3 options upon the historic

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Please note that English Heritage operates an access to information policy. Correspondence or information which you send us may therefore become publicly available





environment and whilst giving some level of support for option 1 I reserve making further comments until more detail is available.

#### Key Strategic Sites

To enable more informed comment about the key strategic sites it would be helpful if the map and description highlighted matters relating to the historic environment both within and close to the site. Whilst I am able to search some information (Listed Buildings, Scheduled Monuments, Registered Parks and Gardens) relating to the historic environment at this office I do not have access to the full range of historic environment information (e.g. conservation areas, locally important buildings or features). The comments below should not therefore be viewed as a complete and comprehensive review of all potential impacts upon the historic environment. It will be important to involve your conservation officer and the GM Archaeologist in reviewing these sites.

108

#### Site A Pomona

The site includes the grade II listed Brindleys Weir. This structure and its setting would need to be safeguarded. Opportunities for enhancement and interpretation should be explored.

109

#### Site C Lancashire County Cricket Club

This site includes Trafford Town Hall which was listed grade II in March 2007. It will be important to safeguard this building and its setting when developing proposals for this site.

110

#### Site D Trafford Park Core

The site includes the grade II listed Trafford Park Hotel, the building and its setting will need to be safeguarded and incorporated into the regeneration of the area.

111

#### Site E Trafford Centre Rectangle

The site includes Pugin's Grade I listed Church of All Saints and the grade II Presbytery. English Heritage and the HLF have offered grant to fund the repair of the chancel roof. These buildings and their setting will need to be safeguarded. Planning gain opportunities for the repair and maintenance of the buildings should be explored.

112

#### Site F Newton Street / Lacy Street, Stretford

The text refers to the Essoldo, grade II listed, and the Civic Theatre also grade II is diagonally opposite the site on Chester Road. Improving links to these buildings will be important.

113

#### Site H Carrington

The site includes the grade II\* listed mid 18<sup>th</sup> century Church of St George. Ways should be explored of how the significant development proposed on the site can be used to safeguard this church and its setting.

114

Site J Woodfield Road, Broadheath

115

The site description refers to the redevelopment of the site. The site includes the grade II listed office block to the Linotype Machinery Works and the Luxi Leisure canal warehouse, it is not clear from the information I have what might also be protected as curtilage buildings. Any redevelopment here will have to be sensitive to the protection of these listed buildings and their settings. Such a site may benefit from the preparation of a more detailed planning brief.

116

Part C

Whilst the built environment is included under the "Relax" theme it will be necessary to address historic environment issues under all themes, as for example the comments above on the development of strategic sites demonstrate. Core policy direction R1 is supported together with the references in the text to the wide range of Trafford's historic assets.

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The section on green infrastructure refers to the natural environment but it will be important to also consider the historic environment components and aspects that make up GI. It needs to be made clear that R3 defines environmental assets as including the historic environment, for example designed landscapes and parks and gardens.

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English Heritage welcomes and supports your inclusion of development management policies covering design and construction and conservation. DM1 and DM2 are supported and I will be recommending this approach to other local planning authorities.

121

DM8 covers planning obligations. The SA refers on a number of occasions to development helping to secure the conservation and enhancement of historic assets. It is important therefore that the historic environment is included in the proposed guidance to prospective developers indicating when planning obligations will be used.

122

Part D

It is important that issues relating to the capacity and sensitivity of the historic environment and landscape are included in the LIP. You may wish to refer to the Daventry Infrastructure Plan from WNDC.

Yours sincerely

Judith Nelson  
Regional Planner

<b>STRATEGIC PLANNING AND DEVELOPMENTS</b>			
22 AUG 2008			
Rec			
Action by			
Ans			
Copied to			

PO/1082  
ACK sent 22/08/08



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f : 01727 835047

20<sup>th</sup> August 2008  
Our Ref: P-07-289/Trafford

Strategic Planning & Developments  
Trafford Council  
1<sup>st</sup> Floor, Waterside House  
Sale Waterside  
Sale M33 7ZF

Dear Sirs

**PLANNING & COMPULSORY PURCHASE ACT 2004  
Local Development Framework for Trafford  
Core Strategy Preferred Options Consultation July/August 2008.**

**1. Introduction**

We act as planning consultants for Barclays Bank plc ("The Bank") in respect of the emerging LDF for Trafford. The Bank is a significant stakeholder within the Borough's area, being long-established with a number of branches which have made a substantial contribution to the vitality and viability of Trafford's centres over the years that they have traded. We responded on behalf of The Bank to the Issues & Options stage of the Development Management and Core Policies in November 2007 and a copy of that response is appended. In that response we emphasised that banks are important contributors to town centres and significant attractors of visitation and that this important role in underpinning town centres and assisting in regeneration should be recognised in all the policies on the matter of promoting town centre vitality and viability within the LDF.

On behalf of the Bank we have examined the current consultation document, together with a number of background documents and we set out our representations below.

**2. Points Arising from the Consultation Documents**

The draft Core Strategy supports the expectation in the Regional Spatial Strategy that Altrincham will be the primary focus for retailing and the Bank supports the intention set out in Strategic Objective SO5 and in Core Policy Direction W2 to maintain and enhance the role of Altrincham as a main town centre and to promote it as a focal point for further development. According to Section 5 on Spatial Options both Option 1 and Option 2 will strengthen the role of Altrincham, giving the opportunity to establish it as the sub-regional centre in the Borough. The Bank agrees that maintaining the vitality and viability of Altrincham will be an important part of this process but emphasises that the delivery of that aim will depend upon major financial investment by private sector stakeholders.

(102)  
(103)

We note that the current document puts forward a *"Direction"* for Core Policies on Town Centres and Retail but it does not contain any meaningful policies on the matter. In our previous representations we criticised some of the retail policies in the Trafford UDP and expressed hope that such outmoded thinking should not be carried forward into the policies in the LDF. We are therefore particularly concerned that a background document for the LDF, the November 2007 Borough Retail and Leisure Study, should be perpetuating the outmoded thinking behind those UDP Policies about other than A1 uses within primary and secondary frontages. The Grimley study suggests that SPD should be prepared to control percentages of uses within frontages. The use of SPD to set out policy is of course contrary the Government's clear guidance which requires all such policies to be within Development Plan Documents to enable them to be subject to proper examination (PPS12), but the suggestion appears to be a reaction to *"the perceived concentration of non-retail (class A3-A5) uses"* in particular locations. It does not appear to stem from perceptions about A2 uses.

PPS 12  
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Maintaining quality and diversity in town centres is critical for the Council's intention to promote the vitality of Trafford but the Bank is concerned that the 2007 Retail Study does not reflect the important role played by financial services retailers in promoting vitality, underpinning town centres and assisting in regeneration. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are *"shopping area uses"* and are acceptable without any need for qualification. Whilst local planning authorities may distinguish between primary and secondary frontages within development plans, such designations should be *"realistically defined"* (PPS6, paragraph 2.17) having regard to such matters as rental levels and yields.

The aim of improving the quality and diversity of what is on offer in the town centre and promoting Altrincham as a focal point for further development does not sit well with seeking to limit other than A1 uses in primary shopping frontages. The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as A2 detract from the vitality and viability of town centres. Advice on this matter is given within ODPM Circular 03/2005 *"Changes of Use of Buildings And Land"* which accompanied the last major revisions to the Use Classes Order, where it is stated at paragraph 38 that the financial services sector is *"very much a part of the established shopping street scene, and which is expanding and diversifying....[being] ...uses which the public now expects to find in shopping areas"*.

The Bank is concerned that the UDP policy should not be continued within the LDF documents as this is likely to work against the Government's objective of promoting vitality and viability in town centres. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. The alternative to diversity can be long-term vacancy and decline. Banks in particular are actually the subject of high levels of visitation and many increasingly present an interesting and varied visual aspect to the street frontage. In order to achieve the Core Strategy's vision of a town centre that offers a wide range of activities and to make it worthy of sub-regional status, it is important to recognise the benefit of A2 uses in fostering footfall and pedestrian activity so planning policies should encourage flexibility to allow changes of use between the A1 and A2 use classes.

As part of the plan process, it is clearly important that any retail policies in the emerging Core Strategy or any other DPDs are founded on a robust and credible evidence base (see Government policy at paragraph 4.36 of PPS12) such as an up-to-date retail assessment that covers, amongst others, the matter of shopping area health checks. The recent Grimley Retail Study (November 2007) did not find that the presence of A2 uses in Altrincham town centre undermines vitality and viability. On the contrary, the report recognises the need for an uplift in the quality of retailing in order for the centre to compete more effectively. There is no good planning reason to restrict the presence of banks at ground floor level in 'primary' shopping frontages and without robust evidence to support such a stance, DPDs run the risk of failing the PPS12 tests of soundness at public examination. The Bank believes that the Council should recognise the important contribution of financial services such as banks in both bringing investment and acting as attractors for investment by others, in the wording and application of policies in all the relevant LDF documents. The Bank asks that this should be explicit in the wording of a Core Policy in order to allow changes of use between the A1 and A2 use classes and that it should also be covered in any forthcoming DPDs or SPDs that may appropriately deal with retailing.

