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23rd November 2003

Our Ref: cw/dpm

Your Ref: CS/issOpt/01

Dear Sirs

TRAFFORD LOCAL DEVELOPMENT FRAMEWORK DEVELOPMENT MANAGEMENT AND CORE POLICIES ISSUES AND OPTIONS PAPER CONSULTATION

We write to your planning authority on behalf of the Mobile Operators Association (MOA), which consists of: -

- Hutchison 3G UK Limited ("**3**"),
- O2 (UK) Limited ("**O₂**"),
- Orange PCS Limited ("**Orange**"),
- T-Mobile UK Limited ("**T-Mobile**"); and
- Vodafone Limited ("**Vodafone**").

The MOA monitors all emerging development plan policies and supplementary planning guidance that relate to telecommunications development and those which would have an impact on their member's agreements to supply a mobile telecommunications service in the UK. Mono Consultants undertake this project on behalf of the MOA.

Further to our previous letter dated 15th August 2007 (copy enclosed for reference) in response to the issues and options consultation for the Core Strategy we welcome the Council's consideration of a policy relating to telecommunications development as an option for inclusion within the Development Management & Core Policies DPD.

We would support the inclusion of a telecommunications policy which generally accords with the principles of PPG8 within the aforementioned DPD, and would reiterate our suggestion of a policy as worded in our previous correspondence, as enclosed or a similar such worded policy. A balanced policy would facilitate the growth of telecommunications as supported by national policy guidance whilst safeguarding the environment.

We hope the Council give due consideration to this option and we would be happy to comment on any such policy contained in a future consultation on the preferred options for the Development Management & Core Policies DPD.



We trust you find the above comments of assistance. Please do not hesitate to contact me should you have any queries relating to the above matters.

Yours faithfully

Carolyn Wilson MRTPI
SENIOR PLANNER

Encl.



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15 August 2007

Our Ref: RM/dpm
Your Ref: CS/lssOpt/01

Dear Sir / Madam

TRAFFORD METROPOLITAN BOROUGH CORE STRATEGY ISSUES AND OPTIONS CONSULTATION

We write to your planning authority on behalf of the Mobile Operators Association (MOA), which consists of: -

- Hutchison 3G UK Limited ("**3**"),
- O2 (UK) Limited ("**O₂**"),
- Orange PCS Limited ("**Orange**"),
- T-Mobile UK Limited ("**T-Mobile**"); and
- Vodafone Limited ("**Vodafone**").

The MOA monitors all emerging development plan policies and supplementary planning guidance that relate to telecommunications development and those which would have an impact on their member's agreements to supply a mobile telecommunications service in the UK. Mono Consultants undertake this project on behalf of the MOA.

The Planning and Compulsory Purchase Act 2004 has introduced significant proposals for change within the development plan framework in England and Wales. We are aware that one of these changes is the move away from Local Plans and Supplementary Planning Guidance to a Local Development Framework (LDF). The LDF comprises of a number of Local Development Documents (LDDs) some of which will have statutory status and some which will take a more informal role. As we understand it, the new legislation requires your Council to draw up a Local Development Scheme which would indicate what documents your Council is intending to produce.

One of the main aims of the new Act is to slim down both the number and the content of policies. Whilst we have no objections to the Council's Core Strategy we consider it important that there remains in place a telecommunications policy. It is noted that the Council's Core Strategy does not contain any specific reference to telecommunications development. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through PPG8. PPG8 gives clear guidance as to the main issues surrounding telecommunications development. These include the legislative framework, siting and design issues, levels of consultation and issues surrounding electromagnetic fields (EMFs). Clear guidance is also given regarding what should be included within local plan (now LDD) policy.



This guidance states that local plans (LDDs) should set out criteria based policies to guide telecommunications development and that whilst regard should be had to siting and design considerations, operational efficiency should not be inhibited. PPG8 also makes clear that "*Criteria should be flexible enough to allow for the efficient development of the network and the demands imposed by the technology*".

Since the revision of PPG8 in 2001, the Office of the Deputy Prime Minister (ODPM) has produced, in conjunction with the industry, a Code of Best Practice. This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process.

As indicated above the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being PPG8. On this basis we would suggest that within the Local Development Framework there should be a concise and flexible telecommunications policy contained within one of the Council's statutory Local Development Document. This should give all stakeholders a clear indication of the issues which development will be assessed against. We would suggest a policy which reads;

Proposals for telecommunications development will be permitted provided that the following criteria are met: -

- (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;***
- (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;***
- (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.***
- (iv) if proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.***

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.

It will of course depend on your Local Development Scheme as to which documents are produced, which documents have a statutory role in development control and which would be considered as material considerations. We would suggest that this policy be a stand alone policy within one of the main LDDs, with any back ground information, such as electromagnetic fields (EMFs) and public health, being contained within a separate LDD or what is currently termed Supplementary Planning Guidance (SPG). This could then be read with PPG8, the Code of Best Practice to give a comprehensive background to any proposed development. We would consider it appropriate to introduce the policy and we would suggest the following;

Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The Council are keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and location on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document.....



In summary, we recognise the early stage of LDFs and the early stage of the consultation process at which we are being asked for comment. We are suggesting that a clear and flexible telecommunications policy be introduced in one of the main LDDs. This should be introduced by a short paragraph outlining the development pressures and the Councils policy aims. We have suggested text for both above. In keeping with the aims and objectives of the new legislation any background information should be contained within a separate LDD which would not need to go through the same consultation process (like a current SPG).

We trust you find the above comments of assistance. Please do not hesitate to contact me should you have any queries relating to the above matters.

Yours faithfully

Robert Monro
PLANNER

Trafford Borough Council
Core Strategy : Development Management and Core Policies
Issues and Options Paper

1. The Woodland Trust welcomes the opportunity to respond to this consultation. The Trust is the UK's leading woodland conservation charity. We have four main aims: no further loss of ancient woodland, restoring and improving woodland biodiversity, increasing new native woodland and increasing people's understanding and enjoyment of woodland. We own over 1,000 sites across the UK, covering around 20,000 hectares (50,000 acres) and we have 300,000 members and supporters.
2. We sent in some detailed comments on the Issues and Options informal consultation paper earlier this year and these are attached as a separate word document for your reference.
3. Here are some specific comments on the current document, including some cross references to our previous submission, so as to avoid duplication.

Development Management Policies

4. We support Policy SBE2 on conservation insofar as it goes. We would like to see the options extended to include strong protection for irreplaceable semi-natural habitats, such as ancient woodland and ancient/veteran trees. The reasons why we believe this to be important and the ways in which it is strongly supported in both regional and national planning policy are outlined in our previous submission (paragraphs 16 to 24).
5. We would also like you to consider protection of ancient woodland under Policy CG2 on minerals. Too often we come across cases where ancient woodland is being destroyed or damaged due to quarrying operations, whether these be new developments or extensions of existing operations. We would like to see protection of ancient woodland included in the "detailed criteria for assessing proposals" which is referred to in Option 2. With this qualification, we therefore prefer Option 2 to Option 1, which talks merely about "broad criteria".
6. Under policy SBE3 (Sustainable Water Management), we would like to see the policy recognise the role which woodland can play in helping reduce surface water run off and the possibility of flooding.
7. New well targeted woodland creation can play an important role in preventing flooding caused by increased rainfall by helping to prevent surface run-off and in flood plains helping as natural storage capacity. Furthermore water course deterioration through silting can be prevented by targeted woodland creation and more sympathetic management. This is becoming a much more important issue as climate change leads to an increase in episodes of heavy rainfall.

8. With regard to Policy PO (Planning Obligations), we would like to give support to two of the additional matters which you suggest could benefit from funding from planning obligations under Section 106 of the Town and Country Planning Act. Under bullet point 3 (nature conservation improvement) we would like to see these contributions used more widely for woodland creation, particularly to help in creating a strategic network of green infrastructure within the borough.
9. We outlined in paragraphs 4 to 10 of our previous submission the wide range of environmental and social benefits provided by woodland and in particular its contribution to the health and well being of local residents.
10. Under bullet point 13 (Carbon off-setting), we would like to see reference to the role of new woodland planting in sequestering carbon from the atmosphere (as part of a comprehensive programme of climate change mitigation measures).
11. We would also like to see reference to the role of woodland creation in enabling wildlife to adapt to the impact of climate change. Key strategies here would include woodland creation targeted at reversing habitat fragmentation by linking semi-natural habitats and buffering and extending them to make them more resilient in the face of climate change.

Core Policies for Trafford

12. Referring to the points which we made in paragraphs 10 and 11 above, one striking omission from the list of core policies is one on climate change. We note that you have a development management policy (SBE4) on renewable energy but we believe it would be better to have a clear policy on climate change, which brings together key strategies for both mitigation and adaptation.
13. We strongly support your suggestion of including a policy on green infrastructure and that this should comprise a network of green open spaces, including parks, playing fields, woodlands and nature reserves. You rightly point out the increasing evidence which links access to green open space to the health and sense of well being of local people. You are proposing a separate policy on "healthy communities" but you might like to consider linking the two, so as to emphasise the key link between health and access to greenspace.
14. As outlined in our previous submission (paragraphs 12 to 15), we would like to see Trafford Council recognise the importance of access to greenspace and in particular to woodland by adopting our Access to Woodland Standard which consists of the following aspirational targets:

- **that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size**

- that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes

15. We would like to see this included in either your Core Strategy or in one of the supporting LDF documents.

+++++

For more information, please contact Nick Sandford (Regional Policy Officer)

Tel: 01476 581111 or email: nicksandford@woodland-trust.org.uk



Trafford Borough Council Issues and Options – Informal Consultation

1. The Woodland Trust welcomes the opportunity to respond to this consultation. The Trust is the UK's leading woodland conservation charity. We have four main aims: no further loss of ancient woodland, restoring and improving woodland biodiversity, increasing new native woodland and increasing people's understanding and enjoyment of woodland. We own over 1,000 sites across the UK, covering around 20,000 hectares (50,000 acres) and we have 300,000 members and supporters.
2. We would like to make two suggestions for policies which we would like to see included in your plan.
3. We take as our starting point the sustainability issues as identified in the sustainability appraisal scoping report and outlined in paragraph 4.2 of the Issues and Options consultation document. In particular, we would like to comment on the following issues and how they need to be translated into policies in your Core Strategy:
 - "Need to protect and enhance the environment of local communities"
 - "Increase access to and provision of areas of natural habitat and open space"
 - "Conserve and enhance the natural environment recognising the importance of biodiversity"

Health of local people and access to open space and woodland

4. Our discussion here relates to the first two issues listed above. We note from the sustainability appraisal that although access to natural greenspace is seen as being quite good in the borough, there is considerable variation in the access which people have in different areas. For example, on page 13 of the Issues and Options document we read that Urmston has an over provision of open space, yet in other areas, such as Stretford and Old Trafford, there is a shortage.
5. It should also be borne in mind that it is important to have a network of greenspace which is able to perform a variety of functions and this must, in our view, include greenspace of high biodiversity value and in particular woodland.
6. Woodland has the ability to contribute to 10 of the 20 of the new UK Framework Indicators of sustainable development launched in March 2005 (HM Government, 2005, One future - different paths. The UK's shared framework for sustainable development, p12). Including contributing to biodiversity, reducing air pollution, improving health, education, employment, environmental equality, wellbeing and helping the economy grow.



7. The UK is one of the least wooded countries in Europe with only 11.6 percent woodland cover. Trees and forests are crucial to life on our planet. They stabilise the soil, generate oxygen, store carbon, play host to a spectacular variety of wildlife, and provide us with raw materials and shelter. They offer us respite, inspire our imagination, creativity and culture, and refresh our souls. A world without trees and forests would be barren, impoverished and intolerable. Woods bring many benefits, and people appreciate them in all sorts of ways. But for everyone to enjoy them, visit them or indirectly gain from them, they need to be located near to where people live.
8. There is growing awareness of the linkage between healthy communities and the quality of the environment. Hospital recovery rates for example, show significantly faster recovery where patients had a view of trees and woodland from their hospital window (Ulrich, R.S. 1984, "View Through a Window May Influence Recovery from Surgery", 'Science Journal' 224, pp.420-421).
9. The National Urban Forestry Unit's report 'Trees Matter' provides an excellent summary of the benefits of trees and woods in towns and cities. It notes the role of stress as a highly significant factor in the health of urban Britain and points to the "ample anecdotal evidence that people feel better in green, leafy surroundings and many seek solace amongst trees and woodland... Urban residents suffering from stress have been known to experience less anger, sadness and insecurity when viewing well treed surroundings as opposed to landscapes devoid of greenery" (National Urban Forestry Unit (1998) 'Trees Matter; the benefits of trees and woods in towns', p.6).
10. Numerous studies on greenspace and particularly woodland have shown that they are highly valued by communities (MORI, 2002, The Environment: Who cares?) and that access to woodland is not only important for health benefits through exercise but also makes visitors feel 'happy', 'relaxed' and 'close to nature' (Coles R.W. and Bussey S.C. 2000, Urban forest landscapes in the UK - progressing the social agenda. Landscape and Urban Planning 52, pp181- 8). Nature is able to improve the quality of people's lives and we believe everyone should experience it and have easy access to it.
11. Recognising this, the Woodland Trust has researched and developed a Woodland Access Standard for local authorities to aim for. This standard is endorsed by Natural England.
12. The Woodland Trust Woodland Access Standard recommends:
 - *that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size*
 - *that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes.*
13. This translates into figures for Trafford as follows – the table below shows the results of applying this Woodland Access Standard to the area with comparisons to two other Greater Manchester



districts. It shows that your residents are on a par with those in Salford in terms of access to woodland but fare less well than residents in Bolton.

14. The data used is available and as it has been collected in GIS form we are able to supply this information both in map and in numerical form.

Table 1: Accessibility to Woodland in Trafford using the Woodland Trust Woodland Access Standard

		Trafford	Bolton	Salford
Accessible woods	% population with access to 2ha+ wood within 500m	10.18	17.30	9.59
	% population with access to 20ha+ wood within 4km	57.88	96.45	68.55
Inaccessible woods	% extra population with access to 2ha+ wood within 500m if existing woods opened	8.87	29.68	22.02
	% extra population with access to 20ha+ wood within 4km if existing woods opened	16.79	3.55	17.13
Woodland creation	% population requiring new woodland creation for access to a 2ha+ wood within 500m	80.95	53.02	68.40
	% population requiring new woodland creation for access to a 20ha+ wood within 4km	25.33	0	14.31
	Minimum area of new woodland required for 2ha+ woods within 500m (ha)	133	167	136
	Minimum area of new woodland required for 20ha+ woods within 4km (ha)	20	0	20

15. 'Space for People' is the first UK-wide assessment of any form of greenspace and, while the targets may seem challenging, they represent the result of detailed analysis. We would like to see Trafford adopt the Woodland Access Standard as an aspirational target

The full 'Space for People' report can be found at www.woodland-trust.org.uk/publications.



Protection of irreplaceable habitats such as ancient woodland.

