

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 | 106 |
| Core Strategy summary broadsheet | | Paragraph Number | 8,39 |
| 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 | | ✓ |

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>The Mobile operators Association would support the Council's consideration of applications for telecommunications development against the provisions of PPG8 in the absence of any relevant policy in the emerging Core Strategy. They would however urge the Council to consider the preparation of a Generic Development Control Policies DPD as part of the LDF which could contain a specific policy for telecommunications development.</p> |

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

Date: 26 August 2008
Our ref: JFB/NW813/NW814/NW1631/2/2
Your ref: CS/PrefOp

PO/1037/



G.C. = general comment

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Dear Sirs,

TRAFFORD CORE STRATEGY PREFERRED OPTION CONSULTATION

Natural England is a statutory agency charged with the responsibility to ensure that England's unique natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for your consultation dated 14 July received on 16 July 2008 consulting Natural England on the above. The following are comments on behalf of Natural England:

Section 2 - Trafford Spatial Portrait

Whilst the spatial portrait is quite lengthy we would welcome additional text to expand the profile, data and issues concerning the environment. Particularly we would welcome additional text that explains the landscape character types and biodiversity interests, along with opportunities that may come forward to conserve and enhance these through key issues raised. This is raised as a general comment although the Mersey Valley and Rural Communities sections are particularly well presented as far and landscape, recreation and biodiversity matters are concerned.

We welcome the recognition given to the contribution that accessible networks of green space provide to both the population and nature conservation interests. We would welcome this being raised for each of the places in Trafford and not just those with rural portions.

Section 3 - The Vision for Trafford Vision

We would welcome expansion of the Vision to include 'natural environment and biodiversity'.

Strategic Objectives

We would welcome broadening the objectives as at present they make no reference to landscape or biodiversity. Strategic objective 6 would seem the most appropriate to amend, although we would want to see Trafford achieve sustainable development that secures protection and enhancement of landscape character and biodiversity throughout the borough and not just in green and blue corridors.

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102

Section 2
P. 12.
General Comment

P. 17 S
P. 21
103
P. 13-23

104
G.C.
para 3-1

P. 25
104

para 3-3
P. 25

SC6
Fig 4
105

106

Section 4 – The Vision and Objectives for Trafford’s Places

S
G.C.
P 28-31
para 4-1
UR04
MV01

We appreciate ‘place objective UR04’, ‘to maintain the environmental character and quality of Urmston’, and would welcome a similar objective for each of the places to show dedication to conserving and enhancing the borough’s environment.

107

We welcome place objective MV01, ‘to safeguard and enhance the landscape, environment, biodiversity, amenity and visual attractiveness of the area’, and again would welcome a similar objective for each of the places.

MV02
MV03
MV04

108

We also welcome place objectives MV02, MV03 and MV04 in relation to recreation. These sites also have a value for landscape character and biodiversity and we would welcome it being captured in the text as appropriate.

P 29, 30
SAV
ALV

109

The visions for Sale, (SAV) and Altrincham (ALV) refer to an ‘environmentally attractive suburban residential community’, but this does not follow through into the objectives. We would welcome an additional objective relating to securing high quality and sustainable design and materials for residential properties for each place.

RC01

110

We welcome RC01 ‘to safeguard and enhance the landscape, environment, biodiversity, amenity and visual attractiveness of the area’, but ask that you consider expanding the text to refer to landscape character and quality to safeguard its character and condition.

P 30
para 4-1
RC05

111

We also particularly welcome RC05 ‘to safeguard the agricultural role of the area’; PA04 ‘to improve the quality of accessible open space’; and CA04 ‘to protect and enhance environmentally sensitive sites, particularly the “mosslands”’.

Section 5 – Spatial Options

P 32
section 5
G.C.

112

We have no particular preference for any of the options identified at this stage, but clearly as far as the environmental objectives of the sustainability appraisal are concerned all should be considered with caution due to the negative and very negative effects they may have on the environment. We would welcome a greater focus on the environment and from the preferred options document to this point there is a strong focus on economic and social development and perhaps not enough on the environment, or even how development can be accommodated with a greater emphasis on conservation and enhancement of the environment.

We consider that whichever option is chosen and where there is potential for detrimental effects on the environment there is a necessity for policy to provide protection. Protection in itself is not enough and opportunities must be seized to secure sustainable development alongside conservation and enhancement of the environment, i.e. a win-win solution.

S

113

Section 7 – Core Policies

P 90
para 7-04
R1

We welcome Core Policy Direction R1 for the Natural and Built Environment, however, we would welcome greater mention of geodiversity alongside biodiversity as reference to it appears only once in the whole document.

R2
G.C.

114

Policy direction R2, Green Belt. We would welcome more from the green belt in terms of gains for the natural environment. We would welcome the green belt making a contribution towards recreation and access to the open countryside, biodiversity, geodiversity and landscape character and quality.

P 91

We welcome Core Policy Direction R3 that shows Trafford’s dedication to delivering green infrastructure.

R3
P 92

115

We too acknowledge the value of open and green space to the health and well-being of people, and for it to be accessible from people’s homes without the need for a journey by car. We

116
P. 93
R4 S
R5
P. 97
DM1 S
appreciate Core Policy Direction R4 to provide, conserve and enhance recreational opportunities within the borough. R4 is also related to R5 promotion of healthy lifestyles and accessible facilities, a direction too that we endorse.

Section 8 – Development Management Policies

117
Design and construction, paragraph 8.2/3, we endorse this approach. We support DM1 and ask that Trafford ensures that it also contributes to local character and distinctiveness.

118
DM2 S
P. 97.
We support DM2 to provide for other strategies and documents to be used. We particularly endorse a historic landscape character approach, but a landscape character assessment of the borough could also be an appropriate approach to consider.

DM3 S
P. 98.
We support DM3 a policy direction for sustainable water management.

119
DM4 S
P. 99
We broadly support your commitment to tackling climate change and to provide renewable energy sources in the borough.

120
We support the policy direction for accessible and sustainable travel in DM7. Although we would welcome a commitment to encourage sustainable travel throughout the borough and not just the A56.

DM7
P. 103
S
121
We support the use of planning obligations in DM8 and would welcome the use of obligations to secure contributions for green infrastructure, access to green space and the wider countryside, biodiversity and improvements to landscape (and townscape) character and quality.

DM9
P. 106
S
122
We support DM9 setting out the policy direction for agriculture and would welcome support to sustain the agricultural businesses in the borough.

Sustainability Appraisal (SA)

SA Rec
E
123
We have examined the report and find it particularly concise. Although the Preferred Options Report states that the accompanying SA incorporates the Strategic Environmental Assessment (SEA) as required under EU Regulations we do not consider that the document supplied satisfies the requirements of the said Regulations as enacted under the 'SEA Directive'. One critical requirement is the need for an Environmental Report.

What the SEA Directive says:

The Environmental Report should provide information on [among other things]:

- the "relationship [of the plan or programme] with other relevant plans and programmes" (Annex I (a))
- "the environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex I (e))
- "relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" and "the environmental characteristics of the areas likely to be significantly affected" (Annex I (b), (c))
- "any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC" (Annex I (d))

[REF: Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents – DCLG 2006]

For reference we direct you to a recent report prepared by Entec for the Lake District National Park Authority Local Development Framework Preferred Options stage which we consider particularly thorough and a good example.

We acknowledge revisions to the SA Scoping report and changes to the SA objectives in the light of comments we made about the SA Scoping Report in our letter dated 5 December 2006. We consider that some of the content from that scoping report has been omitted from this current SA/SEA report and contributes to the perception of brevity. If this is intentional and the current document is purely a portion of a wider SA report (of which the SA scoping report forms part) then we would welcome better reference to that fact at the start of the document along with direct reference to the revised SA scoping report on the consultation CD and web site.

We find the colour scheme for the appraisal of spatial options a little misleading. In parts it is incorrect and the yellow wash is applied where it ought to be green or light green.

NERC Act - Duty in Relation to Biodiversity

While writing, we would like to draw attention to the duty in relation to biodiversity introduced through the Natural Environment and Rural Communities Act (NERC) Act, 2006. Section 40 of the Act states that:

"Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity". Advice on implementing this duty is available from the Defra website, and we would of course also be pleased to help.

We would welcome a reference to this 'duty' within the Core Strategy document.

Habitats Regulations Assessment Screening

We note that the Habitat Regulations Assessment (HRA) Screening Opinion report clearly states the purpose and objectives of the plan as well as giving a description of the area and timescales covered.

Whilst we do not necessarily disagree with the conclusions regarding likely significant effect, we would like to bring your attention to the following comments.

We note the extensive reference to the HRA for the Regional Spatial Strategy (RSS). We are currently developing guidance relating to the weight and extent of reference between HRA at the different levels of planning documents and hope to comment more fully in this regard in future consultations.

We would advise, when considering any likely effect; direct, indirect, or secondary, either alone or in combination with other plans on the designated sites, that a systematic process is demonstrated. This should show in this case how effects on the sites identified (including possible sources, pathways and receptors) have been considered for each of the Preferred Options. Given the complexity in this case, it may be appropriate to present the information in a tabular format.

While we are pleased that you have considered Habitats Regulations Assessment at an early stage of the Core Strategy, subsequent documents arising will require a further Habitats Regulations Assessment.

If you wish to discuss any of the matters set out in this letter please do not hesitate to contact me at the above address.

124

C.S.
dec.
G.C.
p.89
R1

125

HRA
dec.
G.C.

Yours faithfully,

Janet Belfield
Planning & Advocacy Team (North West)

☎ 0161 234 0218

✉ janet.belfield@naturalengland.org.uk

cc: Mick Holding, Cheshire to Lancashire Government Team, Natural England.
Janet Baguley, Cheshire to Lancashire Government Team, Natural England.

Franklin, Lesley

From: Belfield, Janet (NE) [Janet.Belfield@naturalengland.org.uk]
Sent: Thursday, September 25, 2008 3:21 PM
To: Franklin, Lesley
Subject: RE: Natural England Comments to Trafford's Core Strategy Preferred Options

Lesley,

Thank you for our telephone conversation this afternoon, and I apologise for not having been able to speak with you before now due to leave and other conflicting work priorities.

We were a little concerned about the brevity of the SA report and when I contacted your office to ask questions your colleagues were unable to allay my concerns. If Government Office are satisfied with your approach to the SA and a later stage will add more detail then our concerns are unfounded. Better reference to the SA Scoping report would have helped and I note that you will consider how to incorporate it as part of any later report. I also understand that you will make changes to the colour scheme in the tables to better reflect the contents.

I trust that this has not caused you any unnecessary inconvenience and I look forward to working with you again.

Regards,

Janet Belfield

Janet Belfield
Planning Specialist
Planning and Advocacy
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Natural England is here to conserve and enhance the natural environment, for its intrinsic value, the well-being and enjoyment of people and the economic prosperity that it brings.

From: Franklin, Lesley [mailto:lesley.franklin@trafford.gov.uk]
Sent: 23 September 2008 13:06
To: Belfield, Janet (NE)
Subject: Natural England Comments to Trafford's Core Strategy preferred options
Importance: High

Dear Janet

Further to my phone message last week I would welcome some discussion or a return email to reconfirm the comments you made to the Sustainability Appraisal of our Core Strategy Preferred Options.

If my understanding is right I read that you consider we have not fully satisfied the requirements of the SEA regulations. This is obviously of serious concern. In particular you seem concerned about the relationship of the plan with other relevant plans and programmes; this is contained within the SA Scoping Report June 2007 which remains part of the SA Report. The Scoping Report was published as part of the Core Strategy Issues and Options July 2007. It was not re published in the preferred options stage as no changes were made but it was still available to view on the web site. I am sorry if you found this confusing we will look at ways to address this at the next stage. Could you confirm that making this Scoping report available with The SA report complies with the regulations?

10/9/2008

We accept the SA at this stage is brief but the two stage appraisal carried out so far has helped to shape the options. It is anticipated more detailed appraisal of effects and necessary mitigation will be needed following completion of the evidence base.

I hope we can work with you to address your concerns. I look forward to hearing from you

Kind Regards

Lesley

Lesley Franklin

Senior Regeneration Officer
Trafford Metropolitan Borough Council
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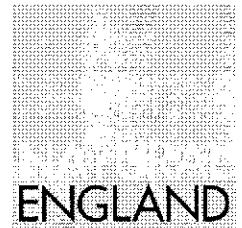
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Date: 17 July 2008
Our ref: JFB/NW/
Your ref: SHLAA/02

PO/1037/____
Ac 13/18



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Dear Sirs,

**TRAFFORD STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT
(SHLAA) DRAFT REPORT CONSULTATION**

Thank you for your consultation dated 14 July received on 16 July 2008 consulting Natural England on the above.

Natural England is a statutory agency charged with the responsibility to ensure that England's unique natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.

While we do not wish to comment in detail on the Housing Land Availability Assessment or suggest sites for development, we ask that you give full consideration to all of our interests in assessing land with potential to be developed for housing. These interests include biodiversity and geodiversity, landscape character and quality, greenspace, access to the countryside and other greenspace, soil conservation, sustainable design and construction, and environmental land management. We are also concerned, of course, to see proposals which show both adaptation to and reduction in the contribution to climate change.

~~102~~
126

We note that the Strategic Housing Land Availability Assessment will be used as an evidence base for the Local Development Framework. Similarly, while we would not wish to suggest sites for development we would again, of course, wish our interests to be fully considered in the process of selecting and assessing sites for development and in protecting sites from development. 'Environmental Quality in Spatial Planning', jointly published by the (then) Countryside Agency and English Nature, English Heritage and the Environment Agency offers guidance on incorporating the natural, built and historic environment and rural issues in Local Development Frameworks. It is available to access and download (together with the Supplementary Files which support it) from our web site at www.naturalengland.org.uk.

~~103~~
127

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NERC Act - Duty in Relation to Biodiversity


While writing, we would like to draw attention to the duty in relation to biodiversity introduced in the Natural Environment and Rural Communities Act (NERC) Act, 2006. Section 40 of the Act states that:

“Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”. Advice on implementing this duty is available from the Defra website, and we would of course also be pleased to help.

If you wish to discuss any of the matters set out in this letter please do not hesitate to contact me at the above address.

Yours faithfully,

Janet Belfield
Planning & Advocacy Team (North West)

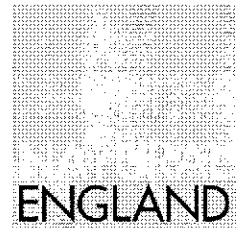
 0161 234 0218

 janet.belfield@naturalengland.org.uk

cc: Mandy North, Cheshire to Lancashire Government Team, Natural England,
Wigan Office.

Date: 17 July 2008
Our ref: JFB/NW/
Your ref: SHLAA/02

PO/1037/____
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If you wish to discuss any of the matters set out in this letter please do not hesitate to contact me at the above address.

Yours faithfully,

Janet Belfield
Planning & Advocacy Team (North West)

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 janet.belfield@naturalengland.org.uk

cc: Mandy North, Cheshire to Lancashire Government Team, Natural England,
Wigan Office.

Trafford LDF Core Strategy: Preferred Options Consultation Comments from the Northwest Regional Development Agency

Chapter 3: Vision and Strategic Objectives for Trafford

The Agency has no specific comments on the vision which is taken from the existing Sustainable Community Strategy. We are, however, pleased to note that the strategic objectives have undergone substantial redrafting from those presented at the Issues and Options stage. The only comments we wish to make at this stage concern strategic objectives SO1 and SO10.

We suggest that SO1 is amended to read: "*The Regional Centre and the surrounding Inner Areas will be the primary focus for residential development and economic growth*" This would better reflect Draft RSS Policy MCR2 which says that residential development in the Regional Centre should be part of mixed-use employment schemes. We are unclear why the reference to sustainable energy and water efficient housing forms part of objective SO1. It may be more appropriate as a generic (Borough-wide) requirement relating to all new homes, not just those in the Regional Centre and Inner Areas.

102

Objective SO10 is to 'Optimise the contribution of the area outside of the Regional Centre and the surrounding Inner Areas in line with Draft RSS Policy MCR3'. The term 'optimise the contribution' does not, in our view, provide a sufficiently clear indication of the Council's objectives for these areas. We suggest it is redrafted to better reflect the intention of Policy MCR3, i.e., the need to sustain and promote economic prosperity consistent with the area's environmental character; allowing residential development in support of local regeneration strategies and to meet local needs; and to support diversification of the rural economy.

103

Chapter 4: Vision and Objectives for Places

In Stretford, Urmston, Sale and Altrincham, objectives ST03, UR03, SA03 and AL02 all aim to "restrict the level of private market housing in accordance with RSS Policy MCR3". Again, we do not feel that this properly reflects the intention behind Policy MCR3. Objectives ST08, UR05, SA04 and AL04, however, do reflect Policy MCR3 as these would 'allow new housing in sustainable locations that support local regeneration strategies and meet identified local needs'. We consider objectives ST03, UR03, SA03 and AL02 to be unnecessary and suggest they are deleted.

104

Chapter 5: Spatial Options

Section 5 sets out 3 spatial options and outlines their likely impact on each of the 10 places identified in Chapter 2. The 3 spatial options share a number of common elements, which means that some of the differences between them are relatively subtle. They also appear to contain some inconsistencies which require further clarification.

In Option 1, paragraph 5.7 suggests that Altrincham town centre would see moderate growth, whereas the subsequent bullet point in paragraph 5.9 identifies it for significant levels of development. Options 1 and 2 both refer to Neighbourhood Renewal Areas, although it is not explicitly clear if this is referring to Lostock, Sale Moor and Broomwood. Option 2 also says that some development will be focussed within the Borough's most vulnerable communities, but does not say precisely where these areas are.

105

Option 2 differs from Option 1 mainly by attaching a higher priority to Carrington, Partington and Sale West as growth locations (relative to Sale and Stretford town centres). We are not convinced that this is appropriate or necessary as the strategic objectives for these places (as set out in Chapter 4) indicate that they perform a different role to the established town centres, which are the preferred location for retail, leisure, cultural and office development.

106

Of the options put forward, Option 3 would direct the greatest proportion of development (around 50%) to the Regional Centre, the adjoining Inner Areas and Altrincham Town Centre. However, compared to Options 1 and 2, it also appears to propose a higher level of growth (described as 'moderate') to the other town centres and regeneration areas in. It is not clear how this would be achieved. In terms of housing, the Table on page 75 actually suggests that Option 3 would direct less development to the areas outside the Regional Centre, the Inner Area and Altrincham town centre.

107

Option 3 also says that development will be prioritised in Old Trafford. Given that Old Trafford is part of the defined 'inner area' (and therefore already prioritised for very significant levels of development) it is unclear how this additional prioritisation would operate in practice.

108

All 3 options suggest that outside the areas specifically mentioned, development will be restricted to meeting local needs in accordance with emerging Draft RSS. Our comments in relation to Chapter 4 are again relevant here; we suggest that 'restricted' is deleted and replaced with '*managed*'.

109

In relation to Chapter 7 (see overleaf) we refer to the Government's recent announcement regarding the Greater Manchester housing growth point bid and suggest that the spatial options may need to be reconsidered in the light of this decision.

110

In view of the points raised above the Agency does not feel in a position to express a preference between the three Spatial Options put forward for consultation.

Chapter 6. Key Strategic Sites

The Agency has no specific views on the sites identified in the paper. However, we note that paragraph 5.18 (page 59) indicates the Council's intention to return the Davenport Green site - which is allocated as a major high amenity site for B1 Use in the adopted UDP - to the Green Belt. Davenport Green was designated by the Agency as a strategic regional site in December 2001. It was subsequently identified as a strategic regional site in both the 2003 and current (2006) Regional Economic Strategies.

111

As this is a consultation on Preferred Options we would have expected any proposal relating to Davenport Green to be put forward as an option, whereas its return to the Green Belt is presented as a proposal. We note that the consultation offers no rationale for de-allocating the site.

The Agency is currently reviewing the strategic regional sites. In doing so, it will have regard to progress to date on the sites, their future potential including any deliverability issues and other matters.

The Agency's review of strategic regional sites will be the subject of further consultation with relevant regional partners in the autumn and this will inform our response to the Submitted Draft LDF Core Strategy. Pending the outcome of the review, the Agency wishes to reserve its position on the proposed return of Davenport Green to the Green Belt; nonetheless we do note the Council's view.

Chapter 7. Core Policies

Core Policy L1 suggests that future housing development will be concentrated '*within the Regional Centre, the Inner Areas and Priority Regeneration Areas, particularly Partington, Sale West and the four main town centres as outlined in the Preferred Options*'. This is not entirely consistent with any of the 3 spatial options considered above. For example, it makes no reference to Carrington or the Trafford Centre rectangle; Urmston town centre is only identified for minimal or moderate growth in the spatial options; and the spatial options do not specifically refer to 'Priority Regeneration Areas'.

DP 1
112

We appreciate that the consultation paper was issued prior to the recent Government announcement on growth points. Paragraph 7.8 indicates that should the bid be successful, it would be dealt with '*through alternatives and flexibilities in the Plan*'. Whilst we welcome the increase in housing provision which growth point status entails, we consider that this requires explicit consideration in the context of the LDF Core Strategy. A 20% increase on the Draft RSS figure will necessitate amendments to the table on page 75 and may necessitate revisions to the spatial options.

DP 2
113

The intended direction of the Council's core economic policy is set out in Policy W1. Whilst this is broadly supported we wish to comment on bullet points 2 and 8. The 2nd bullet identifies Trafford Park, Carrington, the four town centres, the Manchester Ship Canal Corridor and the A56 Corridor as Priority Employment Zones (PEZs). The Ship Canal and A56 Corridor are not highlighted in any of the spatial options put forward in Chapter 5. For consistency we suggest that they ought to be. Bullet point 8 says that sufficient land will be provided '*to meet anticipated demand*'. This provides no clear guidance as to the future level of employment land provision as discussed in paragraph 7.41. We suggest that this bullet point is revised such that it refers to the employment requirement for Greater Manchester in emerging Draft RSS and (when available) its apportionment down to district level.

DP 3
114
115

Core Policy R2 sets out the direction of the Council's intended Policy on Green Belt. This makes no mention of the proposal to return the Davenport Green site to Green Belt (see above).