On the matter of Planning Obligations it should not be assumed that all applications for planning permission produce a need for planning benefits. Furthermore, any contributions that are sought must meet the Secretary of State's Policy Tests and in the cases where benefits are justified as necessary, care must be exercised so that the contribution sought is not set at such a level that new development becomes unviable. Policy DM6 should explicitly recognise this, as should any forthcoming detailed policies.

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### 3. Closing Comments

The Bank trusts that the above comment is helpful and that full regard will be taken of the points in the preparation of the next stages of the Trafford LDF documents.

The Bank would also like to reaffirm its commitment to being involved in the preparation of the main components of the LDF and in that regard we wish to be notified of details of all the emerging LDDs.

Yours faithfully

*P.A.* **Michael Fearn of Shireconsulting**  
**On behalf of BARCLAYS BANK PLC**



<b>STRATEGIC PLANNING AND DEVELOPMENTS</b>			
26 AUG 2008			
Time			
Location			
By			
Area			
Comments			

Trafford Council  
 Strategic Planning and Developments  
 Waterside House  
 Sale Waterside  
 Sale  
 M33 7ZF

22<sup>nd</sup> August 2008

**Re : Trafford Core Strategy Preferred Options**

Dear Sir/Madam,

We understand that our landlord, Shell has been in discussion with the Council regarding the future of their land holdings at Carrington as they have ceased operations on large sections of the brownfield site. We would like to support the representations made by Shell and also participate in the plan making process as we have a long leasehold on much of this brownfield land.

The land at Carrington presents the opportunity within and beyond the LDF timescale for a comprehensive redevelopment of the brownfield land which comprises 181 hectares (448 acres) of core petroleum manufacture and distribution and a further 473 hectares (1,169 acres) of mainly agricultural land. Of this agricultural land some 396 ha (980 acres) is Green Belt whilst the remainder is subject to commercial lettings or is known as the C8 land.

The brownfield site is established as an employment site and is allocated in the UDP as a main industrial area identified as a priority for regeneration. Carrington Business Park and the adjoining agricultural land is allocated as a strategic development site. To the south of the site is an area of land allocated as expansion land for the future expansion of the existing industrial site (known as the C8 land). The Trafford Interchange proposals were identified as a strategic regional site by the NWDA and the wider site is still identified as a strategic site. It is against this background and the on-going discussions with the Council that these representations are made.

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We support the key issues identified for Carrington and support Shell continuing to work with the Council to produce a mixed use scheme for the regeneration of the site. In this respect we would suggest that the wording within the Preferred Options, together with the 3 Options themselves, is revised to reflect these ongoing discussions.

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We support the representations made by Shell in respect of the policies in Part B of the plan and their proposals to develop an Option 2A to encompass a mixed use development on the land.

In this context we support Shell's suggestion that the description of Carrington is re-drafted to make reference to the role of the land as a key mixed use site to deliver the increased levels of development. The focus should be on a mix of residential, employment, educational, health and community facilities linked to the regeneration of Carrington and Partington. As a consequence the place objectives will need to change to reflect the revised role for Carrington as part of an Option 2 A.

107

In conclusion we would suggest that the text within the Preferred Options is amended where appropriate to make reference to the land at Carrington as a mixed use redevelopment opportunity that will make a positive contribution to the delivery of the aims of the Strategy throughout and beyond the timeframe for the LDF. We believe that the opportunity presented by the total landholding at Carrington is not exploited by the Options currently presented and the potential for housing on the site is largely ignored notwithstanding the promotion of the site by the Council for an eco-town and the successful growth point bid. Furthermore the site is well connected to both strategic and local road networks, as well as having the capability of linking effectively to the wider public transport offer.

I look forward to receiving an acknowledgement of this letter and your response to the points made in due course.

For and on behalf of Basell Polyolefins UK Ltd,

P.B. Pyman

Site Manager, Carrington

Director, Basell Polyolefins UK Ltd

PO/1093/

4NW

Lord Peter Smith, Chair; Phil Robinson, Chief Executive;  
Contact Officer: Andrew Ashall Tel: 01942 776932 Fax 01942 776740  
E-mail: Andrew.ashall@4nw.org.uk

Strategic Planning and Developments  
First Floor  
Waterside House  
Sale Waterside  
Sale  
M33 7ZF  
Via email

Our Reference: DP46

Your Reference:

27<sup>th</sup> August 2008

Dear Dennis,

### **Trafford Borough Council – Core Strategy Preferred Option**

Thank you for the opportunity to comment on the above document. The following represents officer level comments from the Regional Planning Body; 4NW

I would like to take this opportunity to inform you of the current situation regarding the Regional Spatial Strategy. As you are aware the Adopted RSS Regional Planning Guidance for the North West (RPG13)<sup>1</sup> now forms an integral part of the development plan and should be given due consideration when assessing planning applications. In addition the Submitted Draft Regional Spatial Strategy for the North West of England<sup>2</sup> has now undergone a number of periods of consultation, with an Examination in Public which ended on the 15<sup>th</sup> February 2007. The Panel Report was published on the 8<sup>th</sup> May 2007<sup>3</sup>. Government Office North West (GONW) published Proposed Changes to RSS in March 2008<sup>4</sup>. 4NW are also in the process of carrying out a Partial Review of the RSS. As the document is now somewhat progressed in the process towards its adoption, it should also be given some consideration when preparing Local development documents.

<sup>1</sup> Regional Planning Guidance for the North West (March 2003) RPG13 -

<http://www.go-nw.gov.uk/gonw/Planning/RegionalPlanning/RegionalPlanningGuidanceNW>

<sup>2</sup> The North West Plan (January 2006) Submitted Draft Regional Spatial Strategy for the North West of England - [http://www.nwra.gov.uk/whatwedo/issues/environment/?page\\_id=223](http://www.nwra.gov.uk/whatwedo/issues/environment/?page_id=223)

<sup>3</sup> North West Draft Regional Spatial Strategy Report of the Panel (May 2007)

[http://www.nwra.gov.uk/whatwedo/issues/environment/?page\\_id=300](http://www.nwra.gov.uk/whatwedo/issues/environment/?page_id=300)

<sup>4</sup> GONW - Proposed Changes to Draft RSS (March 2008)

<http://gonw-consult.limehouse.co.uk/portal/regionalstrat/rss>

4NW is the Regional Leaders Forum for England's Northwest and is also the designated regional planning body for the Northwest



4NW would like to make the following comments on the following elements of the Core Strategy Preferred Options:

In terms of the three options presented, a mixture of options 1 and 2 seems to be the most appropriate approach, fulfilling many aspects of the core Development Principles and the other sub-regional policies such as MCR2 in the Secretary of State's Proposed Changes to the Draft Regional Spatial Strategy (hereafter referred to as 'the emerging RSS'). The final option should support the majority of growth within the Regional Centre and regeneration where it is most needed in the inner areas, in line with policy MCR2. However there should be provision for smaller-scale development in other settlements to maintain their vitality and viability and meet local service needs to satisfy policy W5. These elements are currently included to differing extents within Options 1 and 2.

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New spatial  
Option  
Object

We would consider the strategic objectives to be relevant and in line with those of the emerging RSS and welcome reference to the emerging RSS within SO10 referring to MCR3. MCR2 is also relevant here.

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P.25-26  
Support

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Para 5  
7.23-7.27  
support

We express general support for the sections relating to accessibility and housing. In relation to Core Policy L8 we would encourage the inclusion of sustainable design principles as well as traditional urban design such as measures for energy efficiency, carbon emission reducing measures, although we note that this is covered within paragraphs 8.1-8.5 and climate change issues are also covered in a different section.

103

Para 7.5  
- 7.15  
Support

105, L8, Object

We express general support for the retail policy, recognising Altrincham as the principal centre in line with emerging RSS.

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W2  
Support

We express general support for policy W1 relating to the economy. With regards to the supply of employment land, emerging RSS recommends that at least 30% of employment land sites are available in order that new and existing business are able to grow successfully. We are also supportive of the encouragement of mixed use schemes within the centres. Whilst we can express general support for 7<sup>th</sup> bullet point in W1 regarding the restriction of the change of use of an employment site, we would suggest that any de-allocation of an employment site should be backed up by an evidence base provided by a comprehensive review. Where this is not the case, Trafford should be satisfied that de-allocating any site would not lead to deficient supply of employment land and if required, alternative sites are available of equal or better quality, all set within the context of the Core Development Principles (policies W4 and DP1-9 in the emerging RSS).