16. In paragraph 5.2 (iii) you list as one of the aims of the Trafford Community Strategy:
"An excellent, clean, safe, sustainable biodiverse environment for local people to enjoy".
In paragraph 5.4, you state that one of the strategic objectives for the core strategy is:
"That areas of environmental value are protected from development".
17. We support these aims but believe that you need to go further and say that irreplaceable habitats such as ancient woodland and ancient/veteran trees should be given absolute protection from development.
18. Ancient woodland (land that has been continually wooded since at least AD1600) is our richest habitat for wildlife being home to more species of conservation concern than any other habitat (supporting some 232 species as outlined in the UK Biodiversity Action Plan, 1994). Ancient woods form a unique link to the primeval wildwood habitat that covered most of lowland Britain following the last Ice Age. Ancient woodland sites are irreplaceable - the interactions between plants, animals, soils, climate and people are unique and have developed over hundreds of years. These eco-systems cannot be re-created and with only just over 2% of the land area in Great Britain **and a tiny 0.17% of Trafford covered by ancient woodland** we cannot afford any more of this finite resource to be lost forever. It is therefore essential that this habitat be protected from development.
19. Government Planning Policy Statement 9 on Biodiversity and Geological Conservation clearly states:
"Ancient woodland is a valuable biodiversity resource both for the diversity of species and for its longevity as woodland. Once lost it cannot be recreated. Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as an SSSI). They should not grant planning permission for any developments that would result in its loss or deterioration...Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Planning authorities should encourage the conservation of such trees as part of development proposals." (ODPM, PPS9, 2005, paragraph 10).
20. The 'UK Forestry Standard' sets out the UK Government's approach to sustainable forestry. It states: "ancient semi-natural woods...are of special value." The Standard has a series of UK-wide aims for semi-natural woodland and clearly states: "the area occupied by semi-natural woodland should not be reduced." (Forestry Authority, 1998, UK Forestry Standard: Standard Note 5, pp.41-43).
21. The Government's recently published policy on ancient and native woodland states that



"The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland."

It also states that:

"The cultural heritage associated with ancient woodland and veteran trees should be protected and conserved." (Keepers of time - A statement of policy for England's ancient and native woodland, 2005 , p10)

22. A recent development has been the publication of the Panel Report on the North West Regional Plan (Regional Spatial Strategy). The panel is recommending a major change to Policy EM1 on the natural environment, a change which significantly enhances the protection given to ancient woodland:

EM1 (D) Trees, woodlands and forests

Plans, strategies, proposals and schemes should:

- Support the aims and priorities of the North West Regional Forestry Framework and sub-regional forestry strategies.....
- Identify and protect ancient semi-natural woodland

23. In the light of this clear national and emerging regional policy, we believe you should identify all ancient woodland in Trafford and ensure that you have policies in place to protect it. Ancient woods less than 2 hectares in area do not generally appear on the ancient woodland inventory yet could be very important in a local context. The draft PPS9 states:

"Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as an SSSI)."

In our view this means that local authorities should record sites that are less than 2 hectares and should notify English Nature so that these sites can be added to their inventory.

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www.woodland-trust.org.uk

For more information, please contact:

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From: Rose Freeman [rose.freeman@theatrestrust.org.uk]
Sent: 23 November 2007 13:34
To: Hiorns, Rachel
Subject: Core SStrategy Further Issues and Options
Our Ref.: RF/1356

Core Strategy Further Issues and Options

Thank you for your email of 2 November consulting The Theatres Trust on further Issues and Options for the Core Strategy.

The Theatres Trust is the national advisory public body for theatres and a statutory consultee for planning applications affecting land on which there is a theatre. This applies to all theatre buildings, old and new, in current use, in other uses, or disused. Established by The Theatres Trust Act 1976 'to promote the better protection of theatres', our main objective is to safeguard theatre use in the UK, or the potential for such use but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies.

Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate policies relating to cultural facilities.

PO1 Planning Obligations – additional matters

It is essential to have a general policy for planning obligations in the Core Strategy as well as an SPD to develop the detailed policies. It is also important that the need for developer contributions for cultural activities and facilities is identified as we are concerned and wish to be assured that any future buildings for theatre and the performance arts will benefit appropriately under the terms of S106 agreements. Section 106 has significantly benefited the provision of cultural facilities and should continue to be used in this way.

Although not listed in your suggestions, cultural facilities should be acknowledged as a key priority to receive planning contributions. Public art is usually seen as an 'add-on', and although important in its own right, there should be a section dealing with buildings that are for cultural uses.

2. Core Policies

We would expect to see an overarching policy to promote and protect your existing cultural and leisure facilities for the benefit of residents and visitors - without a policy to protect such facilities it could become difficult to retain an essential community asset particularly where land values become higher for an alternative use. This policy should also state that the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed, or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community.

This policy should also allow for new development of cultural and leisure facilities and although a town which already has a theatre is unlikely to need another there might well be a demand for an arts centre or other cultural activity.

From our previous letter we repeat that it is vital to the 'Soundness' of the Core Strategy that it shares the vision of the Community Strategy. Trafford 2021 *A Blueprint Community Strategy* states in the Relax section that it will 'Raise the profile of sport, arts and culture ... Support and develop the wide range of local sporting and cultural networks'. Trafford 2021 *Community Strategy Action Plan 2006-2009* states at RL1 that by 2009 it will increase overall by 4% the level of participation in sport, art and cultural activities.

However your headings in the Core Policies have split sport from culture as you have placed sport and recreation under Healthy Communities. **We suggest that your Core Strategy Policy headings should reflect the topic sections in your other strategies and that for consistency there should be a section dealing with sport, art and cultural activities.**

The section on Crime should come under the Regeneration and Deprivation heading as these

both relate to safety and security which are essential for successful sustainable developments. A poor quality public realm creates feelings of alienation - it makes people feel uncomfortable and so they don't use it. On the other hand a good design will make people feel comfortable and the space will be used and busy. This makes crime more difficult to commit and reduces anti social behaviour so benefiting regeneration and reducing deprivation.

We look forward to being consulted on the next stage of the Core Strategy and any town centre Area Action Plans.

Rose Freeman, Planning Assistant
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The Theatres Trust
Protecting Theatres for Everyone
National Advisory Public Body for Theatres

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Date: 12 November 2007
Our ref: JFB/NW/
Your ref: CS/lssOpt/02

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Dear Sirs,

**TRAFFORD METROPOLITAN BOROUGH COUNCIL
CORE STRATEGY DEVELOPMENT MANAGEMENT AND CORE
POLICY ISSUES AND OPTIONS – INFORMAL CONSULTATION**

Natural England has been formed by bringing together English Nature, the landscape, access and recreation elements of the Countryside Agency and the environmental land management functions of the Rural Development Service. We are working towards the delivery of our purpose to conserve, enhance and manage the natural environment for the benefit of current and future generations.

Thank you for your informal consultation dated 1 November 2007, received by email on 2 November attaching a copy of the Paper. We welcome this opportunity to comment. Our comments follow the questions in the paper.

SBE1 Sustainable Design and Construction

We have no preference over whether you use the national Code for Sustainable Homes or use a locally distinctive standard.

SBE2 Conservation

We prefer Option 2 that would embrace a broader view and would provide for the conservation and enhancement of all landscapes and townscapes, and not just historic ones.

SBE3 Sustainable Water Management

Water Consumption – Yes the Council should seek to reduce water consumption in all new development

Surface Water Run Off – Yes the Council should reduce surface water runoff and, investigate and promote ways that mitigation measures can conserve and enhance biodiversity.

Natural England
Head Office
1 East Parade
Sheffield S1 2ET

www.naturalengland.org.uk

SBE4 Renewable Energy

We too would wish to see all development make a contribution to reducing carbon emissions. We would want to see a wider scale for the use of renewables in new development as it would be in the larger schemes where cost efficiencies would be at their highest. Categorising schemes into either 'large' or 'small' is too restrictive and more categories could allow greater flexibility and gains. Smaller schemes could aim for greater conservation of energy and optional renewables with larger schemes necessitating greater use of renewables the further along the scale you go and certainly in excess of 10-20%.

AT Accessible, Integrated Sustainable Transport

We consider that Option 2 would be more favourable, but there needs to be an assessment of needs undertaken throughout the Borough to identify the areas where there is a shortfall of sustainable transport routes. Where planning obligations are used to secure sustainable transport measures this would target the best use of resources to what is needed and to where it is needed. Make the policy locally significant rather than to apply a fixed standard throughout the Borough.

CG Clean and Green

CG1 Waste

It is for Trafford (with other Greater Manchester Authorities and GMGU) to decide whether it is more appropriate to have this policy within this Core Strategy or within the Greater Manchester Joint Waste DPD.

CG2 Minerals

We have no preference for either option.

QH Quality Homes for All

QH1 House Type

We have no preference for either option.

QH2 Affordable Housing

We have no preference for either option.

TE Telecommunications

We note that Trafford wants to facilitate expansion of the telecommunications network whilst minimising any environmental impact. In relation to our environmental interests the main point of concern to Natural England is the landscape and visual impact of telecommunications infrastructure in the countryside. We ask that your strategies and policies demonstrate innovative ways of providing infrastructure whilst conserving and enhancing the landscape.

PO Planning Obligations

PO1 The Use of Planning Contributions to Improve the Quality of Life in Trafford

We would like to see planning obligations secured for conservation and enhancement of biodiversity; and provision and maintenance of publicly accessible open space and green infrastructure.


2. Core Policies for Trafford


We agree that Core Policies should be created for the policy areas as stated. However, we consider that core policy topics or content should also include renewable energy and climate change.

This concludes our comments at this stage. We should be pleased to offer any further assistance or information if required. We look forward to further opportunities to be involved in your work.

Yours faithfully,

Mrs Janet Belfield
Planning & Advocacy Team (North West)

 0161 234 0218

 janet.belfield@naturalengland.org.uk

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

STRATEGIC PLANNING AND DEVELOPMENTS

07 NOV 2007

Rec			
Action by			
Ans			
Copied to			

GMGU

Director: Simon Talbot,
BSc, MSc, FGS, CEng, MIMMM

(38)

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Our Ref: 4935ph2
Contact: philippa.hothersall@gmgug.org.uk
Your Ref:
Date: 06 November 2007

FAO Rachel Hiorns
LDF Team, Strategic Planning &
Developments
First Floor, Waterside House
Sale Waterside
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Dear Rachel Hiorns

Subject:

Thank you for consulting GMGU on the above document. Having read through the documents GMGU have the following comments to make:

General Comments

GMGU is pleased to note that policies for both waste and minerals are to be included in the Core Strategy. This will enable the issues surrounding waste to be addressed across Trafford as a whole.

Clean and Green – CG1 Waste

Detailed policy will be developed for Trafford through the JWDPD and the Core Strategy will be the overarching document with which the JWDPD will comply. It may be useful to clarify this point in the wording of paragraph 2 of CG1 Waste.

Further to GMGU's letter dated 29th August 2007, it may be prudent to show that the recent C&I and C&D studies have been taken into account.

The third bullet point within CG1 Waste refers to '...maintenance of all new developments...'. It may be useful to also refer to 're-developments' in order to clarify this point for developers.

Option 2 proposes to 'set out detailed criteria to guide waste management in Trafford, including those that will be used in assessing proposals for waste development'. It is intended that the JWDPD will provide detailed policy on waste related matters and there is the potential for duplication or confusion for developers.

It may be useful to consider the location of new / improved waste management facilities and sites across the borough.



Association of
Greater Manchester Authorities



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Clean and Green – CG2 Minerals

As mentioned in GMGU's previous letter, minerals reserves are likely to have planning permission and therefore count towards Trafford's sub-regional RAWP (Regional Aggregate Working Group) apportionment figure, whereas resources are un-quantified areas of mineral which do not have planning permission. This is an important distinction because, if the sand and gravel referred to in the Core Strategy is a reserve, this would impact upon the vision and strategic options put forward, as there would potentially be a need to safeguard the sand and gravel from sterilisation.

GMGU is pleased to note that the options put forward include the need to identify areas for safeguarding minerals and minerals infrastructure and the need to develop criteria for assessing proposals for minerals development. Option 2 refers to 'areas of search for extraction'; it may be useful to also refer to these in Option 1.

Option 2 refers to the development of detailed criteria for assessing proposals for minerals development. GMGU is currently developing potential ways forward for minerals policy in Greater Manchester and should it be decided that a joint approach is the best way forward, it may not be appropriate for the Core Strategy to contain such detailed criteria.

I hope you find these comment useful. If you wish to discuss any of the issues raised in more detail, please do not hesitate to contact me on 0161 275 0313.

Yours sincerely

Philippa Hothersall
Planner (Minerals and Waste)

**TRAFFORD CORE STRATEGY:
DEVELOPMENT MANAGEMENT &
CORE POLICIES: REPRESENTATIONS
BY
PEEL HOLDINGS**

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To:	Trafford Council		
Cc:	Peel Holdings		
From:	Turley Associates, on behalf of Peel Holdings		
Date:	26 November 2007	Our Ref:	PEEM1047

**Trafford Core Strategy: Development Management & Core Policies
Issues and Options Paper
Consultation response by Peel Holdings**

GENERAL PURPOSE & CONTENT

The document seeks to lay foundations for “DC” type policies and what might formerly have been “Part 1” type policies. The document is not spatial and only partially addresses some of the comments of GONW (dated 23-08-07) regarding the spatial approach and other key matters relating to evidence and soundness. These will need to be dealt with fully through the Preferred Options stage. The one clear exception in GONW’s letter is how the Council deal with cross-boundary issues and the definition of the “inner area” which should be done through Issues and Options, but which has not yet been consulted upon. The Council is aware of Peel’s position in this respect.

The DM/CP Paper itself document is fairly difficult to read and follow, owing to the structure and presentation of the document. However, the additional content provided by the DM/CP Paper to the Core Strategy in respect of some of the issues and options facing Trafford is welcomed, as it provides some further clarity of the Council’s thinking on where some of the issues are heading, particularly regarding housing.

SPECIFIC COMMENTS – DEVELOPMENT MANAGEMENT

The “Quality Homes for All” options **QH1** (pg 10) are presented as “either/or” options, but are really mix and match type options – this should be clarified. Specific comments on these options are as follows:

1. Any requirement for new residential development to provide “lifetime homes” (for all general housing to be easily adaptable to meet the needs of elderly or disabled people) is likely to add to the overall costs of housing provision. If this option is to be pursued then it would be desirable to apply this requirement only to a reasonable proportion of new homes. In our experience, LPAs have used 10 or 20% as a reasonable proportion.

2. Specific sites for particular housing needs could be identified, but if this approach is taken the proposals need to be realistic and deliverable, based on known demands/needs in an area and suitability and deliverability of the site for such needs, otherwise they could stymie other housing needs and/or make housing development undeliverable/unviable.
3. Trafford must release greenfield land for family housing, otherwise it is difficult to see how the RSS requirement can be met and a suitable mix of types of housing provided.
4. Higher density, smaller units may well be appropriate in/around town centres, but can also be in the more “urban” and accessible parts of the “inner area” (yet to be geographically defined), where family housing is unlikely to be as attractive to the market and may be particularly difficult to deliver in any quantum owing to site constraints and limited site sizes.
5. The commentary that allowing the market to decide the type of units is what happen at present is the approach currently adopted within the Unitary Development Plan is not accurate. The effect of the current housing policy is that the “market” is directed to the regeneration areas, where family housing has traditionally been less in demand and the urban context generally leads to higher density, apartment type schemes. Whereas in other areas, the market is not operating at all, or on a very limited basis. RSS provision will change this and Trafford will need to decide how, if at all, it intervenes in the market through planning policy. It may be appropriate for sites above a certain threshold to incorporate a range of housing provision, as this is required by national guidance (PPS3) anyway. The acceptability of this point will come through detailed proposals of which locations, what thresholds and which types. Any such prescriptions should be spatially defined, justifiable by robust evidence regarding the specific needs in the localities affected, and at a reasonable scale. It will also be important that policy acknowledges that in determining the appropriate type/mix on any site, the LPA will need to take account of site characteristics/ constraints and the costs of development that can affect the ability to deliver certain forms of housing, such as abnormal development costs & infrastructure, affordable housing and other planning obligations (see separate point on obligations below) and objectives.
6. As 5.