DP 4
116

Chapter 8. Development Management Policies

Policy DM1 sets out the Council's intended direction of travel with regard to design and construction. The 3rd bullet indicates its intention to achieve Level 6 of the Code for Sustainable Homes by 2014. We suggest it should indicate what standards will be applied at present and the intended timescale for stepping these up to Level 6 by 2014. The words '*as appropriate*', as used in this bullet, add uncertainty and should be deleted.

DP 5
117

Policy DM 4 relates to renewable energy and reflects the Council's commitment to tackling climate change. This is welcome and fully supported. However, the 3rd bullet says the Council will 'Develop targets requiring all development to assess the potential for using renewable or low carbon energy sources'. It is unclear whether this is intended to apply to all new development or existing buildings. If the former, this seems unnecessary given that the 1st bullet would 'seek to incorporate renewable energy or low carbon energy sources in all new developments'. If the latter, it is not clear how such a policy would be implemented or enforced.

PP DM4
S 118
PP DM4
S 119
O 119

The Agency welcomes the Council's recognition of the need to support the agricultural economy and its diversification, as set out in policy direction DM9.

PP DM4
S 120

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| Core Strategy Preferred Options report | X | Page Number | 8 to 23 |
| 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 | |
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The section on 'Trafford a place to live, work, learn and relax' has very little to say about the natural and built environment assets of the Borough and their importance in the quality of life of its residents, in attracting investment and providing employment. In addition open spaces within the Borough provide a multitude of benefits whether in terms of health and exercise, in reducing flood risks, in storing carbon or for their biodiversity value. These assets are also largely absent from the descriptions of the identified places.

There is very little reference to heritage assets, in particular the wealth of fine Listed Buildings within the Borough, its archaeological resources or its Registered Historic Parks and Gardens. The Spatial Profiles should be supplemented accordingly and consideration given to the issues raised in seeking to protect and enhance these assets and increasing the contribution that they can make to the Borough's economy; the quality of life of its residents, workers and visitors; and their role in education.

There is a similar lack of consideration of the wider benefits to the Borough of its range of nature conservation resources.

The reference to Dunham Massey, whilst welcome in acknowledging its importance to the Borough as a cultural asset, fails to consider either the wider setting of this resource or its special ecological importance. ~~Issues should include how its significances will be safeguarded, enhanced and extended.~~

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

PO/1051/103

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| Core Strategy Preferred Options report | X | Page Number | 80 |
| Core Strategy summary broadsheet | | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | L4 |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
| Other document, (please specify) | | Spatial Option Reference | |
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It is noted that in the context of 'improved links' and 'accessibility' little is said about the mode of travel. Especially for the not inconsiderable number of people living in households without access to a car, and particularly where they are living in more remote areas, the key improvements that are needed relate to better public transport, e.g. the frequency and reliability of bus services; extensions to Metrolink; and new, safe routes for cyclists and pedestrians.

Name: Alan Hubbard (The National Trust)

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FC/1051/104

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| Core Strategy Preferred Options report | X | Page Number | 27 |
| Core Strategy summary broadsheet | | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | SO9 |
| Other document, (please specify) | | Spatial Option Reference | |
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Generally the National Trust wishes to endorse the stated Objective. However, it also wishes to draw attention to the fact that the pursuit of this Objective will achieve more than just the aims of Sustainability Objective E9. In particular the protection of these areas and the enhancement of their value to the community will also assist in pursuing the following Sustainability Objectives: S9, E2, E3, E4, E6, E7, E8, E9, EC1 and EC3.

Name: Alan Hubbard (The National Trust)

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

10/1051/105

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| Core Strategy Preferred Options report | X | Page Number | 32-38 |
| Core Strategy summary broadsheet | | Paragraph Number | Section 5 |
| Sustainability Appraisal | X | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
| Other document, (please specify) | | Spatial Option Reference | Options 1-3 |
| | | Strategic Site Reference | |
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The National Trust notes with some concern that the assessment of all three of the Options that have been developed indicates that for each there would be adverse environmental consequences.

The Trust would have to question, on the basis of the information set out in the consultation document, if any of the Options can yet successfully claim to meet the statutory test of pursuing sustainable development, and in particular the requirement set out in PPS1 (para 13(1)) that "...local planning authorities should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time". Study of the SA assessment document has not lessened these concerns.

It appears that more attention needs to be given to the Options so that positive benefits are achieved across the full range of sustainable development objectives. It is argued that none of the Options so far presented has demonstrated that it is a sufficiently sustainable way forward.

However, having considered the material that has presented the Trust is of the opinion that Option 1, with appropriate additional consideration and refinement, would be the most likely to be capable of meeting the statutory requirement.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
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PC/1051/106

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| Core Strategy Preferred Options report | X | Page Number | 59 |
| Core Strategy summary broadsheet | | Paragraph Number | 5.17 |
| Sustainability Appraisal | | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
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It is understood that the Government has decided not to pursue the expression of interest for an Eco-town proposal at Carrington and it is therefore assumed that this is not a matter that will be considered through the Core Strategy.

However, should this not be the case the Trust is unable to agree with the suggestion that such a major proposal could just be grafted onto this LDD. The implications would be considerable, not least for the stated economic development objectives for Carrington. Rather it is considered that to promote such a significant change at a later date would require a full re-assessment of possible options for development and a fundamental review of the SA.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
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PC/1051/107

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| Core Strategy Preferred Options report | X | Page Number | 90 |
| Core Strategy summary broadsheet | | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | R1 |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
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Much of the content of this policy approach is agreed and supported. However, it is considered that some changes and additions would improve its clarity and intent.

Firstly, there is no explicit reference to landscape character - the assessment of this is a key consideration (in accordance with PPS7) and should be included accordingly.

Heritage resources, including archaeological assets, do not exist in isolation but are part and parcel of their wider settings - these are explicitly to be protected in accordance with national (e.g. PPG15 and PPG16) and Regional (existing RSS Policies and proposed Policy EM1) planning advice. Indeed many historic assets are both safeguarded and well cared for, and it is the threat to their surroundings, to views and vistas, and to the visitor approach that are most keenly felt.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
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fo/1051/108

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| Core Strategy Preferred Options report | X | Page Number | 94 |
| Core Strategy summary broadsheet | | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | R5 |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
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Generally this intended approach is supported. However, it is considered that the key role of accessibility has been underplayed, and in particular is limited to access to sports facilities and recreational areas. It has also been demonstrated by a number studies that there are considerable health benefits to be gained from access to the wider countryside in terms of peace, fresh air and opportunity for refreshment within a pleasant environment. This is also a key feature in the quality of life for both residents and visitors alike.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
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| Core Strategy Preferred Options report | X | Page Number | 95 |
| Core Strategy summary broadsheet | | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | R6 |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
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As demonstrated in earlier responses to LDDs, including for example the A56 SPD, the key tourism assets within the Borough are not limited to those referred to in R6 but also encompass Dunham Massey Hall, Garden, Parkland and its wider Estate. This is a heritage asset of the highest order that provides a major attraction to the area for many visitors.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
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| 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 | |
| Strategic Housing Land Availability Assessment | | Objective reference number | RCO1 |
| Other document, (please specify) | | Spatial Option Reference | |
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The Objective needs to encompass the full range of attributes of the rural communities. In particular reference should be included to the rich archaeological and heritage resources.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

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| Core Strategy summary broadsheet | | Paragraph Number | 4.1 |
| Sustainability Appraisal | | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
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It is unclear why this is the only area within the Borough where specific reference is made to "providing sustainable energy sources". The term itself is ambiguous - the 'sources' are where they are, the LDF cannot 'provide' them. It is assumed that this is meant to refer to the exploitation of (renewable) energy sources?

This approach is equally applicable to all the other areas of the Borough - and indeed more so. One of potential benefits of renewable technologies is that they provide an opportunity for decentralised supply and can be more efficient as power is used close to its source rather than suffering losses through transmission over longer distances. It is also the case that in terms of the ability of the landscape and valued buildings to absorb renewable technology equipment that the Rural Communities are those areas where this is likely to be most challenging. That does not mean that no provision can be made in this location, indeed it could be well suited to some technologies, e.g. small scale hydro; however, there is clearly potential for greater benefits and less impacts in the other parts of the Borough.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

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| Core Strategy summary broadsheet | | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
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Under 'spatial' (Trafford's Rural Communities) the final sentence needs to be re-considered. It is presumed that the reference at the end to 'no major roads' is not in fact meant to relate to the first part of the sentence, i.e. to the Dunham Massey Estate. For the avoidance of any doubt the Trust would not support new road development upon its land.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required

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

PC/1051/113

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| Core Strategy summary broadsheet | | Paragraph Number | 4.1 |
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If the aspirations for the rural areas and their wider role is to be met it will be important to do more than just 'maintain' and 'protect' them. The clear Objective above and beyond safeguarding existing assets and resources will be to seek their enhancement so that their contribution to quality of life, and in underpinning the attractive image of the Borough, is secured.

Furthermore it is considered that the attributes of this area include its landscape qualities (both designed and more naturalistic) and its wealth of heritage (including the wide range of archaeological resources). It is also noted that these attributes are enjoyed not only by those within the City Region but also much more widely - the Dunham Massey Estate with its range of architectural, archaeological, ecological and recreational resources is enjoyed by many from much further afield.

It is requested that the Vision for the Rural Communities is supplemented accordingly.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
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PC/1051/114

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| Core Strategy summary broadsheet | | Paragraph Number | 3.3 |
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| Strategic Housing Land Availability Assessment | | Objective reference number | SO1 |
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The meaning of this Objective is unclear. It might help if the sentence was punctuated, but it is still unclear what is meant by 'water efficient housing' or why water efficiency is not an Objective for non-residential forms of development?

It would perhaps be better to say: a) significant areas of new housing and employment growth will be focussed in the Regional Centre and the surrounding Inner Areas, and b) that the new development undertaken will be required to meet high standards of sustainable construction including minimising energy requirements, water use and waste and including appropriate renewable energy technologies.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

PO/1051/115

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

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Additional 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 full contact details if you are submitting all your comments at the same time, but please put your name on each additional sheet and indicate the total number of comment sheets being submitted on the contact details form.

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| Document | | Section | |
| Core Strategy Preferred Options report | X | Page Number | 25 |
| Core Strategy summary broadsheet | | Paragraph Number | 3.3 |
| Sustainability Appraisal | | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | SO4 |
| Other document, (please specify) | | Spatial Option Reference | |
| | | Strategic Site Reference | |
| | | Map/Figure Reference Number | |
| | | Other (including omissions and suggestions for alternative approaches) | |

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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 is to be hoped (and expected) that the regeneration of Partington, including as supported by Carrington, will include environmental regeneration. Not to do so would fail to achieve an integrated approach to sustainable development contrary to PPS1.

It is suggested that the Objective is amended to read "...of Carrington to support the economic, environmental and social regeneration and development of Partington."

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

PC/1051/116

**Trafford's Core Strategy Preferred Options
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| Document | | Section | |
| Core Strategy Preferred Options report | X | Page Number | 25 |
| Core Strategy summary broadsheet | | Paragraph Number | 3.1 |
| Sustainability Appraisal | | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
| Other document, (please specify) | | Spatial Option Reference | |
| | | Strategic Site Reference | |
| | | Map/Figure Reference Number | |
| | | Other (including omissions and suggestions for alternative approaches) | |

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| Support | | Object | X | General Comment |

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.

The Vision is lacking in any specific aspirations for Trafford's landscapes, natural environment, wider range of heritage assets beyond those that are major cultural attractions, or open spaces.

The Vision also fails to consider the Borough's role in addressing the challenges of climate change, including reducing emissions and adapting to those impacts that are now inevitable.

The approach to resources is also unclear - does Trafford intend to ensure the prudent use of natural resources, to minimise energy and water use, to reduce flood risk, to protect soils, to improve air quality, and protect tranquillity and 'dark skies'? The reference to 'sustainable environment' in the document is unclear and, if indeed it was intended to cover these issues, it needs to be more explicit and to recognise that these resources have social and economic dimensions, not solely environmental ones.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

PC/1051/117

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

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| Document | | Section | |
| Core Strategy Preferred Options report | X | Page Number | 87 |
| Core Strategy summary broadsheet | | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | W2 |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
| Other document, (please specify) | | Spatial Option Reference | |
| | | Strategic Site Reference | |
| | | Map/Figure Reference Number | |
| | | Other (including omissions and suggestions for alternative approaches) | |

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Although dealt with later on in a different context (at para 8.36) it is important to remember that as well as being a major land use within the Borough, agriculture is also an important economic activity that provides a modest amount of employment for local residents. Increasingly these employment opportunities are within diversification schemes within existing farming enterprises, a number of these being of direct relevance to the tourist/leisure economy that is being promoted.

It is considered that appropriate rural diversification schemes should be supported within Policy W2.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

PC/1051/118

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

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Additional Comment Sheet

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| Document | | Section | |
| Core Strategy Preferred Options report | X | Page Number | 89 |
| Core Strategy summary broadsheet | | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | W3 |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
| Other document, (please specify) | | Spatial Option Reference | |
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Much of this policy approach is supported but in promoting the sustainable management of mineral resources it will also be important to encourage the recycling of suitable resources thereby reducing the demands upon primary mineral resources. The policy should be supplemented accordingly.

Name: Alan Hubbard (The National Trust)

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

PC/1051/119

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

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Additional Comment Sheet

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| Core Strategy Preferred Options report | X | Page Number | 81 |
| Core Strategy summary broadsheet | | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | L5 |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
| Other document, (please specify) | | Spatial Option Reference | |
| | | Strategic Site Reference | |
| | | Map/Figure Reference Number | |
| | | Other (including omissions and suggestions for alternative approaches) | |

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| Support | X | Object | | General Comment |

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.

The Trust supports the overall approach to climate change issues and notes that the Stamford Brook development within the Borough demonstrates how many of these can be successfully tackled through careful thought and consideration of the approach to sustainable construction.

Particular attention is drawn to the energy efficiency benefits that can be gained by careful consideration of orientation and the utilisation of high standards of thermal efficiency coupled with a keen approach to air tightness. Stamford Brook also provides a number of relevant lessons in respect of managing the water environment both in terms of flood capacity and biodiversity.

Name: Aian Hubbard (The National Trust)

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

10/12/08/12C
15.11.2008 2.47.08.108

Green, Helen

From: Cutting, Damien on behalf of Strategic Planning
Sent: 27 August 2008 10:07
To: Green, Helen
Subject: FW: SHLAA Draft Report Consultation - response from the National Trust

From: Hubbard, Alan [mailto:alan.hubbard@nationaltrust.org.uk]
Sent: 27 August 2008 00:49
To: Strategic Planning
Subject: SHLAA Draft Report Consultation - response from the National Trust

Dear Sir/Madam,

Thank you for your letter of 14th July 2008 notifying the National Trust of this consultation. Having reviewed the document I can advise you that at this stage there are no specific comments which the National Trust wishes to submit.

Regards,
Alan Hubbard

Land Use Planning Adviser (E Midlands & NW)
The National Trust
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Cheshire
WA14 1PH

Tel: 0161 925 4330
Fax: 0161 929 6819
Email: alan.hubbard@nationaltrust.org.uk

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The views expressed in this email are personal and may not necessarily reflect those of The National Trust unless explicitly stated otherwise.

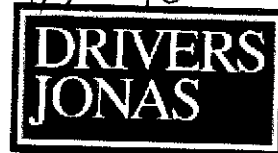
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By Post and E-mail

27 August 2008

Dear Sir / Madam

**Consultation on Trafford Core Strategy Preferred Options
 Comments on Behalf of Lancashire County Cricket Club and ASK**

We are writing to provide our comments on Trafford's Core Strategy Preferred Options paper on behalf of Lancashire County Cricket Club and its development partner, ASK Property Developments Ltd (ASK).

The Club and ASK are currently preparing a masterplan to provide a world class state-of-the-art cricket arena as the centrepiece of a bold and transformational regeneration framework for sport in the Borough which will also include new training and sporting facilities together with related commercial, education and community uses, residential, retail, leisure, hotels, public realm and infrastructure.

Further information on these emerging proposals is outlined in the representations submitted on behalf of the Club and ASK in respect of the consultations for the Trafford Core Strategy Issues and Options Paper and Land Allocations Plan, which are attached to this letter for information.

Our comments on the key components of the Core Strategy Preferred Options paper are provided as follows:

Spatial Options

The Preferred Options paper sets out three different Spatial Options for the future of Trafford as a whole. Each of these three Options seek to focus new growth within the part of the Borough towards the Regional Centre / Inner Area, which includes the Old Trafford Cricket Ground and adjoining area, which is the subject of the emerging masterplan being prepared by the Club and ASK.

All three Spatial Options highlight the opportunities that exist to bring forward significant new residential development and to provide new convenience retail of a significant scale as part of a wider mixed-use regeneration scheme focused on the Cricket Ground. Lancashire County Cricket Club and ASK welcome the recognition by the Council of these opportunities for new growth at Old Trafford in each of the three Spatial Options. The benefits that the strategic regeneration of Old Trafford can bring to the local community, including by way of the provision of new educational and community facilities cannot be underestimated.

The first of the three options (Spatial Option 1), promotes a greater concentration of growth within the Regional Centre / Inner Area than Options 2 and 3 and would thus best help to secure the future of the Cricket Ground as a test match venue and deliver the significant regeneration benefits associated with the wider proposals for the area. On this basis, the Cricket Club and ASK consider that Spatial Option 1 presents the preferred way forward which should inform future stages of the preparation of Trafford's Core Strategy.

5-123
 5 (102)
 503
 5 (103)

ABOVE PARAGRAPH HAS BEEN AMENDED TO SUPPORT SPATIAL OPTION 3. SEE LETTER AFTER PAGE 3.

Strategic Sites

Old Trafford Cricket Ground and adjoining land is promoted within the Core Strategy Preferred Options paper as a "Strategic Site" which will be key to the overall delivery of the Core Strategy, regardless of which Spatial Option the Council ultimately decides to pursue.

A brief description of the LCCC Strategic Site and an indication of the emerging development proposals is included within the Preferred Options paper.

Lancashire County Cricket Club and ASK fully support the identification of Old Trafford Cricket Ground and adjoining land as a "Strategic Site" in recognition of the undoubted potential for growth that exists in this area.

We note that the *New Growth Points Initiative*, published by the Department of Communities and Local Government on 16 July 2008, in selecting Trafford as one of 29 New Growth Points, specifically highlights the opportunity for bringing forward further development in Trafford including, specifically, "sites around Lancashire County Cricket Club". This lends further support for the large-scale, sustainable regeneration and growth that is proposed by the Cricket Club and ASK at Old Trafford, and which is reflected in the emerging Core Strategy.

(104)

Strategic Objectives

Strategic Objective **SO6** within the Preferred Options paper highlights the need to sustain and improve the quality, function and accessibility of the sporting assets of Trafford.

The Core Strategy Preferred Options paper correctly makes specific reference to land centred on the Cricket Ground. The Cricket Club and ASK support the acknowledgement made within the emerging Core Strategy of the key role that the land at Old Trafford will have in fulfilling Strategic Objective **SO6**.

(105)

Retail Policies

Core Policy Direction **W2 - Retail** states that a priority for the Borough is to create retail policy which seeks to protect and enhance Stretford town centre. This objective is highlighted in all three Spatial Options, which note the potential for limited to moderate development of Stretford town centre as the key commercial, business and community service focus in the area.

As mentioned above, all three of the Spatial Options identified within the Preferred Options paper highlight the opportunities that exist to provide new convenience retail (including the implementation of the existing Tesco planning permission) as part of a wider mixed-use regeneration scheme focused on the Cricket Ground.

However, the 2007 Trafford Retail Study recognises that there is significant quantitative and qualitative merit in the case for a larger convenience store (i.e. than that for which planning permission currently exists) as part of a wider sports-led regeneration of the Old Trafford area. The Council should acknowledge this within the Core Strategy's retail policy directions.

(106)

If you have any queries or require any further information with regard to these comments, please do not hesitate to contact John Adams, Michele Brown 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
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Matthew Wansborough
Trafford Metropolitan Borough Council
Strategic Planning & Developments
Waterside House
Sale Waterside
Sale
Manchester
M33 7ZF

Our ref MS/PG/047183

18 September 2008

Dear Matthew

Consultation on Trafford Core Strategy Preferred Options Comments on Behalf of Lancashire County Cricket Club and ASK

We are writing with regard to the representations that we submitted on behalf of our clients, Lancashire County Cricket Club and ASK Property Developments Ltd, on the Trafford Core Strategy Preferred Options consultation paper in our letter to the Council dated 27 August 2008.

As you are aware, the Preferred Options paper set out three different Spatial Options for the future of Trafford as a whole, all of which highlighted the opportunities that exist to bring forward significant new development as part of a wider mixed-use regeneration scheme focused on the Old Trafford Cricket Ground.

Within our letter, we indicated in error that Spatial Option 1 would be the preferred option for the purpose of securing the future of the Cricket Ground as a test match venue and delivering the significant regeneration benefits associated with the wider proposals for the area. The letter should in fact have stated that Spatial Option 3 represents the preferred way forward and should, in our view, inform future stages of the preparation of Trafford's Core Strategy.

Please accept our apology for any confusion that may have been caused by this error. We trust that you will be able to take account of this point of clarification in the future stages of the preparation of the Core Strategy document. However, if you require any further information on this matter, please do not hesitate to contact John Adams, Michele Steel or Philip Grant.

Yours faithfully

DRIVERS JONAS LLP

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LDF Team
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By Post and E-mail

27 August 2008

Dear Sir/Madam

Representations to Trafford Strategic Housing Land Availability Assessment (SHLAA) Draft Report (July 2008)

On behalf of our client Lancashire County Cricket Club (LCCC) and its development partner, Ask Property Developments Ltd (Ask), we write to provide our comments on the Draft Strategic Housing Land Availability Assessment (SHLAA), which forms part of the evidence base feeding into the Local Development Framework for Trafford.

The LCCC and Ask are currently preparing a masterplan to provide a world class state-of-the-art cricket arena as the centrepiece of a bold and transformational regeneration framework for sport in the Borough which will also include new training and sporting facilities together with related commercial, education and community uses, residential, retail, leisure, hotels, public realm and infrastructure.