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W1  
Support

In terms of the environment and green infrastructure, 4NW are generally supportive of the approach taken. Within the core policy R1, reference could also be made to the Biodiversity Resource and Opportunities map. Much of Trafford borough makes up an area where there exists opportunity to expand and reconnect, and expand and buffer current biodiversity resources. The positive approach to the treatment of environmental assets is welcomed.

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Para 7.60-  
7.73  
Support

109

R1  
Comments

The Green Infrastructure Guide for the North West<sup>5</sup> provides a detailed definition of green infrastructure, as outlined in Policy EM3 of the Submitted Draft RSS. The guide offers broad advice on how to plan and enhance green networks.

Core Policy R5 is supported; this is in line with L1 of emerging RSS.

110  
R5  
support

Within Development Management Policy DM1, we welcome reference to the North West Sustainability Checklist.

111  
DM1  
support

We are largely supportive of DM3 with regards to planning and water infrastructure issues. We would also encourage Trafford to specifically make the commitment to work with the Water Companies and the Environment Agency when planning the location and phasing of any development, and locate development where there is spare capacity within the existing water supply and treatment infrastructure. Where this is not possible, development must be phased so that new infrastructure capacity can be provided without environmental harm.

112  
DM3  
support

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

Yours sincerely,

Principal Regional Planning Officer

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<sup>5</sup> Green Infrastructure Guide for the North West (2008) –  
<http://www.greeninfrastructurenw.co.uk/resources/GIguide.pdf>

Director of Strategic Planning and Development  
Trafford Metropolitan Borough Council  
Waterside House  
Sale Waterside  
Sale  
Manchester  
M33 7ZF

Your ref.

Attention of Helen Green  
27 August 2008

<b>STRATEGIC PLANNING AND DEVELOPMENTS</b>			
28 AUG 2008			
Rec			
Action by			
Ans			
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the company  
2008

Our ref. GAO/AMCM/MC 0002

Dear Sir/Madam,

### Strategic Housing Land Availability Assessment (SHLAA), August 2008

Land at Skerton Road, Old Trafford, Manchester M16 0NQ

Trafford Metropolitan Borough Council Site Reference Number: LA 81

We write on behalf of our client, Bakemark UK, concerning the above site and following our representations submitted to Trafford Metropolitan Borough Council in December 2007 relating to the emerging Land Allocations Plan. We have now received notification in your letter of 14 July advising of the publication of the Strategic Housing Land Availability Assessment (SHLAA) Draft Report July 2008 and welcoming comments by 27 August 2008.

As you will be aware the Skerton Road site ("the site") has already been put forward as a potential housing led mixed use site in the previous submission to the Council. The latest consultation letter requests a review of the SHLAA and it seeks additional information that maybe available to support the proposed allocated sites.

### The site and surrounding area

As set out in our previous submission, the site is located within the Old Trafford Area of the borough and is within a five minute walk of Trafford Bar tram station. The site has a main road frontage on Elsinore Road to the north (to the north of which are located the tram lines) and is bounded by Skerton Road to the east, residential properties on Lime Grove to the south, and by a vacant site to the west.

The site is approximately 2.5 hectares in size and is currently occupied by a food processing plant. A number of buildings occupy the site. The buildings located predominantly at the northern part of the site are old, with a poor visual appearance and are not used as part of the operational facility as they are now considered obsolete. It is therefore a previously developed brownfield site, set within the urban area of Old Trafford that is significantly underused and in large parts remains vacant and is located with a sustainable location.

The uses to the east of the site are predominantly office and light industrial, and to the south is a residential area that branches off Skerton Road. It can therefore be considered that the area is one of a mixed use nature and that a mixed use redevelopment scheme would be an appropriate alternative use for the site.

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Acc sent 28/08/08

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13 17  
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**Central Government Guidance**

In July 2007 Communities and Local Government published, 'Strategic Housing Land Availability Assessments: Practice Guidance.' This document was prepared in accordance with Planning Policy Statement 3: Housing (PPS3) and informed the preparation of Trafford MBC's 'Strategic Housing Land Availability Assessment, Methodology and Project Plan' published January 2008.

It should be noted that the Central Government guidance states in paragraph 7, relating to the purpose of the assessment that:

*'It should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area.'*

Stage 2 of Central Government's advice relates to sources of sites with potential for housing and highlights:

*'Land allocated (or with permission) for employment or other land uses which are no longer required for those uses.'*

This advice is appropriately taken through to the Council's SHLAA Methodology and Project Plan as identified in paragraph 3.5.

Paragraph 21 of the Central Government guidance, which lies within stage 2 of the assessment states that:

*'Except for more clear-cut designations such as Sites of Special Scientific Interest, the scope of the assessment should not be narrowed down by existing policies designed to constrain development, so that the local planning authority is in the best possible position when it comes to decide its strategy for delivering its housing objectives.'*

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It is quite clear therefore that sites with non-housing allocations under the existing development plan, should not be discounted from an assessment as a potential housing site in the future, merely because of their existing allocation.

**National Planning Policy – Draft Planning Policy Statement 4: Planning for sustainable economic development (Draft PPS4)**

In December 2007 the Government released Draft PPS4 for public consultation. This draft document sets out how planning bodies should, in the wider context of sustainable development, positively plan for sustainable economic growth, and respond to the challenges of the global economy in their plan policies.

Of particular relevance is paragraph 4 of Draft PPS4, which states that, Local Planning Authorities should:

*'Thoroughly assess the existing supply of land available for economic development through an employment land review. Where possible, land reviews, such as housing and employment, should be undertaken at the same time to ensure a full assessment of competing land uses is made. Where appropriate, local authorities should carry out joint land use reviews.'*

Draft PPS4 seeks to recognise the needs of business. It states that:

*'Local Authorities should avoid designating sites for single or restricted use classes wherever possible and avoid carrying forward existing allocations where this cannot be justified.'*  
(paragraph 22)

103

para 22  
objection

Paragraph 24 adds further support to the site specific allocation issue by stating that Local Authorities should:

*'...limiting the designation of sites for single or restricted use classes and promoting mixed – use developments in appropriate locations.'*

This paragraph also advises that:

*'If there is no reasonable prospect of a site being used for economic development during the plan period, the employment allocation should not be proposed or retained, and wider employment uses or alternative uses, such as housing, should be actively considered.'*

**Development Plan**

It is considered important to reiterate the Skerton Road site's allocation as part of the Council's development plan, as this is relevant to the assessment of the SHLAA.

The site is allocated within the revised Trafford Unitary Development Plan (UDP) adopted on 19 June 2006 as a Main Industrial Area (Proposal E7) and as such the Council will permit development for business, industry, storage/distribution (B1, B2 and B8 Use Classes) and similar appropriate uses in conjunction with other criteria set out in Proposal E7.

Importantly the site is also allocated within the Old Trafford Priority Regeneration Area under Proposal H10 and as part of this, the Council will take action to:

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- improve the quality and diversity of the area's housing stock;
- improve the quality, appearance and safety of the local environment;
- mitigate the effects on the area of local and through traffic;
- improve facilities for pedestrians, cyclists and public transport;
- promote the redevelopment and re-use of unused, under-used or derelict land and buildings for residential, business and community purposes; and
- improve the quality and diversity of recreational and other facilities available to the local community.

para 24  
objection

**Review of the Skerton Road site in the SHLAA**

The site has been identified as being promoted in the 'Call for Sites' public consultation event in December 2007. It is also noted that the site is allocated as having an employment allocation and therefore Policy E7 is relevant. Paragraph 3.9 of the SHLAA – Draft Report states that,

*'Existing employment development sites (in use, vacant or allocated for such use in the adopted UDP under Proposals E7 and E13) have been excluded from this initial assessment until such time as an Employment Land Review is completed and published.'*

Indeed with regard to the above, the Skerton Road site, as outlined in Appendix 6 has been discounted at this stage due to its existing employment allocation. In short the site has been set aside at this stage as the Employment Land Review has not run parallel with the SHLAA, contrary to the advice guidance contained within draft PPS4. Given the strong emphasis from Central Government in draft PPS4 to recognising the needs of businesses and thus not adopting a formulaic and rigid approach to site designation, it is considered that a more appropriate approach to the SHLAA would be to retain all existing employment sites within the housing land assessment and undertake the further work in terms of deliverability and developability until the results of the Employment Land Review state otherwise. By adopting this approach, work on existing employment sites can be undertaken concurrent to other promoted sites and then discounted at a later stage if there is the strong evidence to support this.