The Affordable Housing (AH) options under **QH2** are all fairly similar, and targets are all around 30-40% based on the latest HMA. Again, *any affordable housing policy needs to recognise that there are often other planning and regeneration objectives/costs to be met, and in some circumstances in order to achieve a deliverable scheme a reduction in AH may be required. In some limited circumstances, where the local regeneration needs require investment by the developer in other benefits and improvements, a provision of nil AH may be merited e.g. Partington where the housing development is funding a new shopping centre.*

Under **PO1**, there is a long list of possible planning obligations. It is not possible to comment on most of these without knowing existing provision/capacity issues and how this is likely to be affected by new development over the LDF period. Any planning obligations taken forward through policy and/or negotiated at the application stage must, in accordance with Circular 05/05, be:

- Necessary to make the proposed development acceptable in planning terms;
- Directly related to the proposed development;

- Fairly and reasonably related in scale and kind to the proposed development.

SPECIFIC COMMENTS – CORE POLICIES

We agree that there should be Core Policies for the items identified. There should also be Core Policies defining the “inner area” and setting the overall spatial emphasis of housing, retail, employment and other developments across the Borough.



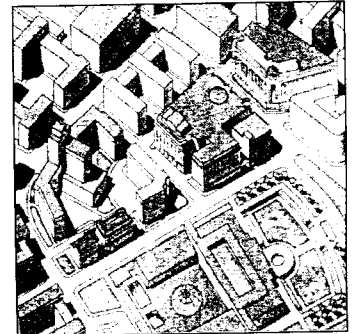
Peacock & Smith Limited

KT/1732A/398(23Nov07)Trafford

BY E-MAIL & POST:
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STRATEGIC PLANNING AND DEVELOPMENTS			
26 NOV 2007			
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Action by			
Ans			
Copied to:			



Chartered Town Planners
Development Consultants

23 November 2007

Dear Sir

**TRAFFORD COUNCIL
LOCAL DEVELOPMENT FRAMEWORK:
CORE STRATEGY DEVELOPMENT MANAGEMENT AND CORE POLICIES
ISSUES & OPTIONS, NOVEMBER 2007
COMMENTS ON BEHALF OF WM MORRISON SUPERMARKETS PLC**

With reference to the above, and on behalf of our client, Wm. Morrison Supermarkets Plc, we write to thank you for providing us with the opportunity to comment on the Core Strategy Development Management and Core Policies Issues and Options document for Trafford.

Wm. Morrison is a major food and grocery superstore retailer which, although currently unrepresented in the Borough, may seek such representation in the future. The company would therefore like to be kept informed and consulted on further stages of preparation of documents which are to comprise the Local Development Framework, particularly with regard to any new retail allocations and new designated town/district/local centres in Trafford, and any emerging SPDs.

Our client would like to make comments on the above document. The reasons for this are explained in more detail below.

With regard to **Policy SBE1 'Design and Construction'** our client considers that the use of the Code for Sustainable Homes as a means to promote minimum standards for all development in Trafford, is wholly unacceptable.

The criteria contained within the Code for Sustainable Homes would be largely irrelevant to any type of commercial development, including supermarkets. Our client considers that any policy relating to sustainable design and construction should have regard to Government guidelines contained within PPS1 and PPS22.

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Consultant: Robert Smith Dip TP, MRTPI

Policy SBE4 ‘Renewable Energy’ sets out the Council’s targets for reducing energy consumption and CO2 emissions. The options formulated by the Council specify the percentage by which new developments must reduce carbon emissions by the use of renewable energy sources.

It is acknowledged that a number of Local Authorities are seeking a percentage of onsite renewable energy generation in new developments and in principle our client supports this approach. However, we consider that any such policy should incorporate an element of flexibility to allow for circumstances where it will not be viable or suitable to incorporate renewable energy equipment to reduce CO2 emissions by a given percentage.

Paragraph 8 of PPS22 states that local planning authorities may include policies in Local Development Documents that require a percentage of energy requirements to come from onsite renewable energy generation, however this guidance is subject to the caveat that such policies:

- (i) *should ensure that that a requirement to generate on-site renewable energy is only applied to developments where the installation of renewable energy generation equipment is viable given the type of development proposed, its location and design;*
- (ii) *should not be framed in such a way as to place an undue burden on developers, for example, by specifying that all energy to be used in a development should come from on-site renewable generation.*

In our view the absence of any such flexibility conflicts with the intentions of Government Guidance within PPS22 and its companion guide. Accordingly, Wm. Morrison requests that any such policy on renewable energy includes text to confirm that the percentage requirement will be subject to tests of viability and suitability.

With regard to section AT ‘**Accessible Integrated Sustainable Transport**’, our client considers that the base maximum standard for car parking associated with new food retail development should reflect current government guidance set out in PPG13 (one space per 14 sq. m for developments of over 1,000 sq. m gross floorspace).

Paragraph 56 of PPG13 notes that a balance has to be struck between encouraging new investment in town centres by providing adequate levels of parking, and potentially increasing traffic congestion caused by too many cars. It is noted that where retail and leisure developments are located in a town centre, or on an ‘edge of centre’ site as defined by PPS6:

“Local Planning Authorities should consider allowing parking additional to the relevant maximum standards provided the Local Authority is satisfied that the parking facilities will genuinely serve the town centre as a whole and that agreement to this has been secured before planning permission has been granted”.

In broad terms, to fulfil the objectives of PPS6, it is necessary for town centre retailing to be competitive. To achieve this it must provide sufficient car parking to make the store as attractive as other existing stores in the area, and to ensure that foodstore facilities operate efficiently without adverse effects on the highway network.

Policy PO1 discusses the use of planning contributions to improve the quality of life in Trafford. Our client supports a flexible approach to planning obligations and would like to see the delivery of planning obligations through the use of a negotiated agreement (Section 106) for all development sites, regardless of their size and nature.

Government Circular 05/05 states in Annex B that planning obligations should only be sought where they meet all the following tests:

1. Relevant to planning;
2. Necessary to make the proposed development acceptable in planning terms;
3. Directly related to the proposed development;
4. Fairly and reasonably related in scale and kind to the proposed development; and
5. Reasonable in all other aspects.

Any such requirements must have regard to the viability of a scheme. There should certainly be scope for flexibility within policy, as by placing unduly onerous requirements on developers, many development schemes may be considered as unviable which is likely to lead to a direct loss of potential investment and regeneration of the Borough.

With regard to new retail development, the Core Strategy should contain a realistic assessment of need for retail development in Trafford, taking account of both quantitative and qualitative considerations, which should be informed by an up to date Retail Study. This is in accordance with guidance set out in PPS6.

The Core Strategy should provide a positive strategic policy framework for retail uses and town centres, which fosters a competitive and innovative retail sector and enables people to have access to a diverse range of quality shopping provision.

Paragraph 2.44 of PPS6 states that a sequential approach should be applied in selecting appropriate sites for allocation for retail uses. All options in the centre should be thoroughly assessed before less central sites are considered for development for main town centre uses. This approach, however, does not presume against edge of centre and out of centre retail development, providing that the sequential test has been met and that the vitality and viability of existing centres is not compromised. It is important that the Core Strategy for Trafford reflects this policy approach.

We also request that the Core Strategy recognises the important role that the retail sector has in the Trafford's economy. Retail development not only provides employment for the local population, but also assists in the regeneration of the area and this should be reflected in the Core Strategy.

I trust that the above is helpful, and would be grateful if you could ensure that Peacock and Smith remain on the consultation database on behalf of Wm. Morrisons to be informed of the outcome of this consultation stage.

If you have any queries or require any further information, please do not hesitate to contact Peacock and Smith at the address overleaf.

Yours sincerely

PEACOCK & SMITH



Northwest

REGIONAL DEVELOPMENT AGENCY



INVESTOR IN PEOPLE

Rachel Hiorns
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Sale
M33 7ZF

Steven Broomhead
Chief Executive

SB/JL/1783/CD
26 November 2007

Dear Ms Hiorns

Trafford LDF Core Strategy: Development Management and Core Policies Issues and Options Consultation

Thank you for your e-mail of 5 November 2007 inviting the Northwest Regional Development Agency's comments on the above.

The Development Management Policy Options relate to a broad range of issues. In many cases, these are not issues on which the Agency has specific views.

With regard to the Sustainable Built Environment policies, the Agency has recently approved its own Policy Statement on 'Sustainability Standards for Buildings'. This sets out minimum requirements for all NWDA-funded projects which involve the construction of new buildings or the refurbishment of existing properties. A copy is enclosed for information. The Council may find it helpful in establishing its own standards for sustainable built development. Should you have any queries about this document, please contact Mark Atherton, Head of Sustainable Development & Climate Change (e-mail mark.atherton@nwda.co.uk).

In relation to parking standards, the options put forward in the consultation paper ask whether the Council should adopt fixed standards across the Borough or whether standards should vary according to public transport accessibility. We are aware that consultants Mouchel Parkman are currently undertaking a review of regional parking standards on behalf of the North West Regional Assembly. We would ask the Council to have appropriate regard to parking standards at the regional and sub-regional level to ensure a degree of consistency with neighbouring areas.

In relation to housing type and affordability, it is difficult to express a view on the options put forward in the consultation paper without further knowledge of your Housing Market Assessment. This should provide a basis for establishing the appropriate mix of housing.

Section 2 of the consultation paper identifies a number of broad policy areas to be covered in the Core Strategy. In relation to housing, it is suggested that core policies will identify sufficient land to meet the RSS housing requirements and manage its phased release. In view of the issues raised in Part 1 of the consultation paper, we would also expect the Core Strategy to contain policies for affordable housing and on the mix of housing types.

We particularly welcome and support the range of policies indicated under the 'Sustainable Economy' heading. Under 'Accessibility' we note that this refers, essentially, to safe and user-friendly access for all. We suggest that the Core Strategy's accessibility policies will also need to address accessibility in wider terms, including access to new developments by different modes of transport.

I trust these comments are helpful.

Yours sincerely

Steven Broomhead
Chief Executive



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kathryn.thompson@eu.jll.com

26 November 2007

Dear Sirs

**DPD1: Core Strategy Development Management and Core Policies:
Issues and Options Paper (November 2007)
Cubic Property**

We write on behalf of our client Cubic Property who has land interests in Trafford. We make the following general comments based on the questions posed in the document, using your numbering:

SBE2: Conservation

Option 1 should be maintained, retaining a similar policy to that within the Adopted UDP, which provides for the protection of conservation areas, listed buildings, ancient monuments and historical landscapes, parks and gardens.

The Historical Landscape Characterisation Project information can be used to supplement the decision making process once it is available. Appropriate management guidance can be developed as part of a Supplementary Planning Document (SPDs) as required, once the document is published. It is more appropriate to incorporate the findings of the Historical Landscape Characterisation Project in an SPD rather than within the Core Strategy, which is a strategic document.

SBE4: Renewable Energy

Option 3 should be pursued whereby 'only large development to reduce carbon emissions by 10% by using renewable energy sources from now to 2015, 15% from now to 2015 and 20% from 2015 to 2020'.

The wording of this option should be re-considered to provide greater clarity.

Generally, it is considered that it is the larger scale developments that can accommodate a range of renewable energy options, for example district heating schemes. Smaller sites should be encouraged to deliver low technology energy savings through high quality design and layout and internal energy efficient 'fit out' and appliances.





**JONES LANG
LASALLE**

QH2: Affordable Housing

Options 4 should be taken forward which sets out that Trafford should negotiate a target of between 30% - 40% depending on the different circumstances of individual applications, for example scheme in Priority Regeneration Areas.

The Core Strategy should reflect Government guidance contained in Planning Policy Statement - PPS3: Housing, which sets out national planning policy guidance with respect to Affordable Housing. We highlight below the key paragraphs which consider should be reflected in the generic text of the Core Strategy. We highlight key paragraphs below:

- Paragraph 27 of PPS3, sets out the Government's definition of affordable housing as including social rented and intermediate housing. Detailed definitions are contained in the Appendix. Affordable housing should be defined with reference to PPS3.
- Paragraph 29 of PPS3, asks local authorities to set an overall target for the amount of affordable housing to be provided reflecting the definition of affordable housing and an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured. This is not explicit in the Core Strategy.
- Indeed paragraph 29 of PPS3 goes on to say that where it can be robustly justified, off-site provision or a financial contribution in lieu of on-site provision may be accepted. This should be reflected.

Core Policies

We do not consider that Core Policies should not replicate policy areas already dealt with in Government Guidance in the form of Planning Policy Statements (and current Planning Policy Guidance Notes) unless there is a specific local need for more detailed guidance.

Generally, we consider that the focus should be on the regeneration of previously developed land that significantly detracts from the environment or amenity of an area, where development can achieve significant benefits to the local environment. Such sites should be prioritised for new development. This should be the focus of the plan.

Should you require any further information in this regard, please do contact Kathryn Thompson at the address above or on (0161) 828 6436.

Yours faithfully

Jones Lang LaSalle
For and on behalf of Cubic Property

cc. Richard O'Reilly BSc (Hons) MRICS: Managing Director, Cubic Property



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Representations to Trafford Council Local Development Framework

DPD1: CORE STRATEGY

Development Management and Core Policies
Issues and Options Consultation Paper

EPP reference: REPS2-7393-CT-

November 2007

1. INTRODUCTION

- 1.1 These representations are submitted in response to general issues identified in the Trafford Council Local Development Framework Core Strategy Development Management and Core Policies Issues and Options Paper.

2. RESPONSE TO QUESTIONNAIRE

Introduction

- 2.1 We respond to the questions raised in the Issues and Options Paper which are of relevance to our client below. The Issues and Options Paper presents a number of options for each heading. In many cases, we consider that these are not alternatives but that a balanced approach should be taken.

SBE1 Design and Construction

- 2.2 It is agreed that the design of new development should seek to embrace sustainability principles and ensure that new development takes account of local distinctiveness and is sympathetic to its surroundings.
- 2.3 The Issues and Options paper sets out two options for achieving sustainability in design and construction:
- 1. should developers be encouraged to use the national Code for Sustainable Homes as a means to promote minimum standards for all development in Trafford not just houses?; or
 - 2. should more locally distinctive guidance be developed to promote sustainable buildings in Trafford?
- 2.4 The Code for Sustainable Homes is a voluntary code at present and is not mandatory. The council intends to make the Code mandatory within the Borough. Whilst it is considered that new development should aim to meet the Code for Sustainable Homes, it should not be mandatory at the local level as such until such time as it is mandatory at the national level.
- 2.5 The Issues and Options Paper does not clarify the sustainability rating system new housing development would be expected to achieve. It is not practicable for all developments to be expected to achieve the same 'star' rating and we would suggest that this is dealt with on a case by case basis.