Our comments on the key components of the SHLAA Draft Report are therefore provided as follows:

Purpose of the Assessment

Our client is fully supportive of the primary aim of identifying as many sites with housing potential in and around the Borough's established settlements, in order to:

- Meet Trafford's RSS housing requirement;
- Provide a continuous, flexible and responsive supply of housing land;
- Provide certainty to the house building industry;
- Ensure choice is available to meet the need and demand for more housing; and
- Provide an evidence base on which to shape places and allocate sites within the LDF.

Methodology

The SHLAA methodology, implemented in line with national CLG policy, is both robust and comprehensive. We are therefore broadly supportive of the parameters and adopted methodology.

Assessment Results and Allocations

Our client is fully supportive of the draft assessment results of the SHLAA and in particular the identification of Old Trafford Cricket Club (SHLAA Ref, LA70) as a site considered within the overall potential housing supply for Trafford. The boundary of the site, as outlined on 'Map 2' is also supported.

Appendix 9 sets out the potential supply of land for Old Trafford Cricket Club:

- 0 dwellings in the <5 year plan period;

Checked
 107

108

Para 2
 Support

109
 LDF
 PA1
 APP 9

- 300 dwellings in the 5-10 year plan period;
- 300 dwellings in the 10-15 year plan period;
- 900 dwellings in the 15+ plan period.

(110)
P23
Page
51
Page 51

We note that the *New Growth Points Initiative*, published by the Department of Communities and Local Government on 16 July 2008, in selecting Trafford as one of 29 New Growth Points, specifically highlights the opportunity for bringing forward further development in Trafford including, specifically, "sites around Lancashire County Cricket Club". This lends further support for the large-scale, sustainable regeneration and growth that is proposed by the Cricket Club and Ask at Old Trafford, and which is reflected in the emerging SHLAA.

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

Yours faithfully

for **DRIVERS JONAS LLP**

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

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.

N.B These comments should be read in conjunction with the covering letter

We were extremely disappointed to find that the Davenport Green site has been removed from the list of Key Strategic Sites within the Preferred Options document. Particularly as no reason for its removal has been made, and its removal is in advance of the NWDA's Strategic Site Review.

The Manchester Airport Masterplan to 2030 identifies a "significant opportunity for the development of a major air-freight logistics operation that is focused on the Airport", which "can be identified on an adjacent or 'near airport' development site".

Davenport Green was one of a number of near airport development sites identified within the Masterplan. As is consistent with both Government and Regional policy (Aviation White Paper and RSS), it is for the LDF process to consider the case for allocating land to help deliver the Masterplan objectives. We therefore ask that the future of the Davenport Green site be reviewed in this context.

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



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27th August 2008

LDF Team
Strategic Planning & Developments
1st Floor
Waterside House
Sale waterside
Sale
M33 7ZF

Dear Sirs

**RE: TRAFFORD CORE STRATEGY PREFERRED OPTIONS
CONSULTATION**

Thank you for providing Manchester Airport with the opportunity to comment on your Core Strategy Preferred Options. We have submitted an outline of our comments on the electronic comments form (as encouraged). However, we feel that the electronic form did not allow us to provide the level of detail required and therefore request you read the comments form in conjunction with this letter.

The Future of Air Transport White Paper (2003), and the Progress Report to Parliament (December 2006), set out a strategic framework for the development of airport capacity in the UK over the next 30 years. It makes the growth of regional airports a priority and recognises that Manchester has a particularly important role both regionally and nationally. The White Paper encourages airport operators to prepare Master Plans, to set out a strategic framework for growth. Airport Master Plans themselves do not have a statutory status, but the Government clearly expects them to be taken into account in the preparation of regional and local policies.

The Manchester Airport Masterplan to 2030 was published in November 2007 following widespread public consultation on a Draft in 2006. It comprises the Masterplan and a suite of 4 supporting action plans on Community, Environment, Ground Transport and Land Use. It identifies the challenges, the opportunities and the actions that need to take place in order to grow the Airport to the Government's envisaged level of throughput. One of the key aspects of the Airport Masterplan is to define our land requirements to support



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future activity and to set out a policy framework to guide and deliver sustainable growth. The Master Plan identifies proposed extensions to the Operational Area to meet our needs to 2030 and gives careful consideration as to how we prioritise the use of our land, to ensure that the main site is used in the most efficient manner possible.

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

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27th August 2008

LDF Team
Strategic Planning & Developments
1st Floor
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M33 7ZF

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PC/1073

Our ref:
Your ref:

Mrs Lindsay Alder
Asst Network Strategy Manager
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M33 7ZF

Direct Line: 0161 930 5642
Fax: 0161 930 4453

22 August 2008

For the attention of Dennis Smith

Dear Madam

CORE STRATEGY PREFERRED OPTIONS REPORT

Thank you very much for the opportunity to comment on the above document.

The Highways Agency is responsible for the strategic road network within Trafford this comprises solely of the M60 (Outer Manchester Ring Road). The M60 provides an orbital route around the Manchester conurbation and links into other key routes of local and national importance, such as the M65, M61 and M62. The M60 is categorised as being of a national nature. In having this role, the Highways Agency has the responsibility for the operation of these routes and is responsible for funding improvements to the route.

Road Safety is also a key concern of the Agency. The Agency would have concerns if the levels of traffic on the network that would lead to any safety issues.

The following comments cover the specific ailments of the document which were also highlighted in our original comments in October 2007.

Spatial Options

These have been assessed below:

Option 1 - Inner Area / Selected Regeneration Area Priority Strategy

This spatial option aims to focus growth in the North East of the borough, with significant development located in Altrincham, Trafford Park and Old Trafford. Moderate levels of development will be brought forward in Carrington, Partington, Sale, Sale West, and Stretford; and at the Trafford Centre.

102

By focusing significant levels of development in the vicinity of Trafford Park, this may result in increased use of the M60 and M602 to access new development opportunities. The M60 and M602 currently suffer from peak hour congestion and increased development in this area may lead to further operational difficulties for the Agency. As such, the Agency would like to see measures developed and infrastructure put in place to facilitate these potential development sites, in order to reduce the need to travel by private car.

Due to the location of the Trafford Centre, Junctions 9 and 10 of the M60 are the principle access points for vehicles accessing the retail and leisure offer on site. As such, any additional development being promoted at the Trafford Centre 'rectangle' may have an impact on the operation of these junctions as well as mainline flows on the M60. The Agency cannot support unsustainable and unconstrained development located in this area.

It is suggested that B1 Office floor space may be included as part of plans for the Trafford Centre 'rectangle'. Such an intensive trip-generating element of a potential development scheme could not be supported by the Agency without wide-ranging public transport infrastructure complementing the development to allow modal choice.

In addition to development being located at the Trafford Centre and Trafford Park, Spatial Option 1 also looks to locate development at Carrington and Partington. It is recognised within the document that Partington and Carrington are not well serviced by public transport, and as such, development being promoted within these locations should be accompanied by the necessary public transport infrastructure improvements to make these sites accessible using non-car modes. The Agency would not be able to support sustainable development in this location due to potential impacts on the SRN.

Development sites being promoted in Altrincham, Sale and Stretford are welcomed by the Agency due to these areas being established local centres with excellent public transport links to the local area and wider region. As such, appropriately located and sized development located here will benefit from existing public transport infrastructure and key services, thus reducing the need to travel by private car.

Notwithstanding this, any development sites proposed in Altrincham may impact upon the M56 as the A56 links Altrincham to Junction 7 of the M56 (and also the A556) and the A538 links Altrincham and Hale to Junction 6 of the M56.

Due to the variety of development being promoted in a number of locations, the Agency is not in a position to fully support or fully reject the themes raised in Spatial Option 1. Notwithstanding this, the points raised above will need to be addressed in order to

ensure sustainable and viable sites are developed through the Core Strategy. The Agency is happy to work with Trafford in the development of the LDF documents.

Option 2 – Inner Area/Wider Regeneration Area Priority Strategy

103 Spatial Option 2 sees development spread more evenly across the Borough, with significant growth located in Carrington, Partington, Sale West, Altrincham, Trafford Park and Old Trafford. More moderate levels of development will be focused in Sale, Stretford and at the Trafford Centre.

Comments: The Agency would not be able to support significant levels of development in the Partington, Carrington and Sale West areas without public transport and sustainable modes infrastructure being provided to facilitate new points of development. This is especially the case as a 'Primary Transport Corridor' is identified between Partington / Carrington and Junction 8 of the M60, via the Carrington Spur.

This Spatial Option also looks to locate development in similar locations to Spatial Option 1; comments made above regarding Spatial Option 1 are valid for Spatial Option 2.

Option 3 – Inner Area Priority Strategy

104 The final Spatial Option looks to locate significant development at Trafford Park, Old Trafford and Altrincham. Moderate levels of development are to be located in Partington, Carrington, Sale West, Sale, Sale Moor, Timperley, Urmston, Stretford and at the Trafford Centre.

Comments: The Agency welcomes development located in Stretford, Timperley and Urmston as these are established local centres with good public transport links to the local area and wider region. As such, appropriately located and sized development located here will benefit from existing public transport infrastructure and key services, thus reducing the need to travel by private car.

Spatial Option 3 locates development in the same areas as the previous Spatial Options, and as such, comments made above are still valid.

Key Strategic Sites

Eleven key, strategic sites have been identified within the document as being key to delivering growth, both in terms of housing numbers and economic growth the Agency has the following comments.

A - Pomona

105. site B, recommended

The Pomona site is located in the North East of the Borough, on the edge of Manchester City Centre. It has been identified within the document as being suitable for a residential-led, mixed-use development, incorporating high-density housing with office and leisure uses. There is scope for the site to be linked to the proposed Ordsall Riverside site, another residential-led, mixed-use scheme, currently being promoted by Salford Council through their LDF documentation.

Development located here may not have an impact on the SRN, due to its proximity from the SRN, the potential of Metrolink to be used (via the Pomona stop) and the closeness of Manchester City Centre. Notwithstanding this, the Agency would like to see the principles of sustainable development being adopted – the site being used for a mix of uses and permeable to public transport and sustainable modes, thus reducing the need to travel via private car.

B - Wharf side

106. site B, recommended

The Wharf side area is split into two distinct areas – the Mediacity UK development and the Manchester United stadium. Once the Mediacity site is fully built out and operational, both development sites will be attracting large numbers of people across the Morning, Evening and Weekend Peak Hours.

Notwithstanding this, both developments are well located in terms of public transport routes, with the TIF bid proposing possible Metrolink stops at 'Wharfside' and 'Manchester United'. Funding has already been secured to provide a spur on the Eccles line to facilitate a new stop at Mediacity which will allow Metrolink to fully access the site and provide public transport links to Manchester City Centre and surrounding areas. It is important however to identify where possible what other back up plans are in place if the TIF bid was not to succeed.

Any potential future development located here may impact upon the SRN, and as such, the Agency will require potential schemes / planning applications to be scoped at an early stage and the Agency is keen to have input into the development process at the earliest opportunity.

C - Lancashire County Cricket Club

107. site B, recommended

It is proposed to re-develop the current LCCC ground at Old Trafford into a world-class venue, capable of hosting international cricket and cultural events. Such a redevelopment will result in an increase of venue capacity, which in turn will lead to increased vehicle trips to the site and surrounding area. The proposal to redevelop the site also encompasses other elements such as housing, leisure and retail. According to the SHLAA, it is proposed to develop 2000 dwellings as part of this scheme.

Old Trafford is well located in terms of public transport routes, and if approved, the proposed TIF money will increase public transport accessibility to the local area. It is possible that the redevelopment of the LCCC ground will impact upon the SRN, and as such, the Agency would like to be consulted and involved at the earliest possible stage in any masterplan / planning application coming forward on this site.

D - Trafford Park (108) Site 10, Trafford Park

Trafford Park is a well-established industrial and business area which has a local and regional significance for employment and economic growth. It is recognised within the document that improvements to public transport are essential – and these could be provided via a new Metrolink line and shuttle bus services if TIF is approved following the public referendum. If the TIF money is not realised, then Trafford Park may not attain such a high level of funding to finance the required infrastructure again there is a need to identify what other back up plans are in place within the issues and options document.

Due to the large numbers of people accessing and egressing Trafford Park, there is an obvious level of impact on the M602 and M60, and should further development be located in Trafford Park, this level of impact is likely to increase. The Agency cannot support development proposals that are unsustainable and do not encourage the use of public transport and sustainable modes as a way of reducing single-occupancy private car use.

E – Trafford Centre Rectangle (109) Site 11, Trafford Centre

As mentioned previously in this response, the Trafford Centre has a considerable impact on the operation of junctions and mainline flow of the M60. As such, any further development at this location will have to be sustainable and reduce the amount of vehicle trips accessing the SRN.

If the TIF money is approved, the Trafford Centre will benefit from a Metrolink line to Manchester City Centre as well as shuttle buses linking Trafford Park and the Trafford Centre to existing Metrolink stops.

The Agency will not be able to support unsustainable development sites in the Trafford Centre area due to the impact on the SRN and lack of public transport alternatives to the private car.

F – Newton Street / Lacy Street, Stretford (110) Site 12, Stretford

This potential development site is not likely to have an impact on the SRN.

G – Stretford Meadows (Lesley Road Tip) (111) Site 13, Stretford

This 50ha site has been identified within the Core Strategy for recreational use / green space. The site is located next to Junctions 7 and 8 of the M60, and as such, development here may affect the operation of the junctions and the mainline flow on the M60.

If development is to come forward at this site, the Agency would require early consultation on any proposals or planning application to ensure that any vehicle impact and visual impact on the SRN is fully considered and assessed, and mitigated where necessary. If the development site being promoted at this location is proposed to take indirect access from the SRN, the Agency would require involvement at the earliest stage of the application / planning process.

H - Carrington

(112)

Carrington is currently an under-utilised brownfield site in the South West of the Borough, which is earmarked for industrial and storage / distribution uses to complement the operations at Trafford Park. The surrounding area is very rural in nature and suffers from poor transport links.

Development at this location may impact on the SRN as the Carrington Spur provides a link from Carrington to Junction 8 of the M60, providing a natural route to allow easy access to the SRN. It is recognised within the Core Strategy that public transport links to Carrington are inadequate. As a consequence, in order for new development to be located here, there would be a necessity for sufficient public transport infrastructure to be built to ensure that proposed sites are sustainable and reduce the need to travel by private car.

I – Partington Canalside

(113)

The development of Partington Canalside, alongside the redevelopment of Partington Town Centre, looks to develop housing units on what is deemed a 'significant site'. The creation of significant numbers of housing units may impact on the SRN at Junction 21 of the M6 or Junction 8 of the M60 if public transport infrastructure is not developed as part of the scheme.

The Agency will not be able to support unsustainable allocations of land which may impact upon the operation of the SRN.

J – Woodfield Road, Broadheath

(114)

It is unlikely that the development of the site will have an impact on the SRN.

K – Altair, Altrincham

(115)

Development at this location may have an impact on the SRN on the A556 and M56. As such, any development located at this site will have to ensure that the residual

impacts are mitigated to ensure that the operation of the SRN is not adversely impacted upon.

Housing

116

The document clearly sets out the requirements of 618 dwellings per year are required as per the North West Regional Spatial Strategy up to 2021. This equates to a total of 9,720 dwellings across a 15 year timeframe throughout the entire Borough. It is noted that Trafford are required to ensure there is sufficient housing land to meet the RSS requirements over the plan period.

The spatial options all intend to deliver 9,300 dwellings. Across all three Spatial Options, the bulk of the housing to be delivered is located at Pomona, Wharfside, Mediacity and the Old Trafford Regeneration Area.

Since the document was made available for consultation, Greater Manchester has been awarded a Housing Growth Point, with additional dwellings (over and above the numbers set out by the RSS) in the following areas:

- Bolton;
- Manchester;
- Salford; and
- Trafford

This will see an additional 20% of dwellings located in these Boroughs.

The DfT's 'Second Round Growth Points, Partnerships for Growth', states that AGMA's plans for the Trafford element of the Housing Growth Point will be 'bringing forward further development in Trafford: in Partington; the Trafford Rectangle; Old Trafford/Gorse Hill and specifically sites around Pomona and Lancashire County Cricket Club'. This appears consistent with the Core Strategy, although it must be noted that the numbers estimated in the Core Strategy Preferred Options will be subject to change and the amendments need to be made within the document.

The Agency will be keen to see new housing development located in areas of the Borough that have existing services and good public transport links, which will reduce the need to travel by private car. The Agency will not be able to support development sites in unsustainable locations, especially if they are located close to, or could have impact upon the operation of, the Strategic Road Network.

Accessibility

Core Policy Direction L4

(117)

100% Support

The Agency welcome Core Policy Direction L4 which states that 'the Council intends to produce policy that will locate jobs, health, education, shops, culture, sport and community facilities, open space, sport and recreation in accessible locations'. The Agency is keen to see development located in sustainable locations with a good access to key services and opportunities. This is built upon further in the policy where it is stated that 'ensure that major new developments are located in the Borough's most accessible locations'.

Development Management Policy Direction DM7

(118)

100% Support

The Agency are in support of Development Management Policy Direction DM7 which has the overarching aims to promote accessible public transport provision, reduce the need to travel and focus development in existing centres and near to major public transport interchanges. These principles need to be adopted to ensure new development is located in sustainable locations, with good accessibility to key services and opportunities and reduces the need to travel by private car.

Transport Modelling / Evidence Base

(119)

100% Support

The Highways Agency is aware that Trafford MBC are looking to utilise existing Greater Manchester traffic models to undertake some modelling of the proposed spatial options and associated land allocations. We recommend that this be referred to within the document. If development is to be promoted at locations close to the SRN, or in locations where there may be an impact; the justification for such sites will have to be demonstrated through a sound and robust evidence base. If this level of evidence is not apparent in the work undertaken to justify specific site allocations, then the Agency may have to resist land allocations that may impact upon the operation of the SRN.

Conclusions

In general terms, the Agency supports improvements to the public transport network in the Borough and any initiatives to increase walking and cycling. Any improvements which reduce the use of the private car and in particular reduce single occupancy vehicle trips are supported. We support connectivity throughout the region by the appropriate management of the Strategic Road Network and seek to ensure that development does not detrimentally affect the network.

I hope that the comments I have set out above for the core Strategy are useful. The Agency recognises the need for growth. However we must be sure that such growth can be accommodated.

Yours faithfully

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22 August 2008

Dear Sir or Madam

STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT -DRAFT REPORT CONSULTATION

Thank you for the opportunity to comment on the above document and the opportunity to work with you in the development of the LDF documents.

The strategic Road Network (SRN) within Trafford is comprised solely of the M60 (Outer Manchester Ring Road). The M60 provides an orbital route around the Manchester conurbation and links into other key routes of local and national importance, such as the M56, M61 and M62. The M60 is categorised as being of a national nature. In having this role the Highways Agency has the responsibility for the operation of these routes and is responsible for funding improvements to the route.

Road Safety is also a key concern to the Agency. The Agency would have concerns if the levels of traffic on the network that would lead to an exacerbation of existing safety problems through land use planning policy, the development or intensification of land would increase safety problems in the future.

Within the draft Strategic Housing Land Availability Assessment [SHLAA] report, a list of all potential housing sites which have either been classed as being included within the assessment, or discounted from the assessment has been provided. Both types have been graphically presented in Appendix 12 within the document. The Agency note that the maps present both included and discounted sites.

The Agency has used the information contained within Appendices 3, 4 and 6-12 to broadly identify proposed housing sites which have the potential to impact the M60, specifically in the vicinity of Junctions 6 to 10 along with digital copies of the housing location boundaries.

Sustainability

122 The Agency endorses Trafford MBC's own approach in using site surveys to determine the "sustainability" of each site being proposed within the document. A copy of the Site Survey Checklist was supplied in Appendix 5 of the SHLAA, and it can be seen that each site was surveyed to determine its;

- Proximity to public transport;
- Accessibility to primary services, facilities and jobs; and
- Accessibility to key local services and facilities.

123 a list of sites which have been discounted after the site survey process were provided, however studying the information within Appendix 5; it appears that no sites were listed as being discounted specifically for issues relating to sustainability, although that is not to say that it was not part of the consideration.

The Agency are keen to see sustainable sites being promoted through the spatial plan-making process to ensure that new allocations reduce the need to travel by private car, by being located close to key services and opportunities, public transport routes and slow modes networks.

Sites of Possible Concern

Based on the size of individual sites and their proximity to the M60, the Agency has identified a number of sites which if brought forward, could affect the operation of junctions and / or mainline flows on the M60. These sites are presented on SHLAA maps 1, 2 and 5 and are discussed under these two headings.

SHLAA Map 1

The sites that could be of possible concern to the Agency are listed in Table 1, below:

124 Table 1: Sites of Possible Concern (SHLAA Map 1)

| Site Name | Status | Distance from M60 (km) | Total Size (Hectares) | Total Number of Houses |
|-------------------------------|--------------------------|------------------------|-----------------------|------------------------|
| LA96 (Trafford Boulevard) | Included | 0.5 | 30 | 2000 |
| LA90-91 (Taylor Road) | Discounted (site survey) | 0.9 | 9 | N/A |
| LA92/93/94 (Barton Dock Road) | Discounted (site survey) | 0.5 | 25 | N/A |
| LA39 (Davyhulme) | Included | 2.3 | 13.4 | 501 |

| | | | | |
|-------|--|--|--|--|
| WWTW) | | | | |
|-------|--|--|--|--|

The sites of the greatest possible concern to the Agency are sites LA96, LA90-91 and LA92/93/94 as they are all located adjacent to the Trafford Centre, an area termed the 'Trafford Centre Rectangle', in close proximity to Junctions 9 and 10 of the M60.

The Agency note that sites LA90-91 and LA92/93/94 have been discounted as a result of the site surveys; however it is inferred that this judgement is not definite and is dependent on the results of the Employment Land Review. These sites currently host operational industrial premises; however, if they were converted to residential sites, which generate trips at a higher rate in the morning and evening peak periods than industrial premises, the Agency may have to resist such applications due to the impact on the operation of the SRN.

