

GONW RESPONSE TO TRAFFORD CORE STRATEGY: FURTHER CONSULTATION ON THE VISION, STRATEGIC OBJECTIVES AND DELIVERY STRATEGY (MARCH 2010)

1031

Policy W1/Strategic Locations

We have raised previously the need for proposals involving town centre uses to accord with national planning policy. The proposals for most of Strategic Locations policies, and other areas referred to in Policy W1, involve such uses. The particular aspects of PPS4 that it would seem should be addressed are the need for these uses, paragraph EC5.1(a), and whether a sequential approach to site selection has been followed, paragraph EC5.2.

We note that the Council has carried out a Town Centre Uses Study to address these issues. We assume that you consider this to provide robust evidence to fully satisfy these points.

Has the joint working with Manchester and Salford on Regional Centre issues covered the questions of need and the sequential approach? It is also relevant to note that the following extract from the Inspector's note of the recent advisory visit in respect of the emerging Salford Core Strategy:

In the Inspector's view the 'Regional Centre of Manchester City Region' as identified in the RSS was more of an economic development designation and did not absolve the Council from a requirement to locate 'town centre' uses sequentially in line with PPS4. The Inspector did not see any inconsistency in this approach.

SL3/W2

You refer in Policies SL3 and W2 a new superstore on Chester Road. You need to be clear about the justification for this and explain how it accords with PPS4.

SL4

We have asked previously about the scope for further development in the Trafford Centre Rectangle, over and above that on the Trafford Quays part of the area and the sites which have planning permission. If the scope is limited it would seem that the focus should be on Trafford Quays rather than the wider area.

L1

The phasing referred to in the second bullet point of paragraph L1.2 does not match that shown in the bottom line of table L1.

R4

We note that you have addressed the issue of the exceptional circumstances for the proposal to restore Davenport Green within the Green Belt. In providing justification for the proposal, the core strategy should also have regard to the five purposes of including land in Green Belts, as set out in paragraph 1.5 of PPG2.

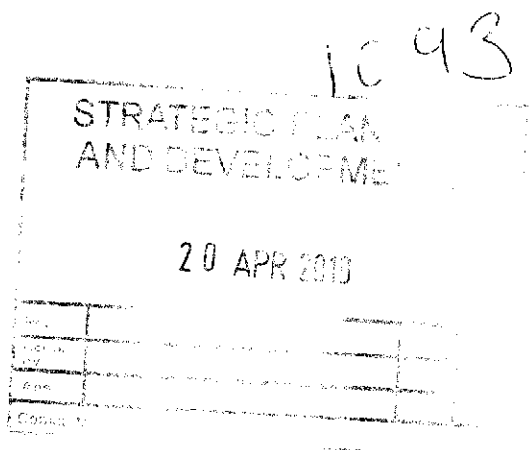
General

For infrastructure proposals which are 'priority 2' – needed to ensure sustainability of growth proposed in the core strategy, you need to be confident that these can be delivered. Where there are doubts about the deliverability or these or the delivery of housing and employment development in the strategic locations, you need to be clear on the contingency position.

The clearer the Council can be on the implementation of the proposals in the core strategy the better. You will be aware of PINS guidance on making clear the 'when, where, who by and how much' of how the intentions of the plan will be achieved; whilst the implementation sections do contain a great deal of detail, it can be inferred that some of it – notably the 'who by' – might be worked up more.

Councillor Sir Richard Leese, Chair; Phil Robinson, Chief Executive;
Tel: 01942 737917; Email: debra.holroyd@4nw.org.uk

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



Our Reference: DP 46
Your Reference:

19th April 2010

Dear Sir/Madam,

Consultation – Trafford Core Strategy – Vision, Strategic Objectives and Delivery Strategy.

Thank you for consulting 4NW on the above document. The following represent officer level comments on the Core Strategy document.

As you will be aware, the Regional Spatial Strategy for the North West of England¹ was published on 30 September 2008. Under the Local Democracy, Economic Development and Construction Act 2009, the RSS now forms the adopted Regional Strategy along with the Regional Economic Strategy. The RSS continues to be part of the Development Plan and therefore Development Plan Documents still need to be in general conformity with the RSS.

In addition to the published RSS, consideration should be given to the current Partial Review, which has been through an EiP and is therefore a material consideration. The draft submission document contains two new policies (L6 and L7) proposed for inclusion in the RSS that deal with the accommodation needs for Gypsy & Traveller, and Travelling Showpeople communities, and a revision to an existing RSS policy (Policy RT2) covering specific matters on Regional Car Parking Standards².

You will no doubt also be aware that the Local Democracy, Economic Development and Construction Act sets out the Government's plans for each region to develop a revised Regional Strategy (See Part 5 of the Act)³. The regional agencies are already developing the new Regional Strategy for the Northwest. To keep updated on progress please visit <http://www.nwregionalstrategy.com/> and register to receive the regular email newsletters. Part 1 of the RS2010 was out for consultation until 26th February; please use this link to view the consultation documents.

¹ North West of England Plan, Regional Spatial Strategy to 2021
http://www.4nw.org.uk/documents/?page_id=4&category_id=275

² <http://www.northwestplanpartialreview.org.uk> and
http://www.planning-inspectorate.gov.uk/pins/rss/north_west_gypsy_and_traveller/news.html

³ http://www.opsi.gov.uk/acts/acts2009/pdf/ukpga_20090020_en.pdf

Economy

Vision

In terms of the areas highlighted in the vision where employment and housing growth will be focused, these are generally in line with the RSS, particularly in relation to Pomona & Wharfside being within the Regional Centre which is included in RDF1 as first priority and also in line with policies W3 and MCR2. Trafford Centre Rectangle and Lancashire County Cricket Quarter is within the inner areas in line with RDF1 as a 2nd priority and MCR2. Altrincham is also listed in RSS policy RDF1 as a 3rd priority and Carrington accounted for in RSS policy MCR3.

Place Objectives

Objectives SO3 and SO4 are in line with RSS. SO3 states that development will be in the areas in line with RDF1 as mentioned previously in the vision comments above and the focus elsewhere will be on improving skills of the people to be able to work in the RDF1 areas. SO4 is broadly in line with the hierarchy / centre approach of PPS4.

Strategic sites and locations

SL1 - Pomona

The mixed use employment and leisure facilities proposed here are within the context of the Regional Centre in line with RDF1, W3 and MCR2.

SL2 - Trafford Wharfside

This does fit within RSS policy W2 and W3 in terms of regionally significant office development within the Regional Centre and policies W6 / W7 in terms of the hotels and visitor / business tourism aspects.

SL3 - LCCC Quarter

The improvements to the cricket ground are in line with RSS policy W6 and W7.

SL4 - Trafford Centre Rectangle

In terms of the Trafford Centre we note that the plan states that it is unlikely to change during the lifetime of the plan, which echoes para 6.26 within the RSS.

In terms of the office development (B1 use) proposed in the context of RDF1 and MCR2 this could support employment however only in the context of W3, which states that office development should as far as possible be located within the Regional Centre or town centres of RDF1.

In terms of hotel and conference facilities, RSS policy W6 directs these facilities within the Regional Centre. PPS4 also expects hotel and conference uses to be considered within a sequential process i.e. centre locations as priority. In terms of Museum facilities similar to hotels, PPS4 describes museums as town centre uses, which should be considered sequentially.