- 2.6 Irrespective of our objections, if the council is to apply the Code for Sustainable Homes to all new housing development we would suggest that it would be unreasonable to expect the development to achieve a rating any greater than 1 star.
- 2.7 In relation to options 1 and 2, it would be more appropriate for the Code for Sustainable Homes to be used as a guide for achieving sustainable buildings other than houses. The Code for Sustainable Homes is a national standard and it is more appropriate for this to guide new development than for new guidance to be created at the local level. It must however, be recognised that the Code for Sustainable Homes is designed specifically for houses and it may not be directly transferable to other forms of development. Again, careful consideration would need to be given to the level of be achieved given that this is a voluntary code.
- 2.8 **Summary:** *the Code for Sustainable Homes should not be mandatory at this stage. Clarification is required on the rating new development would be required to achieve and care should be taken to ensure that this is achievable. Option 1 is the most appropriate option with the proviso that the Code is designed specifically for housing.*

SBE2 Conservation

- 2.9 The Issues and Options Paper presents two options. These are interrelated issues rather than alternatives. There is a statutory requirement to protect conservation areas, listed buildings, ancient monuments and historic landscapes parks and gardens and therefore similar policies such as those set out in the UDP should be retained as set out in option 1. We have not reviewed a copy of the Great Manchester Historic Landscape Characterisation Project however, this could be used to inform character area appraisals or supplementary planning documents which could be used as a material consideration in planning decisions. This should not however, comprise planning policy.

SBE4 Renewable energy

- 2.10 The Issues and Options Paper presents three options in relation to renewable energy:
1. All new buildings including single houses to reduce carbon emissions by 10% using renewable sources of energy.
 2. Only large development to reduce carbon emissions by 15% by using renewable energy sources from now to 2015 and 20% from 2015 to 2020.
 3. Only large development to reduce carbon emissions by 10% by using renewable energy sources from now to 2015, 15% from now to 2015 and 20% from 2015 to 2020.

2.11 The need to utilise renewable energy where possible is acknowledged in order to meet national targets. Option 1 is considered onerous and the associated costs may prove unreachable to single house developments. Option 3 is the most preferable. Renewable energy is a relatively new concept and the thresholds which developers are required to meet should be as achievable as possible to enable methods of construction and sources of renewable energy to adapt and emerge.

2.12 **Summary:** *option 3 is the preferred option.*

AT Accessible, Integrated Sustainable Transport

2.13 This section of the Issues and Options Paper deals with car parking standards. The options presented are either:

- 1. The council adopt fixed maximum standards and apply them universally across the borough; or
- 2. The council apply a range of standards depending on the circumstances of the development.

2.14 PPG13 requires a consistent approach to maximum parking standards. The standards set nationally however, do not apply to smaller developments and the guidance advises that local planning authorities use their discretion in setting the levels of parking appropriate for small development to reflect local circumstances.

2.15 It is considered that it would be appropriate to apply a range of standards depending on the circumstances of the development.

2.16 We note that option 2 gives the example of "*having lower standards in areas that have good access to facilities such as in town centres*". Whilst lower standards in centres and areas with good public transport are likely to be appropriate in the majority of cases, we consider however, that standards should be applied flexibly to meet the needs of the specific development. For example it may be beneficial for some retail or leisure schemes in accessible places to have additional parking to support existing centres, particularly in light of competition from the Trafford Centre. This accords with paragraph 56 of PPG13.

2.17 **Summary:** *option 2 is the preferred option.*

QH1 House Type

2.18 In providing quality homes for all, the Issues and Options Paper sets out 6 options:

- 1. ensure that where possible new residential development conforms to lifetime housing; or

- 2. identify specific development sites for particular physical, health and cultural needs; or
 - 3. aim to meet the demand for family homes; or
 - 4. encourage the continued development of high density 1 and 2 bedroom apartments in and adjacent to town and district centres; or
 - 5. allow the market to determine the type of residential units on individual sites; or
 - 6. require all sites above a threshold to incorporate a range of house types and sizes.
- 2.19 These are interrelated matters rather than alternatives. A more balanced approach should be taken rather than simply selecting one of the above options.
- 2.20 In respect of option 1, whilst achieving the Lifetime Homes standard is considered desirable, it would not be possible or necessary to meet the standard for every home provided. Such a requirement would be onerous and could serve to prevent development coming forward where it is most needed. Each scheme should be considered on a site by site basis taking into account the characteristics and location of the specific site.
- 2.21 With regard to options 2, 3, 4 and 5 PPS3 considers that the key characteristics of a mixed community are a variety of housing particularly in terms of tenure and price and a mix of households such as families with children, single person households and older people. A mix of housing types should be provided across the Borough to reflect the needs of the area. It is not however, considered that the policy should be so specific to define the exact split of house types required on sites or to identify specific sites for specific types of housing. This could serve to stifle development.
- 2.22 With regard to option 5, PPS3 specifically states that one of the government's key objectives is to provide a variety of high quality market housing. It considers that developers should bring forward proposals for market housing which reflect demand and the profile of households requiring market housing in order to sustain mixed communities. Ultimately, allowing the market to determine the type of residential units on individual sites should provide housing which reflects demand.
- 2.23 **Summary:** *a balanced approach should be taken whereby a mix of housing types is sought across the borough. The market should remain a key influence in determining the type of housing to be provided.*

QH2 Affordable Housing

- 2.24 At present the adopted UDP seeks to provide a split of affordable housing across the Borough as follows: Altrincham 35% Sale 30% Stretford 30% Old Trafford 25% Urmston

35%. This applies to sites of 25 units or more. It is accepted that the threshold will need to fall in line with the guidance in PPS3 to sites of 15 or over.

- 2.25 The Housing Market Assessment recommends a target of 40% affordable houses on qualifying sites in order to meet the need for affordable housing. Clarification is sought on whether the Housing Market Assessment takes into account the decrease in the threshold for achieving affordable housing from 25 units to 15 units as this should yield a much higher annual provision of affordable housing than previously.
- 2.26 The four options put forward for achieving affordable housing are as follows:
- 1. apply a standard target contribution across the borough of 40% based on up to date housing market needs assessment data.
 - 2. apply a two way split of 35% in the North of the borough and 40% in the south.
 - 3. Continue to apply the current five-way split for contributions ranging from 30-40%.
 - 4. Negotiate a target between 30-40% depending on the different circumstances of individual applications for example schemes in priority regeneration areas.
- 2.27 We consider that it would be inappropriate to apply a standard target contribution across the borough as this would not take into account the varying needs. Similarly a simple two way split would also fail to take into account the specific pockets of need within these two wider areas. Continuing to apply the current five way split would be consistent, however, this should also allow an element of negotiation to take into account the particular characteristics of the specific development and site. As such the preferred options are options 3 and 4 which would meet the needs of the specific area but also enable the circumstances of each case to be taken into account.
- 2.28 In addition, consideration needs to be given to the tenure of affordable housing to be provided.
- 2.29 ***Summary:** a combined approach utilising options 3 and 4 would be preferred.*

PO1 The Use of Planning Contributions to Improve the Quality of Life in Trafford

- 2.30 Circular 05/2005 makes it clear that planning obligations are private agreements negotiated usually in the context of planning applications between local planning authorities and persons with an interest in a piece of land and are **intended to make acceptable development which would otherwise be unacceptable in planning terms.**

- 2.31 The key tests of planning obligations are that they must be:
1. relevant to planning.
 2. necessary to make the proposed development acceptable in planning terms.
 3. directly related to the proposed development.
 4. fairly and reasonably related to the scale of the proposed development
 5. reasonable in all other respects.
- 2.32 Paragraph B7 states that *"the use of planning obligations must be governed by the fundamental principle that **planning permission may not be bought or sold**"*
- 2.33 These principles must be firmly borne in mind when considering requests for the suggested contributions.
- 2.34 At present, where relevant the council requests four types of contribution where these are applicable to a certain development. This is considered in line with the circular.
- 2.35 The Issues and Options Paper suggests 13 further potential contributions to be sought in planning obligations. This list is extensive and the document is not clear on whether the intention is for this to be provided to all planning applications. This would be onerous and we would object strongly to the proposals. Such requirements would jeopardise many development proposals.
- 2.36 We are not able to comment specifically on each of the contributions suggested without knowledge of the development the contributions would apply to and the likely extent of each of the contributions. It would not be acceptable for additional planning obligations to be applied if the five criteria set out in Circular 5/05 cannot be met. For example, it would only be reasonable to request a contribution towards education services where there is clear evidence from the education authority that the specific development would have a detrimental impact on such services without a contribution i.e. a shortage of education places and a transparent calculation of those costs. Similarly it would be unreasonable to expect a development which achieved an acceptable sustainability code to provide a contribution to carbon off-setting.
- 2.37 We would also suggest that the emerging documents take into account the government's emerging proposals for a statutory planning charge.
- 2.38 **Summary:** *the list of suggested contributions is extensive. We are not able to comment specifically without further information on when the contributions would be required and the extent of them.*

Development Management and Core Policies
Issues and Options Questionnaire – November 2007

1. Development Management Policy Options

SBE1 Design and Construction

Option 1

Should developers be encouraged to use the national Code for Sustainable Homes as a means to promote minimum standards for all development in Trafford not just houses?

Yes/No

Option 2

Should more locally distinctive guidance be developed to promote sustainable buildings in Trafford?

Yes/No

If yes what locally distinctive characteristics should be incorporated?

.....

SBE2 Conservation

Option 1

Retain a similar policy to that within the adopted UDP, with the protection of listed conservation areas, listed buildings, ancient monuments and historic landscapes, parks and gardens.

Option 2

Take account of the results of the Greater Manchester-wide Historic Landscape Characterisation Project to establish a broader view of local distinctiveness and its enhancement to develop not only conservation areas but also appropriate management guidelines across the borough.

Which option do you prefer?

Or is there another option that you think we should consider?

If so what would it be and why?

SBE3 Sustainable Water Management

Water Consumption

Do you agree that the Council should seek to reduce water consumption in new development?

Yes / No

If yes, should this apply to all new development?

Yes / No

THE TRAFFORD CORE STRATEGY

Surface Water Runoff

Should the Council seek to reduce surface water runoff and, by the use of mitigation measures such as sustainable drainage systems, green roofs, rainwater harvesting and storage, manage the risk of flooding in new developments?

Yes / No

If yes, what other mitigation measures should be employed?

.....

Please indicate Yes or No to the above questions.

Please also tell us if there are any additional issues that you would like us to consider on sustainable water management.

SBE4 Renewable Energy

Option 1

All new buildings including single houses to reduce carbon emissions by 10% using renewable sources of energy.

All large development to reduce carbon emissions by 10% using renewable energy sources from now to 2010, 15% from 2010 to 2015 and 20% from 2015 to 2020.

Option 2

Only large development to reduce carbon emissions by 15% by using renewable energy sources from now to 2015 and 20% from 2015 to 2020.

Option 3

Only large development to reduce carbon emissions by 10% by using renewable energy sources from now to 2015, 15% from now to 2015 and 20% from 2015 to 2020.

Which option do you prefer?

Or is there another option that you think we should consider?

If so what would it be and why?

AT Accessible, Integrated Sustainable Transport

Option 1

The Council should adopt fixed maximum standards and apply them universally across the borough.

Option 2

The Council should apply a range of standards depending on the circumstances of the development. For example by having lower standards in areas that have good access to facilities such as in town centres or along public transport corridors incentives such as public transport passes could be bought by developers for new residents in lieu of providing car parking spaces.

Which option do you prefer?

Or is there another option that you think we should consider?

If so what would it be and why?

CG1 Waste

Option 1

Identify broad principles to be followed in guiding waste management in Trafford, including the following criteria:-

- i. the need for Trafford to make an appropriate contribution towards the maintenance at all times of sufficient provision of waste management facilities within Greater Manchester;
- ii. the need to promote the waste hierarchy, including encouraging recycling of waste, thereby reducing the use of limited natural resources and minimizing the need for use of scarce landfill sites;
- iii. the impact of waste management proposals on the physical environment;
- iv. the impact of waste management proposals on local communities;
- v. the impact of waste management proposals on existing or proposed development;
- vi. the need to ensure sustainable transport of waste.

Option 2

Set out detailed criteria to guide waste management in Trafford, including those that will be used in assessing proposals for waste development.

Which option do you prefer?

Or is there another option that you think we should consider?

If so what would it be and why?

CG2 Minerals

Option 1

Identify areas for safeguarding minerals and minerals infrastructure and broad criteria that will be used in assessing proposals for minerals development.

Option 2

Identify areas for safeguarding minerals, Areas of Search for extraction and sites for minerals infrastructure together with detailed criteria that will be used in assessing proposals for minerals development.

Which option do you prefer?

Or is there another option that you think we should consider?

If so what would it be and why?

QH1 House Type

Option 1

Ensure that where possible new residential development conforms to lifetime housing.

Option 2

Identify specific development sites for particular physical, health and cultural needs.

Option 3

Aim to meet the demand for family homes.

Option 4

Encourage the continued development of high density 1 and 2 bedroom apartments in and adjacent to town and district centres.

Option 5

Allow the market to determine the type of residential units on individual sites.

Option 6

Require all sites above a threshold to incorporate a range of house types and sizes.

Please indicate which of the above you consider would help to meet the future housing needs of the Borough.

Do you consider that there are any other ways in which new housing can address changing household requirements?

QH2 Affordable Housing

Option 1

Apply a standard target contribution across the borough of 40% based on up to date housing market needs assessment data.

Option 2

Apply a two way split of 35% in the North of the borough and 40% in the south based on up to date Housing Market Needs Assessment data.

Option 3

Continue to apply the current five-way split for contributions ranging from 30 - 40% based on up to date Housing Market Needs Assessment data.

Option 4

Negotiate a target between 30% and 40% depending on the different circumstances of individual applications, for example schemes in Priority Regeneration Areas.

THE TRAFFORD CORE STRATEGY

Which option do you prefer?

Or is there another option that you think we should consider?

If so what would it be and why?

TE Telecommunications

Please indicate what issues you think the council should consider in seeking to facilitate new telecommunications infrastructure?

PO1 The Use of Planning Contributions to Improve the Quality of Life in Trafford

We believe it is time to consider if there are any additional matters that it would be appropriate for us to seek contributions towards, these could include:

1. Public Realm improvements;
2. Public Art;
3. Nature conservation improvement measures;
4. Historic building and area conservation measures;
5. New or improved social and community facilities;
6. New or improved waste minimisation and recycling initiatives and services;
7. New and improved education services, including the extended school initiative;
8. New and improved health facilities/resources;
9. New and improved visitor facilities;
10. Town centre management initiatives;
11. Community safety initiatives;
12. Contribution to the cost of a dedicated officer to deal with planning contributions;
13. Carbon off-setting as a means of investment to improve existing settlements and in adapting them, to be better able to deal with climate change.

Please indicate which of the above benefits you would like to see contributions being collected towards via suitable supplementary planning documents.

Please also tell us if there are any additional benefits that you would like us to consider seeking contributions towards.

2. Core Policies for Trafford

- **Housing**
- **Retail**
- **Sustainable Economy**
- **Mixed Use Development/ Integrated Communities**
- **Regeneration and Deprivation**
- **Crime**
- **Healthy Communities**
- **Accessibility**
- **Culture and Tourism**
- **Neighbourhood Harmony**

THE TRAFFORD CORE STRATEGY

- Pollution
- Natural Environment
- Green Infrastructure
- Agriculture

Do you agree that Core Policies should be created for these policy areas?

Yes / No

Please give specifics as appropriate

.....

Are there additional policy areas that should be covered within the Core Strategy?

Yes / No

Please give details

.....

About yourself

Name: _____

Organisation: _____

Address: _____

_____ Postcode: _____

Telephone: _____

Fax: _____

Email: _____

Please return to the LDF Team at:
Strategic Planning and Developments, Waterside House, Sale Waterside, Sale, M33 7ZF

Or return online at: www.trafford.gov.uk

No later than 26th November 2007

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.