Site LA96, however, has been included as part of the SHLAA but unlike the discounted sites LA90-91 and LA92/93/94, this site is currently vacant. Due to the location of the site, and the indication that some 2000 residential units are to be delivered, if this site was to become allocated and then developed, the Agency would require that consultation take place at the earliest opportunity in the master planning stage with ongoing pre-application discussions, due to the potential for impact on the SRN.

Site LA39 is located to the west of the J10 of the M60 on green field land in the proximity of the Davyhulme Waste Water Treatment Works. If this site was to be allocated, it is proposed that 201 residential units would be developed in the first phase for the period 10-15 years after the baseline of April 2008. However, due to its location to the north of Urmston, it is reasonable to expect that some traffic generated from the site would use Junction 10 of the M60. For this site to be realised, improvements to public transport routes and services to the site will need to be realised to reduce the need to travel by private car.

SHLAA Map 2

The sites that are of potential concern to the Agency are listed in Table 2, below:

Table 2: Sites of Concern (SHLAA Map 2)

| Site Name | Status | Distance from M60 (km) | Total Size (Hectares) | Total Number of Houses |
|------------------------------------|----------|------------------------|-----------------------|------------------------|
| LA70 (Old Trafford Cricket Ground) | Included | 2.9 | 33 | 1500 |

129
The Agency acknowledge that the location of this site does benefit greatly from the Metrolink, with services to Manchester City Centre, Sale and Altrincham operating on a frequent basis, however the Agency consider that there is potential for trips to other destinations that would necessitate the use of the M602.

The Agency would also like to take this opportunity to state that in accordance with Circular 02/2007, they would like to be consulted at the earliest opportunity with regard the redevelopment of Old Trafford Cricket Ground and the associated regeneration of the immediate area due to a potential impact on the operation on the M60 and M602.

130 SHLAA Map 5

The majority of sites allocated within SHLAA Map 5 are located in the immediate vicinity of Partington. Although Partington is not located close to the SRN, the area has been targeted for high levels of development within the Core Strategy: Preferred Options, which recognises that Partington suffers from poor public transport accessibility. As such, unless public transport infrastructure and services are developed at this location, it is fair to assume that sites located in this area will generate high levels of private car trips in the morning and evening peak periods. Although the largest site (LA15) has been discounted during the site survey stage, Site LA86 located at Canal Side, which could potentially realise 550 new dwellings on greenfield land, is included within the assessment.

Conclusions

131
The SHLAA has set out the framework on which future housing land allocations will be based in Trafford throughout the lifetime of the emerging LDF. At this stage, the Agency are not in a position to fully endorse the document or to fully reject the allocations being proposed as it is appreciated that not all sites will come forward. Notwithstanding this, this response has highlighted the sites which may impact upon the operation of the SRN, and the Agency have stated they would like to be involved early in the planning process should said sites become allocated in the LDF process.

The Agency are keen to see housing sites allocated in areas of good accessibility, close to key services and opportunities and close to sustainable transport routes and links. By locating development sites in said areas, this will help to reduce the need to travel by private car and reduce the demand for the SRN.

In general terms, the Agency supports improvements to the public transport network in the Borough and any initiatives to increase walking and cycling. Any improvements which reduce the use of the private car and in particular reduce single occupancy vehicle trips are supported. We support connectivity throughout the region by the

appropriate management of the Strategic Road Network and seek to ensure that the allocation of development sites does not detrimentally affect the network.

It is also important to identify that as well as specific traffic impact evidence we would also be looking to see the infrastructure planning for any new infrastructure that would be required with new housing sites.

Should you require any further information, please do not hesitate to contact me.

Yours faithfully

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

PC/1084/101

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 | 4 |
| Core Strategy summary broadsheet | | Paragraph Number | 1.13 |
| 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 |
|---------|--------|-----------------|
| | X | |

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 disagree that the Trafford Core Strategy Preferred Options reflects the latest position on RSS for the reasons set out below.

At Policy W4 of the Proposed Changes to the RSS, it is stated that:

“...there should be a presumption against the release of allocated employment sites for other uses. Sites should not be released where they provide, or have the potential to provide, an important contribution to the economy of the local area. If Local Authorities are minded to release sites they should be satisfied, before so doing, that:

- an appropriate supply of sites is available for employment uses. The de-allocation or re-allocation of a site should not result in a deficient supply of employment land, in either quantitative or qualitative terms, matched against the demand and supply requirements of the local economy...”

Davenport Green remains an allocated site in the currently adopted development plan – the saved policies of the UDP. In this Core Strategy Preferred Options, Davenport Green has been de-allocated, without justification (see 5.18). Indeed, at Para 3.7 of the Core Strategy Issues and Options, “Future prospects for the development of the strategic employment site at Davenport Green” was identified as a key issue for Altrincham. The treatment afforded Davenport Green at this Preferred Options stage represents a dismissal of this issue rather than a justified resolution. (cont'd)...

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

...(cont'd)

It is clear that Trafford cannot at this stage be certain about whether there is an appropriate supply of sites available for employment use against the demand and supply requirements of the local economy, since a key piece of the evidence base – the Employment Land Review – has not yet been completed. Therefore, the Core Strategy is likely to fail the test of soundness for Core Strategies, as defined in PPS12 (Para 4.52):

“To be “sound” a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

“Justified” means that the document must be:

- founded on a robust and credible evidence base
- the most appropriate strategy when considered against the reasonable alternatives...”

The Proposed Changes to the RSS provide a clear sequential focus for development, and it is made clear that “development elsewhere may be acceptable if it satisfies other policies, notably DP1 to 9” (Policy RDF1). We are confident that Davenport Green satisfies other policies in the Proposed Changes to the RSS including DP1 to 9.

Furthermore, although the Proposed Changes to the RSS provide for regionally significant economic development to be located within the urban areas of the region in Policy W2, that policy also states that “sites for regionally significant knowledge-based services may also be clustered close to universities, major hospitals or other research establishments.” The potential therefore remains for Davenport Green to be re-allocated in order to take realise the potential employment benefits from the site as they relate to proximity to Wythenshawe Hospital.

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

Po/1084 / 102

Comment Sheet

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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 | 59 |
| Core Strategy summary broadsheet | | Paragraph Number | 5.18 |
| 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 |
|---------|--------|-----------------|
| | X | |

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.

As stated in our representation relating to Para 1.13, the de-allocation of Davenport Green has not been justified, and is in conflict with Policy W4 of the Proposed Changes to the RSS.

Furthermore, Trafford's Economic Strategy has not yet been published or adopted, and therefore does not contribute to "a robust and credible evidence base" as is required in producing a sound Core Strategy. The most recent document covering a similar scope is the Economic Development Plan, published in November 2005. The position that the Economic Development Strategy justifies de-allocation of Davenport Green is untenable, since policies E13 and E14 of the revised UDP relating to Davenport Green, were saved in June 2006, at which time the Economic Development Plan formed part of the evidence base for the preparation for revisions. Therefore, at that time, Council officers clearly allocated Davenport Green in addition to the five Priority Employment Zones identified in the Economic Development Plan.

As echoed in our representation relating to Para 6.2, in allocating strategic sites for employment, the Council is required to apply the criteria as outlined in Policy W2 of the Proposed Changes to the RSS (see below). To apply these criteria, the Council should have conducted an appropriate assessment (such as Sustainability Appraisal) in order to select those sites which performed best across a range of criteria. We would like to see the robust and credible evidence which supports the statement that the 11 sites are the best-performing in terms of being in "the appropriate place and of an appropriate type", and the evidence that those allocated for employment are compliant with the criteria of Policy W2 of the Proposed Changes to the RSS.

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

...(cont'd)

We are confident that Davenport Green would perform favourably in any appropriate assessment, and following favourable performance in such an assessment, Davenport Green could be allocated so as to be compliant with criteria-based policy test for regionally significant economic development, as provided for by Policy W2 of the Proposed Changes to the RSS.

Proposed Changes to the North West RSS – March 2008

Policy W2 – Locations for Regionally Significant Economic Development

Regionally significant economic development will be located close to transport nodes within the urban areas of Manchester, Liverpool and Central Lancashire City Regions and Crewe, Lancaster, Carlisle, Barrow-in-Furness and Workington and Whitehaven.

Sites will be identified in local development documents, having regard to the priorities in RDF1; spatial principles in Policies DP1- 9 and relevant sub regional policies in Chapters 10-14. They should be:

- capable of development within the plan period, having regard to the condition and availability of the land, infrastructure capacity, market considerations and environmental capacity;*
- highly accessible, especially by adequate public transport services, walking and cycling;*
- well-related to areas with high levels of worklessness and/or areas in need of regeneration;*
- well related to neighbouring uses, particularly in terms of access, traffic generation, noise and pollution.*

They should not be used for development that could equally well be accommodated elsewhere and should not be developed in a piecemeal manner.

Sites for regionally significant office development should be focussed in or adjacent to the regional centres and town/city centres listed in RDF1 consistent with the sequential approach in PPS6.

Sites for regionally significant knowledge-based services may also be clustered close to universities, major hospitals or other research establishments. Sites for regionally significant knowledge-based manufacturing should be well connected to these facilities by transport and ICT links.

Sites for regionally significant logistics and high-volume manufacturing should be well connected to the primary freight transport networks.

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

FO/1084/103

Comment Sheet

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|---|---|--|-----|
| 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 | 60 |
| Core Strategy summary broadsheet | | Paragraph Number | 6.2 |
| 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? | | | |
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| Support | | Object | General Comment |
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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.

No details have been provided of how these 11 sites were selected from the large array of potential strategic sites available in the borough. All 11 sites feature in each of the three spatial options that were tested, thus circumscribing the extent to which the Spatial Options really do represent "reasonable alternatives". We would like to see the robust and credible evidence which supports the statement that the 11 sites are the best-performing in terms of being in "the appropriate place and of an appropriate type". In allocating strategic sites for employment, the Council is required to apply the criteria as outlined in Policy W2 of the Proposed Changes to the RSS (see below). To apply this criteria, the Council should have conducted an appropriate assessment (such as Sustainability Appraisal) in order to select those sites which performed best across a range of criteria. We are confident that Davenport Green would perform favourably (see our consultation representation to Chapter 7 and the Sustainability Appraisal).

Subsequent to a favourable assessment through appropriate Sustainability Appraisal, Davenport Green should be added to this list for the reasons it was originally allocated (see below). Although the Proposed Changes to the RSS provide for regionally significant economic development to be located within the urban areas of the region in Policy W2, that policy also states that "sites for regionally significant knowledge-based services may also be clustered close to universities, major hospitals or other research establishments." The potential therefore remains for Davenport Green to be re-allocated in order to take realise the potential employment benefits from the site as they relate to proximity to Wythenshawe Hospital.:

(cont'd)...

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

...(cont'd)

Trafford Unitary Development Plan Saved Policy E14 – Justification

1. *Opportunities across the conurbation and indeed across the region for the development of high quality, prestige sites for modern, major international headquarter business activities are very limited. This site presents a very significant opportunity to provide for just such a form of development that would bring great benefit to the Greater Manchester and the regional economy. Its location in close proximity to Manchester Airport gives the site unique attraction and advantage.*

2. *Major companies serving national and international markets are able to choose between a variety of locations in the UK and continental Europe. Greater Manchester and the North West lack sites that are capable of attracting the headquarters, research and development and related facilities of such companies. The region needs a truly exceptional site that will offset some of the disadvantages of the North West, namely its poor image and its peripheral location to the economic core of Europe. This need has been recognised by the Secretary of State in his Regional Planning Guidance and by the Regional Economic Development Strategy prepared by the North West Regional Association. A key feature of a competitive site is ready availability including in planning terms; hence the need for strategic sites including Davenport Green to be provided in the UDP ahead of an identified requirement.*

3. *The development of Davenport Green for the activities identified in the Proposal will revitalise the sub-regional economy by attracting wealth-creating/exporting business which might otherwise be attracted elsewhere. It will complement the development of sites in existing urban areas, and thereby promote urban regeneration, by stimulating indirect and spin-off development and jobs in other parts of the conurbation. It will further promote urban regeneration by directly creating jobs of a high quality that are readily accessible to disadvantaged communities in the former Urban Programme target areas of Greater Manchester. The conservation and enhancement of the 99.12 Ha (245 acres) of land surrounding the development site for ecological interest, farming and controlled public access will bring additional tangible benefit to the community and the local environment.*

Proposed Changes to the North West RSS – March 2008 Policy W2 – Locations for Regionally Significant Economic Development

Regionally significant economic development will be located close to transport nodes within the urban areas of Manchester, Liverpool and Central Lancashire City Regions and Crewe, Lancaster, Carlisle, Barrow-in-Furness and Workington and Whitehaven.

Sites will be identified in local development documents, having regard to the priorities in RDF1; spatial principles in Policies DP1- 9 and relevant sub regional policies in Chapters 10-14. They should be:

- capable of development within the plan period, having regard to the condition and availability of the land, infrastructure capacity, market considerations and environmental capacity;*
- highly accessible, especially by adequate public transport services, walking and cycling;*
- well-related to areas with high levels of worklessness and/or areas in need of regeneration;*
- well related to neighbouring uses, particularly in terms of access, traffic generation, noise and pollution.*

They should not be used for development that could equally well be accommodated elsewhere and should not be developed in a piecemeal manner.

Sites for regionally significant office development should be focussed in or adjacent to the regional centres and town/city centres listed in RDF1 consistent with the sequential approach in PPS6.

Sites for regionally significant knowledge-based services may also be clustered close to universities, major hospitals or other research establishments. Sites for regionally significant knowledge-based manufacturing should be well connected to these facilities by transport and ICT links.

Sites for regionally significant logistics and high-volume manufacturing should be well connected to the primary freight transport networks.

Trafford's Core Strategy Preferred Options
 Comment Form July 2008

PO/1084/104

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 | 84 |
| Core Strategy summary broadsheet | | Paragraph Number | 7.40 – 7.42 |
| 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 |
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| | X | |

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To distinguish potential employment locations in the borough by whether they are new or existing is of little relevance to the task of meeting the RSS/EDP objectives, although the Proposed Changes to the RSS requires Local Planning Authorities to ensure that "brownfield land used for employment purposes is maximised" (Policy W3). The principal objective of RSS Policy W3 is that allocated locations for employment should provide for employment needs in an appropriate and sustainable manner. In allocating strategic sites for employment, the Council is required to apply the criteria as outlined in Policy W2 of the Proposed Changes to the RSS (see below). To apply this criteria, the Council should have conducted an appropriate assessment (such as Sustainability Appraisal) in order to select those sites which performed best across a range of criteria. Davenport Green, as a site suitable and available for employment use, should have been tested through Sustainability Appraisal against the other potential employment sites in TMBC – both existing and new – with the potential to meet employment needs.

As stated in our response to Para 1.13 of the Core Strategy Preferred Options, it is clear that Trafford cannot at this stage be certain about whether there is an appropriate supply of sites available for employment use against the demand and supply requirements of the local economy, since a key piece of the evidence base – the Employment Land Review – has not yet been completed. Therefore, the Core Strategy is likely to fail the test of soundness for Core Strategies, as defined in PPS12 (Para 4.52):

"To be "sound" a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY. "Justified" means that the document must be: • founded on a robust and credible evidence base• the most appropriate strategy when considered against the reasonable alternatives..." (cont'd)...

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

...(cont'd)

Proposed Changes to the North West RSS – March 2008
Policy W3 – Supply of Employment Land

Provision should be made for a supply of employment land as outlined in Table 6.1. Local planning authorities should undertake a comprehensive review of commitments, to secure a portfolio of sites that complies with the spatial development principles outlined in Policies DP1 – 9, and RDF1 and sub regional policies (Chapters 10- 14), and to ensure:

- *the most appropriate range of sites, in terms of market attractiveness and social, environmental and economic sustainability, are safeguarded for employment use;*
- *these sites can meet the full range of needs and are actively marketed;*
- *at least 30% of sites are available so that all new and existing businesses have the ability to grow successfully;*
- *the amount of brownfield land used for employment purposes is maximised, reflecting the likely increases in the amount available as a result of economic restructuring;*
- *full consideration is given to the scope for mixed-use development particularly within centres, and on larger sites;*
- *appropriate provision is made in Key Service Centres and full consideration given to the innovative re-use of agricultural buildings to facilitate the growth and diversification of the rural economy;*
- *the implications of home working on the scale and location of future employment land requirements are considered.*

Office development should, as far as possible, be focused in the regional centres, in and or adjacent to town /city centres listed in RDF1 and in Key Service Centres, consistent with RDF2 and the sequential approach in PPS6 .

The portfolio must be kept under regular review to ensure that the region does not over- or under-allocate land in relation to the actual scale of economic growth. Local Authorities should review their employment land portfolio every three years.

PO/1084/105

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

Comment Sheet

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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 | 86 |
| Core Strategy summary broadsheet | | Paragraph Number | 7.50 |
| Sustainability Appraisal | | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Other document, (please specify) | | Objective reference number | |
| | | Spatial Option Reference | |
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It is not evident that the negative implications of Carrington's brownfield status have been considered in the Sustainability Appraisal (the positive impact of improving contaminated sites at Carrington is counted as a positive benefit in the assessment of Spatial Option 2 against Environmental Criteria 6 – Conservation of Natural Resources). For example, assuming full remediation and decontamination is *possible* on this former chemical works in order to create an environment safe for new development, it is *probable* that there will be extensive financial costs to developers, or to the local authority (since the supporting document to the Sustainability Appraisal states "To ensure maximum benefits we need to ensure that the development is not developer led"). Such costs are likely to inhibit the feasibility of developers contributing to public benefits – such as transport links or recreational facilities – and the funds available for the council to meet its other objectives.

Furthermore, the approach as stated in Para 7.50 does not conform to the requirements of PPS12 which guide local authorities in the production of sound core strategies, despite the assertion in Para 1.12 of the Core Strategy Preferred Changes that these new requirements are reflected.

To be considered "sound", a Core Strategy must be justified and effective. Deliverability is one of the three aspects of effectiveness (PPS12, 4.45). Therefore "evidence should cover who will provide the infrastructure and when it will be provided." (PPS12, 4.8). As an example, Spatial Option 2 involves both a new road at Carrington and a Water Taxi from Manchester to Partington. The relevant documents in the Core Strategies Preferred Options evidence base are the Local Infrastructure Plan: Draft Infrastructure Capacity Assessment and the Greater Manchester Local Transport Plan. (cont'd)...

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

...(cont'd)

The LIP contains no timetable or funding arrangements for any improvement to public transport or highways in the Carrington area, and the web page states:

"The next stage of the LIP will involve an assessment of what infrastructure will be required to support development within the Borough over the Plan period. This will require joint working with key partners including external organisations, as the implementation of solutions often falls to an agency other than the local planning authority. The LIP will aid all parties to identify and prioritise infrastructure provision as part of an integrated approach to planning and infrastructure development. This will ensure services can match demand and that growth is sustainable. The framework to be produced will give a clear steer on who is responsible for implementing policies and proposals, by when and the resources that will be required. This approach will give greater confidence in the deliverability of the LDF."

The LTP is also insufficient as evidence: it does not provide for a new road at Carrington nor mention Water Taxis.

In the Sustainability Appraisal, it is clear that the deliverability of this new road is doubtful: "Large scale expansion of highway capacity may well be unaffordable, and raises the issue of whether expansion here is really realistic." (Spatial Option 2, assessed against Social Issue 3 – Sustainable Travel). Given this expressed concern, the favourable scores given in the Sustainability Appraisal to Spatial Option 2, which includes significant development at Carrington and a new road, are likely to result in the Core Strategy being found unsound; since this element of Spatial Option 2 is uncertain in its deliverability.

Finally, we question the validity of the assertions made as to the social, environmental and economic impacts of this new road at Carrington. The assessment of the road's impacts are highly speculative, since there no formal studies or planning has been undertaken. The assessed impacts seem to be generally positive, contributing significantly to a favourable score for Spatial Option 2 – the only option which includes this road. Three examples are provided in reference to the Sustainability Appraisal document.

FD/1084/106

**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 | 17-19 |
| Core Strategy summary broadsheet | | Paragraph Number | |
| Sustainability Appraisal | X | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Other document, (please specify) | | Objective reference number | |
| | | Spatial Option Reference | SO2: E2, E3 and E8 |
| | | Strategic Site Reference | |
| | | Map/Figure Reference Number | |
| | | Other (including omissions and suggestions for alternative approaches) | |

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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.

E2: Any biodiversity improvements associated with construction and operation of a new road are likely to involve measures to mitigate impacts, rather than represent a significant improvement, as is the commonly stated premise for a Section 106 agreement between a developer and the local authority. The potential designation of Shell Ponds at Carrington as an SSSI is presented in the LIP irrespective of new road construction.

E3: This is highly questionable. Even if development results in an improvement to public transport, and even if such improvements reduce the modal share of private cars among commuters, the overall km travelled by car is likely to increase as a result of the dispersed nature of development associated with Spatial Option 2 and the significant development at locations such as Carrington which are distant from the regional centre and without adequate public transport links. Since the overall km travelled is the relevant statistic to energy consumption and carbon emissions, it should be clear that the "level" of commuting – if this means mode share – is less relevant than the overall km generated by this Spatial Option.

E8: The link between air quality and congestion is indirect. A given quantum of km travelled will generate more air pollution in congested conditions than uncongested conditions. However, if a new road resulted in an overall increase in km travelled, this would be likely to more than offset the air quality improvements associated with a reduction in traffic on the A6144. (cont'd)...

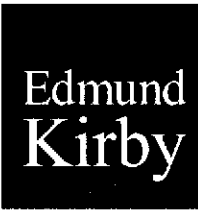
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

...(cont'd)

By comparison, development of employment floorspace at Davenport Green involves a greater degree of certainty about the provision of supporting infrastructure, provision for enhancement of biodiversity and likely impacts on air quality. In granting outline planning permission in 2003, the council was assured appropriate road improvements were to be delivered as a condition of development, and the outline application proposed a country park of 99 ha to mitigate potential impacts on local biodiversity. Davenport Green is identified in the Local Transport Plan 2006-11 as a future station on the expanded Manchester Metrolink system, and is in close proximity to the regional road, air and rail interchange at Manchester Airport, thereby reducing travel by private car for employees and visitors.

We are confident that Davenport Green would perform favourably in any appropriate assessment, and following favourable performance in such an assessment, Davenport Green could be allocated so as to be compliant with criteria-based policy test for regionally significant economic development, as provided for by Policy W2 of the Proposed Changes to the RSS.