In addition to the above, there has been no assessment and acknowledgement of the site and the wider area's allocation as a Priority Regeneration Area (PRA). It is considered that Policy H10, which relates to this allocation and the site is pertinent to the SHLAA and the housing assessment should take this allocation into consideration.

Policy H10 focuses on the regeneration of the Old Trafford Area. Significantly there is a focus upon residential led regeneration schemes of under used sites. The Skerton Road site meets many of the criteria outlined in Policy H10 and it is considered that this allocation should be given appropriate attention as part of future housing studies.

It is also considered important to make reference at this point to the Core Strategy Preferred Options consultation, which is running in parallel with the SHLAA consultation. In broad terms there is a strong emphasis, in varying degrees, of focussing investment within the Old Trafford Area, which is strongly supported. Despite this emphasis and the Priority Regeneration Area allocation as part of the Revised UDP, this is not referenced as part of the assessment criteria in the SHLAA. It is therefore considered that the emphasis in the Core Strategy Preferred Options and the existing regeneration based policies should be fully taken into account as part of future housing assessments.

#### **Further information requested by Trafford MBC**

The consultation letter of 14 July requests further information in relation to site constraints, housing potential and the deliverability and developability of sites that may influence and therefore alter the development capacity. This information is required upon sites that have not been put aside at this stage, however it is still considered pertinent to highlight the above information with regard to the Skerton Road site.

With regards to the potential for contamination, the site contains a number of industrial buildings of varying age and condition. In addition, historically the site has been used as an industrial plant, and therefore Environmental Site Investigation Reports may be required to confirm if contamination does exist on site.

#### **Conclusion**

The setting aside of the site for further investigation as part of the SHLAA is solely due to the timetable slips in the preparation and publication of the Employment Land Review. It is strongly recommended that this document and the SHLAA should run in tandem as advised in draft PPS4. This would provide all landowners/stakeholders/consultants with a much clearer idea as to the future aspirations of the Council. Accordingly it is advised that a more appropriate approach to handling existing employment sites would be to keep undertaking a thorough assessment of every employment site submitted to the Council until

the results of the Employment Land Review indicate otherwise or to withhold from any further housing assessment work until the Employment Land Review has reached a conclusion.

Notwithstanding this, the site has a dual allocation for an employment use and as part of the Old Trafford Priority Regeneration Area (PRA). It is considered that the employment allocation has been given priority during the initial assessment of the site and the PRA allocation has been overlooked at this stage. By making an assessment of the site on both Revised UDP policies it would not only provide a more balanced assessment of the site but would also create a more coordinated approach with the Council's Core Strategy, which is also progressing through the Local Development Framework.

It is considered that the site is strategically placed to assist meeting regeneration aims and will play an important and beneficial contribution to the Council's land allocations development plan document.

We would like to be kept informed about progress on the SHLAA and ask that correspondence is marked for the attention of Andy McMullan of this office.

Yours faithfully

**Gerald Eve**

PO/1096

Dennis Smith  
Trafford Metropolitan Borough Council  
Planning & Building Control Services  
1, Town Hall Waterside Plaza  
Sale  
Cheshire  
M33 7ZF

**Our ref:** SO/2006/000285/CS-  
01/PO2-L01  
**Your ref:** CS/PrefOpt  
**Date:** 22 August 2008

Dear Dennis

## **CORE STRATEGY PREFERRED OPTIONS CONSULTATION**

Thank you for referring the above document to the Environment Agency for consultation. We would wish to make the following comments.

### **Core Strategy DPD**

#### **Evidence Base**

Whilst we support the Council in the approach they have taken in using the most up to date information on the SFRA, we must OBJECT to the DPD document for the reasons as outlined below.

We note that the Draft of the Strategic Flood Risk Assessment (SFRA) has been used in support of the Core Strategy Development Plan Document (DPD).

Although we accept that work is ongoing to complete the SFRA, we would expect that a completed SFRA is in place so that this can inform the sustainability appraisal of the DPD and spatial options. The LPA can then also apply the sequential and exceptions test where necessary.

The current Greater Manchester SFRA is only at its first sub regional stage and has yet to undertake a more detailed level two assessment which considers flooding from all sources (Canals, Sewers, Pluvial etc).

Without having the evidence base in place to consider the flood risk from all sources (i.e. Canals) then it would be difficult to agree that the site would be suitable for development in accordance with PPS25. This would be of a particular concern where more vulnerable development is proposed in such locations. Furthermore paragraph

Environment Agency  
Appleton House, 430 Birchwood Boulevard, Birchwood, Warrington, Cheshire, WA3 7WD.  
Customer services line: 08708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

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P.C.  
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C.



4.10 (Practice Guide) clearly states that LPAs should use the sequential approach to steer new development away from other sources of flooding.

In considering the broad spatial options, we note that some of the priority regeneration areas (Carrington, Partington, Altrincham and Sale Moor) fall within identified flood zones. Paragraph 3.39 of the Practice guide to PPS25 states that where land can not be accommodated outside of flood risk areas the scope of the SFRA needs to be widened in a level 2 SFRA. If the preferred options are to be considered in these areas then it is essential that a level 2 SFRA is in place.

The DPD identifies several strategic sites that are adjacent to the Manchester Ship Canal (MSC) and the Bridgewater Canal. (See reference to the strategic sites below).

Without the completed SFRA or level 2 SFRA in place this means that the DPD has not been able to adequately apply the sequential test to broad allocations of development/strategic sites or consider flood risk in its entirety. The risk associated with this is in allocating strategic sites which could ultimately be at risk from flooding elsewhere.

Furthermore it has been noted that these sites have not been considered within the Sustainability Appraisal. We would expect that this is undertaken in order to complete the evidence base.

Failure to have the appropriate evidence base may result in the DPD not being considered 'justified' during the test of soundness at the inspection stage.

Before the Core Strategy is submitted for examination, we would suggest that the SFRA needs to be completed to a level 2 assessment and that the sequential needs to be applied.

All sources of flooding need to be considered in relation to the MSC. We are aware that you are awaiting the results of the Manchester Ship Canal study to determine the flood outlines. Currently we are awaiting authorisation from the MSC in order for us to start this work. Assuming we get the approval to use the MSC model our estimated completion date for the study is June / July 2009.

However, we have requested that the consultants explore the possibility of undertaking this work with a view to completing the study at an earlier date.

We are keen to continue to work closely with AGMA in respect of ensuring the completion of the final stage of the SFRA as early as possible. It is our view that Trafford is a main priority within the second phase of the SFRA due to the LDF timetable and the importance of their strategic sites in relation to the 'Growth Point' bid.

Notwithstanding the above comments, we would also like to make the following comments in relation to the rest of the Core Strategy document:

#### **Section 4: The Vision and Objectives for Trafford's Places**

Urmston URV (Page 29)

102  
SA dec.  
G.C.

ESP  
P 29  
URV  
P 29  
103

Some of the boundary of the Urmston area overlaps with the area identified as the Mersey Valley. As such we would expect that an objective is included which safeguards the landscape and provides enhancement where possible.

6.6  
6  
Sale SAV (Page 29)

6.6  
SAV  
P 29  
Para 4.1  
104  
We would wish to see an objective which safeguards and enhances the landscape, environment, recreational use and visual attractiveness of watercourses (Sinderland, Baguley and Fairwell Brook) in the Sale District. For example see objective AL07.

PAV  
P 30  
9  
105  
Partington PAV (Page 30)

We believe Partington's vision should include an objective to protect and enhance wildlife corridors (e.g. Red Brook) and Sites of Biological Importance (SBIs).

CAV  
P 31  
5  
106  
Carrington CAV (Page 31)

We feel that there should be reference within the vision for Carrington to be developed as a 'sustainable' employment centre, including the management of flood risk, sustainable construction and water efficiency.

P 31  
CA04  
5  
107  
We support the objectives identified for Carrington, particularly CA04. However as part of the area of Carrington includes the Mersey Valley we would wish to see reference to the safeguard/enhancement of this area or possibly make reference to it in CA04.

**Section 6. Key Strategic Sites**

P 60  
Section 6  
Site A  
108  
Site A. Pomona (Page 60)

As the site is adjacent to the MSC there may be a residual risk from flooding. More detailed work (SFRA) will be required to determine the suitability of the site and identifying it for development within the DPD.

Site B. Wharfside (Page 61)

Site B  
P 61  
109  
As the site is adjacent to the MSC there may be a residual risk from flooding. More detailed work (SFRA) will be required to determine the suitability of the site and identifying it for development within the DPD

P 63  
Site D  
Section 6  
110  
Site D. Trafford Park Core (Page 63)

Both the MSC and Bridgewater Canal run adjacent to this site identified for development. If development is required for wider aspiration purposes then the residual risk of flooding from the canals will need to be considered.