Emailed to strategic.planning@trafford.gov.uk

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

23 November 2007

Dear Sir or Madam

Development Management and Core Policies: Issues and Options

Thank you for giving the Home Builders Federation (HBF) the opportunity to comment on the above document. The HBF have considered the proposed document and have made the following observations:

SBE1 Design and Construction

Option 1: Yes. The Home Builders Federation supports the use of the Code for Sustainable Homes as a single national standard to improve environmental standards. However, the Council should ensure that it keeps to the Code timetable to ensure that environmental standards are increased gradually and supply chains are in place to meet the demands.

Option 2: No

SBE4 Renewable Energy

The HBF does not agree with any of the options and believes that the renewable energy policy should be removed from this document. The HBF believes that any requirement for renewable energy provision upon new development should be delivered through the higher stages of the Code for Sustainable Homes. As this is a framework and timescale to which the industry is committed to delivering. The HBF consider that the application of locally based energy performance standards would be unhelpful in facilitating the broader delivery of higher energy performance and consumption standards from new housing. In order to reduce CO₂ emissions, renewables

provision on site might not be the most appropriate means of achieving this overall reduction, either technically or financially.

In terms of on-site renewables the industry is serious about reducing the carbon footprint of housing and is supportive of the *Code for Sustainable Homes as well as being a signatory to the 2016 Commitment*. Housebuilders are working to improve the energy efficiency of new housing and finding ways of incorporating energy efficient technologies (where relevant) in the design process. However, the industry believes that the best way to improve the energy efficiency of new housing stock and to promote renewable energy is through innovations in materials and technology development and the economies of scale available to house builders to incorporate the best of these new technologies in the construction process, not by setting arbitrary targets that are impossible to measure. We feel that the prescription of minimum percentages for the incorporation of certain types of micro-renewable energy is neither constructive nor beneficial in helping to tackle the long-term challenges of climate change. Such an approach could fragment efforts to achieve economies of scale and prevent a concerted focus from the supply chain in developing the most promising new products efficiently.

The generation of energy via micro-renewables will do little to help reduce carbon emissions (for many reasons, but not least because of the energy consumed by domestic appliances *inside* the home). The reduction of CO₂ is best tackled through the design and construction of homes, improvements to the existing stock, changes in consumer preferences and individual behaviour and, at the macro-scale, through investment in cleaner power generation by Central Government. A plethora of micro-renewables spread across the UK's 26 million existing homes, needing regular cleaning, routine servicing (by people in vans) and eventual replacement after a couple of decades, strikes us as an inefficient use of resources.

Moreover, many of these renewable technologies are in their infancy and are relatively untested. Only solar collectors are anything like a viable on-site option at the moment – all the other options currently available are expensive, inefficient and offer no security of supply in the longer term. This may adversely affect the saleability of housing schemes if people are wary of these untested technologies and the implication of break-down in the form of rising service charges or maintenance costs. These technologies will also add to the medium and long-term management costs of the socially rented sector.

QH Quality Homes

QH1 House Type

Option 5.

The HBF believes that leaving the market to determine the type of residential units on site is the most appropriate option. HBF is concerned that the Council will dictate the provision of a mix of dwelling types in new developments in all cases. It will not be appropriate for the council to dictate this in all circumstances. This matter must be approached sensibly. Achieving mixed communities does not mean that all areas have to have the same mix of

dwelling types. All areas are different, all housing markets are different and this needs to be considered on a sub-regional scale. Different areas perform different functions and this is often largely as a result of the housing mix in an area. The market assessment needs to consider the issue of complementarity between areas.

It is appreciated that the planning system's involvement in the housing mix is becoming of increasing importance. However, HBF members believe that the public sector should not dictate housing sizes, mix or specification on private sector sites. Private individuals buying a home make choices about price, location, dwelling type and size; plot size etc. according to their income and personal requirements. The state has no place restricting the availability of certain types of housing (e.g. small affordable units), which in practice amounts to telling certain households what they should or should not buy. Also, by imposing size standards or housing mix on private housing sites, local authorities reduce the supply of housing, exclude some households from decent housing and worsen the affordability crisis. What history has demonstrated is that the more flexible housing is the more likely it is to last. Over- designing houses today must not limit the flexibility of houses to meet tomorrow's needs.

However, if the local authority planning departments are to become involved in this, which seems inevitable, it would seem sensible to adopt a flexible approach which could be applied by all developers.

PO Planning Obligations

PO1 The Use of Planning Obligations to Improve Life in Trafford

The HBF believes that any planning obligations that the Council seeks to acquire for housing developments must be directly related to its impact on the area. The HBF draws attention to the Circular 05/2005, paragraph B5, which sets out five tests which must be met by all local planning authorities in seeking planning obligations:

"A planning obligation must be:

- (i) relevant to planning;
- (ii) necessary to make the proposed development acceptable in planning terms;
- (iii) directly related to the proposed development;
- (iv) fairly and reasonably related in scale and kind to the proposed development; and
- (v) reasonable in all other respects."

Any obligation must meet these tests. Therefore, additional provision cannot be sought if it is not directly related in scale and kind to the development. The standards should be set as a clear formula that is readily understood thereby conforming to Circular 05/32005.

The HBF believes that “12 Contribution to the cost of a dedicated officer to deal with planning contributions” should be removed as this is unreasonable and should be covered by the planning application fee.

Thank you again for giving the HBF the opportunity to comment. We trust you will take our comments into account and look forward to receiving further information regarding the progress of the document.

Yours faithfully,

Laura Edwards (maternity cover for Gina Bourne)
Regional Planner – Northern Region

Home Builders Federation

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THE EMERSON GROUP

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STRATEGIC PLANNING AND DEVELOPMENTS			
26 NOV 2007			
Rec			
Action by			
Ans			
Copied to.			

Our ref: NS/Planning

23 November 2007

Dear Sir

RE: TRAFFORD DPD1 – CORE STRATEGY – DEVELOPMENT MANAGEMENT AND CORE POLICIES ISSUES AND OPTIONS PAPER

Thank you for your correspondence highlighting the opportunity to submit representations on the above document.

As a stakeholder in the Borough of Trafford, The Emerson Group requests that the following comments be carefully considered by the Authority as it further progresses work on the emerging Local Development Framework and in particular the Core Strategy.

SBE1: Design and Construction

Option 1 – The use of the Code for Sustainable Homes (CFSH) could be encouraged, as the Code continues to emerge as a recognised national framework and basis for sustainable house building, however it should be re-emphasised that at present it is a voluntary code and it is not compulsory that developers accord with its content. Adopting the Code standards as a means to promote minimum standards in the Borough is deemed unnecessary, excessive and premature, as it is likely that compliance with the Code will become a mandatory requirement in the not so distant future. It is envisaged that the Councils objective to exceed Code standards two years in advance of their formal requirement will place increased burdens upon developers and it is recommended that the Authority consider staggering their sustainability requirements in line with the Code as and when it becomes mandatory, to create a level of uniformity with the National Policy. Whilst the need for sustainable development is appreciated, the suggestion of applying the Code to all forms of development, not just housing, is deemed to exceed the remit of the Code and it is believed that the Council should investigate its own requirements for the sustainability of other, non residential properties, or consider the use of other national guidance as a basis for non residential developments.

AJ WATKINS BEECH DEPUTY CHAIRMAN, ME JONES AE JONES SP WILSON PA BAREN BA (Econ) FCA (FINANCIAL)
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SBE3: Sustainable Water Management

Whilst the Council should seek to reduce water consumption in new development, as in accordance with PPS1, further information on this topic is detailed within the Authorities emerging Sustainable Design and Construction SPD and as such there is little need for detailed criteria on sustainable water management within the Core Strategy.

SBE4: Renewable Energy

With future advancements in the energy efficiency of homes, in accordance with the Code for Sustainable Homes, the Council should consider whether the requirement for on site renewable energy can be instead off-set by additional improvements in a buildings performance. In instances whereby a buildings energy performance is of a high level and in advance of minimum standards, this could reduce the requirement or need for any renewable energy that is, at present, costly to implement. I believe that the Authority is already investigating further the relationship between energy efficiency and renewable energy as part of the emerging Sustainable Design and Construction SPD and it is hoped that those findings will be used to inform Policy SBE4.

Also, it should be recognised that it is not always feasible to provide on site renewable energy generation. Subscription to green energy providers for electricity supply is an option that should be considered.

AT: Accessible, Integrated Sustainable Transport

Option 1 would be more transparent and it would also assist developers in calculating requirements when preparing future proposals, but there should also be some flexibility to cater for special circumstances which would suggest an option, similar to Option 2 should be adopted.

QH1: Quality Homes for All

Option 5 is the preferred option as it enables developers to react to need and demand. This could lead to added variety in houses types, sizes, styles and costs. In many instances the type of units will be informed by the sites location and topographic layout, as well as existing and predicted market trends and information made available via the Authorities Strategic Housing Market Assessment. PPS3 does not encourage prescription in terms of market housing.

QH2: Affordable Housing

Option 4 would be the preferential method of determining the requirement for affordable housing in the Borough. As circumstances can vary significantly between sites, the option of a negotiable level is appealing as in certain instances there may be a greater or lesser identified local need for affordable housing. However with the adoption of such an approach, the Authority would need to maintain and provide accurate and annual information on housing market need across the Borough so that developers can determine in advance, the level of affordable housing requirement that may be expected within a certain area.

Setting a high level for affordable housing will expose the Council to the risk that sites will be unviable and will not come forward for development. This provision should be included within any policy.

PO1: Planning Obligations

Provided the Council consult individually and in full on each of the proposed new forms of contribution, and each SPD fully complies with the requirements of Circular 05/2005 then the Authority could consider the rationale for such additional matters that may be addressed via potential planning obligations, provided it is accepted that each such additional sum requested diminish the viability of a scheme and will result in higher house prices, rentals on commercial and industrial properties and a risk that development targets will not be achieved.

I trust that the above comments will be fully considered by the Authority in its preparation of the above document. Should you have any comments regarding these comments, please do not hesitate to contact me.

Yours faithfully

Nick Scott
Planner

E4

EM.5028

26 November 2007



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Dear Sir

**RE: TRAFFORD METROPOLITAN BOROUGH COUNCIL
LOCAL DEVELOPMENT FRAMEWORK
DPD1: CORE STRATEGY – DEVELOPMENT MANAGEMENT AND CORE
POLICIES ISSUES AND OPTIONS PAPER**

- 1. We have the following comments to make on the draft LDF DPD1: Core Strategy – Development Management and Core Policies, Issues and Options paper.

SECTION 1 DEVELOPMENT MANAGEMENT POLICY OPTIONS

SBE1 Design and Construction

- 2. It needs to be made clear whether this is a generic policy or for residential development only.
- 3. Whilst it is agreed that new development should be embracing sustainability principles each site should be assessed individually when reviewing layout, density, height, massing, architectural style, and materials used. The policy should not be overly prescriptive and acknowledge that there are sites in the Borough that can accommodate more contemporary schemes whilst still being able to respect local distinctiveness.
- 4. To expect all new development to take account of local distinctiveness could unnecessarily restrict well designed, higher density schemes that make an efficient use of a site.

SBE2 Conservation

- 5. SBE2 should not be used as an obstacle to block contemporary design but rather the policy should be directed towards the protection of conservation areas and listed buildings.
- 6. There are a number of CABI publications particularly "Building in context: New development in Historic Areas" which advises on how new development can sit alongside the historic environment without spoiling the area.

SBE3 Sustainable Water Management

- 7. It is agreed that the Council should seek to reduce surface water runoff as well as needing to manage the risk of flooding in the Borough in light of the new 1:100 year flooding plus climate change data that the Environment Agency has produced this

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year. It is also agreed that the mitigation measures included in the draft document are all valid ways of managing the risk of flooding in development. However as more land is now being included in the flood risk maps as a result of the revised 1:100 year flooding plus climate change data it would be prudent to produce a Supplementary Planning Document which provides detailed design guidance on how to design a building in an area of flood risk.

SBE4 Renewable Energy

8. While there is some scope for larger projects to achieve lower carbon emissions, it is by no means clear that in an urban environment this can be achieved at this time by the utilisation of renewable forms of energy generation. In any event, the renewables market for provision of the necessary technology is not sufficiently developed and therefore the target of 15% by 2015 is unlikely to be achievable on an individual project basis. Savings on carbon emissions can more readily be achieved through the design of a development and through materials having better insulation properties.

AT Accessible, Integrated Sustainable Transport

9. New development must be accessible to all and this is achieved through the Part M Building Regulations and the Disability Discrimination Act as well as local framework policy.
10. In terms of controlling parking and parking standards, clean, efficient, more frequent and reliable public transport facilities need to be in place before parking restrictions are applied. The Council should be aware that restricting car parking in town centres such as Altrincham would have an adverse effect at this time on potential new investment when the town is still recovering from the impacts of the Trafford Centre.
11. If car parking is restricted in Altrincham before the transport interchange is upgraded, in the absence of substantial investment in public transport, shoppers would be forced back to shopping in areas that are more readily accessible, such as the Trafford Centre.

SECTION 2 CORE POLICIES FOR TRAFFORD

Retail

12. There should be a clear statement of support from the Council designed to attract inward investment into the primary shopping area of Altrincham town centre.

If you have any further questions please contact Emma Mann at this office.

Yours faithfully

DALTON WARNER DAVIS LLP
em@daltonwd.co.uk
Direct line 020 7489 4890

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STRATEGIC PLANNING AND DEVELOPMENTS
28 NOV 2007



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Borough Council			
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By Post & E-mail

Regulated by RICS

26 November 2007

Dear Rachel

**Trafford Core Strategy Development Management and Core Policies: Issues and Options - Informal Consultation
Comments on Behalf of Lancashire County Cricket Club**

On behalf of Lancashire County Cricket Club and its development partner, ASK Property Developments Ltd, we set out below our comments on the Trafford Core Strategy Development Management and Core Policies: Issues and Options Paper.

These comments should be read in conjunction with the representations submitted on behalf of the Club and ASK in respect of the previous informal consultation on the Trafford Core Strategy Issues and Options Paper, which outlined a visionary redevelopment proposal for Old Trafford as the centrepiece of a bold and transformational new masterplanning framework for sport in the Borough and invited the Council to identify the need for a new cricket stadium and the sports-led regeneration of Old Trafford as a key issue and major proposal for inclusion in the Core Strategy.

The Council's current consultation suggests, firstly, a series of Development Management Policies and secondly, a series of Core Policies. Comments on each of these two sections of the current Paper are provided in turn below

Development Management Policies

The redevelopment proposal for Old Trafford will incorporate a wide range of outcomes which relate to specifically to the matters covered by the proposed Development Management Policies including, for example:

- Medium to high density residential accommodation, close to the regional centre and well served by public transport, helping to meet the borough's regional housing targets and creating a vibrant and mixed use community.
- An improved arrival and departure experience by all modes of transport, including an enhanced Metrolink station.
- A highly accessible location which benefits from excellent public transport access including high quality bus and light rail links via an enhanced public transport interchange.
- Sustainable design and construction, best practice in terms of energy use and water conservation.

The Council should give consideration to the significant proposals for Old Trafford in finalising these Development Management Policies.

Core Policies

The second section of the consultation paper seeks comment on the broad policy areas which will form the basis of the Core Policies within the Core Strategy which will guide future development within Trafford.

A significant number of the suggested broad policy areas that are outlined within this section of the paper are relevant in the context of the Old Trafford proposals. The policy area on Healthy Communities, which encourages developments to provide facilities for sports and recreation, is particularly relevant, given the contribution that the Old Trafford proposal would make towards increasing participation in sport.