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| STRATEGIC PLANNING AND DEVELOPMENTS | | | |
| 26 AUG 2008 | | | |
| Rec | | | |
| Action by | | | |
| Ans | | | |
| Copied to: | | | |

Our Ref: EL/RD/41293/2

SPECIAL DELIVERY

The LDF Team
c/o Strategic Planning and Developments
Trafford Metropolitan Borough Council
1st Floor Waterside House
Sale Waterside
Sale
M33 7ZF

22 August 2008

BY POST & EMAIL: strategic.planning@trafford.gov.uk

Dear Sir/Madam

REPRESENTATIONS RE: CORE STRATEGY – PREFERRED OPTIONS, TRAFFORD COUNCIL

I have been instructed by JD Davidson to submit representations on their behalf, to the draft Strategic Housing Land Availability Assessment (SHLAA) and Core Strategy – Preferred Options.

Davidson's are a long established metal recycling business operating from premises in Broadheath, Altrincham. They currently occupy a significant part of the south frontage onto Viaduct Road, north of the Bridgewater Canal. (See site location plan attached – edged red). They own the freehold for part of the site, and have leased the other half for many years (site hatched blue).

The site has been submitted for consideration into the Land Allocations Plan and SHLAA by Turley Associates, on behalf of the landowner – Peel Holdings. Within the SHLAA, the site has been identified as having potential for 65 dwellings, with the land to be released in 5-10 years time.

101

JD Davidson strongly objects to this proposal, given that the business has been operating from this site for over 50 years and it provides an important recycling service as well as significant employment for the local area.

Davidson's have a very successful and active scrap metal receiving, processing and recycling business, with a weighbridge and scrap shearer, and clearly undertake an important and necessary business with a reasonable degree of tidiness in an urban area location, which is well suited. My client also has considerable capital investment in the present site. Viaduct Road, with the railway arches on the north side and the small concentration of bad neighbourly industry on the south side, at the end of a cul-de-sac, is well located for these sorts of trades.

It is noted that the area to the north west of the site is an existing residential area; however this is not immediately adjacent to my client's site. An area of open space to the north of the

PROPERTY CONSULTANTS • TOWN PLANNING • BUILDING CONSULTANTS

Partners C C Hubbard FRICS G R Smith FRICS D Jones MRICS N R Lovell-Kennedy MRICS E I Landor MRTPI

Associates R H Lowe MRICS J Davies MRICS Consultant M Y Pitts FRICS



The LDF Team
Trafford Metropolitan Borough Council
22.08.08

site along with Viaduct Road acts as a buffer to preserve residential amenity in the vicinity. In addition, existing small workshops and warehouse units in the old railway arches occupy a linear barrier to the north of the site, effectively creating a screen in terms of visual and aural amenity.

Adjacent to the site lies a small Retail Park and a further modern large scale retail warehouse park to the west of the A56. Broadheath Industrial Area lies beyond the retail park. Therefore the site is well located for its current purpose, complementary to the adjacent development; as such it is a conforming use.

In addition to metal receiving and recycling facility, this location provides workshop space and warehousing for local businesses. This is therefore an important area of local employment and an excellent opportunity for small business start-ups. Davidson's provide employment for 19 employees and directors.

The Core Strategy – Preferred Options outlines three options relating to future development for the Borough. It is my client's view that option 3 for Altrincham will be preferable given that new housing development will be sufficiently accommodated within the designated sites, i.e. Woodfield Road. This would therefore not impact upon the client's site, allowing their business to continue in the future. As noted within the Core Strategy, *'the reduced level of residential development...would result in less pressure on existing employment areas for alternative uses'* (p.51).

102

An assessment of the Council's existing evidence base reveals that the Employment Land Study has yet to be produced. I am of the opinion that the Council should not put forward any preferred options until this Study has been completed as it could likely result in the selection of an option which could potentially prejudice the level of employment land in the Borough. This stage of the LDF process is therefore premature and likely to be challengeable at a future stage.

103

I wish to reiterate that my client would make the strongest representations against the potential loss of employment land in this area, especially given the history of the area and necessary service which is provided by the business. I also note the evolving joint waste plan for Greater Manchester, which is at its early stages of development. To make any decision on housing land, which would prejudice the existing use of the site, would be imprudent.

104

I would appreciate it if you could keep me informed of the future developments of the LDF, and ensure that my contact details are kept within your database. Please note that we will be submitting further representations once consultation is open for the Land Allocations Study.

I note that you encourage representations to be submitted via an online form, however given the strength and complexity of our objections I have chosen not to make use of your standard form. I do, however, enclose my details within this form as an attachment.

The LDF Team
Trafford Metropolitan Borough Council
22.08.08

I trust you will take into account my objections.

With kind regards.

Yours sincerely

EL

EDWARD LANDOR – MRTPI Partner

For and on behalf of Edmund Kirby

email: edwardlandor@edmundkirby.co.uk

Enc. Site Location Plan
Comments from Trafford Council

c.c. Mr C C Hubbard, Edmund Kirby



10510
REF: 27/05/08

LEITH PLANNING LIMITED

Our Ref: LPL 466 22-08-08

Strategic Planning and Developments
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| STRATEGIC PLANNING AND DEVELOPMENTS | | | |
| 27 AUG 2008 | | | |
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22nd August 2008

Dear Sir/Madam,

**RE: CORE STRATEGY PREFERRED OPTIONS CONSULTATION
AND STRATEGIC HOUSING LAND AVAILABILITY
ASSESSMENT**

Council's Invitation: The Council has invited comments on the Core Strategy Preferred Options. The consultation document deals with spatial options for development and seeks to receive feedback as to the best way of planning to manage and promote the future improvement and growth of the Borough in the public interest. It is noted that the deadline for submission of representations is the 27th August 2008.

Instructions: Leith Planning Ltd was instructed by Tim Jacomb and Anna Cooper to obtain and review the Core Strategy Preferred Options document and the Strategic Housing Land Availability Assessment draft report and to comment as necessary.

Submission: This submission deals with the spatial options proposed by Trafford Council, associated background papers, and a proposal for a comprehensive development of the site delineated at Appendix 1. This submission will only deal with the key points of relevance to the proposed development of Westwood Avenue and broader housing related matters.

Land adjacent to 15 Westwood Avenue: It is understood that the land in the ownership of my clients (as delineated at Appendix 1) will be considered, through

the evolution of the Site Allocations Development Plan Document which is understood to be currently on hold pending further work on the Core Strategy. Whilst no firm dates for the Preferred Options consultation on the Site Allocations DPD have as yet been published it is understood that the submission to Secretary of State is currently scheduled for June 2009.

The site identified at Appendix 1 is being considered by my client for residential development. The design and principle of development is being progressed with Cormac McGowan within the authority's development control section and through the provisions of the development plan process.

To date the site has been included within the Strategic Housing Land Availability Assessment and has been assigned the reference number LA43 and has passed through the first phase of analysis. It is understood that the inclusion of the site into the next phase of the process does not guarantee an allocation, but that the details provided within the Strategic Housing Land Availability Assessment will inform the next stage of the process. Should any further details on our site be required in relation to this stage of the evaluation process, please do not hesitate to contact us.

Local Policy Context: The current Trafford Unitary Development Plan (Revised) was adopted on 19th June 2006 and has been operative since that date. Within the current policy context the site owned by my clients and delineated at Appendix 1 is located within a residential urban area and is an in-fill plot between two existing residential properties.

Sub-Area: It is understood that the site delineated at Appendix 1 (Timperley) would fall within the Altrincham sub-area. This is an area characterised by semi-detached housing, retail/commercial centres and traditional industrial land.

It is understood that for the purposes of the Core Strategy document the site does fall within the Altrincham sub-area, but with regards to Part B the Spatial Option seeks to focus development in the Town Centre and does not seek to promote any development within the area of interest for our client. In this regard the site delineated at Appendix 1 falls within a 'white area'.

Vision for Trafford: We support the Council's vision for development in Trafford; however we would wish to see greater focus placed on the provision of residential development to meet the needs of the current and future local community.

Vision and Objectives for Altrincham: We support the Council's Vision for Altrincham, which reads as follows:

"To sustain and further develop Altrincham as a vibrant, prosperous, inclusive and environmentally attractive suburban residential community."

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However, we do not agree with the preference to focus development in the town centre and away from other locations. For the reasons outlined elsewhere within this report this approach is not considered to promote the provision of sustainable communities and sustainable growth.

It is considered that the provision of a high quality well-designed residential development on the land available adjacent to 15 Westwood Avenue would fully embrace and promote the vision as outlined above, and secure residential development in an appropriate and sustainable location.

In terms of the objectives as drafted, the objective relating to the provision of residential housing should be more flexible and workable with the requirements of PPS3 and the North West Regional Spatial Strategy through a re-wording which would remove reference to 'restrict' and which would just relate to the provision of development in line with the requirements and target provision of regional policy.

Housing Requirements: Attention is drawn to paragraph 7.5 which outlines that the Secretary of State's "Proposed Changes" to the Regional Spatial Strategy published in March 2008 proposed a net average annual requirement of 578 dwellings per annum for Trafford up to 2021. The report also notes that once an allowance of 40 units per annum is made for clearance / replacement the minimum gross annual average requirement for Trafford would rise to 618 new units per year. This requirement may increase to some 694 units per year should the Greater Manchester Growth Point Bid be accepted.

Whilst attention is drawn to the content of the Strategic Housing Land Availability Assessment and the need for a five year supply, there are limited details provided within the Core Strategy Preferred Options to demonstrate whether or not there is a current five year provision of housing land for the figures outlined above. Without these details being transferred clearly into the consultation document it is difficult to make meaningful representations on the housing provision within Trafford; albeit it is clear that there may well be an under provision in the medium term and difficulties in achieving provision should the Growth Point Bid be successful.

Local Evidence Base: Part of the Council's requirements in the preparation of the Local Development Plan relate to the provision of a sound and robust evidence base. This is supported in legislation at Section 13 of the Planning and Compensation Act 2004 which deals with a "survey of the area" and the Council's duty to survey.

It is noted at paragraph 1.24 that the local authority lists the evidence base for the Core Strategy. It is useful to note that a number of documents are currently under review or have recently been reviewed and/or published, however the

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preferred options should only have been promoted once the full findings of the interim reports have been established. Holding a consultation in advance of these results may undermine the quality and robustness of consultation process, and raise questions on the soundness of the document and the need for further Preferred Options consultations.

Growth Options: It is noted that the local authority put forward three varying growth options for the future of Trafford.

We would wish to support Option 2 which would provide the most residential development for Altrincham, namely approximately 600 units. However, we would only support a strategy which sought to disperse residential development throughout the sub-area (including Broadheath, Broomwood and Timperley) with an element of concentration within Altrincham Town Centre. Any other options for development would undermine the viability of other locations and their localised housing markets, and would go against the principle of sustainable development and the creation of sustainable communities. Development should primarily be focussed within existing residential areas throughout the sub-area and on sustainable routes to accord and promote with national policy.

106
Option 2
Support

We fully support the provision of requirements for all new development to need to reflect the characteristics of the area within which they are situated.

107
Fully support

We would seek clarification as to whether a further Preferred Options consultation would be carried out in due course should the Greater Manchester Housing Growth Point bid be accepted, given the strategic implications this will have on housing figures.

108
Fully support

Policy Directions: it is not considered necessary to review and comment on all of the various Policy Directions and Management Directions outlined within the Core Strategy Preferred Options consultation document. However, we would wish to make it clear that we would support any policies which sought to provide housing in the areas where need has been identified through an up to date assessment. Housing should not be concentrated within only a handful of key strategic locations. There should be provision available for an element of dispersal to the small towns and villages such as Timperley where housing demand is high and sustainable locations found which will support the principles of local, regional and national policy, and promote the provision of mixed sustainable communities.

109
Fully support

Summary: We would wish to demonstrate support for Option 2 which would provide the most residential development for Altrincham, namely approximately 600 units. However, we would only support a strategy which sought to disperse residential development throughout the sub-area (including Broadheath, Broomwood and Timperley) with an element of concentration within Altrincham Town Centre. Any other options for development would undermine the viability of


other locations and their localised housing markets, and would go against the principle of sustainable development and the creation of sustainable communities. Development should primarily be focussed within existing residential areas throughout the sub-area and on sustainable routes to accord and promote with national policy.

Housing should not be concentrated within only a handful of key strategic locations, there should be provision available for an element of dispersal to the small towns and villages such as Timperley where housing demand is high and sustainable locations found which will support the principles of local, regional and national policy, and promote the provision of mixed sustainable communities.

We would seek to be kept apprised of developments within the evolving Local Development Framework in due course and be notified when there are future opportunities to engage in the process.

Should you require any additional information, or clarification on matters raised above, please do not hesitate to contact us.

Yours faithfully

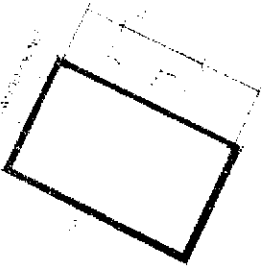

Rebecca Deloize
MSc (Dist) BSc (Hons)
Associate Planning Director

Enc

Cc Tim Jacomb and Anna Cooper



St. Hugh's RC
Primary School





1090
ACK sent 27/08/08.

LEITH PLANNING LIMITED

Our Ref: LPL 466 22-08-08

Strategic Planning and Developments
Trafford Council
First Floor
Sale waterside
Sale
Manchester
M33 7ZF

STRATEGIC PLANNING AND DEVELOPMENTS

27 AUG 2008

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| Rec | | | |
| Action by | | | |
| Ans | | | |
| Copied to | | | |

22nd August 2008

Dear Sir/Madam,

**RE: CORE STRATEGY PREFERRED OPTIONS CONSULTATION
AND STRATEGIC HOUSING LAND AVAILABILITY
ASSESSMENT**

Council's Invitation: The Council has invited comments on the Core Strategy Preferred Options. The consultation document deals with spatial options for development and seeks to receive feedback as to the best way of planning to manage and promote the future improvement and growth of the Borough in the public interest. It is noted that the deadline for submission of representations is the 27th August 2008.

Instructions: Leith Planning Ltd was instructed by Tim Jacomb and Anna Cooper to obtain and review the Core Strategy Preferred Options document and the Strategic Housing Land Availability Assessment draft report and to comment as necessary.

Submission: This submission deals with the spatial options proposed by Trafford Council, associated background papers, and a proposal for a comprehensive development of the site delineated at Appendix 1. This submission will only deal with the key points of relevance to the proposed development of Westwood Avenue and broader housing related matters.

Land adjacent to 15 Westwood Avenue: It is understood that the land in the ownership of my clients (as delineated at Appendix 1) will be considered, through

the evolution of the Site Allocations Development Plan Document which is understood to be currently on hold pending further work on the Core Strategy. Whilst no firm dates for the Preferred Options consultation on the Site Allocations DPD have as yet been published it is understood that the submission to Secretary of State is currently scheduled for June 2009.

The site identified at Appendix 1 is being considered by my client for residential development. The design and principle of development is being progressed with Cormac McGowan within the authority's development control section and through the provisions of the development plan process.

To date the site has been included within the Strategic Housing Land Availability Assessment and has been assigned the reference number LA43 and has passed through the first phase of analysis. It is understood that the inclusion of the site into the next phase of the process does not guarantee an allocation, but that the details provided within the Strategic Housing Land Availability Assessment will inform the next stage of the process. Should any further details on our site be required in relation to this stage of the evaluation process, please do not hesitate to contact us.

Local Policy Context: The current Trafford Unitary Development Plan (Revised) was adopted on 19th June 2006 and has been operative since that date. Within the current policy context the site owned by my clients and delineated at Appendix 1 is located within a residential urban area and is an in-fill plot between two existing residential properties.

Sub-Area: It is understood that the site delineated at Appendix 1 (Timperley) would fall within the Altrincham sub-area. This is an area characterised by semi-detached housing, retail/commercial centres and traditional industrial land.

It is understood that for the purposes of the Core Strategy document the site does fall within the Altrincham sub-area, but with regards to Part B the Spatial Option seeks to focus development in the Town Centre and does not seek to promote any development within the area of interest for our client. In this regard the site delineated at Appendix 1 falls within a 'white area'.

Vision for Trafford: We support the Council's vision for development in Trafford; however we would wish to see greater focus placed on the provision of residential development to meet the needs of the current and future local community.

Vision and Objectives for Altrincham: We support the Council's Vision for Altrincham, which reads as follows:

"To sustain and further develop Altrincham as a vibrant, prosperous, inclusive and environmentally attractive suburban residential community."

However, we do not agree with the preference to focus development in the town centre and away from other locations. For the reasons outlined elsewhere within this report this approach is not considered to promote the provision of sustainable communities and sustainable growth.

It is considered that the provision of a high quality well-designed residential development on the land available adjacent to 15 Westwood Avenue would fully embrace and promote the vision as outlined above, and secure residential development in an appropriate and sustainable location.

In terms of the objectives as drafted, the objective relating to the provision of residential housing should be more flexible and workable with the requirements of PPS3 and the North West Regional Spatial Strategy through a re-wording which would remove reference to 'restrict' and which would just relate to the provision of development in line with the requirements and target provision of regional policy.

Housing Requirements: Attention is drawn to paragraph 7.5 which outlines that the Secretary of State's "Proposed Changes" to the Regional Spatial Strategy published in March 2008 proposed a net average annual requirement of 578 dwellings per annum for Trafford up to 2021. The report also notes that once an allowance of 40 units per annum is made for clearance / replacement the minimum gross annual average requirement for Trafford would rise to 618 new units per year. This requirement may increase to some 694 units per year should the Greater Manchester Growth Point Bid be accepted.

Whilst attention is drawn to the content of the Strategic Housing Land Availability Assessment and the need for a five year supply, there are limited details provided within the Core Strategy Preferred Options to demonstrate whether or not there is a current five year provision of housing land for the figures outlined above. Without these details being transferred clearly into the consultation document it is difficult to make meaningful representations on the housing provision within Trafford; albeit it is clear that there may well be an under provision in the medium term and difficulties in achieving provision should the Growth Point Bid be successful.

Local Evidence Base: Part of the Council's requirements in the preparation of the Local Development Plan relate to the provision of a sound and robust evidence base. This is supported in legislation at Section 13 of the Planning and Compensation Act 2004 which deals with a "survey of the area" and the Council's duty to survey.

It is noted at paragraph 1.24 that the local authority lists the evidence base for the Core Strategy. It is useful to note that a number of documents are currently under review or have recently been reviewed and/or published, however the

preferred options should only have been promoted once the full findings of the interim reports have been established. Holding a consultation in advance of these results may undermine the quality and robustness of consultation process, and raise questions on the soundness of the document and the need for further Preferred Options consultations.

Growth Options: It is noted that the local authority put forward three varying growth options for the future of Trafford.

We would wish to support Option 2 which would provide the most residential development for Altrincham, namely approximately 600 units. However, we would only support a strategy which sought to disperse residential development throughout the sub-area (including Broadheath, Broomwood and Timperley) with an element of concentration within Altrincham Town Centre. Any other options for development would undermine the viability of other locations and their localised housing markets, and would go against the principle of sustainable development and the creation of sustainable communities. Development should primarily be focussed within existing residential areas throughout the sub-area and on sustainable routes to accord and promote with national policy.

We fully support the provision of requirements for all new development to need to reflect the characteristics of the area within which they are situated.

We would seek clarification as to whether a further Preferred Options consultation would be carried out in due course should the Greater Manchester Housing Growth Point bid be accepted, given the strategic implications this will have on housing figures.

Policy Directions: it is not considered necessary to review and comment on all of the various Policy Directions and Management Directions outlined within the Core Strategy Preferred Options consultation document. However, we would wish to make it clear that we would support any policies which sought to provide housing in the areas where need has been identified through an up to date assessment. Housing should not be concentrated within only a handful of key strategic locations. There should be provision available for an element of dispersal to the small towns and villages such as Timperley where housing demand is high and sustainable locations found which will support the principles of local, regional and national policy, and promote the provision of mixed sustainable communities.

Summary: We would wish to demonstrate support for Option 2 which would provide the most residential development for Altrincham, namely approximately 600 units. However, we would only support a strategy which sought to disperse residential development throughout the sub-area (including Broadheath, Broomwood and Timperley) with an element of concentration within Altrincham Town Centre. Any other options for development would undermine the viability of

other locations and their localised housing markets, and would go against the principle of sustainable development and the creation of sustainable communities. Development should primarily be focussed within existing residential areas throughout the sub-area and on sustainable routes to accord and promote with national policy.

Housing should not be concentrated within only a handful of key strategic locations, there should be provision available for an element of dispersal to the small towns and villages such as Timperley where housing demand is high and sustainable locations found which will support the principles of local, regional and national policy, and promote the provision of mixed sustainable communities.

We would seek to be kept apprised of developments within the evolving Local Development Framework in due course and be notified when there are future opportunities to engage in the process.

Should you require any additional information, or clarification on matters raised above, please do not hesitate to contact us.