P 64  
Site E  
111  
Site E. Trafford Centre Rectangle (Page 64)

Both the MSC and Bridgewater Canal run adjacent to this site identified for development. If development is required for wider aspiration purposes then the residual risk of flooding from the canals will need to be considered.

P 65  
Site F  
112  
Site F. Newton Street / Lacy Street, Stretford (Page 65)

As the site is adjacent to the Bridgewater Canal there may be a residual risk from

flooding. More detailed work (SFRA) will be required to determine the suitability of the site and identifying it for development within the DPD.

Site G. Stretford Meadows (Page 66)

We support the inclusion of this site within the DPD which safeguards the land in meeting the aspirations of 'Green Infrastructure' principles for Greater Manchester.

Site H. Carrington (Page 67)

Part of this site lies within flood zone 2 and a small part is within flood zone 3. Therefore if the Council consider that the development can not be located elsewhere (Sequential Test) and it is important for wider sustainability reasons (Exception Test), a level 2 SFRA should be in place to meet the requirements of PPS25.

Site I. Partington Canalside (Page 68)

As the site is adjacent to the MSC there may be a residual risk from flooding. More detailed work (SFRA) will be required to determine the suitability of the site and identifying it for development within the DPD.

Site J. Woodfield Road, Broadheath (page 69)

As the site is adjacent to the Bridgewater Canal there may be a residual risk from flooding. More detailed work (SFRA) will be required to determine the suitability of the site and identifying it for development within the DPD.

**Section 7. Core Policies**

Climate Change – Core Policy Direction L5 (Page 81)

We support Trafford's policy to promote Sustainable Urban Drainage Systems (SUDS). All developments, no matter what the threshold, should assess the feasibility of incorporating SUDS to not only reduce flood risk, but to also enhance biodiversity within developments and conform to PPS9.

We support the policy direction including the reference to identification of flood risk. However, we would ask that reference is made in this part of the policy to ensure that inappropriate development is located in flood risk areas.

Natural and Built Environment – Core Policy Direction R1 (Page 90)

We would expect that as part of this policy, it should include reference to restoring watercourses back to their natural state. This would also include opening culverts and pulling back development from watercourses as this can have a significant benefit not only to ecology but also reduce flood risk and result in improvements in water quality.

I trust that you will consider these comments in further detail in taking forward the DPD document. Should you wish to discuss anything please do not hesitate to get in touch.

Yours faithfully

**Helen Telfer**  
**Planning Liaison Officer**

Direct dial 01925 543363

Direct fax 01925 852260

Direct e-mail [helen.telfer@environment-agency.gov.uk](mailto:helen.telfer@environment-agency.gov.uk)

End

5

PO/1096

Trafford Metropolitan Borough Council  
Planning & Building Control Services  
1, Town Hall Waterside Plaza  
Sale  
Cheshire  
M33 7ZF

**Our ref:** SO/2006/000285/BD-02/IC1-L01  
**Your ref:** SHLAA/02  
**Date:** 27 August 2008

Dear Sir/Madam

**STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT  
DRAFT REPORT CONSULTATION**

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

In considering the draft report we would like to make the following comments.

**Stage 4 – Sites and Areas to be Surveyed**

We support the inclusion of removing sites within flood plain as this accords with the principles of the sequential test in PPS25.

It has been assumed that reference to the 'floodplain' means sites within areas of Flood Zones 2 and 3 as shown on our flood maps. If this is not the case then this needs further clarification within the document.

**Stage 7 – Assessing whether sites are likely to be developed**

Although we support the identification of discounted sites that are in floodplain, other sites which have been taken forward may be at risk of flooding from other sources.

The associated Practice Guide to PPS25 states in paragraph 3.41 that Strategic Flood Risk Assessments (SFRA's) can help to assess the potential suitability of broad locations for the SHLAA.

The current Greater Manchester Strategic Flood Risk Assessment is only at its first sub regional stage and has yet to undertake a more detailed level two assessment which considers flooding from all sources (Canals, Sewers, Pluvial etc).

Environment Agency  
Appleton House, 430 Birchwood Boulevard, Birchwood, Warrington, Cheshire, WA3 7WD.  
Customer services line: 08708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)  
Cont/d..

119  
PT3

Page 2 of 21

support

P13

Page 24

clarification

support

120

P15

Page 3

support

support

support

support

support

P15 - (122)

3 32  
General  
/obj  
M...  
000

Without having the evidence base in place to consider the flood risk from all sources it would be difficult to determine whether other sites (E.g. Those adjacent to the MSC - Trafford Park, Pomona Docks) would be suitable for development within the SHLAA. This would be of a particular concern where more vulnerable residential development is proposed in such locations.

Although we would not expect such sites to be discounted from the SHLAA, we would suggest that reference should be made to sites where it is considered that additional detail will be required in undertaking a level 2 SFRA. The results of which may have an impact on whether a site is 'developable' for housing.

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

Yours faithfully

**Helen Telfer**  
**Planning Liaison Officer**

Direct dial 01925 543363  
Direct fax 01925 852260  
Direct e-mail [helen.telfer@environment-agency.gov.uk](mailto:helen.telfer@environment-agency.gov.uk)

<b>STRATEGIC PLANNING AND DEVELOPMENTS</b>			
29 AUG 2008			
Rec			
Action by			
Ans			
Copied to	Our ref	JDATPG/MW/034504	

PC/10981 —  
ACK 28/8/08



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[www.driversjonas.com](http://www.driversjonas.com)

LDF Team  
C/o Strategic Planning & Developments  
Waterside House  
Sale Waterside  
Sale  
Manchester  
M33 7ZF

By Post and E-mail

27 August 2008

Dear Sir / Madam

### Consultation on Trafford Core Strategy Preferred Options Comments on Behalf of Burford

On behalf of our client, the Burford Group, we are writing to provide our comments on Trafford's Core Strategy Preferred Options paper, which is currently out for consultation.

These comments relate specifically to the land at Carrington shown on the attached plan which comprises land at the Carrington chemical manufacturing works combined with an area of agricultural land to the south of this. This letter should be read in conjunction with Burford's earlier representations on the New Trafford Land Allocations Plan (dated 21/12/2007), which are also attached.

The Preferred Options consultation paper explains that Carrington is underperforming as an employment area and highlights the need to attract significant new activity to ensure its future economic viability. It states that the overall vision for Carrington is to regenerate and develop the area as an important focus of economic activity serving and supporting the business and employment needs of the City Region, the residents of Partington and adjoining areas. This overall vision is reflected in the three Spatial Options identified within the Preferred Options paper, each of which indicate that the focus of development within Carrington should be on economic growth.

Burford supports this overall vision for Carrington which reflects the area's continued importance as a strategic employment location. The land identified on the attached site plan would be particularly suitable for a rail-served warehousing and distribution facility (which would accord with Carrington's status as a strategic employment location) for the reasons set out in Burford's representations on the New Trafford Land Allocations Plan in December 2007. The site's potential for this use should be specifically acknowledged by the Council within the new Trafford Core Strategy.

The Preferred Options paper also notes that an opportunity for an Eco-Town at Carrington is being investigated further and work is underway to consider the potential for a mixed-use scheme to facilitate the regeneration of Carrington and Partington. Notwithstanding Carrington's underperformance as an employment area, employment remains the most appropriate land use to ensure its future economic viability and enable the Council to meet the regeneration objectives both for the local area and for Trafford as a whole. Alternative land uses such as housing would not be appropriate and Burford would object to the promotion of such land uses here which would clearly be in conflict with Carrington's key role as a strategic employment location within the Borough.

If you have any queries or require any further information with regard to these comments, please do not hesitate to contact John Adams or Philip Grant. In the meantime, we would be grateful if you could confirm receipt of this submission.