Notwithstanding the policy areas already proposed, we suggest that an additional policy area should be included within the Core Strategy which recognises, more explicitly, that the development of sport and sporting facilities should be a key priority for the Borough.

This additional policy area should highlight the growing role of professional sport in the regeneration of local communities and encourage, in particular, proposals which are of significant value to the local area, assist social inclusion, provide a focal point for community activities, support the economic development of the City Region and the North West, and are of national sporting significance. The new Core Policy should also encourage such developments, where possible, to be brought forward as part of a comprehensive regeneration masterplan.

We trust that you will find these comments helpful. If you have any queries or require any further information, please do not hesitate to contact John Adams, Nick Cole or Philip Grant.

Yours faithfully

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22 November 2007

Dear Sir

TRAFFORD MBC - CORE STRATEGY DEVELOPMENT MANAGEMENT & CORE POLICY ISSUES & OPTIONS INFORMAL CONSULTATION

Thank you for your email of the 1st November 2007 regarding the above. Set out below is the response of the Highways Agency on the issues raised that may affect our remit.

SBE 4 – Renewable Energy

Option 1 appears to offer the most appropriate solution.

AT – Accessible, Integrated Sustainable Transport

On the issue of car parking the regional assembly are looking at this very issue and may come up with some guidelines about what provision is appropriate where. The reduction in car parking provision in areas that have good public transport access is a workable idea. However, it must be ensured that developments in less accessible locations should not be rewarded by having better parking provision than they would have had if they had been in a more sustainable location. As a result, it may prove favourable to have one standard covering the whole borough. That standard should be at a suitable level to ensure that public transport and non car modes are given a competitive chance at being the mode of choice.

Clearly achieving “Accessible, Integrated Sustainable Transport” is more than just car parking. Policies that are included within the plan must ensure that development throughout the borough is planned appropriately to ensure that services and facilities that can change travel behaviour are at the forefront of the decision making process. In line with current government policy, providing new infrastructure should be considered a last resort to cater for the residual traffic and not a first option.

In terms of delivering anticipated growth within the borough, it is likely to be necessary to produce an infrastructure plan setting out what infrastructure will be required to cater for this residual traffic. There are currently plans to look at doing this on a Greater

Manchester level, Chris Findlay at Salford and Tim Hill at Bolton are currently considering how best to achieve this and no doubt will be encouraging others to join in the process. This plan will establish the likely demands that will be put on infrastructure as a result of future plans and will help identify where development may cause problems, where new facilities may need to be provided, or where changes to development patterns may be required. It is going to be essential that Trafford get involved with this process to ensure that development in Trafford is likely to be deliverable.

QH – Quality Homes

There is clearly a need to provide a range of homes not just within Trafford but throughout much of Greater Manchester. From the Agency's point of view we would be looking for you to demonstrate that you have followed the principles of reducing the need to travel by private car as much as possible. It may therefore be that a mix of the options put forward may end up being appropriate. However, an assessment of the potential impacts on the transport networks should be made before any final decisions on specific sites are made. However, specific sites for housing should be identified.

PO – Planning Obligations

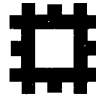
With the need to facilitate growth there is likely to be an increasing demand on how contributions from planning obligations are spent. It is therefore essential that you establish what needs to be provided in terms of transport provision, for example, before considering whether such contributions should go to other causes.

I trust that the above comments are helpful. However, please feel free to give me a ring if you wish to discuss any of the points made further.

Yours faithfully

Kristian Marsh
NS North West
Email: kristian.marsh@highways.gsi.gov.uk

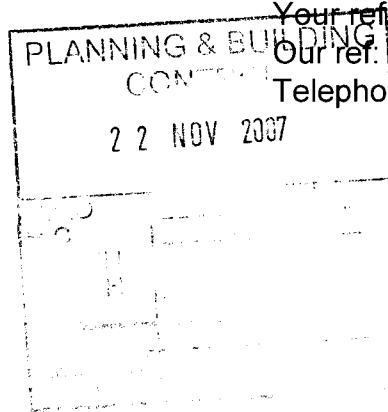
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ENGLISH HERITAGE
NORTH WEST REGION

STRATEGIC PLANNING AND DEVELOPMENTS	
22 NOV 2007	
Rec	
Action by	
Ans	
Copied to	

Trafford Council
LDF Team
Attn Rachel Hiorns
PO Box 96
1st Floor Waterside House
Sale Waterside
Sale Trafford
M33 7ZF



Your ref:
Our ref:
Telephone: 0161 242 1423

20 November 2007

Dear Ms Hiorns,

DPD 1: Core Strategy: Development Management and Core Policies – Issues and Options Paper

I refer to your consultation on the above paper received on the 6th November 2007.

Core Policies

The second part of the paper outlines a number of policy areas which will be addressed in the Core Strategy. I note that whilst Culture and Tourism and Natural Environment are included the historic environment is not. I suggest that it is important for the Core Strategy to address the broad range of issues covered by the historic environment and include an appropriate Core Policy. This will help ensure a distinctive set of policies securing a sustainable future for the Borough.

The Government has long-recognised that the concept of sustainability has a particular relevance for the historic environment since the historic environment is, by its very nature, irreplaceable. The historic environment is central to economic and social regeneration, liveability, local quality of life and community cohesion.

The reuse of historic buildings contributes towards the prudent use of resources. It can help reduce the quantity of construction and demolition material that ends up as waste and the amount of minerals and energy used in the construction industry.

The historic environment plays an important role in helping to maintain high and stable levels of economic growth. It contributes to the regeneration of areas, creates liveable towns and cities and helps attract new business. The historic environment is a vital part of social and cultural identity. The historic environment can help determine whether people feel "at home" with a place which can, in turn, affect how socially included they feel in society. Finding ways of regenerating pride and interest in local places using the historic environment can help build confidence in community involvement in local decision making.



The historic environment makes an important contribution towards the sense of place, the quality of life of communities and to the economic well-being. The protection and enhancement of those elements of the environment that contribute towards the character of Trafford must form part of the long-term spatial vision of the Core Strategy.

A Strategic Policy either for, or which includes, the historic environment could be located as part of a suite of overarching environmental policies, as part of the place-making/shaping policies, or as part of the sustainable communities agenda. Such a Policy could include the following:-

- Preserving and enhancing the historic environment
- Understanding and respecting the local context
- Reinforcing local distinctiveness
- Promoting good design
- Heritage led regeneration

Development Management Policy Options

The inclusion of a “conservation” policy within a suite of Sustainable Built Environment policies is supported. However it is important that policy covers not only the potential adverse effects of new development upon the historic environment but more positive measures to characterise, protect and enhance the historic environment and to weave this into other policies of the LDF as appropriate. For example covering heritage led regeneration, re-use of buildings of historic or architectural interest. Whilst it remains important to protect the wide range of heritage assets in the Borough an approach which builds on the special character and distinctiveness of the area will provide the local context and help identify the particular issues and opportunities relating to the historic environment in the Borough.

English Heritage supports the broader range of matters set out for Planning Obligations under PO1. We particularly encourage the inclusion of points 4 and 1. In some circumstances it may also be appropriate to include archaeological mitigation and interpretation.

Yours sincerely

Regional Planner
E-mail: judith.nelson@english-heritage.org.uk

**TRAFFORD CORE STRATEGY:
DEVELOPMENT MANAGEMENT &
CORE POLICIES: REPRESENTATIONS
BY
CITY AIRPORT MANCHESTER LTD**

TURLEYASSOCIATES

The Chancery
58 Spring Gardens
Manchester
M2 1EW

T : 0161 831 1300

F : 0161 831 1301

www.turleyassociates.co.uk

To:	Trafford Council		
Cc:	S Gaines, Peel Airports N Duriez, CAM		
From:	Turley Associates, on behalf of City Airport Manchester Ltd		
Date:	26 November 2007	Our Ref:	PEEM1047

**Trafford Core Strategy: Development Management & Core Policies
Issues and Options Paper
Consultation response by City Airport Manchester Ltd**

This note sets out the need for the Trafford Core Strategy to take account of both the existence of City Airport Manchester, and the need to work with the Airport to ensure it is properly safeguarded through the planning system.

City Airport Manchester operates from a site immediately north of Trafford Borough, located within Salford City. It uses four runways licenced for use by the Civil Aviation Authority. Responsibility for ensuring the aerodrome and its surrounding airspace is safe for use at all times by aircraft is the responsibility of the licensee, presently City Airport Manchester Ltd.

To assist with this, City Airport Manchester has a safeguarding map, colour coded which shows the extent of the safeguarded area, principally derived from a series of protected surfaces above and around the aerodrome which are defined in Annex 14 to the Chicago Convention and the Civil Aviation Authority's licensing guidance document CAP168. This safeguarding map is designed to be used as a tool by the Airport, planners/developers, and the Local Planning Authorities to ensure that building heights and structures do not pose a safety hazard to aircraft. Additionally this map also displays an area in which the airport would wish to be consulted on all schemes which may be likely to increase bird activity, potentially increasing the bird strike hazard to aircraft.

It is understood that in previous years, the Airport's safeguard map was provided to the Local Planning Authorities (principally Trafford and Salford). However, in recent years, the Airport has not been formally notified of several applications for developments which have potential to infringe upon safeguarding and in one case such a development actually became a safeguarding infringement, requiring extensive risk assessments and last minute modification by the developer to mitigate against the additional hazards which were created.

The Airport would therefore welcome discussions with Trafford Council on what practical measures can and should be taken to safeguard the Airport and prevent such re-occurrences. The Airport would like to see an appropriate policy basis through

the Core Strategy (and Development Management policies) and the entering into of a formal agreement with Trafford MBC for an ongoing safeguarding process between the airport licensee and the LPA. The aim of the policy would be to ensure that building heights and structures, and landscape schemes likely to increase bird activity (and potentially the risk of birdstrike hazard), do not pose a safety hazard to aircraft.

Key to this process is ensuring that the LPA holds and is able to use information when choosing consultees for applications and when considering constraint and implications for development. City Airport Manchester would propose that the safeguarding map should be re-provided and used by the LPA as a development management tool. The map can be provided in digital and paper format.

Additional and background information relating to the safeguarding of aerodromes: The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002, is published by the Department for Transport at this link:

<http://www.dft.gov.uk/pgr/aviation/safety/safeguarding/safeguardingaerodromestechi2988>.

Principal Contacts for the Airport are as follows:

Stephen Gaines, Peel Airports – 0161 629 8200 sgaines@peel.co.uk

Nick Duriez, City Airport Manchester – 0161 789 1362 nick.duriez@cityairportmanchester.com

**Development Management and Core Policies
Issues and Options Questionnaire – November 2007**

1. Development Management Policy Options

SBE1 Design and Construction

Option 1

Should developers be encouraged to use the national Code for Sustainable Homes as a means to promote minimum standards for all development in Trafford not just houses?

Yes/~~No~~

Option 2

Should more locally distinctive guidance be developed to promote sustainable buildings in Trafford?

Yes/~~No~~

If yes what locally distinctive characteristics should be incorporated?

For Warrington please see Village Design Statement

SBE2 Conservation

Option 1

Retain a similar policy to that within the adopted UDP, with the protection of listed conservation areas, listed buildings, ancient monuments and historic landscapes, parks and gardens.

Option 2

Take account of the results of the Greater Manchester-wide Historic Landscape Characterisation Project to establish a broader view of local distinctiveness and its enhancement to develop not only conservation areas but also appropriate management guidelines across the borough.

Which option do you prefer? *option 1. UDP is more local & focused and has*
Or is there another option that you think we should consider? *already been approved*
If so what would it be and why? *after a lot of thought and*
deliberation.

SBE3 Sustainable Water Management

Water Consumption

Do you agree that the Council should seek to reduce water consumption in new development?

Yes / ~~No~~

If yes, should this apply to all new development?

Yes / ~~No~~

Surface Water Runoff

Should the Council seek to reduce surface water runoff and, by the use of mitigation measures such as sustainable drainage systems, green roofs, rainwater harvesting and storage, manage the risk of flooding in new developments?

Yes / ~~No~~

If yes, what other mitigation measures should be employed?

.....

Please indicate Yes or No to the above questions.

Please also tell us if there are any additional issues that you would like us to consider on sustainable water management.

SBE4 Renewable Energy

Option 1

All new buildings including single houses to reduce carbon emissions by 10% using renewable sources of energy.

All large development to reduce carbon emissions by 10% using renewable energy sources from now to 2010, 15% from 2010 to 2015 and 20% from 2015 to 2020.

Option 2

Only large development to reduce carbon emissions by 15% by using renewable energy sources from now to 2015 and 20% from 2015 to 2020.

Option 3

Only large development to reduce carbon emissions by 10% by using renewable energy sources from now to 2015, 15% from now to 2015 and 20% from 2015 to 2020.

Which option do you prefer? *option 1, to work this will need all new developments.*

Or is there another option that you think we should consider?

If so what would it be and why?

AT Accessible, Integrated Sustainable Transport

Option 1

The Council should adopt fixed maximum standards and apply them universally across the borough.

Option 2

The Council should apply a range of standards depending on the circumstances of the development. For example by having lower standards in areas that have good access to facilities such as in town centres or along public transport corridors incentives such as public transport passes could be bought by developers for new residents in lieu of providing car parking spaces.

Which option do you prefer?

option 2, circumstances vary enormously

Or is there another option that you think we should consider?

If so what would it be and why?

CG1 Waste

Option 1

Identify broad principles to be followed in guiding waste management in Trafford, including the following criteria:-

- i. the need for Trafford to make an appropriate contribution towards the maintenance at all times of sufficient provision of waste management facilities within Greater Manchester;
- ii. the need to promote the waste hierarchy, including encouraging recycling of waste, thereby reducing the use of limited natural resources and minimizing the need for use of scarce landfill sites;
- iii. the impact of waste management proposals on the physical environment;
- iv. the impact of waste management proposals on local communities;
- v. the impact of waste management proposals on existing or proposed development;
- vi. the need to ensure sustainable transport of waste.

Option 2

Set out detailed criteria to guide waste management in Trafford, including those that will be used in assessing proposals for waste development.

Which option do you prefer?

option 2

Or is there another option that you think we should consider?

If so what would it be and why?

CG2 Minerals

Option 1

Identify areas for safeguarding minerals and minerals infrastructure and broad criteria that will be used in assessing proposals for minerals development.

Option 2

Identify areas for safeguarding minerals, Areas of Search for extraction and sites for minerals infrastructure together with detailed criteria that will be used in assessing proposals for minerals development.

Which option do you prefer? *option 2*

Or is there another option that you think we should consider?

If so what would it be and why?

QH1 House Type

Option 1

Ensure that where possible new residential development conforms to lifetime housing.

Option 2

Identify specific development sites for particular physical, health and cultural needs.

Option 3

Aim to meet the demand for family homes.

Option 4

Encourage the continued development of high density 1 and 2 bedroom apartments in and adjacent to town and district centres.

Option 5

Allow the market to determine the type of residential units on individual sites.

Option 6

Require all sites above a threshold to incorporate a range of house types and sizes.

Please indicate which of the above you consider would help to meet the future housing needs of the Borough. *A mixbre across the borough, some apartments (option 4), some lifestyle and some influence of market*
Do you consider that there are any other ways in which new housing can address changing household requirements?

QH2 Affordable Housing

Option 1

Apply a standard target contribution across the borough of 40% based on up to date housing market needs assessment data.

Option 2

Apply a two way split of 35% in the North of the borough and 40% in the south based on up to date Housing Market Needs Assessment data.

Option 3

Continue to apply the current five-way split for contributions ranging from 30 - 40% based on up to date Housing Market Needs Assessment data.