SL5 - Carrington

RSS policy MCR3 states that plans in this part of the City Region should sustain and promote economic prosperity consistent with the environmental character of the area and further that employment development will be focused in the towns set out in RDF1 and brownfield sites which accord with spatial principles to support the overall economic growth of the City Region. We would encourage this for the 75 ha proposed at this site, the approach also needs to be consistent with W3, which again states that office should be in the centres identified in RDF1. More specific detail on employment uses (i.e. B1, B2 & B8 breakdown) would be welcomed.

Policy W1 - Economy

We recognise that justification for office use outside centre locations is included which refers to a section on PPS4 testing and discussion of the study on other main town centre uses including B1 office. This would suggest that within the context of PPS4 policy EC5, office development would be appropriate in certain non-central sites as there are not enough

suitable and available central sites to meet the need. The location of office in Pomona & Wharfside would be supported as being in the regional centre, however further justification may be required for office development in the other areas such as Carrington in line with RSS policies W3 and MCR1, in terms of the location of office development.

Policy W2 - Town Centres & Retail

The hierarchy approach is in line with PPS4. Altrincham as the principal town centre is in line with RSS policy RDF1 and W5. We note the presumption against out of town centre development including The Trafford Centre and other out of centre retail parks which is supported in the context of RSS policy W5 and PPS4.

Policy R6 - Culture & Tourism

Tourism & culture within the regional centre and hotels within town centre locations is in line with RSS policy W6 / W7.

Housing

Vision

4NW welcome the focus on the urban areas and Altrincham which is in line with RSS policy RDF1. We also welcome the emphasis on delivering a range of housing types and tenures which is in line with RSS Policy L4.

Strategic objectives

We would Support SO1 which is in line with RSS Policy L4

Place objectives

There is a lack of any reference in to making best use of the existing stock. There is also little mention of the place objectives providing a high quality housing offer. In relation to Altrincham and Neighbouring Communities we would like more clarity on how AL01 and AL05 link together, as they very similar, however if they are different how do they support one another?

In relation to rural communities is there a need to provide affordable housing in these areas to meet local needs in line with RSS policy L4.

Strategic sites and locations

SL2 -Trafford Wharfside

As this site is within the Regional Centre it is therefore in line with RSS Policy MCR1, as residential development is acceptable where it is part of a mixed use scheme comprising a good range of housing sizes, types, tenures and affordability. As the proposal is for a mixed use development and although there is an emphasis on the provision of apartments, there is also a requirement to deliver some family accommodation on this site which we welcome in line with RSS policy L4. There is, however, no requirement for the provision of affordable housing which is needed to be in line with RSS policy L5.

SL3 Lancashire Cricket Club

As it is within the inner area it is therefore in line with RSS Policy MCR2.

SL4 Trafford Centre Rectangle

We note that the background document and technical note on strategic sites and locations identify that this area is not within the Regional Centre or the inner area, and therefore falls under RSS Policy MCR3. This policy states that residential development should support local regeneration strategies and meet local needs (particularly for affordable housing) in sustainable locations well served by public transport. We note that the proposal is to deliver 1,050 residential units on the greenfield Trafford Quays site, which will be predominantly family accommodation. There is also a requirement to provide 30% affordable housing. The SHLAA (dated June 2009) identifies that 16% of the total potential supply is within the Trafford Park (Wharfside and Trafford Quays) area, which is the third largest part of the

supply after Old Trafford and Altrincham. Acknowledging that, care needs to be taken around the provision of such a large proportion of housing in the Trafford Quays area, and how it will support regeneration priorities and contribute to meeting local needs.

SL5 Carrington

This falls within RSS Policy MCR3 and therefore residential development should support local regeneration strategies and meet local needs (particularly for affordable housing) in sustainable locations well served by public transport. This strategic location is within the vicinity of, but somewhat detached from Partington (an area of identified regeneration need). It is not clear how the provision of a significant proportion of new housing development will support and / or compliment the regeneration of Partington, more clarity on this would be welcomed. It is however recognised that there is a requirement to provide affordable housing in line with Policy L2, and we welcome the emphasis on the provision of family housing.

We note that the background document on strategic locations highlights that Carrington falls within the least accessible area with poor transport links. This is clearly a significant issue which will need to be addressed in making this an appropriate location for significant residential development.

Core Policies - Policy L1

L1.1 – We would like clarification on 'affordable by all sectors of the local community' and what is the meaning, as not all new housing provision will be affordable by all sectors of the community.

L1.2 – The policy should refer to the spatial development framework, not the distribution framework.

L1.5 – We note that 30% of housing development will be in the Regional Centre and Inner Areas and 70% in the South City Region areas of which 50% supports key regeneration priorities and / or strengthens Trafford's town centres. Paragraph 11.8 says that the distribution takes into account the Council's wider objectives, the SHLAA and SFRA. There is some variation between the focus set out in RSS Policies MCR 1, 2 and 3 and this distribution so the evidence to support this, and how it will support regeneration and meet local needs, will need to be clearly set out.

It might be helpful to show in table L1 what proportion of housing development is being directed towards identified regeneration priority areas identified in Policy L3.

Transport

In our previous responses we had concerns with Carrington and Partington in terms of their sustainability due to the limited highway access, this is still the case and it is particularly relevant for Partington, where new housing is the focus of proposals as stated above. Both of these sites border the Manchester Ship Canal, and a disused rail line visible on the map has been mooted in the past as a link into Carrington, in light of this (for your information) the DaSTS Study 3: Access to the Port of Liverpool is now looking at increasing the use of the canal for distribution from the Port of Liverpool rather than road, this may increase the opportunity for industrial / distribution uses for Trafford Park (in general) and perhaps for the proposals at Carrington; if the highway access issues we have mentioned above can be resolved.

With reference to the above we would like to stress that the delivery of the Core Strategy needs to take into account the likely budget cuts that will hinder the implementation of large transport schemes. As outlined through the DaSTS programme, the emphasis should be on a package of small scheme measures that address the primary issues of Climate Change, reducing the need to travel by private car and improved accessibility.

Any proposed transport scheme which is enabled by funding in relation to the Core Strategy should meet the five DaSTS goals of 1.) Reducing Carbon Emissions, 2.) Supporting

Economic Growth, 3.) Promoting Equality of Opportunity, 4.) Contributing to Better Safety, Security & Health, 5.) Improving Quality of Life and a Healthy Natural Environment.

We would encourage Trafford to get involved in the DaSTS (Delivering a Sustainable Transport System) studies that 4NW have recently commissioned, through Project Advisory Group membership and liaising with the consultants when contacted, 4NW are happy to work with Trafford or the Greater Manchester sub region as a whole in delivering the outputs from these studies. Please contact Alec Curley for further information – Alec.Curley@4nw.org.uk.

We would also encourage the Local Authority to include the need for travel plans in policy for all new developments and existing major sites, ensuring a range of sustainable transport alternatives are provided rather than the private car. It is important that these travel plans are monitored which will help with the delivery of future schemes.

Environment

Green infrastructure could be explored in development requirements for each of the strategic sites, meaning that the natural environment through a green infrastructure approach can be improved within the development site. However the changes to policy R3 - Green Infrastructure look positive and we note that the policy also includes a strong focus on Climate Change which helps to promote the positive functionality of Green infrastructure. And using examples of integrating sustainable design such as SUDs as requested in our previous responses is welcomed.

If you require anything more then please contact me.
Yours faithfully

Debra Holroyd,

Regional Planning Officer.

From: Adshead, Steve
Sent: 05 April 2010 09:18
To: Taylor-Russell, Clare
Subject: RE: Trafford Core Strategy: Further Consultation on The Vision, Strategic Objectives and Delivery Strategy

Hi Clare,

I have just noticed that the strategy seems to halt development at White City retail park, given its current run down position how does the strategy/Council intend to support regeneration of this area? this is a vital retail area for the Stretford and Old Trafford areas we cannot simply stand by and watch it fail.