Yours faithfully

Rebecca Delo~~ze~~
MSc (Dist) BSc (Hons)
Associate Planning Director

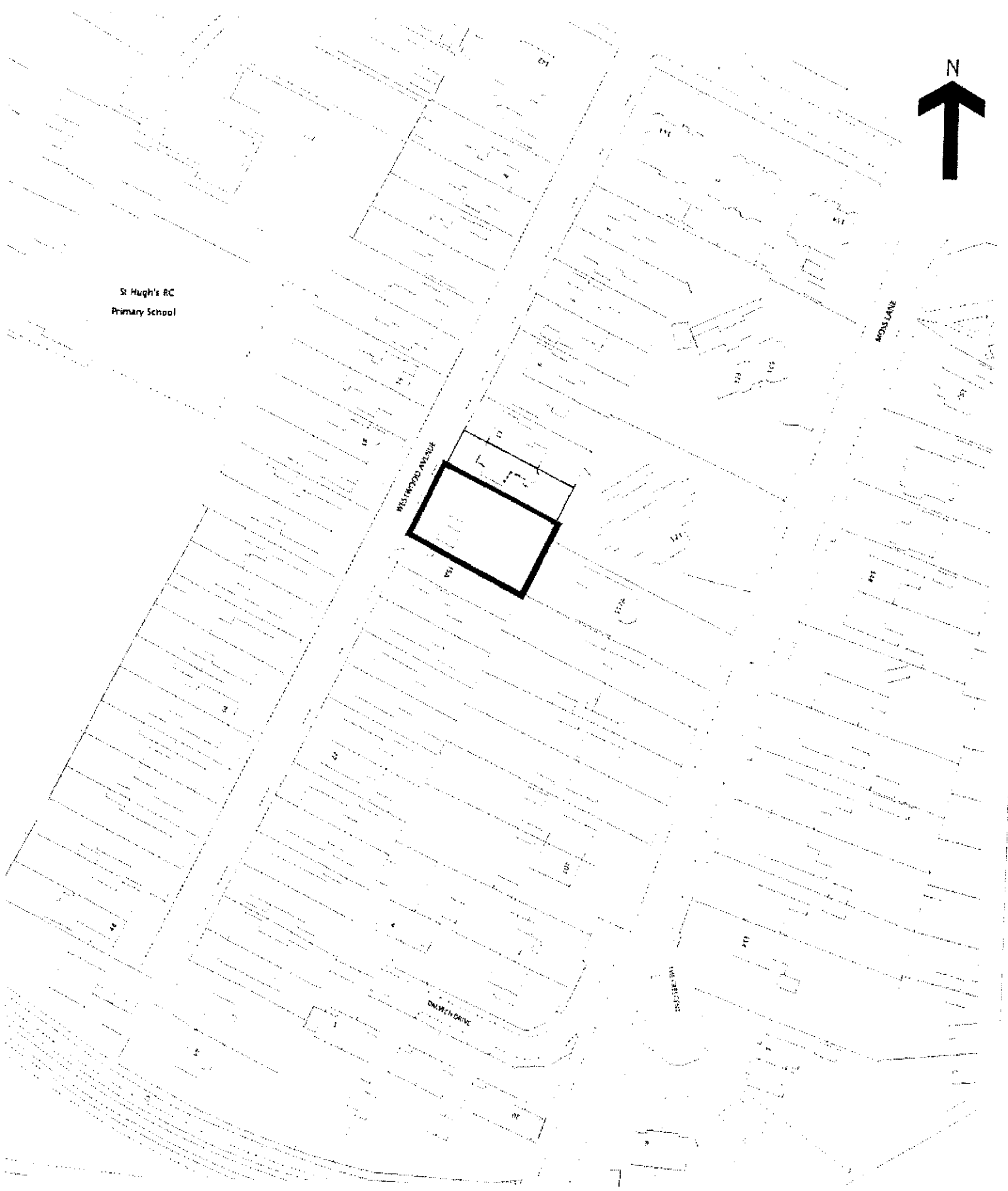
Enc

Cc Tim Jacomb and Anna Cooper

APPENDIX 1



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Primary School



PO/1095/



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C/o Strategic Planning & Developments
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Manchester
M33 7ZF

Our ref JPI/JH/0065670

27 August 2008

Dear Sir/Madam

Representations to DPD1: Core Strategy Preferred Options (July 2008)

On behalf of our client **Howard Holdings PLC**, we write to thank you for providing us with an opportunity to comment on the Core Strategy Preferred Options for the new Local Development Framework in Trafford.

Our client is a major mixed use property developer who is working extensively with Trafford MBC and other partners to provide a major regeneration led mixed-use development at Victoria Warehouse, situated on Trafford Park Road. The site is located at the Eastern extent of the 'Wharfside' Key Strategic Site, as identified in the Core Strategy Preferred Options.

Overview

It is important that the Core Strategy reflects the aspirations of the Greater Manchester region as a whole, through the emerging Regional Spatial Strategy, in providing a spatial vision for Trafford and the City Region.

Our client is generally supportive of the proposals set out in the Core Strategy Preferred Options, which seek to focus future development and regeneration within the City Region and in the surrounding Greater Manchester conurbation. Our client is supportive of the view that Trafford is a key economic driver for the City Region economy and we therefore support a strategy that provides for appropriate growth and regeneration of the Regional Centre and surrounding Inner Areas.

In relation to housing provision, our client is supportive of a strategy that seeks to plan for the future needs and aspirations of the future population, which is indicated to be growing in line with forecasts for economic growth in the City Region economy. We support the Council's interest in seeking to become a new Growth Point, which if accepted would see the draft RSS housing allocation of 578 units p.a. rise by an additional 20% to 694 units p.a; supporting government aspirations to build 3 million new homes by 2020. The Greater Manchester Growth Bid supports the spatial focus of the RSS in seeking to repopulate the deprived areas at the core of the Manchester conurbation through the delivery of sustainable mixed communities.

Our specific comments on the key components of the Core Strategy Preferred Options paper are provided as follows:

Mapping and Area Designation

Firstly, we feel there is confusion and inconsistency over the specific location of our client's site at Victoria Warehouse, Trafford Park Road. It is clearly located within the 'Wharfside' Key Strategic Site (B), as identified by the detailed map contained on page 61. Furthermore, Wharfside is designated within 'Trafford Park' as one of the "10 locally distinctive places in Trafford" (page 13). This is reiterated in the spatial policy options for Trafford Park (page 39), which identify development opportunities at both Wharfside and Victoria Warehouse (page 39).

In contrast, paragraph 7.12 (page 74) suggests that Victoria Warehouse lies within 'Old Trafford', stating:

101

"...The Council considers that there are a number of strategic sites that will deliver the majority of the required housing land. The sites in Old Trafford are: Pomona, Victoria Warehouses and LCCC; in Trafford Park: Media City/Wharfside and Trafford Quays..."

We therefore suggest that the core strategy is clear and explicit in the designation of our client's site within Wharfside/Trafford Park area, by accepting the following recommendations:

- Deletion of Figure 3 and replacement with a clear, detailed map(s) to defined the boundaries of the "10 locally distinctive places in Trafford"; clearly identifying our client's site within the 'Trafford Park' area; and
- Removal of reference to "Victoria Warehouses" in paragraph 7.12 above to reflect our client's site location within Wharfside, Trafford Park, as opposed to Old Trafford.

Secondly, at a more generic level, we feel that the Core Strategy in its entirety conveys confusion over the designation of distinctive areas and illustrative mapping. In particular, we would like to make the following comments:

- Figure 3 should be deleted and replaced with a detailed map(s) to define the "10 locally distinctive places in Trafford" as recommended above. Also, this would require deletion and replacement of the associated small-scale plans which accompany each of the 10 distinct area spatial profiles.
- There is a lack of clarity in the definition of 'key regeneration areas' within the Strategy, such as, Old Trafford/Gorse Hill, Partington and Sale West (paragraph 7.20 and core policy L2). Clarification on the extent of these areas is required, for example, as to whether they are related to ward boundaries or existing UDP designations.

Our detailed comments on the Core Strategy will assume our client's site to sit within the Wharfside Key Strategic Site, and consequently the Trafford Park area.

Trafford: A Place to Live, Work, Learn and Relax (Chapter 2)

Our client is fully in support of the Core Strategy's requirement for the Trafford LDF to contribute to the delivery of the North West Regional Spatial Strategy. In particular, the identification of the Regional Centre as the primary economic driver within the City Region, in line with Policy MCR2 of the emerging Regional Spatial Strategy.

The significant role of Wharfside in the growth of business, retail, leisure, cultural and tourism development is supported; alongside acknowledgement that residential development as part of mixed use schemes is both acceptable and contributory to the vitality and viability of the Regional Centre.

Our client agrees with the proposed detailed boundary of both the Regional Centre and Inner Areas, as illustrated in Figure 2.

The designation of Wharfside, and consequently our client's site, within Trafford Park as one of the "10 locally distinctive places that make up Trafford" is supported; though we recommend Figure 2 to be removed and replaced with a more specific, detailed map as suggested above.

The spatial profile of Trafford Park sets out the key issues that exist, in the context of the "live, learn, work and relax" Sustainable Community Strategy Themes. Our clients particularly support the following view, with a minor wording change that reflects the opportunities that **do** exist within Wharfside:

“...opportunities exist within the Wharfside area and around the Trafford Centre to include sustainable residential development as part of high quality mixed use redevelopment/development schemes in these locations...”

Our client also supports the potential to accommodate high class sustainable mixed use development as part of the proposed Media City development as a key issue; particularly in expected growth sectors including financial & professional services, ICT/digital new media, tourism and environmental technologies.

The spatial profile of Trafford Park and the remaining key issues that are identified are generally supported.

The Vision for Trafford (Chapter 3)

The vision, as set out in the revised Sustainable Community Strategy, outlines the overarching vision for Trafford up to 2021. Our client is fully supportive of the adoption of this vision as an overall vision for the LDF and, more specifically, the emerging Core Strategy.

Figure 4 outlines the Strategic Objectives which the Core Strategy spatial vision will seek to achieve by 2024. We believe that **SO1** is not a clear strategic objective, because:

- It is too detailed and specific to act as an overarching strategic objective; and
- It should be focused on the economic growth of the Regional Centre as the primary economic driver within the City Region, in line with the strategic aims of emerging Regional Spatial Strategy policies MCR1 and MCR2.

We suggest that the wording of this policy should be changed to reflect this:

“... significant economic growth in the Regional Centre and surrounding Inner Areas...”

The aims and objectives of the remaining Strategic Objectives are generally supported.

The Vision and Objectives for Trafford's Places (Chapter 4)

Chapter 4 outlines the vision and place objectives for each of the 10 distinct places in Trafford. Our client is supportive of the vision to sustain Trafford Park as a regionally significant focus of economic activity; serving and supporting the business and employment needs of Trafford, the wider City Region economy and its residents.

Place Objective **TPO2** seeks to:

“...create the right conditions for significant, mixed business and residential development in line with its role within the City Region...”

Place Objective **TPO3** seeks to:

“...maximise the economic and residential potential in line with RSS Policy MCR2...”

Our client is fully supportive of these objectives, which seek to deliver the spatial policies of the emerging RSS and deliver economic growth within the City Region and Regional Centre. The overall objectives of the Trafford Park area are supported; particularly the need to consolidate and build upon key tourist attractions.

Spatial Options (Chapter 5)

Chapter 5 in the Core Strategy Preferred Options sets out three Spatial Options which will shape future spatial development in Trafford. Each of the three options identifies the Regional Centre, including Wharfside, as a focus for economic and residential growth.

Preferred Option Outline

On review of the spatial options, our client would like to register support for **Option 1** as a preferred strategic direction for the Core Strategy and the LDF. Option 1 seeks to deliver significant levels of development within the Regional Centre and Inner Areas. It identifies new housing opportunities at Wharfside that should come forward early in the plan period.

We believe that Option 1 provides a measured approach to the spatial development of Trafford, whilst recognising the Regional Centre as the significant economic driver and location for future growth. It identifies the need for significant residential development in the Wharfside area early in the plan period, whilst recognising the need to support emerging digital and media industries as part of potential mixed use developments.

In response to Option 1, we feel that it should be more generic and not contain specific housing and particularly affordable housing figures; for two reasons:

- Specific housing allocation and provision should be confirmed on final completion of the SHLAA and detailed in accompanying Development Plan Documents (DPDs). Until this time there is no firm evidence base for the incorporation of figures; and
- Affordable housing should not be allocated on a site specific basis within the Core Strategy. Moreover, this should be incorporated into a Borough-wide housing policy, reflecting housing need. PPS12 states:

"...in general the core strategy will not include site specific detail which can date quickly..." [PPS12, paragraph 4.7]

It also suggests that site specific criteria should be set out to:

"...allow more precise definition through masterplanning using an area action plan (if required) or through a supplementary planning document (SPD)..." [PPS12, paragraph 4.7]

To reflect this, we recommend the deletion of the following paragraph:

"...affordable housing opportunities would arise at Media City/Victoria Warehouse starting early in the plan period (Approx. 270-360 units)..."

If the above paragraph is to remain, we would request that "Victoria Warehouse" be replaced with "Wharfside" to avoid site specific allocation, as recommended in paragraph 4.7 of PPS12, and to remain consistent with the remainder of the core strategy.

Key Strategic Sites (Chapter 6)

Our client welcomes and supports the identification and objectives of Wharfside as a 'Key Strategic Site'.

We suggest the following minor amendment to the description of Wharfside to reflect its position to the East of the core Trafford Park area:

"mixed area within the Regional Centre incorporating Trafford Park." end of

The identified place objectives for Wharfside, particularly its identification as an area that promotes significant mixed business and residential development, are fully supported.

Core Policies (Chapter 7)

The housing chapter provides a breakdown of the spatial housing provision, for each identified spatial option (page 75). There is no explanation of how the housing figures for each option are either calculated or compiled. We would recommend:

- The removal of the table contained on page 75. The allocation of housing figures does not reflect the 15 year core strategy time horizon and reduces the flexibility of a “*plan, monitor and manage*” approach as outlined in paragraph 7.7. In addition, the Draft Strategic Housing Land Availability Study (SHLAA) is not yet finalised and may result in a change in overall assumptions.

Our client is generally supportive of the proposed Core Policies in meeting the aims of:

- The emerging RSS, in promoting economic development and focusing growth within the Regional Centre;
- The Sustainable Communities agenda;
- National and regional climate change policies;
- The Ship Canal Corridor; and
- The protection and enhancement of existing cultural facilities.

Development Management Policies (Chapter 8)

Our client is generally supportive of the aims and objectives of the development management policies, but seeks to make the following comments and recommendations:

Design and Construction

Our client agrees with the requirement for all development to achieve high standards of design and construction, but seeks to recommend that Level 6 Code for Sustainable Homes be achieved by 2016, in line with existing government targets.

Affordable Housing

As detailed in our earlier comments on the spatial options (chapter 5), we would like to reiterate the need to removed specific affordable housing figures from the Core Strategy; as incorporated in paragraph's 8.12 and 8.14. We would recommend:

- Specific figures regarding affordable housing requirement are removed. This reflects national guidance in PPS12, which stresses the need for the core strategy to remain flexible and responsive in order to respond to changes during its 15 year lifespan.
- Specific reference to Trafford's existing Housing Market Assessment is removed and replaced with a generic reference to the most up-to-date Housing Market Assessment at the time of reading. This again provides flexibility and ensures that the does not date quickly and require frequent, substantial revision.

The above recommendations are supported by PPS12, which states that:

“... the need for frequent updating may be reduced by taking a long-term view and providing some flexibility...” [PPS12, paragraph 4.14]

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

Yours sincerely

Joanne Hill
for DRIVERS JONAS LLP

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Our ref JP/JH/065760

27 August 2008

Dear Sir/Madam

Representations to Trafford Strategic Housing Land Availability Assessment (SHLAA) Draft Report (July 2008)

On behalf of our client **Howard Holdings PLC**, we write to thank you for providing us with an opportunity to comment on the Strategic Housing Land Availability Assessment (SHLAA), which forms part of the evidence base feeding into the Local Development Framework for Trafford.

Our client is a major mixed use property developer who is working extensively with Trafford MBC and other partners to provide a major regeneration led mixed-use development at Victoria Warehouse, situated on Trafford Park Road.

Our comments on the key components of the SHLAA Draft Report are provided as follows:

Purpose of the Assessment

Our client is fully supportive of the primary aim of identifying as many sites with housing potential in and around the Borough's established settlements, in order to:

- Meet Trafford's RSS housing requirement;
- Provide a continuous, flexible and responsive supply of housing land;
- Provide certainty to the house building industry;
- Ensure choice is available to meet the need and demand for more housing; and
- Provide an evidence base on which to shape places and allocate sites within the LDF.

Methodology

The SHLAA methodology, implemented in line with national CLG policy, is both robust and comprehensive. We are therefore broadly supportive of the parameters and adopted methodology.

Assessment Results and Allocations

Our client is in agreement with the draft assessment results of the SHLAA and in particular the identification of Victoria Warehouse, Trafford Park Road (**63230/00**) as a site considered within the overall potential housing supply for Trafford. The boundary of the site, as outlined on 'Map 2' within the SHLAA is also supported.

Whilst the identification of our client's site within the SHLAA is welcomed, we request an amendment to the figures which outline the <5 and 5-10 year potential housing supply for the Victoria Warehouse site. Appendices 7, 8, 10 and 11 currently suggest an estimated supply of:

123
P 7
124

125

- 300 dwellings in the <5 year plan period; and
- 88 dwellings in the 5-10 year plan period.

We request an amendment to the above figures to reflect the current potential of the site and its progress within the planning process. The figures for the plan period should read:

- 605 dwellings in the <5 year plan period; and
- 0 dwellings in the 5-10 year plan period.

Our client is fully in support of the Council's bid become a new Growth Point, which if accepted would see the draft RSS housing allocation of 578 units p.a. rise by an additional 20% to 694 units p.a. This compliments government policy which targets 3 million homes by 2020, and provides an opportunity to provide increased future economic growth within the Regional Centre, in line with the objectives of the emerging Regional Spatial Strategy.

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

Yours sincerely

Joanne Hill
for DRIVERS JONAS LLP

joannehill@driversjonas.com
Tel: 0161 247 7388 Fax: 0161 236 8420

Amend
Figs
Object

P23
Para
51

126

PO/1097/101

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"/> | Page Number | 26 |
| Core Strategy summary broadsheet | <input type="checkbox"/> | Paragraph Number | |
| Sustainability Appraisal | <input type="checkbox"/> | Policy Direction reference | |
| Equality Impact - Initial Assessment | <input type="checkbox"/> | Vision Reference Number | |
| Other document, (please specify) | <input type="checkbox"/> | Objective Reference Number | S02 |
| | | 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.

PLEASE SEE ATTACHED SCHEDULE

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

**TRAFFORD COUNCIL LOCAL DEVELOPMENT FRAMEWORK
DPD 1: CORE STRATEGY: PREFERRED OPTIONS**

OBJECTIVE REFERENCE S02

National Grid are freehold owners of a series of key strategic sites within the Carrington/Partington area. The sites comprise a redundant former gas works and associated land which is largely vacant and available for redevelopment, and other land which has the potential to be made available for development over the longer term period of the DPD. The sites could make a significant contribution to the employment and other development requirements in this area of identified regeneration need.

National Grid support the strategic objective to "*...regenerate the physical, economic and social fabric of the principal deprived areas*", including Partington. Although National Grid's landholdings largely fall outside the settlement boundary of Partington, opportunities exist for development of these sites to make a significant contribution to the regeneration objectives given the direct linkages between the landholdings and the village.

PO/1097/102

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

Name

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.

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| Other document, (please specify) | <input type="checkbox"/> | Objective Reference Number | S04 |
| | | Spatial Option Reference | |
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**TRAFFORD COUNCIL LOCAL DEVELOPMENT FRAMEWORK
DPD 1: CORE STRATEGY: PREFERRED OPTIONS**

OBJECTIVE REFERENCE S04

National Grid are freehold owners of a series of key strategic sites within the Carrington/Partington area. The sites comprise a redundant former gas works and associated land which is largely vacant and available for redevelopment, and other land which has the potential to be made available for development over the longer term period of the DPD. The sites could make a significant contribution to the employment and other development requirements in this area of identified regeneration need.

National Grid support the strategic objective to "*...develop the capacity of Carrington to support the economic and social regeneration and development of Partington*". In accordance with the representations submitted to S02, land in National Grid's ownership has the potential to deliver significant new development opportunities within easy walking distance of Partington Village.

PO/1097/103

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

Name

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 | |
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| Core Strategy Preferred Options report | <input checked="" type="checkbox"/> | Page Number | 27 |
| Core Strategy summary broadsheet | <input type="checkbox"/> | Paragraph Number | |
| Sustainability Appraisal | <input type="checkbox"/> | Policy Direction reference | |
| Equality Impact - Initial Assessment | <input type="checkbox"/> | Vision Reference Number | |
| Other document, (please specify) | <input type="checkbox"/> | Objective Reference Number | S08 |
| | | 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.

PLEASE SEE ATTACHED SCHEDULE

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

**TRAFFORD COUNCIL LOCAL DEVELOPMENT FRAMEWORK
DPD 1: CORE STRATEGY: PREFERRED OPTIONS**

OBJECTIVE REFERENCE S08

National Grid are freehold owners of a series of key strategic sites within the Carrington/Partington area. The sites comprise a redundant former gas works and associated land which is largely vacant and available for redevelopment, and other land which has the potential to be made available for development over the longer term period of the DPD. The sites could make a significant contribution to the employment and other development requirements in this area of identified regeneration need.

National Grid support the strategic objective to "...*improve local highway access to Partington and Carrington*". All parties involved in delivering regeneration in this area acknowledge that enhanced transport links are essential, particularly via the local highway network. National Grid are committed to contributing towards this objective through compliance with SPD1, however it is evident that public intervention is likely to be required to deliver the scale of improvements necessary.

PC/1097/104

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

Name

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| Document | | Section | |
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| Core Strategy Preferred Options report | <input checked="" type="checkbox"/> | Page Number | 30 |
| Core Strategy summary broadsheet | <input type="checkbox"/> | Paragraph Number | |
| Sustainability Appraisal | <input type="checkbox"/> | Policy Direction reference | |
| Equality Impact - Initial Assessment | <input type="checkbox"/> | Vision Reference Number | PAV |
| 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) | |

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Support Object General Comment

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**TRAFFORD COUNCIL LOCAL DEVELOPMENT FRAMEWORK
DPD 1: CORE STRATEGY: PREFERRED OPTIONS**

VISION REFERENCE PAV

National Grid are freehold owners of a series of key strategic sites within the Carrington/Partington area. The sites comprise a redundant former gas works and associated land which is largely vacant and available for redevelopment, and other land which has the potential to be made available for development over the longer term period of the DPD. The sites could make a significant contribution to the employment and other development requirements in this area of identified regeneration need.

In accordance with representations submitted in respect of Strategic Objectives S02, S04 and S08, National Grid support the stated vision for Partington to regenerate and develop the Village "*...as a vibrant, inclusive, prosperous, environmentally attractive and sustainable residential community.*" National Grid's landholdings in the area have the potential to make a significant contribution to achieving this vision.