Option 4

Negotiate a target between 30% and 40% depending on the different circumstances of individual applications, for example schemes in Priority Regeneration Areas.

Which option do you prefer?

Or is there another option that you think we should consider? Need to increase the

If so what would it be and why?

proportion of rented, affordable housing
or experience in warburton. Need to
increase funding from somewhere.

TE Telecommunications

Please indicate what issues you think the council should consider in seeking to facilitate new telecommunications infrastructure?

PO1 The Use of Planning Contributions to Improve the Quality of Life in Trafford

We believe it is time to consider if there are any additional matters that it would be appropriate for us to seek contributions towards, these could include:

1. Public Realm improvements;
2. Public Art;
3. Nature conservation improvement measures;
4. Historic building and area conservation measures;
5. New or improved social and community facilities;
6. New or improved waste minimisation and recycling initiatives and services;
7. New and improved education services, including the extended school initiative;
8. New and improved health facilities/resources;
9. New and improved visitor facilities;
10. Town centre management initiatives;
11. Community safety initiatives;
12. Contribution to the cost of a dedicated officer to deal with planning contributions;
13. Carbon off-setting as a means of investment to improve existing settlements and in adapting them, to be better able to deal with climate change.

Please indicate which of the above benefits you would like to see contributions being collected towards via suitable supplementary planning documents.

Please also tell us if there are any additional benefits that you would like us to consider seeking contributions towards.

2. Core Policies for Trafford

- Housing
- Retail
- Sustainable Economy
- Mixed Use Development/ Integrated Communities
- Regeneration and Deprivation
- Crime
- Healthy Communities
- Accessibility
- Culture and Tourism
- Neighbourhood Harmony
- Pollution

THE TRAFFORD CORE STRATEGY

- Natural Environment
- Green Infrastructure
- Agriculture

Do you agree that Core Policies should be created for these policy areas?

Yes / ~~No~~

Please give specifics as appropriate. A vision is required for these items and transport also.

Are there additional policy areas that should be covered within the Core Strategy?

Yes / ~~No~~

Please give details

effective transport vision for the future.

P.S. This questionnaire is very unclear. In places there are lines or questions which we have to write on the sheet, on other places there are questions with no room for an answer. The format for response was much clearer when compiling the UDP.

Appendix to questionnaire

Need to explain to the public about the needs for Masts and that we need them for the future. They need to blend with the environment. More sharing of infrastructure between service providers. Need to know that they are safe and if so then this needs to be communicated to the general public

PO1

This should not be a levy or ~~to~~ other form of taxation but developers should be responsible for matters arising in their developments such as native conservation and improvement measures directly relating to their site and development. Most of the other items should be provided for elsewhere, though historic building conservation is important and some contribution to effective transport structure would be relevant.

from Warburton Parish Council

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FRIENDS, FAMILIES AND TRAVELLERS

Community Base
113 Queens Rd.
Brighton,
E. Sussex
BN1 3XG



Tel. : 01273 234 777
Fax. : 01273 234 778
Email : fft@gypsy-traveller.org
Web : www.gypsy-traveller.org

FFT is a registered charity(1112326) and a non-profit making company limited by guarantee

Please reply to: FFT Planning, PO Box 223, Ely, CB7 9BA (tel: 07845 930065)Email: steve@gypsy-traveller.org

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

4th December 2007

Dear Sir

Your letter relating to the core strategy informal consultation has just been passed to me from the traveller Law reform project. They do not have the capacity to respond to local authority consultations whilst we do the best we can with our limited resources.

I have made a response which is attached and even though it is beyond the indicated closing date would be grateful if it can be taken into account.

Yours sincerely

S J Staines

FFT Planning

STRATEGIC PLANNING AND DEVELOPMENTS			
7 DEC 2007			
Rec			
Action by			
Ans			
Copied to.			

Trafford Core Strategy: Issues and Options

Response by Friends, Families and Travellers

The paper as laid out does not seem to pay due regard to the needs of Gypsies and Travellers residing in or resorting to the district. The CLG caravan count statistics indicate a significant number of caravans on private developments and at the least provision will have to be made for future family formation arising from this source. Fuller information on the plurality and extent of need should become available when the GTAA is available.

There is a range of other sources of information which will help further inform the council of need prior to the completion of a robust GTAA. These are listed in the Circular 1/2006 under Transitional Arrangements but can be usefully widened to include a variety of agencies which may have useful information, for example the Traveller Education Service, police records of unauthorised encampments, health providers, Gypsy liaison Officers as well as information flowing from Homelessness and Housing Strategies. There should be full consultation of the local Gypsy and Traveller community as to their needs and aspirations.

In any event the Core Strategy should set out criteria for the location of sites which will be used to guide the allocation of sites in a relevant DPD and also be used to meet unexpected demand. Circular 1/2006 gives advice and guidance as to the location of sites and also Good Practice in relation to criteria.

The RTPI Good Practice Advice Note No 4 states that a pragmatic solution to the search for sites can involve a move to the direct identification of a range of sites with the full involvement of the Gypsy and Traveller community. The most suitable alternative can then be considered and sites allocated as part of a balancing act. This sort of approach has been used by Mid Bedfordshire District Council and they already have had a series of sites put forward for consideration as part of a dedicated DPD. The sites include land in public ownership. We would suggest that the three Worcestershire Districts follow this approach.

The Circular indicates ways in which local authorities can identify specific sites which includes use of land in public ownership and also compulsory purchase powers.

Gypsy and Traveller sites, when owned or operated by the local authority or registered social landlords, are a type of affordable housing. As a proportion of need is likely to be met within this sector the council should pay due regard to the implications of this in the core strategy and other planning documents. The ability of councils to negotiate Sec 106 agreements with developers, whether to provide land within new developments or to use commuted sums to help provide sites, should be considered when preparing policies on planning obligations. In addition, given the high price of land, consideration should be given to modes of delivery of sites to Gypsies and Travellers wishing to establish their

own sites (for example self-build schemes, let to buy schemes and shared ownership).

In view of emerging government guidance on sites for Travelling Showpeople the core strategy should address the issue of sites for this group in a similar manner.

3rd December 2007

S J Staines

FFT Planning
PO Box 223
ELY
Cams
CB7 9BA

07845 930065

Steve@gs-ply-travel.co.uk

THE TRAFFORD CORE STRATEGY

Development Management and Core Policies
Issues and Options Questionnaire – November 2007

1. Development Management Policy Options

SBE1 Design and Construction

Option 1

Should developers be encouraged to use the national Code for Sustainable Homes as a means to promote minimum standards for all development in Trafford not just houses?

Yes/~~No~~ *The Code must not be introduced quicker than that agreed between Government and the industry. Otherwise there will be unfortunate consequences in terms of delivery and affordability.*

Option 2

Should more locally distinctive guidance be developed to promote sustainable buildings in Trafford?

~~Yes/No~~

If yes what locally distinctive characteristics should be incorporated?

SBE2 Conservation

Option 1

Retain a similar policy to that within the adopted UDP, with the protection of listed conservation areas, listed buildings, ancient monuments and historic landscapes, parks and gardens.

Option 2

Take account of the results of the Greater Manchester-wide Historic Landscape Characterisation Project to establish a broader view of local distinctiveness and its enhancement to develop not only conservation areas but also appropriate management guidelines across the borough.

Which option do you prefer? *Option 1*
Or is there another option that you think we should consider?
If so what would it be and why?

SBE3 Sustainable Water Management

Water Consumption

Do you agree that the Council should seek to reduce water consumption in new development?

Yes /~~No~~

If yes, should this apply to all new development?

Yes /~~NO~~

Surface Water Runoff

Should the Council seek to reduce surface water runoff and, by the use of mitigation measures such as sustainable drainage systems, green roofs, rainwater harvesting and storage, manage the risk of flooding in new developments?

Yes ~~No~~ *The Council need to ensure the use of mitigation measures is appropriate to the particular circumstances and that adoption issues are taken into account*

If yes, what other mitigation measures should be employed? *issues are taken into account*

Please indicate Yes or No to the above questions.

Please also tell us if there are any additional issues that you would like us to consider on sustainable water management.

SBE4 Renewable Energy

Option 1

All new buildings including single houses to reduce carbon emissions by 10% using renewable sources of energy.

All large development to reduce carbon emissions by 10% using renewable energy sources from now to 2010, 15% from 2010 to 2015 and 20% from 2015 to 2020.

Option 2

Only large development to reduce carbon emissions by 15% by using renewable energy sources from now to 2015 and 20% from 2015 to 2020.

Option 3

Only large development to reduce carbon emissions by 10% by using renewable energy sources from now to 2015, 15% from now to 2015 and 20% from 2015 to 2020.

Which option do you prefer? *None*

Or is there another option that you think we should consider? *Yes*

If so what would it be and why? *A more sophisticated approach is required, which is more concerned with the efficiency of the building envelope rather than micro generation for its own sake.*

AT Accessible, Integrated Sustainable Transport

Option 1

The Council should adopt fixed maximum standards and apply them universally across the borough.

Option 2

The Council should apply a range of standards depending on the circumstances of the development. For example by having lower standards in areas that have good access to facilities such as in town centres or along public transport corridors incentives such as public transport passes could be bought by developers for new residents in lieu of providing car parking spaces.

Which option do you prefer? *Option 2 providing standards are realistic. It is car usage rather than ownership which creates pollution and congestion and people just need to be encouraged to make sensible decisions about their choice of transport mode - eg. Green Travel Plans etc.*
Or is there another option that you think we should consider?
If so what would it be and why?

CG1 Waste

Option 1

Identify broad principles to be followed in guiding waste management in Trafford, including the following criteria:-

- i. the need for Trafford to make an appropriate contribution towards the maintenance at all times of sufficient provision of waste management facilities within Greater Manchester;
- ii. the need to promote the waste hierarchy, including encouraging recycling of waste, thereby reducing the use of limited natural resources and minimizing the need for use of scarce landfill sites;
- iii. the impact of waste management proposals on the physical environment;
- iv. the impact of waste management proposals on local communities;
- v. the impact of waste management proposals on existing or proposed development;
- vi. the need to ensure sustainable transport of waste.

Option 2

Set out detailed criteria to guide waste management in Trafford, including those that will be used in assessing proposals for waste development.

Which option do you prefer? *DK*
Or is there another option that you think we should consider?
If so what would it be and why?

CG2 Minerals

Option 1

Identify areas for safeguarding minerals and minerals infrastructure and broad criteria that will be used in assessing proposals for minerals development.

Option 2

Identify areas for safeguarding minerals, Areas of Search for extraction and sites for minerals infrastructure together with detailed criteria that will be used in assessing proposals for minerals development.

Which option do you prefer? *DK*

Or is there another option that you think we should consider?

If so what would it be and why?

QH1 House Type

Option 1

Ensure that where possible new residential development conforms to lifetime housing.

Option 2

Identify specific development sites for particular physical, health and cultural needs.

Option 3

Aim to meet the demand for family homes.

Option 4

Encourage the continued development of high density 1 and 2 bedroom apartments in and adjacent to town and district centres.

Option 5

Allow the market to determine the type of residential units on individual sites.

Option 6

Require all sites above a threshold to incorporate a range of house types and sizes.

Please indicate which of the above you consider would help to meet the future housing needs of the Borough.

Option 5 - providing a choice of sites/locations is provided. Over-provision of apartments in recent years is a direct result of PPG 3/sequential test.

Do you consider that there are any other ways in which new housing can address changing household requirements?

QH2 Affordable Housing

Option 1

Apply a standard target contribution across the borough of 40% based on up to date housing market needs assessment data.

Option 2

Apply a two way split of 35% in the North of the borough and 40% in the south based on up to date Housing Market Needs Assessment data.

Option 3

Continue to apply the current five-way split for contributions ranging from 30 - 40% based on up to date Housing Market Needs Assessment data.

Option 4

Negotiate a target between 30% and 40% depending on the different circumstances of individual applications, for example schemes in Priority Regeneration Areas.

Which option do you prefer? *Option 4 – allows greater flexibility.*

Or is there another option that you think we should consider?

If so what would it be and why?

TE Telecommunications

Please indicate what issues you think the council should consider in seeking to facilitate new telecommunications infrastructure?

PO1 The Use of Planning Contributions to Improve the Quality of Life in Trafford

We believe it is time to consider if there are any additional matters that it would be appropriate for us to seek contributions towards, these could include:

1. Public Realm improvements;
2. Public Art;
3. Nature conservation improvement measures;
4. Historic building and area conservation measures;
5. New or improved social and community facilities;
6. New or improved waste minimisation and recycling initiatives and services;
7. New and improved education services, including the extended school initiative;
8. New and improved health facilities/resources;
9. New and improved visitor facilities;
10. Town centre management initiatives;
11. Community safety initiatives;
12. Contribution to the cost of a dedicated officer to deal with planning contributions;
13. Carbon off-setting as a means of investment to improve existing settlements and in adapting them, to be better able to deal with climate change.

Please indicate which of the above benefits you would like to see contributions being collected towards via suitable supplementary planning documents.

None. Carbon off-setting may have some merit in lieu of
Please also tell us if there are any additional benefits that you would like us to consider seeking contributions towards.

2. Core Policies for Trafford

- Housing
- Retail
- Sustainable Economy
- Mixed Use Development/ Integrated Communities
- Regeneration and Deprivation
- Crime
- Healthy Communities
- Accessibility
- Culture and Tourism
- Neighbourhood Harmony

*inefficient / expensive / exper-
-imental micro generation
technology. The forthcoming
tariff system is likely to
limit scope to negotiate
extraneous planning gains
in any event.*

THE TRAFFORD CORE STRATEGY

- Pollution
- Natural Environment
- Green Infrastructure
- Agriculture

Do you agree that Core Policies should be created for these policy areas?

Yes ~~NO~~

Please give specifics as appropriate

Are there additional policy areas that should be covered within the Core Strategy?

~~Yes~~ / No

Please give details

About yourself

Name: Robin Buckley

Organisation: Redrow Homes (North West) Ltd

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Or return online at: www.trafford.gov.uk

No later than 26th November 2007

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.

THE TRAFFORD CORE STRATEGY

Development Management and Core Policies
Issues and Options Questionnaire – November 2007

1. Development Management Policy Options

SBE1 Design and Construction

Option 1

Should developers be encouraged to use the national Code for Sustainable Homes as a means to promote minimum standards for all development in Trafford not just houses?

Yes

Option 2

Should more locally distinctive guidance be developed to promote sustainable buildings in Trafford?

Yes, it is important that the local characteristics of the different areas of Trafford are reflected.

If yes what locally distinctive characteristics should be incorporated?

It would need to promote the 8 tests for a sustainable community:

- Well Run
- Well Connected
- Well Served
- Environmentally Sensitive
- Fair for Everyone
- Thriving
- Well Designed and Built
- Active, Inclusive and Safe

.....

...
SBE2 Conservation

Option 1

Retain a similar policy to that within the adopted UDP, with the protection of listed conservation areas, listed buildings, ancient monuments and historic landscapes, parks and gardens.

Option 2

Take account of the results of the Greater Manchester-wide Historic Landscape Characterisation Project to establish a broader view of local

distinctiveness and its enhancement to develop not only conservation areas but also appropriate management guidelines across the borough.

Which option do you prefer?

As we are not familiar with the Greater Manchester-wide Historic Landscape Characterisation Project, it is difficult for us to make an informed response to this question. Therefore we will be advised accordingly.

**Or is there another option that you think we should consider?
If so what would it be and why?**

SBE3 Sustainable Water Management

Water Consumption

Do you agree that the Council should seek to reduce water consumption in new development?