Thank you, I await someone's reply

Cllr Steve Adshead

From: Taylor-Russell, Clare

From: Baugh, Jane
Sent: Tuesday, March 30, 2010 3:34 PM
To: Franklin, Lesley
Cc: Brotherton, Barry; Acton, David
Subject: RE: Core Strategy

thanks
The wording is too general and not strong enough for me "due regard" ?

From: Franklin, Lesley
Sent: 30 March 2010 09:38
To: Baugh, Jane
Cc: Smith, Dennis; Haslam, Rob; Doow, Amarjit
Subject: RE: Core Strategy

Dear Jane

Having now had a closer look at this issue Policy L1 – Land for New Homes, has had a paragraph added since the June 2009 consultation that provides more guidance.

L1.8 “where development proposals would involve the use of domestic gardens, due regard will need to be paid to local character, environment, amenity and conservation consideration”.

This Policy is presently out for consultation as part of the Trafford Core Strategy: Further Consultation on the Vision, Strategic Objectives, and Delivery Strategy until Friday 16 April.

Policy L7 - Design also refers to protection of amenity land and local character and refers to best practice in the document “Building for Life, CABI and Creating Inspirational Spaces, Places Matter”. More detailed advice will be produced as part of Supplementary Planning Guidance.

I hope this is helpful. If you require any further information please do not hesitate to contact me.

Best wishes

Lesley

Lesley Franklin

Senior Regeneration Officer
Trafford Metropolitan Borough Council

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From: Baugh, Jane
Sent: Thursday, March 25, 2010 6:35 PM
To: Franklin, Lesley
Subject: RE: Core Strategy

OK We would like this included
jane

From: Franklin, Lesley
Sent: 25 March 2010 15:48
To: Baugh, Jane
Cc: Smith, Dennis; Haslam, Rob
Subject: Core Strategy

Dear Jane Baugh

Dennis has passed on to me your query as regards protecting small areas of green space in The Core Strategy.

I am presently working on minor changes to Core Strategy Policies concerning environmental issues and Supplementary Planning Documents to assist implementation of these policies.

Several Policies areas cover this issue but I will give some thought as to the best place within these documents in which to provide clearer direction for development and discuss this with my Development Control colleagues.

I will get back to you next week with a fuller response.

Best wishes

Lesley

Lesley Franklin

Senior Regeneration Officer
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www.trafford.gov.uk**

From: Baugh, Jane
Sent: 12 March 2010 14:54
To: Smith, Dennis
Cc: Brotherton, Barry; Acton, David
Subject: FW: core strategy

Dear Dennis

In relation to your letter dated 5th March. Every time there is a planning application to develop to demolish/ rebuild on a plot, we lose green space /gardens , two recent examples Roebuck lane and 85 Broad rd .the area for development always larger than the existing site This means that green space in the borough is gradually being eroded albeit, bit by bit ,which though a small area seemingly for one plot ,adds up to a considerable area overall.

I and my group want to prevent this loss of green space and would like our concerns incorporated into the core strategy to prevent this insidious loss of green space happening, and ultimately changing our landscape and environment permanently Please advise on the best way to incorporate their into the strategy.

best wishes
Jane Baugh

1082

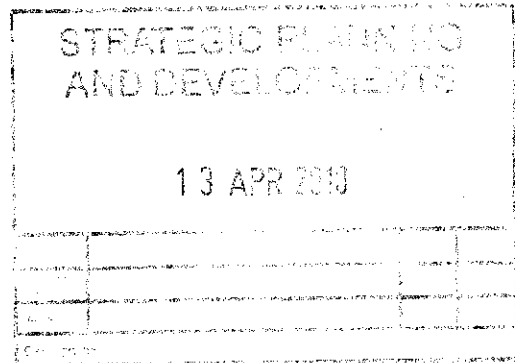


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12th April 2010
Our Ref: P-07-289/Trafford
Your ref: PO 1082

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
Core Strategy Further Consultation March / April 2010.**

1. Introduction and Background

We act as planning consultants for Barclays Bank plc ("the Bank") in respect of the Local Development Framework (LDF) for Trafford and this letter forms the Bank's response to the above document. As a long-established business, the Bank has made a substantial contribution to the vitality and viability of the Borough over the years that it has traded and as a significant stakeholder within the Council's area it is therefore concerned that development plan policies should not fetter the important contribution that it makes to the vitality and viability of town centres. Financial services retailers generally, and the Bank in particular, play a key role in promoting town centre health through high attraction of footfall so the provision of financial services should be allowed to improve and evolve alongside the improvements to shopping provision envisaged by the LDF.

We responded on behalf of The Bank to the Issues & Options stage of the Development Management and Core Policies in November 2007, to the Preferred Options stage of the Core Strategy in August 2008 (Your ref: PO1082) and to the Core Strategy Preferred Options Further Consultation in July 2009, all of which were acknowledged by yourselves.

Despite all of this, and our repeated requests that you keep us informed of consultations on all LDF documents, we were not informed of this current consultation. Please will you confirm in writing that we are on your database and that you will inform us of all future consultations.

2. The Bank's previous representations

In our representations on the Development Management and Core Policies Issues & Options Consultation in November 2007 we noted that it seemed to be the Council's intention to include retail policies in the Core Strategy but that much would depend upon their content and nature. We also expressed serious reservations about continuing with the type of restrictive retail policies in the Trafford UDP.

Our representations on the Core Strategy Preferred Options Consultation in August 2008 noted that the document actually contained no meaningful policies on 'Town Centres and Retail' and again criticised the outmoded restrictive policies in the Trafford UDP. We were also critical of November 2007 Trafford Retail and Leisure Study's suggestions about primary shopping frontages. We explained why it is important that local authorities' planning policies should recognise the important role played by financial service retailers such as the Bank in promoting the vitality and viability of town centres and underpinning regeneration.

In our representations on the Core Strategy Preferred Options Further Consultation in July 2009 we expanded upon our previous criticisms, explaining why it is important that Banks are not subject to outmoded restrictive controls on their location, particularly as this is not supported by Government policy or by any evidence. We commented that the Council is missing an important opportunity to address revisions to retail policy and that this risks the strategy being found unsound.

The Council has therefore had a number of opportunities to address the matters we raised and to discuss them with us, but we note with concern that in the current consultation there seems to have been no attempt whatsoever to consider the merits of the Bank's representations or indeed to address the specific areas of criticism. The content of those previous representations is still relevant but we set out below the Bank's representations on the latest stage of consultation.

3. Representations on the Consultation Document

Strategic Objective SO4 sets a clear intention to "*Revitalise Town Centres*" but it is difficult to reconcile this with the paucity of retail policy in the draft Core Strategy. Policy W2 contains a list of aspirations, noting in its 'Justification' that "*funding will primarily be through private sector investment*", but it does nothing to address the matters repeatedly raised by the Bank. That is hardly "*working with local stakeholders*".

The 'Justification' still seems to rely on the 2007 Trafford Retail and Leisure Study, the shortcomings of which we have already raised, and makes reference to a "*forthcoming Land Allocations Plan DPD*" that will set "*the precise boundaries of the primary and secondary shopping areas*". However, there is no mention whatsoever of any policies that may apply within those designations. This is simply unacceptable, particularly as the next stage of the Core Strategy should be the Submission version for the Secretary of State, prior to its examination by an Inspector to determine its soundness.