Yours faithfully

**DRIVERS JONAS LLP**

[johnadams@driversjonas.com](mailto:johnadams@driversjonas.com)

Tel: 0161 247 7302 Fax: 0161 236 8420

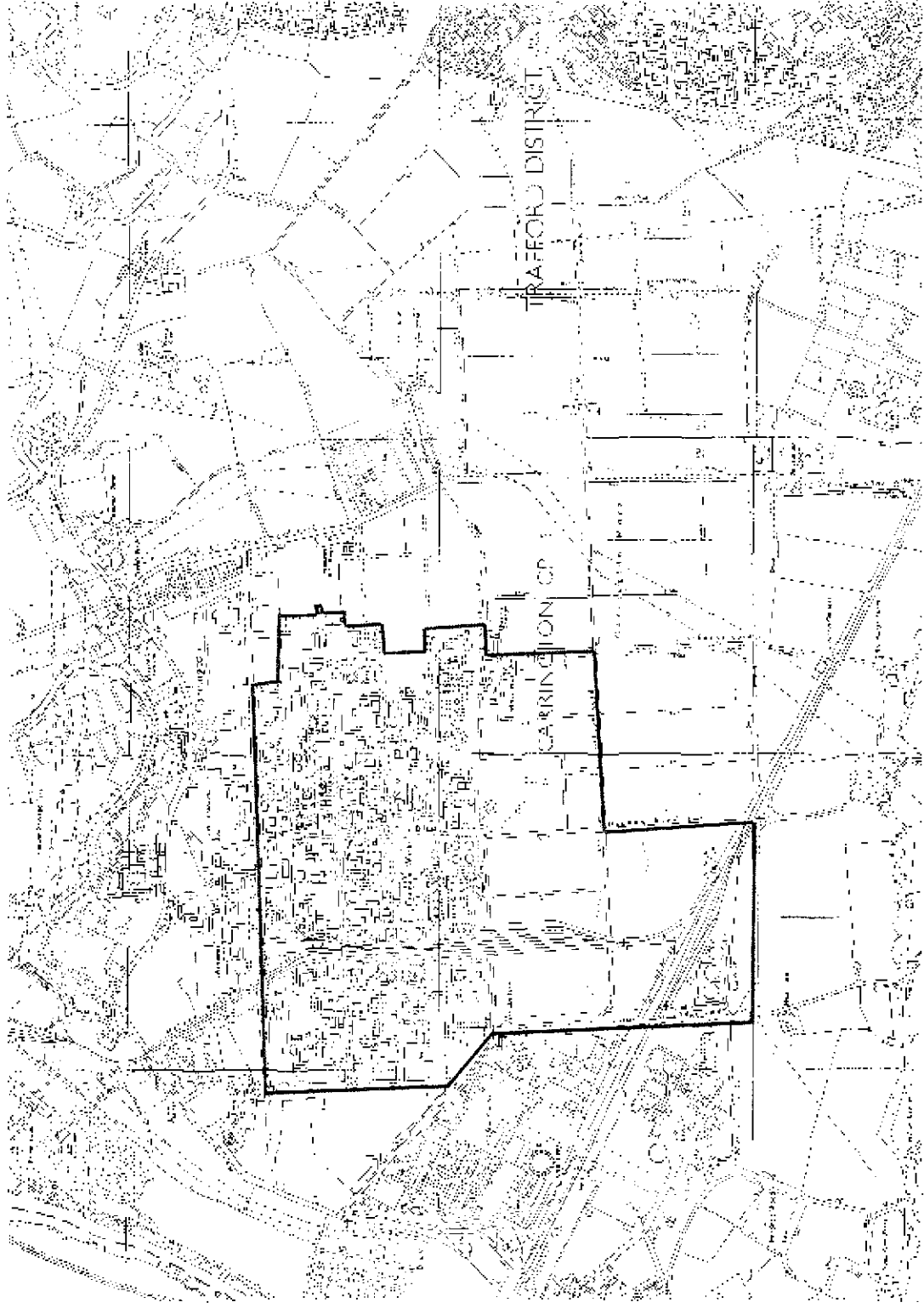
[philipgrant@driversjonas.com](mailto:philipgrant@driversjonas.com)

Tel: 0161 247 7322 Fax: 0161 236 8420

Enc: Site Plan  
Burford's Representations on the New Trafford Land Allocations Plan dated 21/12/2007



TMBC Core Strategy Preferred Options Consultation August 2008  
Land at Carrington Site Plan





Chartered Surveyors

Strategic Planning & Developments  
Waterside House  
Sale Waterside  
Sale  
Manchester  
M33 7ZF

Our ref JDA/PG/034504

5 New York Street  
Manchester  
M1 4JB  
Tel 0161 247 7373  
Fax 0161 236 8420  
[www.driversjonas.com](http://www.driversjonas.com)

By Post & Email

Regulated by RICS

COPY

21 December 2007

Dear Sir / Madam

## Consultation on New Trafford Land Allocations Plan Comments on Behalf of Burford

On behalf of our client, the Burford Group, please find enclosed a set of completed forms and a site plan which recommends that a site in Carrington, comprising land at the Carrington chemical manufacturing works combined with an area of agricultural land to the south of this, should be allocated in the new Trafford Land Allocation Plan for redevelopment to provide a rail-served warehousing and distribution facility.

Our comments on Section C of the forms (Site Issues) are provided as follows:

### Accessibility

The land at Carrington is geographically well placed within the region's road, rail and shipping network, providing the potential for good access to Manchester Airport, and is highly accessible to Greater Manchester's centres of employment and residential areas.

The main road access to Carrington along Manchester Road is heavily congested, particularly at peak hours, with serious delay at the junction with Flixton Road. Carrington is also poorly served by public transport, which combined with the congestion on Manchester Road, is currently constraining the regeneration and growth of the area, which is allocated as a Priority Regeneration Area in the existing Adopted Trafford UDP, and is one of the key employment opportunities within Greater Manchester.

Steps should be taken to ensure that the uses proposed for the land at Carrington in the new Trafford Land Allocation Plan will help to deliver the improvements to the local road, rail and public transport infrastructure that are required to allow the area to realise its full potential.

### Suitability

Carrington is a particularly suitable location for a rail-served warehousing and distribution facility both in terms of its ability to serve the rail freight supply chain, and its proximity to the market place.

It meets the key criteria in terms of the site and location for strategic rail freight interchanges that is set out in relevant national guidance (including that produced by the old Strategic Rail Authority), and as contained in Regional Planning Guidance and the Regional Freight Strategy.

The site is well placed to meet the need arising from the Greater Manchester conurbation and is located in the Liverpool / Warrington / Manchester commercial belt in the south of the North West region, where rail freight facilities can make most efficient use of the west coast mainline.

The size of the site at Carrington provides the potential to deliver a range of major warehousing and manufacturing buildings to create a critical mass of rail served warehousing which would be necessary to support infrastructure costs, and to provide economies of scale for occupiers.

Detailed environmental and transportation studies and masterplanning work was undertaken between 2000 and 2004 as part of a previous proposal to deliver a strategic rail freight interchange at Carrington. This previous scheme, which Burford and Shell sought to progress through the UDP Review process, involved agricultural land to the south of the chemical manufacturing works that is shown on the attached site plan, combined with 86 ha of additional land south and east of this site which falls within the Green Belt. The work undertaken demonstrated that the land was suitable for use for these purposes. This previous proposal was supported in full by a number of key consultees including the old Strategic Rail Authority and North West Development Agency.

Further work would need to be done to assess the suitability of the land within the chemical manufacturing area to also be used for rail-served warehousing and distribution, although this and other employment uses would be likely to involve less environmental constraints than those associated with most other potential uses that may be suggested for the area such as, for example, housing.

The current shortfall in provision and the availability of suitable sites, accessible by suitable railway lines and trunk roads, in appropriate locations close to major centres of population and economic activity indicates that the potential to bring forward the site at Carrington for these purposes should be considered seriously given its undoubted suitability.

#### Availability

We understand that the land to the south of the chemical works that is currently in agricultural use could be brought forward quickly for redevelopment. The land that falls within the chemical manufacturing area is likely to take significantly longer to bring forward given that these works are currently in operation and, in the event that they did cease to function, would still require significant clearance/remediation before any redevelopment could commence.

#### Viability

Previous proposals for a strategic rail served interchange in this location, demonstrate recent significant commercial interest in the site for the uses suggested within these representations.

The forecast growth in road traffic, which will exacerbate congestion problems and impact on the efficiency of the UK economy, is likely to increase the market interest in rail-served warehousing and distribution facilities further still.

The serious quantitative and qualitative deficiency in the provision of rail-served warehousing in the North West, and more specifically in the Greater Manchester area, indicates that the need for this type of facility in a location such as Carrington is likely to remain strong.

#### Sustainability

The development of a rail-served distribution and warehousing facility at Carrington would play a key role in assisting the transfer of freight from road to rail, which is a highly sustainable form of transport.

It would also have the potential to provide important economic impacts by improving regional competitiveness, enabling national and international logistics businesses, retailers and manufacturers to operate from a location which will meet their long term growth requirements and providing them with a dedicated rail capability to serve destinations in the UK and mainland Europe.

The uses proposed would also provide substantial regeneration opportunities for the the wider area in particular in terms of job creation and preservation, social inclusion and the redevelopment of brownfield sites in Carrington.