PO/1097/105

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

Name

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| Document | | Section | |
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| Core Strategy Preferred Options report | <input checked="" type="checkbox"/> | Page Number | 31 |
| Core Strategy summary broadsheet | <input type="checkbox"/> | Paragraph Number | |
| Sustainability Appraisal | <input type="checkbox"/> | Policy Direction reference | |
| Equality Impact - Initial Assessment | <input type="checkbox"/> | Vision Reference Number | CAV |
| 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) | |

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Support

Object

General Comment

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**TRAFFORD COUNCIL LOCAL DEVELOPMENT FRAMEWORK
DPD 1: CORE STRATEGY: PREFERRED OPTIONS**

VISION REFERENCE CAV

National Grid are freehold owners of a series of key strategic sites within the Carrington/Partington area. The sites comprise a redundant former gas works and associated land which is largely vacant and available for redevelopment, and other land which has the potential to be made available for development over the longer term period of the DPD. The sites could make a significant contribution to the employment and other development requirements in this area of identified regeneration need.

In accordance with the representations submitted in respect of Strategic Objectives S02, S04 and S08, and the Vision for Partington, National Grid support the stated vision for Carrington 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 economy, the residents of Partington and adjoining areas*".

However, it is National Grid's view that there needs to be some recognition of the requirement for alternative forms of development to "new business activity" directly adjoining the residential areas of Partington and Carrington, in order to deliver an appropriate transition between economic generation and residential uses, protecting the amenity of existing residents.

PO/1097/106

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

Name

Comments Sheet

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| Document | | Section | |
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| Core Strategy Preferred Options report | <input checked="" type="checkbox"/> | Page Number | 35 |
| Core Strategy summary broadsheet | <input type="checkbox"/> | Paragraph Number | |
| Sustainability Appraisal | <input type="checkbox"/> | Policy Direction reference | |
| Equality Impact - Initial Assessment | <input type="checkbox"/> | Vision Reference Number | |
| Other document, (please specify) | <input type="checkbox"/> | Objective Reference Number | |
| | | Spatial Option Reference | 2 |
| | | 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

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**TRAFFORD COUNCIL LOCAL DEVELOPMENT FRAMEWORK
DPD 1: CORE STRATEGY: PREFERRED OPTIONS**

SPATIAL OPTION 2

National Grid are freehold owners of a series of key strategic sites within the Carrington/Partington area. The sites comprise a redundant former gas works and associated land which is largely vacant and available for redevelopment, and other land which has the potential to be made available for development over the longer term period of the DPD. The sites could make a significant contribution to the employment and other development requirements in this area of identified regeneration need.

In order to deliver true regeneration within the priority development areas of the Borough, the spatial planning strategy needs to direct a critical mass of development to these areas. National Grid therefore support Spatial Option 2 which maximises development growth in the Carrington and Partington area without unduly diluting the main urban focus on the regional centre. This option complies with the key central government objectives of focussing most development in sustainable urban areas, whilst also creating an environment in which true regeneration can be delivered within the most vulnerable communities in Trafford.

However, given the need to enhance the economic, social and environmental conditions across the entirety of Partington Village, National Grid query the weight attached to new housing delivery being focussed on a single, largely greenfield site on the western periphery of the Village. There are several brownfield redevelopment opportunities in and around the Village which could contribute to meeting the Council's regeneration objectives, and should not be prejudiced at this stage through over reliance on one allocation.

PO/1097/107

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

Name

Comments Sheet

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| Document | | Section | |
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| Core Strategy Preferred Options report | <input checked="" type="checkbox"/> | Page Number | 67 |
| Core Strategy summary broadsheet | <input type="checkbox"/> | Paragraph Number | |
| Sustainability Appraisal | <input type="checkbox"/> | Policy Direction reference | |
| 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 | H |
| | | 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

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**TRAFFORD COUNCIL LOCAL DEVELOPMENT FRAMEWORK
DPD 1: CORE STRATEGY: PREFERRED OPTIONS**

STRATEGIC SITE REFERENCE H

National Grid are freehold owners of a series of key strategic sites within the Carrington/Partington area. The sites comprise a redundant former gas works and associated land which is largely vacant and available for redevelopment, and other land which has the potential to be made available for development over the longer term period of the DPD. The sites could make a significant contribution to the employment and other development requirements in this area of identified regeneration need.

The majority of National Grid's landholdings fall within Strategic Site reference H.

National Grid largely support the policy objectives set for the site. However, in accordance with the representations submitted to Vision reference CAV and Core Policy W1 it is considered that the policy needs to recognise the need for measures to reduce conflict between different land uses, particularly where the site adjoins the villages of Partington and Carrington.

PO/1097/108

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

Name

Comments Sheet

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Document

Section

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| Core Strategy Preferred Options report | <input checked="" type="checkbox"/> | Page Number | 78 |
| Core Strategy summary broadsheet | <input type="checkbox"/> | Paragraph Number | |
| Sustainability Appraisal | <input type="checkbox"/> | Policy Direction reference | L2 |
| 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) | |

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Support Object General Comment

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**TRAFFORD COUNCIL LOCAL DEVELOPMENT FRAMEWORK
DPD 1: CORE STRATEGY: PREFERRED OPTIONS**

CORE POLICY DIRECTION L2

National Grid are freehold owners of a series of key strategic sites within the Carrington/Partington area. The sites comprise a redundant former gas works and associated land which is largely vacant and available for redevelopment, and other land which has the potential to be made available for development over the longer term period of the DPD. The sites could make a significant contribution to the employment and other development requirements in this area of identified regeneration need.

In line with representations submitted to Strategic Objectives SO2, SO4 and SO8, National Grid support the regeneration policy framework set out within Core Policy Direction L2, where it is clear that their landholdings can provide a significant contribution to the objectives relevant to Partington and Carrington.

16/1097/109

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

Name

Comments Sheet

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Document

Section

Core Strategy Preferred Options report

Page Number

80

Core Strategy summary broadsheet

Paragraph Number

Sustainability Appraisal

Policy Direction reference

L4

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

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**TRAFFORD COUNCIL LOCAL DEVELOPMENT FRAMEWORK
DPD 1: CORE STRATEGY: PREFERRED OPTIONS**

CORE POLICY DIRECTION L4

National Grid are freehold owners of a series of key strategic sites within the Carrington/Partington area. The sites comprise a redundant former gas works and associated land which is largely vacant and available for redevelopment, and other land which has the potential to be made available for development over the longer term period of the DPD. The sites could make a significant contribution to the employment and other development requirements in this area of identified regeneration need.

In line with representations submitted to Strategic Objective SO8, National Grid support the accessibility policy framework set out within Core Policy Direction L4, where it relates to improved links to and from Carrington and Partington. All parties involved in delivering regeneration in this area acknowledge that enhanced transport links are essential, particularly via the local highway network. National Grid are committed to contributing towards this objective through compliance with SPD1, however it is evident that public intervention is likely to be required to deliver the scale of improvements necessary.

10/1097/110

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

Name

Comments Sheet

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

| Document | | Section | |
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| Core Strategy Preferred Options report | <input checked="" type="checkbox"/> | Page Number | 87 |
| Core Strategy summary broadsheet | <input type="checkbox"/> | Paragraph Number | |
| Sustainability Appraisal | <input type="checkbox"/> | Policy Direction reference | W1 |
| 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

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PLEASE SEE ATTACHED SHEET

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**TRAFFORD COUNCIL LOCAL DEVELOPMENT FRAMEWORK
DPD 1: CORE STRATEGY: PREFERRED OPTIONS**

CORE POLICY DIRECTION W1

National Grid are freehold owners of a series of key strategic sites within the Carrington/Partington area. The sites comprise a redundant former gas works and associated land which is largely vacant and available for redevelopment, and other land which has the potential to be made available for development over the longer term period of the DPD. The sites could make a significant contribution to the employment and other development requirements in this area of identified regeneration need.

National Grid generally support the proposed policy direction for economic development, subject to representations submitted in respect of Vision Reference CAV and Strategic Site H. It is considered that the policy needs to recognise the need for measures to reduce conflict between different uses (i.e. employment and non employment), in addition to those between the different "B" Class uses. This is particularly relevant in relation to the Carrington and Partington area where the significant employment zone directly abuts the two villages.

| Office Use Only | |
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| Date | |
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| Ack | |

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

Additional 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 full contact details if you are submitting all your comments at the same time, but please put your name on each additional sheet and indicate the total number of comment sheets being submitted on the contact details form.

| What are you commenting on? | | | |
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| 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 | |
| Core Strategy summary broadsheet | X | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | SO3 |
| Other document, (please specify) | | Spatial Option Reference | |
| | | Strategic Site Reference | |
| | | Map/Figure Reference Number | |
| | | Other (including omissions and suggestions for alternative approaches) | |

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| Support | | Object | General Comment |

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.

My comments with regard to SO3, SO4, SO8, and your favour towards OPTION TWO, I have contained within a single A4 page that I have copied for each sheet.

Name: **Joyce B. Mason**

Please continue on a separate sheet if required
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 SO3/SO4/SO8/OPTION 2 ADDITIONAL COMMENT SHEET

In early 2000s, during discussion of Road/Rail interchange (now cancelled) with Councillor Rigby's assistance residents of Harboro Road and Carrington Lane contributed an element of objection. Regardless of a night ban on HGVs obtained at that time heavy, noisy vehicles continue to use the road at night. In fact we consider the road unsuitable for heavy traffic at all (witness the closure of the unused section of Harboro Road to through-traffic*) as houses shake at their passing, although we recognise need for access to service/deliver to premises in the area.

*Some time after creating Harboro Way, I continued to cycle Harboro Road from Washway Road. However, residents objected to the similar, uninterrupted use by heavy vehicles that (significantly) created unreasonably high noise and vibration disturbance. That section of Harboro Road was as a result closed off completely, the contention being that it was to stop using it as a 'shortcut'. This was not a shortcut - **this was a stretch of the original, whole Harboro Road, just as ours is now!** If it was then recognised that the disturbance was unreasonable, then council should similarly recognise our plight on this stretch of the road.

Most reasonable persons would say that there is no objection to development of business and commence in Trafford, and this is not just a 'not in my area' context, but the increasing disregard by Trafford Council in respect of the real traffic experience of living on Harboro Road and Carrington Lane means that other routes to reach the Carrington and Partington areas are not being developed. Indeed in spite of several meetings at that time assuring us there was concentration on the streaming of traffic **away** from this road and **on to** the (then) A6144(M), I was outraged to see that traffic is DIRECTED this way as an alternative route to Sale! This causes severe bottle-necking at times on Carrington Lane. In addition, signage directing heavy traffic away from the route between 10pm and 6am is not clear enough, early enough and so much traffic still uses it at night, disturbing residents' rest.

The unsuitability, and in some places (especially parts of Carrington Lane) dangerous nature, of this road does not change! The prospective use to support new development in Sale West, Carrington, Partington may not be quite so high as the previous plan, but any increase of traffic here is now becoming of great concern to residents. The unique junction at Carrington Spur that would have re-directed heavy vehicles towards Crossford Bridge area, so allaying our traffic fears, has not materialised.

ANOTHER point raised previously was that regardless of bringing business and commerce into the area, it was believe that local residents wouldn't necessarily be the ones to obtain employment; it would be more likely that businesses would bring in some existing, some recruited staff from other locations, so that would not help locals, but would, detrimentally, increase motor cars etc. even more.

AS SECRETARY of currently low-activity Harboro Rd & Carrington La Residents' Association, I copied and can again highlight that in the early 1960s, against residents' objections, many houses were demolished to create a new access from Washway Road for the current HARBORO WAY. Minutes of Council meetings show members recognised the inadequacy of the road and intended other measures to address these matters. Re-jigging a well-planned, intentionally wide swathe of Manor Ave, with integrated verges to distance traffic from houses, was detrimental, increasing our problems.

Since that time, HGV weight limits have considerably increased several times, local PSVs, notably Airport parking buses, have commenced to use parts of it as a shortcut, regardless of the fact that it is not designated a passenger route. An extracted promise of non through-use by plant from Council premises and giant skips from the Waste Site has not been fulfilled. Currently we witness huge tractors towing small containers, very large skips towing large loaders with or without other vehicles on board, etc., etc., on all of which the articulation and suspension are so poor as to create very noisy rattling and even bouncing on a drastically deteriorating surface, causing severe disturbance to residents. It was for good reason that one resident's newspaper article was headed 'SLEEPLESS IN SALE RATTLE'!

Our Chairman at the time strongly advocated that recognised, legally binding passages built into any permission/contracts granted for the area that HGVs, especially those connected with demolition and preparation, but I fear Council has not pursued this easy device. We accepted that we would necessarily endure great disruption for a few years whilst the new motorway junction works were in progress, but short-sightedly believed council would honour the spirit of our discussions once that and the new junction at 'Carrington Spur' were completed. As the 'Spur' is now renamed A6144, losing its Motorway status, we advocate returning Harboro Rd/Carrington La to their original 'B' numbers!

Mrs J B Mason

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

| Office Use Only | |
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| Date | |
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Additional Comment Sheet

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| 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 | |
| Core Strategy summary broadsheet | X | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | SO4 |
| Other document, (please specify) | | Spatial Option Reference | |
| | | Strategic Site Reference | |
| | | Map/Figure Reference Number | |
| | | Other (including omissions and suggestions for alternative approaches) | SO8 |

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

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My comments with regard to SO3, SO4, SO8, and your favour towards OPTION TWO, I have contained within a single A4 page that I have copied for each sheet.

Name:

Please continue on a separate sheet if required
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Trafford's Core Strategy Preferred Options Comment Form SO3/SO4/SO8/OPTION 2 ADDITIONAL COMMENT SHEET

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*Some time after creating Harboro Way, I continued to cycle Harboro Road from Washway Road. However, residents objected to the similar, uninterrupted use by heavy vehicles that (significantly) created unreasonably high noise and vibration disturbance. That section of Harboro Road was as a result closed off completely, the contention being that it was to stop using it as a 'shortcut'. This was not a shortcut - **this was a stretch of the original, whole Harboro Road, just as ours is now!** If it was then recognised that the disturbance was unreasonable, then council should similarly recognise our plight on this stretch of the road.

Most reasonable persons would say that there is no objection to development of business and commerce in Trafford, and this is not just a 'not in my area' context, but the increasing disregard by Trafford Council in respect of the real traffic experience of living on Harboro Road and Carrington Lane means that other routes to reach the Carrington and Partington areas are not being developed. Indeed in spite of several meetings at that time assuring us there was concentration on the streaming of traffic **away** from this road and **on to** the (then) A6144(M), I was outraged to see that traffic is DIRECTED this way as an alternative route to Sale! This causes severe bottle-necking at times on Carrington Lane. In addition, signage directing heavy traffic away from the route between 10pm and 6am is not clear enough, early enough and so much traffic still uses it at night, disturbing residents' rest.

The unsuitability, and in some places (especially parts of Carrington Lane) dangerous nature, of this road does not change! The prospective use to support new development in Sale West, Carrington, Partington may not be quite so high as the previous plan, but any increase of traffic here is now becoming of great concern to residents. The unique junction at Carrington Spur that would have redirected heavy vehicles towards Crossford Bridge area, so allaying our traffic fears, has not materialised.

ANOTHER point raised previously was that regardless of bringing business and commerce into the area, it was believe that local residents wouldn't necessarily be the ones to obtain employment; it would be more likely that businesses would bring in some existing, some recruited staff from other locations, so that would not help locals, but would, detrimentally, increase motor cars etc. even more.

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Mrs J B Mason

PO/1102/103

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

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Additional Comment Sheet

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| What are you commenting on? | | | |
| Please indicate the document and the specific paragraph number, policy, map or table you are commenting on. | | | |
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| Core Strategy Preferred Options report | | Page Number | |
| Core Strategy summary broadsheet | X | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | SO 8 |
| Other document, (please specify) | | Spatial Option Reference | |
| | | Strategic Site Reference | |
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| Do you support, oppose or have general comments about this specific part of the document? | | | |
| Support | <input checked="" type="checkbox"/> | Object | General Comment |

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.

My comments with regard to SO3, SO4, SO8, and your favour towards OPTION TWO, I have contained within a single A4 page that I have copied for each sheet.

Name: JOYCE B MASON

Please continue on a separate sheet if required
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 SO3/SO4/SO8/OPTION 2 ADDITIONAL COMMENT SHEET

In early 2000s, during discussion of Road/Rail interchange (now cancelled) with Councillor Rigby's assistance residents of Harboro Road and Carrington Lane contributed an element of objection. Regardless of a night ban on HGVs obtained at that time heavy, noisy vehicles continue to use the road at night. In fact we consider the road unsuitable for heavy traffic at all (witness the closure of the unused section of Harboro Road to through-traffic*) as houses shake at their passing, although we recognise need for access to service/deliver to premises in the area.

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Most reasonable persons would say that there is no objection to development of business and commerce in Trafford, and this is not just a 'not in my area' context, but the increasing disregard by Trafford Council in respect of the real traffic experience of living on Harboro Road and Carrington Lane means that other routes to reach the Carrington and Partington areas are not being developed. Indeed in spite of several meetings at that time assuring us there was concentration on the streaming of traffic **away** from this road and **on to** the (then) A6144(M), I was outraged to see that traffic is DIRECTED this way as an alternative route to Sale! This causes severe bottle-necking at times on Carrington Lane. In addition, signage directing heavy traffic away from the route between 10pm and 6am is not clear enough, early enough and so much traffic still uses it at night, disturbing residents' rest.

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Mrs J B Mason

PO/1102/104

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

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| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
| Other document, (please specify) | | Spatial Option Reference | 2 |
| | | Strategic Site Reference | |
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| Support | | Object | “ | General Comment |

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.

I have indicated this section as an objection to your OPTION TWO

This simply because the A6144, Harboro Road and Carrington Lane, is inadequate. As in my attached comment form, I believe most reasonable constituents would not object to more business/commerce per se, but are increasingly terribly concerned about the extremely disturbing nature of traffic travelling along this stretch.

You must pay intensely focused attention to this road and my strong comment about it. That is, not the ‘Carrington Spur’ also numbered A6144, and previously A6144M – but Harboro Road and Carrington Lane – we believe that these two roads should revert back to their ‘B’ designations, and that A4199 ‘Carrington Spur’ should carry most traffic from the direction of Partington on towards Sale, leaving this road, as was discussed, to be used for local access and in emergency situations.

Please see attached Comment Form

Name: **JOYCE B. MASON**

Please continue on a separate sheet if required
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 SO3/SO4/SO8/OPTION 2 ADDITIONAL COMMENT SHEET

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Mrs J B Mason

PO/1102/105

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

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| Core Strategy summary broadsheet | X | Paragraph Number | |
| Sustainability Appraisal | | Policy Direction reference | W1 |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
| Other document, (please specify) | | Spatial Option Reference | |
| | | Strategic Site Reference | |
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| Do you support, oppose or have general comments about this specific part of the document? | | | |
| Support | | Object | General Comment |

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.

W1

Be mindful of comment made on sections SO3, SO4, SO8, Second Option, about development of business and commerce in Sale West, Carrington, Partington.

Copy letter attached.

Name: JOYCE B. MASON

Please continue on a separate sheet if required
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Trafford's Core Strategy Preferred Options Comment Form SO3/SO4/SO8/OPTION 2 ADDITIONAL COMMENT SHEET

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Mrs J B Mason

PO/1102/106

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

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| Sustainability Appraisal | X | Policy Direction reference | |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
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| | | Strategic Site Reference | |
| | | Map/Figure Reference Number | PIE CHARTS |
| | | Other (including omissions and suggestions for alternative approaches) | |

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

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.

These pie charts do not seem to me to be truly representative – they are predictive only – not only predictive, but they are so attributable I believe to point of view or opinion – that Council opinion which favours Option 2, and unsurprisingly shows the most favourable picture/image. I would question this.

Whoever has seen such a pie chart? The pie generally shows 100% of a subject – you have divided it into 3 x 100% of 3 subjects, so negating the principle of a 'pie chart' per se.

Name: JOYCE B MASON

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

PO/1102/107

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

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| Sustainability Appraisal | | Policy Direction reference | R2 |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
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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.

L1 and R2

Ensure land identified on housing does not encroach on Green Belt by re-organising or re-designating.

Name: JOYCE B MASON

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

PO/1102/108

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

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| Sustainability Appraisal | | Policy Direction reference | L6 |
| Equality Impact - Initial Assessment | | Vision Reference Number | |
| Strategic Housing Land Availability Assessment | | Objective reference number | |
| Other document, (please specify) | | Spatial Option Reference | |
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| Support | | Object | General Comment X |

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.

L6

Ensure our water is not polluted by fluoridation!!!

Name: **Joyce B MASON**

Please continue on a separate sheet if required
Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

PO/1102/109

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

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L1 and R2

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Name: Joyce B Mason

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PO/1102/110

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| | | Map/Figure Reference Number | |
| | | Other (including omissions and suggestions for alternative approaches) | "WORK LIST DM9" |

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

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.

DM9

I believe we need to fiercely protect farming land now, as farmers will come back into their own element due to Worldwide changes in human life and activities.

Name: JOYCE B MASON

Please continue on a separate sheet if required
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 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 | Page Number | 99 |
| Core Strategy summary broadsheet | Paragraph Number | 8.12 - 8.24 |
| Sustainability Appraisal | Policy Direction reference | DM5 |
| 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 this document.

| | | |
|--|---|--|
| PPS3 requires that through a Strategic should establish th housing in each ca housing, with sepa to be needed in pa approach to seekir Trafford Housing M commissioned in a required of an SHM requires especially Borough. Unsurpri: SHMA should be cc Thank you for takir | <p style="font-size: 2em; font-family: cursive;">SEE NEXT PAGE</p> | ridence base (HLAA). The SHMA size and type of cunt of affordable housing that it likely ired, and the policy. As it was all the core outputs olds in need ons for the rtified as part of much appreciated. |
|--|---|--|

PPS3 requires that local planning authorities' Local Development Documents be informed by a robust, shared evidence base through a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA). The SHMA should establish the likely overall proportions of households that require market or affordable housing, and the size and type of housing in each category. Local Development Documents should set an overall (i.e. plan wide) target for the amount of affordable housing, with separate targets for social rented or intermediate housing where appropriate, specify the type of housing that it likely to be needed in particular locations, set out the range of circumstances in which affordable housing will be required, and the approach to seeking developer contributions.