On the matter of policy formulation, PPS12 is clear that all DPDs must be:

- "*founded on a robust and credible evidence base; and*
- "*the most appropriate strategy when considered against the reasonable alternatives*"; and must be
- "*consistent with National Policy*"

Policy in the existing UDP sets out arbitrary restrictions on non-A1 uses. This is unjustified, and is unsupported by any evidence. The Council's intention to seek to attract private sector investment in town centres does not sit well with any continuation of previous policies seeking to limit certain Part A uses in primary shopping frontages.

The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as A2 detract from the vitality and viability of town centres. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are “*shopping area uses*” and are acceptable without any need for restriction or qualification.

This is particularly the case for the financial services sector. ODPM Circular 03/2005 “*Changes of Use of Buildings And Land*” which accompanied the last major revisions to the Use Classes Order specifically states in relation to the A2 Financial and Professional Services use class (which was created to separate those uses “*servicing the public, from other office uses not directly servicing the public*” - paragraph 32), that the Class is also “*designed to allow flexibility within a sector which is very much a part of the established shopping street scene, and which is expanding and diversifying*”. The uses within Class A2 are noted as being those “*which the public now expects to find in shopping areas*” (paragraph 38). The wider role played by town centres than a pure shopping function is recognised throughout Government policy on town centres.

Government Policy in PPS6 has been replaced by the publication of PPS4 “*Planning for Sustainable Economic Growth*”, although this continues the thrust of policy in PPG6 relating to town centres. Policy EC3.1c states that Planning Authorities should: “*at the local level, define the extent of the centre and the primary shopping area in their Adopted Proposals Map*”. They should have considered whether there is evidence of a need to designate “*realistically defined primary and secondary frontages in designated centres*” [our underlining]. A strong emphasis upon the promotion of town centre vitality and viability remains in the new PPS and the Government is clear that there should be a positive attitude towards all development which generates wealth and creates employment. The “*over-arching objective is sustainable economic growth*” (paragraph 9). The Government wants town centres to offer “*a wide range of services to communities in an attractive and safe environment and remedying deficiencies in provision in areas with poor access to facilities*”. There should be “*enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres*” (paragraph 10). Policy EC10.1 states that: “*Local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably*”. It is therefore important that local policies should facilitate this.

The Bank objects that the approach taken in UDP policy is apparently to be continued within the LDF as this is likely to work against the objectives of the Government and the Council to promote vitality and viability in town centres. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. The Bank therefore objects to the omission from Policies of the Core Strategy of any intention to review UDP policies that seek to restrict A2 uses, particularly as the Council has provided no evidence to justify their position on such policies and has not given consideration to reasonable alternative strategies.

As the quantity and quality of shopping is improved so should the quality of provision of other activities. Banks have moved away from the traditional style of frontage, preferring to have an open, visually interesting and attractive face to the ‘high street’. The Bank has become increasingly retail in its presentation and has recently introduced an innovative ‘flagship’ branch design, which has been developed in association with its customers, to transform banking into what it terms as “*a retail focused experience*”. The Bank estimates that some 10 million customers use its branches each week and through listening to their feedback, a design has been developed that meets their requirements for modern banking and provides branches similar in appearance and operation to retail shops.

Whilst the design of every new branch has to be flexible in order to be sensitive to the requirements of each building occupied, the aim is generally to ensure that in excess of 70% of the internal space at ground floor is accessible to customers. The Bank's managers regularly report that upon the opening of a 'flagship' branch the customer visitation levels significantly increase and thus the level of activity helps to underpin pedestrian flows to the benefit of surrounding traders. It is therefore important that the Council recognises the benefit of A2 uses in fostering footfall and pedestrian activity and that planning policies should encourage flexibility to allow changes of use between the A1 and A2 use classes.

Class A2 retailers such as the Bank routinely experience very high levels of customer visitation, contributing significantly towards pedestrian movement and therefore the vitality and viability of town centres. The Bank has undertaken a number of comparative footfall surveys in connection with its current acquisitions programme at its branches in various towns and cities in the UK (copies attached). These conclusively show that the level of footfall associated with Bank branches is commensurate with, and often higher than, the best known national multiple Class A1 traders. These surveys have been key in helping to change the attitudes towards Class A2 and even those planning authorities that once strongly resisted Class A2 uses in their primary areas have recently granted permission for Barclays 'flagship' outlets. Examples of authorities which have recognised the wider benefits of the 'flagship' design (following receipt of applications which have been supported by evidence of high footfall), include Leicester, Manchester, Plymouth, Reading, Sheffield, Southampton and Kensington & Chelsea.

4. Closing Comments

The Council recognises the need for significant private sector investment in town centres. The opportunity provided by the preparation of the main elements of the LDF should be used to reappraise out of date policies and give greater encouragement to 'appropriate' Part A uses to invest and to improve the quality of their representation. The Bank believes that there is no good planning reason to restrict the presence of Class A2 uses at ground floor level in any shopping frontages. Indeed there would be considerable benefit to shopping centres in seeking to attract A2 users such as banks who provide a high level of investment in, and maintenance of, their premises resulting in active and attractive street frontages and who also foster very significant footfall and pedestrian activity. This can only assist in providing the confidence and commercial viability necessary for any programme of regeneration and investment.

The Council should recognise the important contribution of financial service retailers such as banks in both bringing investment and acting as attractors for investment by others, in the wording and application of policies in all the relevant LDF documents. This will help to achieve the Core Strategy's strategic objective to revitalise town centres. Planning policies should therefore encourage flexibility to allow appropriate changes of use between the A1 and A2 use classes where this will support vitality and viability.

Pursuing restrictive policies to keep significant generators of footfall out of central shopping areas will actively work against the achievement of the Core Strategy's strategic objectives and is inconsistent with national policy. In fact there is nothing in Government policy that recommends or supports imposing constraints upon acceptable town centre uses at all. The continuation of historic primary frontage policy is unjustified by any robust and credible evidence and the Council has provided no explanation for the decisions it has taken about the most appropriate strategy to follow when considered against the reasonable alternatives.