Yes

If yes, should this apply to all new development?

Yes as far as it is feasible to do so.

Surface Water Runoff

Should the Council seek to reduce surface water runoff and, by the use of mitigation measures such as sustainable drainage systems, green roofs, rainwater harvesting and storage, manage the risk of flooding in new developments?

Yes

If yes, what other mitigation measures should be employed?

The above should be incorporation into design of new buildings, particularly in the 17% of Trafford that is a high flood risk area.

Please indicate Yes or No to the above questions.

Please also tell us if there are any additional issues that you would like us to consider on sustainable water management.

SBE4 Renewable Energy

Option1

All new buildings including single houses to reduce carbon emissions by 10% using renewable sources of energy.

All large development to reduce carbon emissions by 10% using renewable energy sources from now to 2010, 15% from 2010 to 2015 and 20% from 2015 to 2020.

Option 2

Only large development to reduce carbon emissions by 15% by using renewable energy sources from now to 2015 and 20% from 2015 to 2020.

Option 3

Only large development to reduce carbon emissions by 10% by using renewable energy sources from now to 2015, 15% from now to 2015 and 20% from 2015 to 2020.

Which option do you prefer?

Option 3

Or is there another option that you think we should consider?

If so what would it be and why?

AT Accessible, Integrated Sustainable Transport

Option 1

The Council should adopt fixed maximum standards and apply them universally across the borough.

Option 2

The Council should apply a range of standards depending on the circumstances of the development. For example by having lower standards in areas that have good access to facilities such as in town centres or along public transport corridors incentives such as public transport passes could be bought by developers for new residents in lieu of providing car parking spaces.

Which option do you prefer?

Option 2

Or is there another option that you think we should consider?

If so what would it be and why?

CG1 Waste

Option 1

Identify broad principles to be followed in guiding waste management in Trafford, including the following criteria:-

- i. the need for Trafford to make an appropriate contribution towards the maintenance at all times of sufficient provision of waste management facilities within Greater Manchester;

- ii. the need to promote the waste hierarchy, including encouraging recycling of waste, thereby reducing the use of limited natural resources and minimizing the need for use of scarce landfill sites;
- iii. the impact of waste management proposals on the physical environment;
- iv. the impact of waste management proposals on local communities;
- v. the impact of waste management proposals on existing or proposed development;
- vi. the need to ensure sustainable transport of waste.

Option 2

Set out detailed criteria to guide waste management in Trafford, including those that will be used in assessing proposals for waste development.

Which option do you prefer?

Option 1

Or is there another option that you think we should consider?

If so what would it be and why?

CG2 Minerals

Option 1

Identify areas for safeguarding minerals and minerals infrastructure and broad criteria that will be used in assessing proposals for minerals development.

Option 2

Identify areas for safeguarding minerals, Areas of Search for extraction and sites for minerals infrastructure together with detailed criteria that will be used in assessing proposals for minerals development.

Which option do you prefer?

Option 1 in accordance with what has been agreed in the AGMA Minerals Strategy.

Or is there another option that you think we should consider?

If so what would it be and why?

QH1 House Type

Option 1

Ensure that where possible new residential development conforms to lifetime housing.

Option 2

Identify specific development sites for particular physical, health and cultural needs.

Option 3

Aim to meet the demand for family homes.

Option 4

Encourage the continued development of high density 1 and 2 bedroom apartments in and adjacent to town and district centres.

Option 5

Allow the market to determine the type of residential units on individual

Option 6

Require all sites above a threshold to incorporate a range of house types and sizes.

Please indicate which of the above you consider would help to meet the future housing needs of the Borough.

Definitely 1, 2 and 3 and ONLY 4 in appropriate areas

Do you consider that there are any other ways in which new housing can address changing household requirements?

QH2 Affordable Housing

Option 1

Apply a standard target contribution across the borough of 40% based on up to date housing market needs assessment data.

Option 2

Apply a two way split of 35% in the North of the borough and 40% in the south based on up to date Housing Market Needs Assessment data.

Option 3

Continue to apply the current five-way split for contributions ranging from 30 - 40% based on up to date Housing Market Needs Assessment data.

Option 4

Negotiate a target between 30% and 40% depending on the different circumstances of individual applications, for example schemes in Priority Regeneration Areas.

Which option do you prefer?

Option 3 because it is the more flexible

Or is there another option that you think we should consider?

If so what would it be and why?

TE Telecommunications

Please indicate what issues you think the council should consider in seeking to facilitate new telecommunications infrastructure?

Super-speed Broadband is a must for business areas in Trafford. Particularly in Trafford Park, Carrington, Broadheath and Town Centres.

PO1 The Use of Planning Contributions to Improve the Quality of Life in Trafford

We believe it is time to consider if there are any additional matters that it would be appropriate for us to seek contributions towards, these could include: Public Realm improvements;

2. Public Art;

3. Nature conservation improvement measures;

4. Historic building and area conservation measures;

5. New or improved social and community facilities;

6. New or improved waste minimisation and recycling initiatives and services;

7. New and improved education services, including the extended school initiative;

8. New and improved health facilities/resources;

9. New and improved visitor facilities;

10. Town centre management initiatives;

11. Community safety initiatives;

12. Contribution to the cost of a dedicated officer to deal with planning contributions;

13. Carbon off-setting as a means of investment to improve existing settlements and in adapting them, to be better able to deal with climate change.

Please indicate which of the above benefits you would like to see contributions being collected towards via suitable supplementary planning documents.

They are all appropriate however the SPDs need to be driven by need and needs assessments especially with large developments e.g. Irwell City Park

and Trafford Park MasterPlan

Please also tell us if there are any additional benefits that you would like us to consider seeking contributions towards.

**Irwell City Park
Trafford Park MasterPlan
Business Support
Local Labour Schemes
Access to Employment Schemes
Local Transport Schemes
Health Improvement Schemes
Long Term Physical Security Investment Schemes**

2. Core Policies for Trafford

- **Housing**
- **Retail**
- **Sustainable High Value Economy**
- **Mixed Use Development/ Integrated Communities**
- **Regeneration and Deprivation**
- **Crime**
- **Healthy Communities**
- **Accessibility**
- **Culture and Tourism**
- **Neighbourhood Harmony**
- **Pollution**
- **Natural Environment**
- **Green Infrastructure**
- **Agriculture**

Do you agree that Core Policies should be created for these policy areas?

No

Please give specifics as appropriate

The topic list appears to be dated and needs to be brought in line with current policy areas and up to date developments. e.g. pollution and green infrastructure is maybe now climate change.

WE WOULD LIKE THE OPPORTUNITY TO DISCUSS THE CORE POLICY AREAS LIST WITH YOU IN MORE DETAIL.

.....
Are there additional policy areas that should be covered within the Core

Strategy?

Yes

Please give details

Town Centres including the night-time and evening economy and other business uses.

Area of significant employment & Business density namely Trafford Park.

.....

About yourself

Name: Paul Corner
Organisation: TMBC Regeneration, Economic Development Policy and Partnership and Trafford Economic Alliance
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No later than 26th November 2007

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Brian Green MRTPI
Planning Manager
Brian.Green@sportengland.org
Direct Tel: 0207 2731573

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20 November 2007

Dear Rachel

**LPA: Trafford Metropolitan Borough Council
Core Strategy - Issues and Options**

Thank you for your email dated 8th November 2007. I would like to make the following comments with regard to the Core Strategy Issues and Options document.

Overview – Sport England

Sport England aims to provide support, guidance and advice to enable the development of high quality sports facilities in the right place, to meet the needs of all levels of sport and all sectors of the community.

Sport England is the statutory agency responsible for leading the development of sport in England by influencing and serving the public, private and voluntary sectors. Its aims are to: get more people involved in sport; secure more places to play sport, and achieving more medals through higher standards of performance in sport. Specifically, Sport England seeks to:

- develop and improve the knowledge and practice of sport and physical recreation in England;
- encourage and develop higher standards of performance and the achievement of excellence;
- foster, support and undertake the development of facilities;
- carry out research into sport and physical recreation; and
- advise, assist and co-operate with other government departments and local authorities.

A key element of Sport England's work encompasses planning the provision of facilities and helping to ensure that they are fit for purpose and attractive to users. In recent years, Sport England has channelled significant Lottery funds towards the development of high quality facilities that are accessible to everyone.

Through policy advice and a network of town planners in each of our regions, Sport England provides advice on what type of sports facilities are needed and where by communities in the future. We also advise on how to protect and improve the current stock of facilities. In particular, Sport England has a specific remit to protect playing fields. Other key areas of work are:

- advising and liaising with central government and other national agencies on the development of planning policy and the planning process insofar as it affects sport and active recreation;
- contributing to the development of Planning Policy Statements and other policy guidance;
- advising strategic and local planning authorities on matters affecting sport and active recreation in development plans and related documents;
- advising local planning authorities on statutory and non-statutory consultations on planning applications affecting sport and active recreation; and
- advising sports bodies on national and local planning issues.

Specific Comments

1. Development Management Policy Options

Sustainable Built Environment

Sport England support the definition of principles and standards that should underpin the development of a more sustainable built environment. Sport England's interest covers both the layout of new developments and their detailed characteristics, in both cases seeking design that will encourage residents, workers and visitors to engage in more active lifestyles. Whilst existing development can be adapted, the clearest gains are to be made with new development.

Sport England has recently launched the Government endorsed "Active Design" which sets out the design principles (improving accessibility, enhancing amenity and increasing awareness) that developments should adopt to make communities more active and healthy. Active Design includes a checklist which can be used as a design tool or an assessment tool when masterplanning new developments.

The Active Design document can be downloaded from Sport England's website at:

www.sportengland.org > get resources > planning for sport > active design

Accessible, Integrated Sustainable Transport

Sport England welcome the attention being paid to sustainable transport initiatives, in particular the aspiration for more walking and cycling as a priority. Sport England, as part of their remit to increase physical activity generally, have advanced the idea of active travel as a means of both improving overall levels of fitness whilst contributing to

- **Culture & Tourism** (e.g. the contribution that sport can make to cultural life and the 'tourism offer').
- **Green Infrastructure** (e.g. the close relationship between green infrastructure and informal sport and recreation).
- **Agriculture** (e.g. through farm diversification).

Sport England has produced a document which sets out the role that sport and active recreation can play in delivering policy aspirations across a range of policy areas. This can be found at the following web-address:

www.sportengland.org > get resources > planning for sport > developing policies for sport > spatial planning for sport and active recreation.pdf

In this document, the sport and active recreation's contribution to the following is explored:

- Environmental sustainability
- Community safety
- Local economic viability
- Improving quality of life and well-being
- Health improvement
- Raising standards in schools

A range of guidance notes on developing policy in core strategies are also available on the Sport England website at:

www.sportengland.org > get resources > planning for sport > developing policies for sport

I hope the above comments are useful. If you require any further information please do not hesitate to contact me.

Yours sincerely

Brian Green MRTPI
Planning Manager
Direct Tel: 0207 2731573
Brian.Green@sportengland.org

26th November 2007
Our ref: J018949/bxb-100
Your ref:

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GL HEARN 

Dear Sir/Madam

**Trafford Local Development Framework:
DPD1: Core Strategy – Development Management and Core Policies
Issues and Options Consultation**

I refer to the above document and I am writing to provide comments on behalf of my client, Tesco Stores Ltd, in connection with its interests in the Trafford Borough.

Sustainable Built Environment

The document introduces Trafford MBC's objective of ensuring that new development meets sustainability principles and standards, including in relation to the use of materials from sustainable local sources, increased energy efficiency, and the use of renewable energy sources. My client is fully in support of the principles which are advanced, and in this regard Tesco as a company has made a wider commitment to endorsing and applying the principles of sustainability.

However, in proposing a set of rigid criteria in order to ensure new development meets sustainability standards (for example, in relation to renewable energy sources) a degree of flexibility would be welcomed in order to allow for site-specific circumstances and in view of constant changes in sustainable technologies. This flexibility would allow, for example, the incorporation of an increased amount and range of energy efficiency measures in cases where the opportunities to offer renewable energy technologies are limited.

Planning Obligations

The document proposes a series of new topic areas where developer contributions could be sought. In response, whilst my client supports the principle of contributions, it is clear that these should only be sought where they would meet the policy tests for planning obligations as set out in Circular 05/2005.



If you require any further information or clarification, please do not hesitate to make contact with my assistant, Bethany Burton. I look forward to reviewing the next stage of the DPD and other LDF documents.

Yours faithfully

MP Mike Baker BA MRICS MRTPI
Planning Director
Email: mike_baker@glhearn.com

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20th November 2007
Our Ref: P-07-289/Trafford

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

Dear Sirs

PLANNING & COMPULSORY PURCHASE ACT 2004
Local Development Framework for Trafford
Development Management and Core Policies Issues & Options

1. Introduction

We act as planning consultants for Barclays Bank plc ("The Bank") in respect of the emerging LDF for Trafford.

The Bank is a significant stakeholder within the Borough's area, being long-established with a number of branches which have made a substantial contribution to the vitality and viability of Trafford's centres over the years that they have traded. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. The alternative to diversity can be long-term vacancy and decline. Banks are important contributors to town centres and significant attractors of visitation and this important role in underpinning town centres and assisting in regeneration should be recognised in all the policies on the matter of promoting town centre vitality and viability within the LDF.

Although there are no firm proposals as yet, it is likely that the Bank's representation within the Borough will need to evolve over the life of the emerging LDF. In view of the likely requirement for improved provision of banking services the Bank would like to register its interest in the forthcoming plan process so that its views are heard and emerging policy can take its future business needs into account.

On behalf of the Bank we have examined the current consultation document (and the earlier Issues and Options paper [July 2007] that is still available on the Council's website), together with a number of background documents. We set out some initial comments below.



2. General Points Arising from the Consultation Documents

Neither the July 2007 Issues and Options paper nor the current Development Management and Core Policies I&O paper really deal with the matter of retail policy. We note that it seems to be the intention of the Council to include retail policies in the Core Strategy. The Bank supports that intention in principle but much will depend upon the content and nature of any proposed policies. By way of example, the Bank is concerned that the policies in the current Trafford UDP fail to reflect the important role played by financial services retailers in underpinning town centres and assisting in regeneration. The Bank is further concerned that this restrictive approach, based on outmoded thinking, should not be continued in the emerging LDF. It is evident from the Council's Town Centre Health Check Database that Altrincham and Sale seem to be in good health with a 40% A1 presence.

As part of the process, it will be important that any options for draft retail policies in the Core Strategy or any other DPDs are rigorously assessed (see Government policy at paragraphs 1.3 and 4.24 of PPS12), for example on the basis of an up-to-date retail assessment. Clearly policy that fails the tests of PPS12 will not be judged as being "sound" at time of its public examination.

On the matter of Planning Obligations it should not be the case that any application for planning permission is automatically assumed to produce a requirement for planning benefits. Firstly, any contributions sought must meet the Secretary of State's Policy Tests and, in a document seeking the views of the public on what "*additional matters*" might be added to the Council's shopping list, it is misleading not to make this clear. Secondly, in the cases where benefits are determined as being necessary, care must be exercised so that the contribution sought is not set at such a level that new development becomes unviable.

3. Closing Comments

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

The Bank would also like to reaffirm its commitment to being involved in the preparation of the LDF's main components and in that regard we would be grateful to be placed on your mailing list to be notified of details of all the emerging LDDs.

Yours faithfully

Michael Fearn of Shireconsulting
On behalf of BARCLAYS BANK PLC