Trafford Housing Market Assessment 2006 is not a SHMA and therefore should not be relied upon to formulate policy. As it was commissioned in advance of SHMA guidance being published it is not surprising that it fails to provide neither all the core outputs required of an SHMA, nor demonstrates compliance with the required core processes. Estimate of future households in need requires especially careful scrutiny as number of newly forming households is some 250% of official CLG projections for the Borough. Unsurprisingly this serves to inflate the incidence of housing need.

SHMA should be commissioned based on published guidance and with regard to the Housing Market Areas identified as part of partial review of North West RSS, which will require cross authority working.

Secondly there is no information within the CS that suggests that an informed assessment of the viability of the Council's proposed affordable housing proportion target and site size thresholds has been undertaken as is required by PPS3. This issue has recently been considered by the High Court in respect of Blyth Valley Borough Council's Core Strategy. In that instance the High Court found the Core Strategy affordable housing policy to be unsound as a result of there being no consideration of viability evidence in respect of the proposed 30% affordable housing target. The Council's policy was quashed. Mr Justice Collins stated in his Judgement that:

"...what is wrong, in my view, is to let a policy be established which may be unsupportable on a proper consideration of all material factors. It seems to me that on the material I have had placed before me, that is the situation in this case. The 30 per cent has been produced on the basis of material which is not supported by the guidance and which ignores a highly material factor, namely the economic viability of the relevant target. True it is, as Mr Porten submits and as the Inspector himself pointed out, that individual applications will be dealt with on the basis of an assessment of economic viability. On the other hand, the target will be there. It is set out as what is to be achieved and it is what section 38(6) of the Act will require to be taken into account as the relevant planning policy. In my judgment, that, in the circumstances of this case, means that there is a legal flaw."

(Paragraph 73 of the Judgement of Mr Justice Collins – emphasis added)

Further work on policy direction DM5 should therefore be suspended until the Council has commissioned and consulted upon a report into the economic viability of its proposed affordable housing target and site size thresholds as is required by PPS3.

FD/1105/101

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 | DPD1 | Page Number 90/91 |
| Core Strategy summary broadsheet | | Paragraph Number 7.66 |
| 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) |

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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.

I would suggest that the green belt boundaries along the Clay Lane /Thorley Lane area need to be be looked with a view to a small adjustment to allow the business there to expand and prosper. The mix of businesses and housing in this area do not seem to form any sort of pattern and conflict with each other. With reference to our nursery business, the green belt restrictions, despite being surrounded by a warehouse and distribution unit, a house and an busy road have restricted growth and caused issues with other statutory regulatory requirements imposed on us by national government.

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

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 checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| SO5 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| SO6 | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| SO7 | <input type="checkbox"/> | <input checked="" 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 checked="" 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?

Yes, Altrincham had enough resources, other places are in desperate need of help.

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 checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Would you like to add any further comments?

Again feel Altrincham has enough resources + development Old Trafford + Partington need the focus of those improvements

* would like to add: the "North of Trafford Skill has the worse education services in Trafford.

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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Site E | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Site I | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Site J | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Site K | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 |
|---|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
|  Live Policies | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|  Work + Learn Policies | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|  Relax Policies | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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
Address

STACY MILLWARD

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 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| SO8 | * <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Would you like to add any further comments?

* *Primarily social housing*

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 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 type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Would you like to add any further comments?

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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Site I | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Site J | <input type="checkbox"/> | <input checked="" 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!)




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| | Strongly Agree | Agree | Neither Agree or disagree | Disagree | Strongly disagree |
|---|-------------------------------------|--------------------------|---------------------------|--------------------------|--------------------------|
|  Option 1 Pie Chart | <input 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 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

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|---|-------------------------------------|--------------------------|---------------------------|--------------------------|--------------------------|
|  Live Policies | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|  Work + Learn Policies | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|  Relax Policies | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Would you like to add any further comments?

LIVE. Would like to see "lifetime homes" standards being pursued with developers.
RELAX. Healthy lifestyles to include mental stimulation for older persons. ie. leisure classes such as Art and Crafts, Reading etc.

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
Address

GORDON MINTON

Postcode

Tel. No.
Fax. No.

Email Address

Trafford Tomorrow



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| | 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| SO3 | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| SO6 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| SO9 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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?

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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Option 3 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Would you like to add any further comments?

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



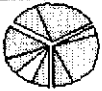
We have included 11 strategic sites within the Options diagrams, these sites are considered to be important to the Borough in terms of where major development might take place. We want to know if you agree with us that the right sites have been picked, and that they are vital to achieving the aims of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

| | Strongly Agree | Agree | Neither Agree or disagree | Disagree | Strongly disagree |
|--------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|
| Site A | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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?

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

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|  Live Policies | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|  Work + Learn Policies | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|  Relax Policies | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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Name
Address

Robert Hardwick

Postcode

Tel. No.
Fax. No.

Email Address

PC/1114

Representations to
Trafford Council Local Development Framework

DPD1: CORE STRATEGY: PREFERRED OPTIONS
GREEN BELT ISSUES

EPP reference: Reps3-DPD1-7393-Green Belt-ct

August 2008

2. INTRODUCTION

- 2.1 Representations have also been submitted on behalf of a number of clients in connection with general housing and development issues identified in the Trafford Council Local Development Framework Core Strategy Draft Issues and Options Paper.
- 2.2 These representations are made on behalf of our client Mr J Kennedy and relate specifically to Green Belt issues identified in Chapter 7 of the document with particular reference to Brooks Drive, Hale Barns.

3. POLICY CONTEXT

National planning guidance

PPG2: Green Belts (2006)

- 3.1 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and to protect the countryside. The 5 purposes of Green Belts are given at paragraph 1.5. These are:-

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

- 3.2 Paragraphs 2.6 to 2.11 of PPG2 deal with defining boundaries of Green Belts. It considers at paragraph 2.6 that once a Green Belt has been approved, it should only be altered in exceptional circumstances. Notwithstanding this, paragraph 2.8 states that Green Belt boundaries should be carefully drawn so as not to include land which it is unnecessary to keep permanently open.

Regional Spatial Strategy

- 3.3 The RSS considers that there is no need for any exceptional change to the Green Belt in Greater Manchester before 2011.

4. RESPONSE TO CORE STRATEGY

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- 4.1 Policy R2 of the Core Strategy seeks to continue to protect the Green Belt in four broad areas; one of which is the area to the south of Hale and Bowdon to the Bollin Valley and the Greater Manchester County southern boundary. The general thrust of this policy direction is supported as this would accord with national guidance in PPG2. It is considered however, that some minor amendments should be made to the Green Belt boundary around Hale.
- 4.2 One such area of land is Brooks Drive, Hale Barns. This is a linear road leading from the main built up area of Hale Barns to the Davenport Green Major High Amenity Site which is allocated in the existing UDP as a high amenity employment site. We attach a plan identifying Brooks Drive.
- 4.3 Brooks Road is built up on either side with large detached properties. The character of the area is akin to the built up area included within the settlement boundary of Hale Barns.
- 4.4 Paragraph 2.8 of PPG2 states that Green Belt boundaries should be carefully drawn so as not to include land which is it unnecessary to keep permanently open.
- 4.5 There is no requirement to keep Brooks Drive permanently open on the basis that it is already a ribbon of development. Furthermore, the release of Brooks Drive from the Green Belt would not cause any harm to the purposes of including land within the Green Belt as set out in the preceding section. On this basis we consider that Brooks Drive should be removed from the Green Belt and the Green Belt boundary should be redrawn accordingly.
- 4.6 Should the council not consider it appropriate to release Brooks Drive from the Green Belt, we consider that, at the very least, Brooks Drive should be washed over by Green Belt but identified in the development plan as an area in which limited infilling can take place.
- 4.7 PPG2 recognises circumstances where existing villages may be situated within the Green Belt. In such cases, the Green Belt can 'wash over' the settlement but the settlement can be listed within the development plan to state that limited infilling will be permissible in this location.
- 102
P.91-92
Other/
Omission
- 4.8 A further policy should be included within the local development framework to recognise that within areas washed over by Green Belt or in a ribbon of development, extensions of greater than 30% may be permissible.
- 4.9 In summary, Brooks Drive should be removed from the Green Belt. Should the council not consider it appropriate to remove Brooks Drive from the Green Belt, it is considered that it

PO/1115/

From: Brian Hilton [mailto:brianhilton997@btinternet.com]
Sent: 19 August 2008 14:35
To: Tober, Anne
Subject: Trafford Core Strategy - Development Plan

Hi Anne, I had a quick read through of the draft strategy and the only specific mention I could see in relation to disabled people was in the section below which was rather weak to say the least.

8.22 Two key findings from Trafford's Housing Market Assessment are that approximately half of all the new homes needed should be 3 bed family homes and that overall there was a need for 50% of new homes to be affordable. Government guidance makes it clear that LDF documents should not only ensure that sufficient land is available to meet RSS targets, but should also provide an adequate mix of housetypes and sizes to meet the needs of the community. In achieving this aim, the Council will have regard to:

- Current and future demographic trends and profiles.
- The accommodation requirements of specific groups, in particular, families with children, older and disabled people.
- The diverse range of requirements across the area, including the need to accommodate Gypsies and Travellers.

Also, I had a look at the Equality Impact Assessment for the strategy which was just as weak.

I don't have time at present to pour over the various documents related to the core strategy, but this seems like a missed opportunity to improve the accessibility of the built environment within Trafford. Surely the council should be setting some targets that go beyond mandatory requirements and actively involving disabled people to both inform and enhance the strategy?.

Cheers

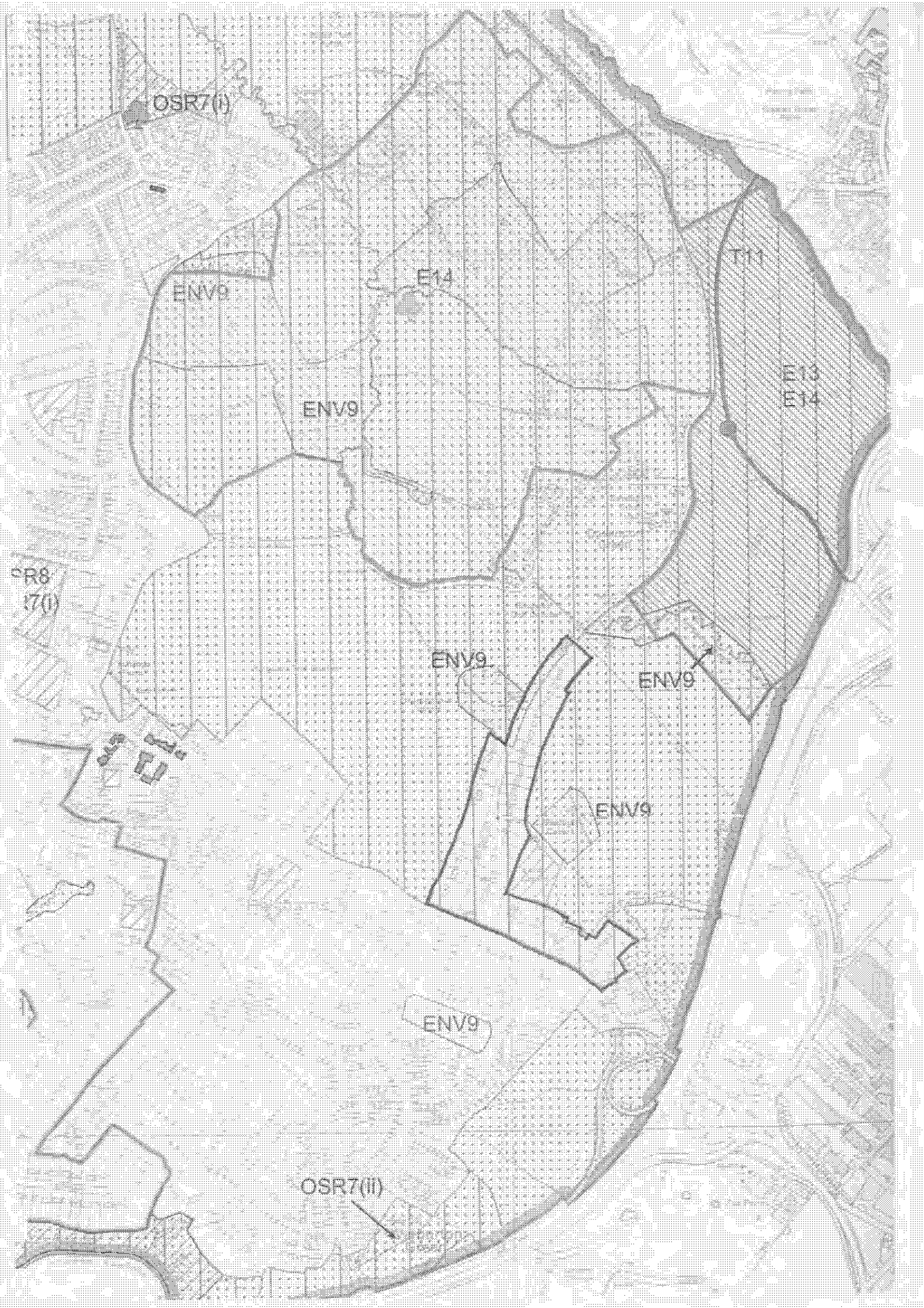
Brian

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P101

102

should be identified as being 'washed over' by the Green Belt and that in this location, infilling should be allowed.



PC/1116/101

Cutting, Damien

From: katie@depol.co.uk
Sent: 09 September 2008 17:31
To: Strategic Planning
Subject: FAO Matthew Wansborough - SHLAA CALL FOR SITES

Attachments: 574btmbclet1.doc; SHLAA_Site_Suggestion_Form[1].pdf



574btmbclet1.doc (48 KB) SHLAA_Site_Suggestion_Form[1].pdf

Dear Mr Wansborough,

I understand you are currently accepting site suggestions for the Strategic Housing Land Availability Assessment for Trafford MBC and in this regard I enclose the completed site suggestion form together with a location map.

A hardcopy of the attached documents has also been posted.

The site, shown edged in red on the enclosed map, is a Brownfield site which is currently an office building. The suites in the building have become increasingly difficult to let and with some suites having remained vacant for a number of years the economic viability of the retention of this site as employment land is questionable.

In light of the above the site ought to be considered as a potential housing site, particularly given its highly sustainable and accessible town centre location.

Although the formal closing date for site suggestions has now passed I am optimistic that there is some degree of flexibility in this. I trust you will contact me should there be any problem in relation to the acceptance of this site suggestion.

I look forward to your response, however should you require further details or clarification please do not hesitate to contact me.

Yours sincerely,

Katie Delaney
De Pol Associates Ltd
Planning & Development Consultants
44 Garstang Road, Preston PR1 1NA
t. 01772 888488
e. katie@depol.co.uk

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:

| | | | |
|----------------------|-------------------------|------------------------------|--|
| Name: | | Agent (if applicable) | Marco De Pol |
| Organisation: | Northern Trust Co. Ltd. | Organisation: | De Pol Associates Ltd |
| Address: | c/o Agent | Address: | 44 Garstang Road, Preston, Lancashire. |
| Postcode: | | Postcode: | PR1 1NA |
| Tel: | | Tel: | 01772 888 488 |
| Fax: | | Fax: | 01772 888 988 |
| Email: | | Email: | marco@depol.co.uk |

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

| | | | | |
|---|--|---|-----------------------------------|-------------------------------------|
| Site Address: | Warwick House, Warwick Road, Stretford. M16 0QQ. | | | |
| Size of site: (If Known) | 0.32 acres | | | |
| Please indicate whether the site is: | Greenfield <input type="checkbox"/> | Brownfield <input checked="" type="checkbox"/> | Mixed <input type="checkbox"/> | Unknown <input type="checkbox"/> |

| | |
|---|--|
| What is the current use of the land? (e.g. retail, employment, recreation, vacant) | Employment - Office block, total floorspace of 27889 sq ft. Some suites within the building have been vacant for up to 5 years, during which time numerous incentives have been offered as well as the employment of joint agents in an attempt to promote its use as offices. |
| What are the predominant surrounding land uses? | Mixed development along Warwick Road and Talbot Road. Predominantly office buildings but also some residential development. |
| Please describe the character of the surrounding area | There is a large supply of office space along Warwick Road, although some redevelopment has taken place in recent years. There are proposals to redevelop the nearby cricket ground, including further retail and residential development. |
| Please provide any other information relating to the site | Designated in the Trafford Unitary Development Plan as a Priority Regeneration Area of Old Trafford and Main Office Development Area, but should be considered for redevelopment for residential use due to its sustainable location. The site sits at the junction of Warwick Road with Talbot road and is well served by the metrolink service linking the area to Manchester City Centre. Together with this, Chester Road which meets Warwick Road to the north of the site is included in the Trafford UDP as a Quality Bus Route, and links the area to the A57, M602 and onto to the M60. |

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:

| | |
|---|-----------|
| Have there been any Planning Applications on the site (please give as much detail as possible) | (unknown) |
|---|-----------|

| | |
|--|-----------|
| Please provide details of the number of residential units that you consider could be accommodated on the site (please give reasons) | (unknown) |
| Please provide any additional information: | |

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 |
|---|-----|----|---------|
| Access/ Infrastructure constraints | | X | |
| Ground conditions | | | X |
| Flood Risk | | X | |
| Hazardous Risks | | | X |
| Pollution or Contamination | | | X |
| Impact on landscape features (protected trees, planting of amenity value) | | | X |
| Is the site within a Conservation Area? | | X | |
| Impact on Listed Buildings (other buildings with historic or local importance) | | | X |
| Topographical constraints | | | X |
| Negative impacts on prospective residents | | | X |
| Known planning constraints | | | 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)

N/A

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

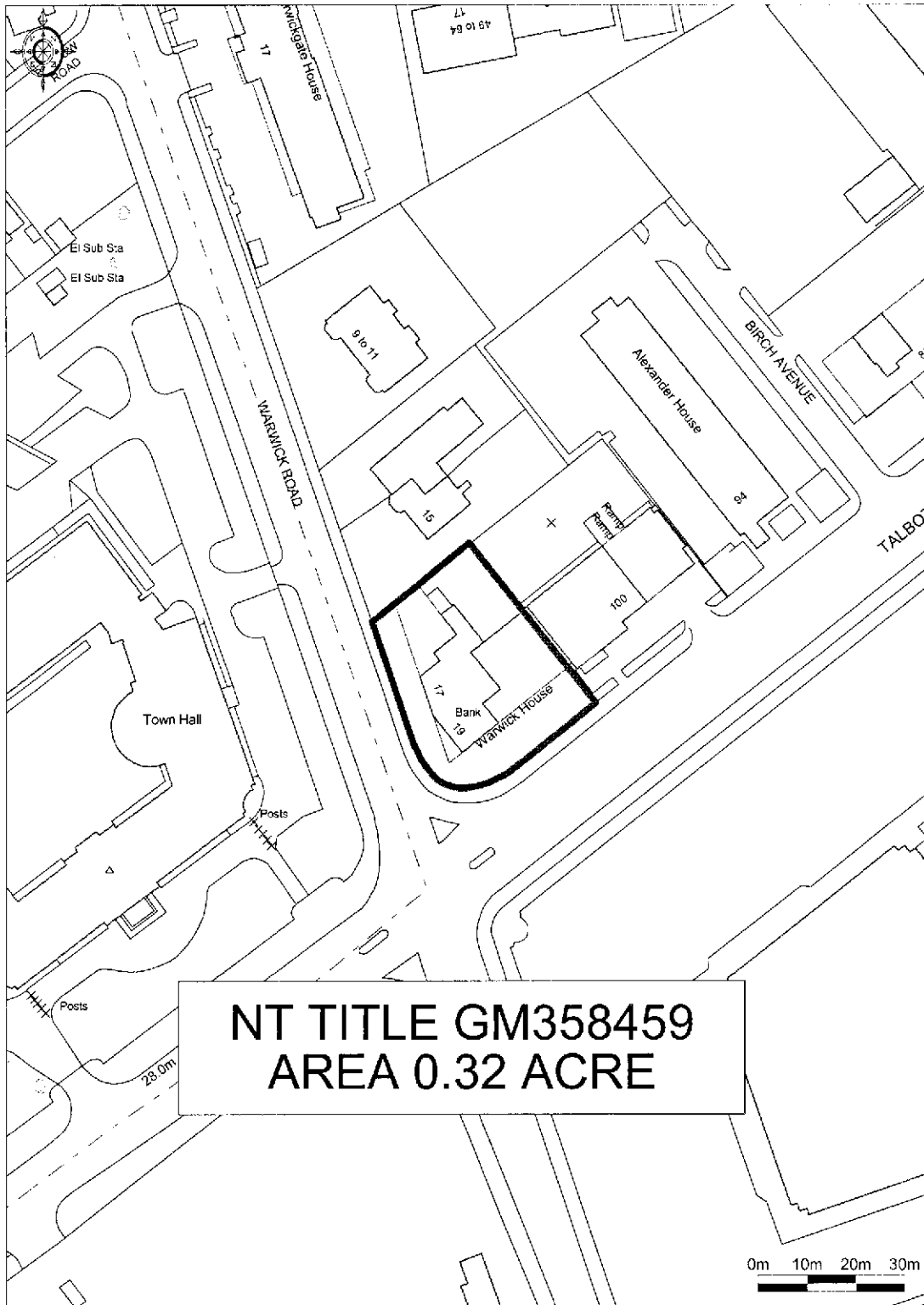
4. Site Ownership

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 |
|---|-----|---------------|
| Do you or your organisation own the site? | X | |
| If you do not own the site do you know who the owner is? | | |
| Please could you provide the following details for the landowner(s) | | |
| Name: | | Name: |
| Organisation: | | Organisation: |
| Address: | | Address: |
| Email: | | Email: |
| Telephone: | | Telephone: |
| To your knowledge are there any ownership issues with the site (e.g. ransom strips, legal, tenancies or operational requirements) | | |
| None | | |
| Please provide any additional information in order to support the suggested site and help the Council to assess the land in question. | | |
| Location map attached | | |

Please continue on a separate sheet if necessary

Warwick House, Manchester



**NT TITLE GM358459
AREA 0.32 ACRE**



Ordnance Survey

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