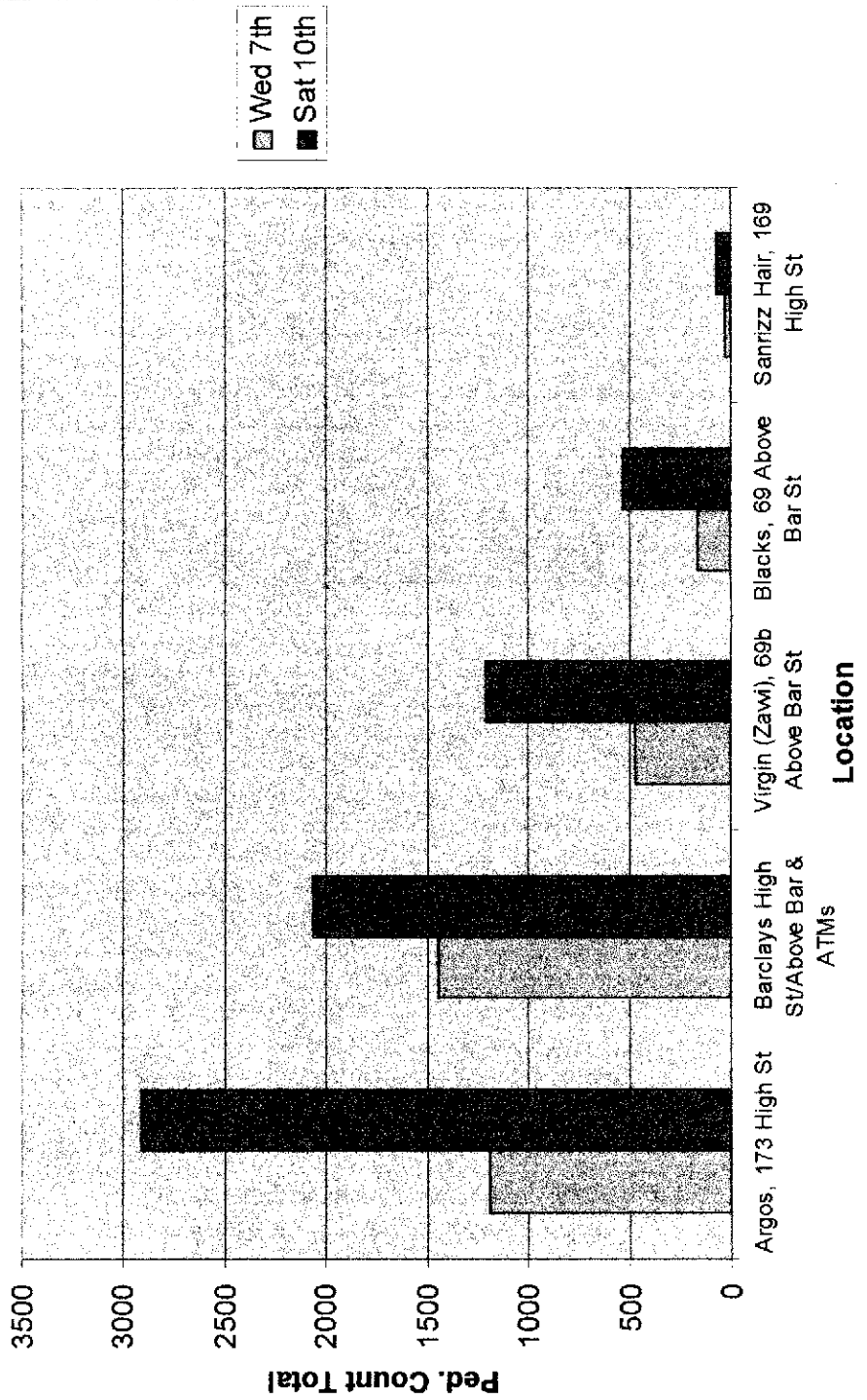
The Council's documents show no indication that it has gone through an objective process and audit trail of assessing alternatives, or indeed that alternatives have even been considered at all. At present the Council's approach to A2 retail uses is neither Justified nor Consistent with National Policy so the Bank therefore objects to the omission from the Core Strategy of any intention to review Policies that seek to restrict A2 uses.

In view of the requirement for improved provision of banking services in Trafford the Bank would like to confirm its continued interest in the LDF process and in that regard we shall be grateful if the Council will continue to notify us of the progress of the Core Strategy as well as details of any other emerging LDDs.