If you have any queries or require any further information with regard to the attached comments, please do not hesitate to contact John Adams or Philip Grant. In the meantime, we would be grateful if you could confirm receipt of this submission.

Yours faithfully

**DRIVERS JONAS**

[johnadams@driversjonas.com](mailto:johnadams@driversjonas.com)

Tel: 0161 247 7302 Fax: 0161 236 8420

[philipgrant@driversjonas.com](mailto:philipgrant@driversjonas.com)

Tel: 0161 247 7322 Fax: 0161 236 8420

Enc: completed consultation forms and site plan

Print Form

Submit by Email

# LAND WANTED!!\*

\* Sustainable Sites Only Need Apply

## A. SITE DETAILS

**SITE ADDRESS:** Land at the Carrington chemical manufacturing works and adjoining open land situated between these works at the Partington branch railway line to the south.

**SITE SIZE (if known):** TBC

**HAS THE LAND BEEN DEVELOPED PREVIOUSLY?:**

YES  NO  DON'T KNOW

**EXISTING USE:** Chemical manufacturing works and open land currently in use for agricultural purposes. The Partington branch line has not been used for several years but it nevertheless remains an operational railway line.

**PREFERRED USE:** Rail-served warehousing and distribution.

**ALTERNATIVE USES:** Carrington is one of the most significant employment opportunities within the whole of the Greater Manchester conurbation. Any alternative use for the site should also be employment led in order to fully realise Carrington's potential.

## B. CONTACT DETAILS

### LANDOWNER

**Name** Burford Group

**Organisation** C/O Agent

**Address**

**Postcode**

**Telephone**

**E-mail**

**Nature of Interest (please select)**

Freehold  Leasehold

### OTHER INTEREST

**Name** John Adams / Philip Grant

**Organisation** Drivers Jonas

**Address** 26 York Street  
Manchester

johnadams@driversjonas.com  
philipgrant@driversjonas.com

**Postcode** M1 4JB

**Telephone** 0161 247 7373

**E-mail**

**Nature of Interest (please select)**

Local Resident  Agent  Organisation

**C. SITE ISSUES**

**ACCESSIBILITY** (e.g. how accessible is the site by motor vehicle/public transport/ walking/cycling etc.?)

**GOOD**                       **BAD**                       **DON'T KNOW**

**DETAILS:**

See covering letter

**SUITABILITY** (e.g. is the affected by contamination or flooding? what utilities such as gas/electricity etc. are present on the site?)

**GOOD**                       **BAD**                       **DON'T KNOW**

**DETAILS:**

See covering letter

**AVAILABILITY** (e.g. would the site be immediately available for development?)

**GOOD**                       **BAD**                       **DON'T KNOW**

**DETAILS:**

See covering letter

**VIABILITY** (e.g. has there been significant market interest in the site?)

**GOOD**                       **BAD**                       **DON'T KNOW**

**DETAILS:**

See covering letter

**SUSTAINABILITY** (e.g. what kind of economic, social or environmental impacts could the site have?)

**GOOD**                       **BAD**                       **DON'T KNOW**

**DETAILS:**

See covering letter

## D. SITE PLANS

It is necessary to submit a plan on an OS map base, with the proposed site edged in blue - this is an **essential** requirement. You can submit an image file as part of this form by inserting it in the space below - preferably the file size should be one MB or less. Older versions of Adobe Acrobat will not support this function so you can either attach the image file to the e-mail used to submit this form or send the plan separately by post to the address below. Please mark any posted maps clearly with their site address.

Insert image file above

Please submit your completed form(s) either electronically by using the 'Submit by Email' button at the top of the form or by printing it out and sending to Strategic Planning & Developments, Waterside House, Sale Waterside, Sale, Manchester M33 7ZF by Friday 21st December 2007.

If you wish to be kept informed about progress on the Land Allocations Plan and the Partington Area Action Plan please indicate by clicking the box. Alternatively check the website ([www.trafford.gov.uk](http://www.trafford.gov.uk)) for updates.

Please Note that all comments will be held by the council on a database for the duration of the Local Development Framework (LDF) and will be available for public inspection under the Freedom of Information Act 2000.

For office use only

Acknowledged:

Reference Number:



**Trafford's Core Strategy Preferred Options Comments Form  
- July 2008**

**Comments Sheet**

Please complete a separate comments sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

**What are you commenting on?** Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.

Document		Section	
Core Strategy Preferred Options report	<input checked="" type="checkbox"/> YES	Page Number	89
Core Strategy summary broadsheet	<input type="checkbox"/>	Paragraph Number	
Sustainability Appraisal	<input type="checkbox"/>	Policy Direction reference	W3
Equality Impact - Initial Assessment	<input type="checkbox"/>	Vision Reference Number	
Other document, (please specify)	<input type="checkbox"/>	Objective Reference Number	
		Spatial Option Reference	
		Strategic Site Reference	
		Map/Figure Reference Number	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?

Support                       Object                       General Comment

Please continue on a separate sheet if required

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve this document.

The Coal Authority welcomes the inclusion of Core Policy Direction W3, particularly in relation to the commitment to the production of the Joint Minerals DPD for the Greater Manchester Area. As you will be aware, coal is present within the North West region, although no coal capable of surface mining is present within the Trafford plan area.

The Coal Authority would also like to make a general comment in respect of future development within the plan area. In areas where coal mining has taken place in the past, this can give rise to the presence of old mine workings and also the need to gain our permission for entering land which has coal present. The LPA should advise developers that should they find any coal in the course of implementation of proposals it will be necessary to contact The Coal Authority and obtain permission, without this permission it does technically constitute an act of trespass for which legal action may be taken. The permission process is designed to ensure that the method of entry into land in coalfield areas will not create any public safety hazards resulting from historical mining activities. An appropriate reference to The Coal Authority and the potential need for its permission within this document may be helpful to plan readers, although it is acknowledged that this plan will not cover minerals in great detail as it is subject to a separate, joint DPD.

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

Click here to Submit this form by email

PO/1107

# Trafford Tomorrow



Help us shape your area - What does it mean for you?

## Delivering the Vision (Jigsaw pieces!)



The Plan sets out 10 aims to deliver the overall Vision set out in the revised Sustainable Community Strategy. We want to know if these are what you would like us to achieve over the next 15 years in Trafford.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
SO1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO8	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO9	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
SO10	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add any further comments?

## The Options (Option 1, Option 2 & Option 3 diagrams)

We want to know your views on which Option we should choose, or how they could be improved.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
Option 1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Option 2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Option 3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add any further comments?

Option 3 would seem ideal as the new BBC village built in Salford Quays on the border of Manchester/Trafford Council will create jobs for the surrounding area during and after construction and could expand the modernisation of Greater Manchester into Trafford. However, with the construction being weak at the moment, work has slightly decreased in creating new residential and commercial buildings due to lack of demand and lack of people purchasing property, with an estimation of this not changing indefinitely. The most ideal option would be Option 2, as it would focus on improving what is already there and would incorporate Trafford Park at the same time, encouraging people to visit local shops and use facilities available. In developing the centres and providing a better service, people in the surrounding areas will be more interested in shopping locally than going further a field especially with the current uncertainty of petrol prices

## The Key Strategic Sites (shown on Options 1, 2 & 3)




We have included 11 strategic sites within the Options diagrams, these sites are considered to be important to the Borough in terms of where major development might take place. We want to know if you agree with us that the right sites have been picked, and that they are vital to achieving the aims of the Plan.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
Site A	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site B	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site C	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site D	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site E	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site F	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site G	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site H	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site I	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site J	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site K	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add any further comments?

## The Effects of the Plan (Pie Charts!)




The results of the Sustainability Appraisal show that all the options had positive neutral and negative effects, with Option 2 showing the most positive effects overall. Do you agree with our conclusions on the effects of the Plan?

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
 Option 1 Pie Chart	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 Option 2 Pie Chart	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 Option 3 Pie Chart	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add any further comments?

## Making it work

We have set out some draft policies that will be used, by the Council, to consider planning applications for development. These will be refined into detailed policies at the next stage therefore we want to hear your views on whether, or not what we are proposing are the right policies and will address the issues the Borough faces.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
 <b>Live Policies</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 <b>Work + Learn Policies</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 <b>Relax Policies</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add any further comments?

## About you:

**We need to have a few details from yourself for you to be entered into the prize draw for the iPod!!!**

Please note that all comments will be held by the Council on a database for the duration of the Local Development Framework (LDF) and will be available for public inspection under the Freedom of Information Act 2000.

Name

Maria Dobson

Address

Postcode

Tel. No.

Fax. No.

Email Address

# Trafford Tomorrow



Help us shape your area - What does it mean for you?