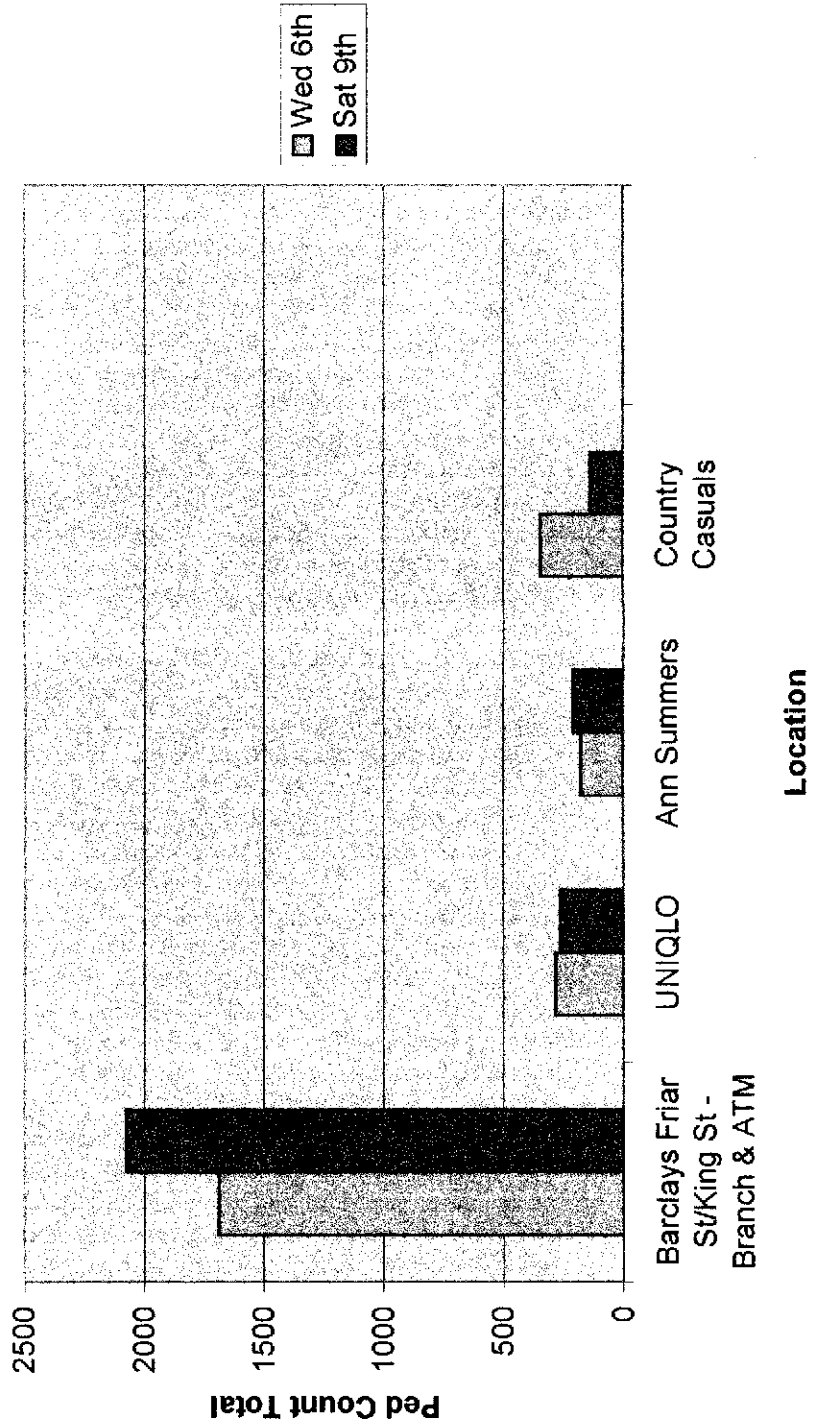
Yours faithfully

Michael Fearn of Shireconsulting
On behalf of BARCLAYS BANK PLC

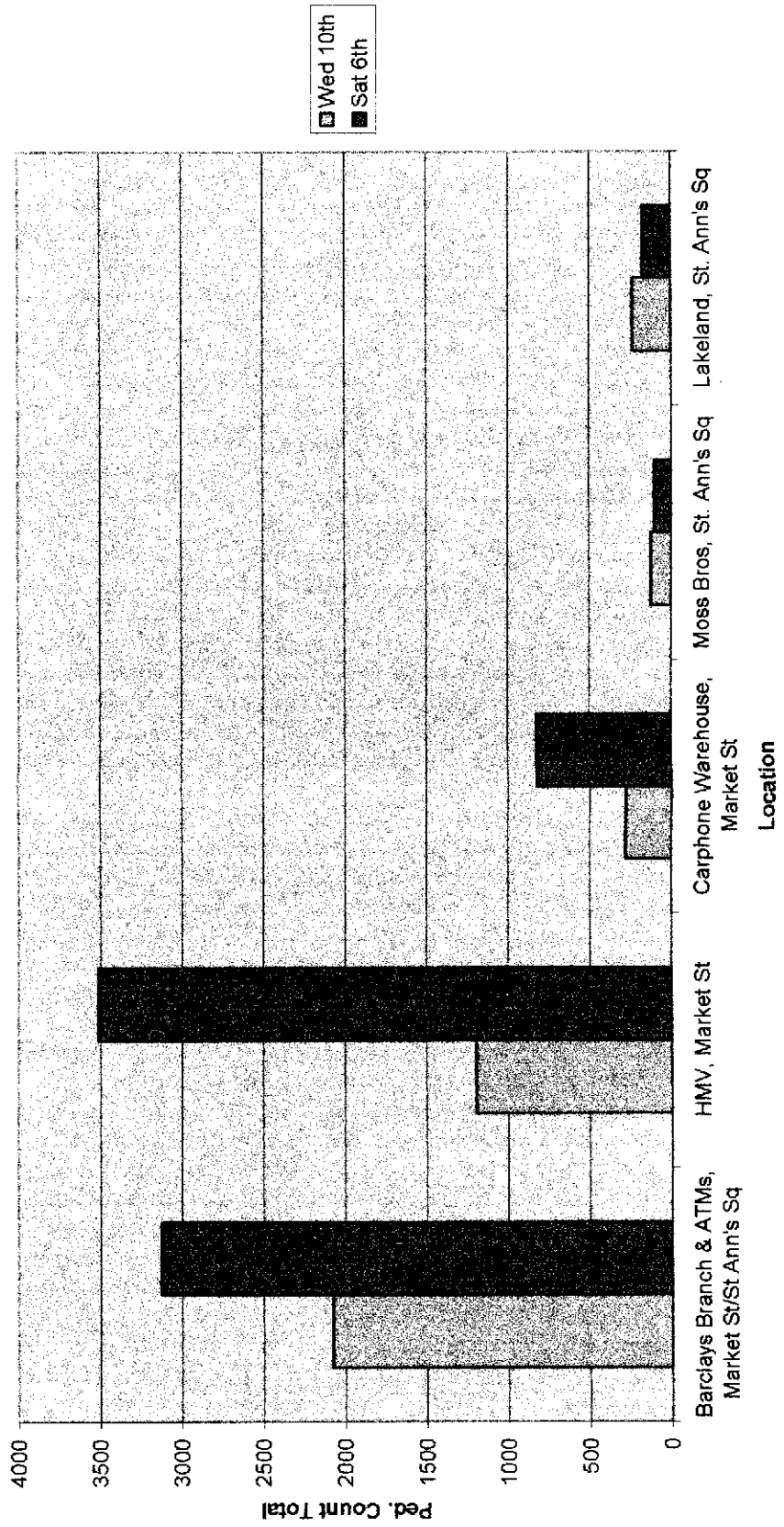
Barclays Pedestrian Count: Southampton May 2008



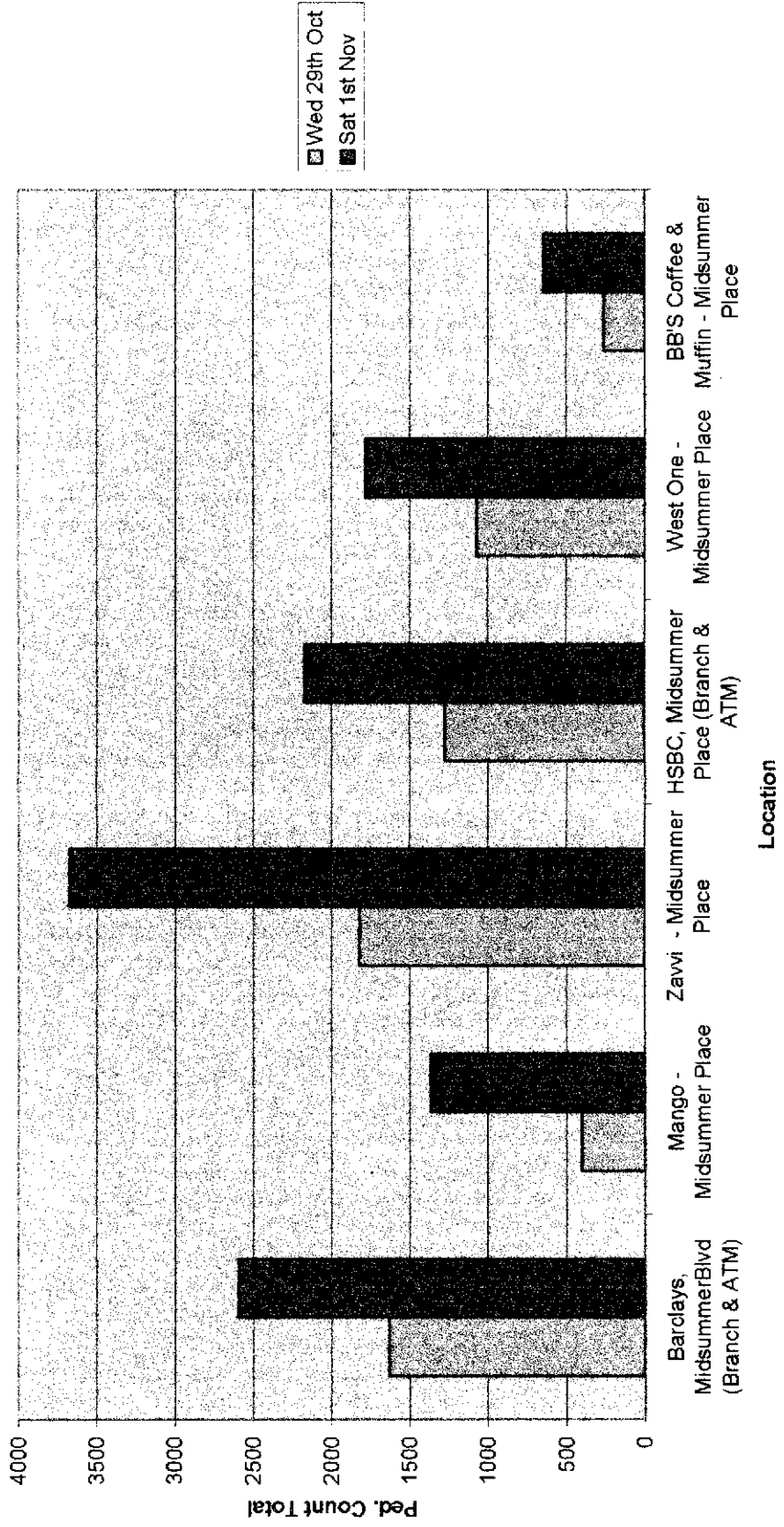
Barclays Pedestrian Counts: Reading, August 2008



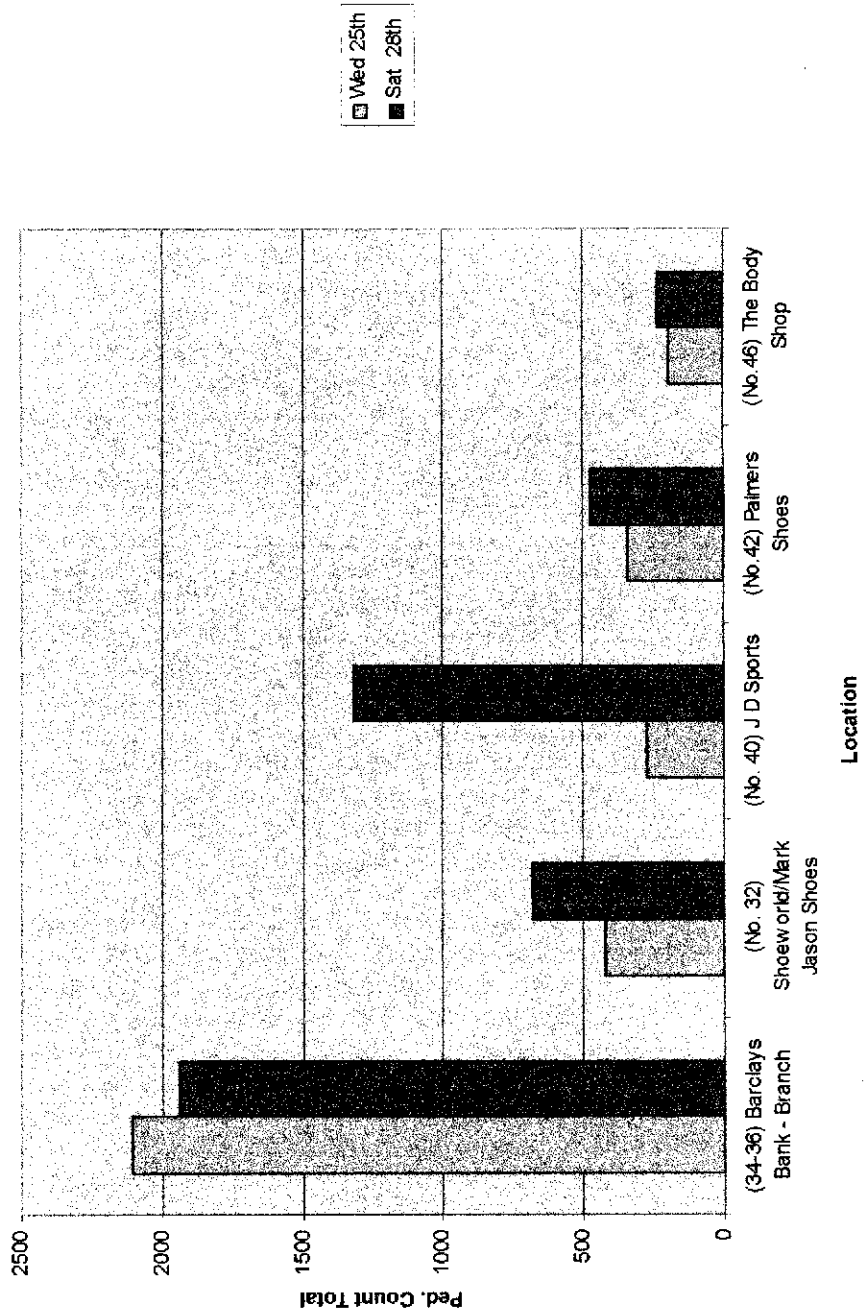
**Barclays Pedestrian Counts
Manchester (Sept 08)**



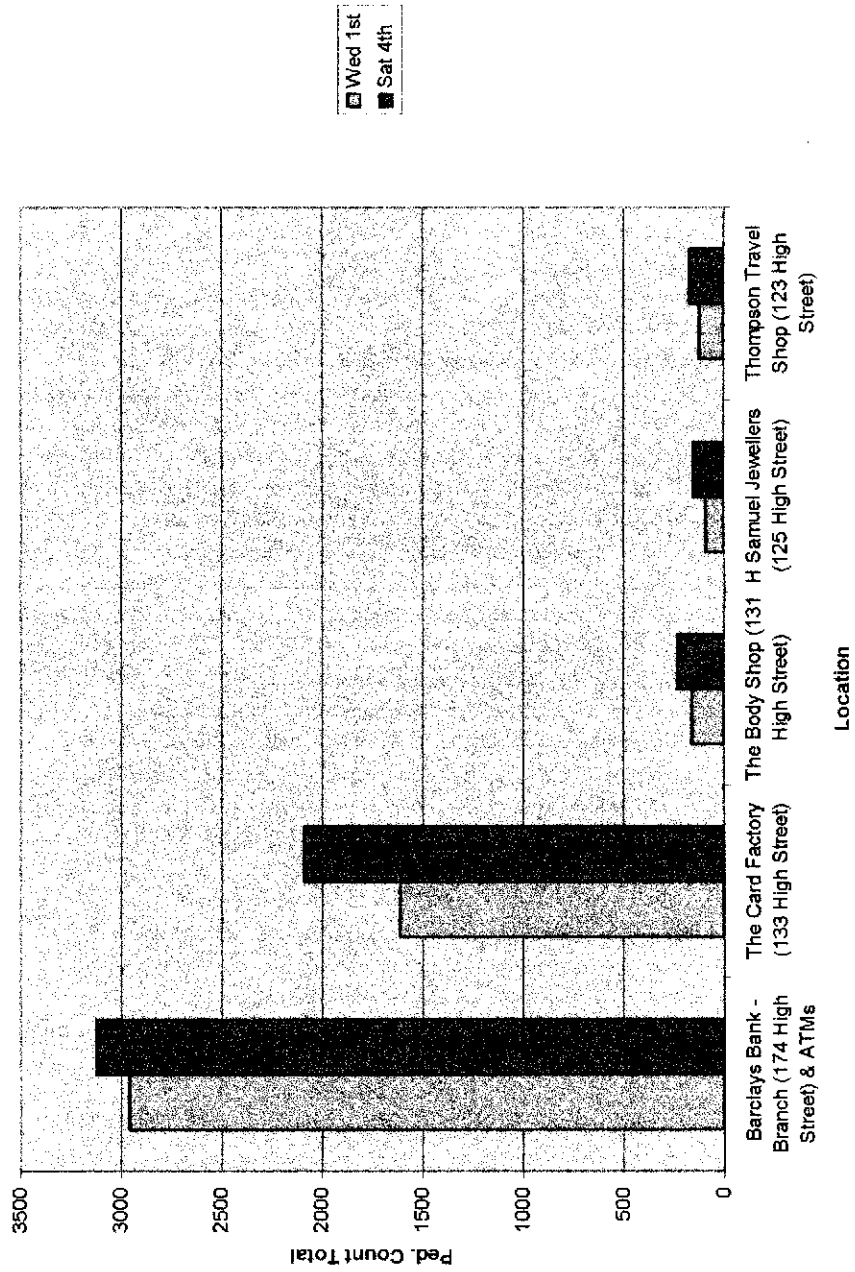
**Barclays Pedestrian Counts
Market Street, Milton Keynes (Oct 08)**



Barclays Pedestrian Counts: Romford, March 2009



Barclays Pedestrian Counts: Southend - April 2009



1040

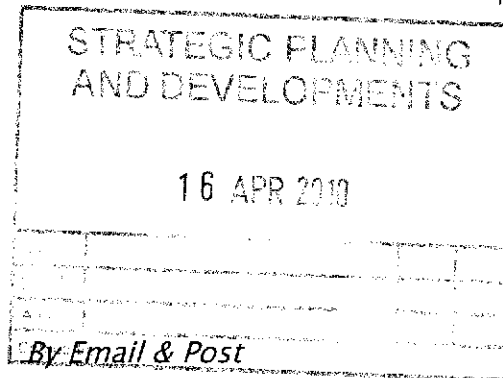
Date: 15 April 2010

Bellway Homes Limited
North West
2 Alderman Road
Hunts Cross
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L24 9LR

Dennis Smith – Strategic Planning & Housing Services
c/o Strategic Planning & Developments

Telephone 0151 486 2900
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Trafford Council
1st Floor
Waterside House
Sale Waterside
Sale
Trafford
M33 7ZF



Dear Mr Smith

CORE STRATEGY – FURTHER CONSULTATION ON VISION, STRATEGIC OBJECTIVES & DEVELOPMENT STRATEGY

This letter follows on from our previous submissions to date, as follows:

- Letter of August 2009 commenting on Core Strategy Preferred Options and Draft SHLAA;
- Attend GVA Grimley event, 26th February 2009;
- Letter of 26th August 2008;
- Call for Sites Submissions;
- Attendance at Stakeholder Event, 3rd December 2007;
- Letter of 12th October 2007 (re: Partington AAP);
- Letter of 31st August 2007.