## Delivering the Vision (Jigsaw pieces!)



The Plan sets out 10 aims to deliver the overall Vision set out in the revised Sustainable Community Strategy. We want to know if these are what you would like us to achieve over the next 15 years in Trafford.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
SO1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO3	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO4	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
SO6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO8	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO9	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO10	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add any further comments?

Attainment is too far south in the borough and hard to reach from parts of the borough. So? Access should be focused on Northern part. (Carrington)

## The Options (Option 1, Option 2 & Option 3 diagrams)

We want to know your views on which Option we should choose, or how they could be improved.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
Option 1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Option 2	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Option 3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add any further comments?

Option 3 gives more variety in development.

## The Key Strategic Sites (shown on Options 1, 2 & 3)

We have included 11 strategic sites within the Options diagrams, these sites are considered to be important to the Borough in terms of where major development might take place. We want to know if you agree with us that the right sites have been picked, and that they are vital to achieving the aims of the Plan.




	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
Site A	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site B	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site C	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site D	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Site F	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site G	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site H	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site I	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site J	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Site K	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add any further comments?

Borough is developed in a new houses to be houses and people need developments

## The Effects of the Plan (Pie Charts!)

The results of the Sustainability Appraisal show that all the options had positive neutral and negative effects, with Option 2 showing the most positive effects overall. Do you agree with our conclusions on the effects of the Plan?




	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
 Option 1 Pie Chart	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 Option 2 Pie Chart	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 Option 3 Pie Chart	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would you like to add any further comments?

3 is more positive in the social side it brings more chances in the borough

## Making it work

We have set out some draft policies that will be used, by the Council, to consider planning applications for development. These will be refined into detailed policies at the next stage therefore we want to hear your views on whether, or not what we are proposing are the right policies and will address the issues the Borough faces.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
 <b>Live Policies</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 <b>Work + Learn Policies</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 <b>Relax Policies</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add any further comments?

## About you:

**We need to have a few details from yourself for you to be entered into the prize draw for the iPod!!!**

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Name  
Address

*Matthew Bennett*

Postcode

Tel. No.  
Fax. No.

Email Address

3

PC/1128



### Core Strategy Preferred Options Community Group Workshop

<b>Project:</b>	Core Strategy Preferred Options	<b>Subject:</b>	Community Group Workshop
<b>Date &amp; Time:</b>	04.08.08 (1.30pm to 4.30pm)		
<b>Meeting Place:</b>	Sale Waterside Arts Centre	<b>Attendees:</b>	Cyril Saunders – 50+ Voice Network David Esdaile – Trafford Housing Trust (Chaperone) Dean Edwards – GGP in Old Trafford Gordon Minton – 50+ Voice Network John Waghorne – Disability Partnership Board Joyce Mason – 50+ Voice Network Marcus King – GGP in Old Trafford Matthew Bowcott – Youth Cabinet Stacy Milward – Youth Cabinet (Chaperone) Tony Wright – Voice of BME Trafford  Amarjit Doow – Trafford Council Damien Cutting – Trafford Council Helen Green – Trafford Council Rob Gaskell – Trafford Council

#### Note of meeting

##### General comments raised:

- Requests to not be included in photographs of event voiced by one adult. One under age attendee present.
- Only one Hospital in Trafford, plus the threat of many doctor's Surgeries closing down.

##### Housing & Community Cohesion comments raised:

- Life time homes – a discussion about lifetime homes found there was a need for new developments across the Borough to be of this standard.
- The development of Broadheath and Altrincham should be progressed jointly, as the sites are very close together.
- Location and type of homes – a mix of house types required, affordability in Old Trafford seen as a particular issue. Many local people in Old Trafford do not have the money to buy new homes, Old Trafford needs a bit of everything, i.e. Social housing of various styles such as town houses, flats etc.
- Many attendees agree on the need for more Social housing and raised the point, the right-to-buy Social rented homes also results in the right to sell eventually.
- It was considered that community cohesion is best achieved, where you have a good variety of people. An example provided was Sale Moor, whereby the need to travel is reduced, as many facilities are located within the centre. It was stated, this was apparent 10 years ago in Old Trafford.
- Particular problems of schools in the south of the Borough attracting pupils from outside of the Borough and resulting in property prices escalating causing affordability issues for local residents.
- The need for more Social housing in the South of the Borough was raised.

##### Education

- It was voiced that the Trafford College (Talbot Road site) facilities and the quality of teaching was poor in comparison to MANCAT. Concerns of future funding issues for Trafford College (Manchester Road) were raised. Accessibility issues to MANCAT were raised, as public transport links to Openshaw from Trafford are difficult.

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- To encourage students to remain in education, a suggestion of a technical/vocational training facility for those school leavers failing GCSEs may encourage progression to College education.
- It was raised there was a need for more employee Apprenticeships, as many young people learn more when in a practical environment.

COMMENTS  
EDUCATION  
SCHOOL LEAVERS

COMMENTS  
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**Transport accessibility comments raised:**

- It was raised that the current location of Trafford Town Hall is poorly served by public transport, moving Trafford Town Hall to the outskirts of the Borough will make it even more inaccessible.
- The attendees understood that public transport provision across the Borough is the responsibility of the Greater Manchester Public Transport Executive (GMPTE). GMPTE have limited funding to provide for the whole of the GM region.
- The options propose improvements in accessibility to Trafford Park, Carrington and Partington. There was a consensus to improve public transport throughout the Borough. Events put on by younger people are difficult for all the younger people in the Borough to travel to potential solution suggested – for GMPTE to provide special buses (example stated was youth event in Lostock).
- In Sale car parking issues were raised.
- Concern was raised about the structural quality of the A6144 to Carrington and Partington, due to the volume and types of vehicles using the road and the vibrations caused by the large Shell oil tankers.

COMMENTS  
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COMMENTS  
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**Employment**

- In Old Trafford, local people find it difficult to gain employment, as they have limited expertise and limited qualifications leading to social problems. Gaining employment could lead to a reduction in crime. Potential education streams were discussed and are stated in the Education section.
- The companies that may locate in the Trafford Park area should be encouraged to take on the local labour pool and provide apprenticeship schemes.
- There was a view that many of the children in school see their elders struggling to find employment, and maybe developing a "what's the point" attitude.
- General consensus amongst the attendees that much of the future employment opportunities should be created in the North of the Borough.
- It was stated that future local jobs in Old Trafford need to be in Information Technology, Service Sector etc, not just in sport and music, the area needs a greater diversity of jobs.

COMMENTS  
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COMMENTS  
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COMMENTS  
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COMMENTS  
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COMMENTS  
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COMMENTS  
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**Land**

- Questions were asked about landownership around Trafford Town Hall and along the Manchester Ship Canal Company.
- The attendees stated they saw the internal layout of the Trafford Town Hall was not suitable for modern day office use.

**Green Belt**

- In general, Trafford was considered quite well off in terms of open space.
- All the attendees agreed that the Green Belt should not be built upon and should be protected.

COMMENTS  
123

COMMENTS  
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**Town Centres Development/Options**

- Altrincham was seen as suffering from fewer social and economic issues than other parts of the Borough and was questioned why in each option it was indicated as an area of significant development.
- Sale Town Centre – was viewed as having limited facilities and it requires more shops and fewer restaurants and bars. Whereas Altrincham has got good facilities and more shops, so why is a high level of development taking place? In general most attendees

COMMENTS  
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COMMENTS  
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COMMENTS  
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COMMENTS  
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COMMENTS  
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wanted an option that saw the developments spread across the entire Borough (Option 3).

- An overview of the objectives for each of the social, economic and environmental criteria's were scored against was provided to aid understanding of the Sustainability Appraisal pie-charts. As the attendees felt it was easy to understand the pie-charts.
- There was a belief that Trafford had already decided on the Plans they wished to take forward, before the start of the consultation period. It was explained that evidence base line reports and Sustainability Appraisals of each of the options are available as part of the consultation period to inform residents how the options have been developed.
- A question was raised, how much of the budget has already been earmarked – what say do the public have? In response to this attendees were informed that the Council's budget was consulted on at Neighbourhood Forums in late 2007.

#### **Future Community Involvement Suggestions**

Having the meeting during the working day will inevitably exclude those working from the consultation process – but by the same token older and younger people may not find evening meetings suitable.

Attendees advised Community Group social events are a good time for consultation.

The attendees would prefer, Officers to attend their individual meetings, but saw the merit in the wider cross-discussion established by this event.

The Deaf Partnership are a body who wish to participate more, but have serious barriers to participation. Consideration of how information is translated or interpreted would need to be investigated by Officers.

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OPTION 3

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OPTION 3

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OPTION 3  
INTERNAL