As you can see, we have been and remain actively interested in the Trafford area and have also (on 13th April) attended a meeting with your recently appointed Housing Growth Officer, Stephanie Everett. We seek realistic development opportunities to deliver new homes, including affordable, to the Borough over the plan period and provide the following comments accordingly:

1. Policy SL1 – we note that this site, because of flood risk, is no longer to be identified as suitable for residential (it had previously been put forward for

such) and therefore increases the importance upon other sites to deliver Trafford's housing needs;

2. SL2 - this estimates the delivery of 900 dwellings to Wharfside in the plan period 2011-2026 (being 60 units/annum) which is envisaged (given the size/location of the site and the existing buildings) to be high density apartments. From our previous submissions and your own local knowledge you will know that the apartment market has collapsed with no sign of it returning as yet. Within this context, a cautious approach needs to be taken. A key consideration is lack of finance for such developments. We would not envisage this market returning for perhaps a further 4-5 years, given the level of unsold stock and these other planning constraints. The 10 year period 2016-2026 would therefore need to deliver annually 90 units from this site, which is a 'Big Ask' even in a good market. We therefore recommend that, for your SHLAA estimates, this site is downgraded in terms of its delivery, to 450 dwellings in the plan period;
3. SL3 - As above, a further 900 dwellings are envisaged from this site, half of which in the latter plan period (2021-26). For all of the above reasons, this remains optimistic, particularly in the early phases as the market recovers. We would also support lower density family homes on this site, as this remains a better market, and therefore the densities will fall accordingly. Again, this site is not likely to deliver the numbers envisaged (450 yield in the plan period?) and other sites will need to come forward;
4. SL4 - 1,050 dwellings envisaged here on the Trafford Quays site. We support the policy emphasis on family accommodation. The phasing envisages 250 units in the 4 year period 2011/12-2015/16, being 64 units per annum which, in this market, is ambitious. As a consequence, the total yield from this site over the plan period should be reduced to no more than 600 units;
5. It is noted that the above 3 sites (bullets 2-4) require infrastructure improvements and investment from the Council, the utilities and from developers. Combined with a depressed market is imminent public sector expenditure constraints and this will have a significant impact upon such enabling or essential works. This too will slow down the rate of completions and needs to be taken into account in terms of phasing/delivery rates;
6. SL5 (Carrington) - we support the inclusion of this site as an important residential development opportunity as its change of use and redevelopment will deliver not only much needed new homes but also regeneration and environmental improvements locally. The policy envisages 1,560 dwellings over the 16 year plan period, being an average of 98 units per annum. In master planning this large site, we consider it could yield potentially more units (in the order of 2,000) which would not only assist in the delivery of your RSS (plus Growth Point, being a 20% uplift on RSS) housing targets but would also generate a scale of development to support the associated works as set out in the Core Strategy (including highway works). A larger development can create a sustainable community in Carrington. We support the presumption that these will predominantly be suitable for families

although the precise mix will reflect market conditions as well as housing needs. In terms of progressing the planning of this site, given the recognised need (Para 9.1) to shift away from its traditional employment focus, it might be that the Council works alongside the landowners/developers in preparing and agreeing a broad Masterplan to structure the phased development programme, and there is no reason why this cannot be progressed sooner rather than delay to await the Land Allocations DPD. In terms of the site's strategic context, potential enhancements to the (off-site) highway network to the south of the site should be investigated further. As for the detailed planning of this site moving forwards, clearly the scale could support a mix of uses subject to commercial interest to avoid the risk of vacant units. In terms of abnormal development costs, site reclamation costs will need to be factored in and are material to the consideration of any Section 106 contributions. An open-book approach is preferred rather than a prescriptive policy approach without the flexibility required to deliver development in difficult circumstances. See further our comments below regarding Core Policies;

7. Policy L1 – we support this policy in its need to identify new housing sites (in the DPD) across the Borough in the plan period and seek to work with the Council in its SHLAA. In terms of PDL sites (Para L1.6), where change of use to residential might be supported in policy terms, we are encountering difficulty in reaching a value that enables this to proceed: suppressed residential values may not persuade landowners to sell such sites, and this will impact upon the rate of delivery of new homes. Monitoring is therefore important as well as an annual review of your SHLAA. It might be that the distribution as set out in Para L1.5 will need to be reviewed as sites deliver at different rates, and we seek to avoid L1.5 dictating the precise rate and location of development over the plan period;
8. Policy L2 – this is not included in the current draft document so our previous comments apply, which concern considerations of development viability in the delivery of affordable homes and other planning gains. Market conditions are extremely difficult and, in order to deliver affordable homes as part of private sector development, careful consideration needs to be given to those sites where development is viable and potentially a balanced approach to selecting those S106 contributions that are most important to the development / locality rather than taking a blanket policy approach that can result in development not coming forward;
9. Policy L3 – this policy needs to be consistent with and support the site specific policies and proposals. There is repetition here with those policies (listed above): L3 should be edited down to focus on regeneration and reducing inequalities aspects rather than repeat the details of other policies (eg. No need to repeat residential targets, focus on family houses, etc);
10. Policy W1 – again, this needs to accord with site specific policies and avoid repetition. Could this policy simply refer to those site specific policies where

employment use is referred to and then focus on statements relating to areas outside of those areas?

11. Policy R3 (Green Infrastructure) – the reclamation of Brownfield sites should be included within this broad category as contributing towards environmental improvements in the Borough. Residential developments, through their provision of both private and public open space, can also accord with these objectives. We welcome improvements to existing green infrastructure as these are important to the quality of life of urban areas;
12. Policy R4 (Green Belt) – First, we have no land interest in the Trafford Green Belt. RSS (Policy RDF4) states that there is no need for any exceptional substantial strategic changes (not defined in RSS) to Green Belt boundaries in Trafford before 2011 and that after 2011 the presumption is against such changes. It does not state that, from 2011 onwards, there will be no Green Belt review in Trafford. As with other local planning authorities in the North West (such as Sefton and West Lancashire, who are progressing such) it is open to Trafford to carry out a strategic study (see RSS Policy RDF4) of its Green Belt if it needs to, based upon an assessment of its land supply. We would not want Policy R4 to rule this option out in the future if it is considered necessary, as RSS does allow for it. We therefore seek a statement to this effect to be inserted into Policy R4 accordingly, making reference to RSS Policy RDF4) and to your SHLAA/5 year housing land supply position (and the requirements of PPS3). Should these latter 2 (reviewed regularly) indicate that a Green Belt review was needed, Policy R4 needs to make allowance for this to take place.

Bellway Homes North West will continue to seek to work with the planning authority in the delivery of new homes into Trafford over the plan period. Should the Council have land / property holdings for disposal we welcome receipt of details. We continue to seek Brownfield and Greenfield land opportunities that are commercially viable and which contribute towards your Core Strategy generally or on a site specific basis. We hope that our commercial insights assist you in progressing your policies and look forward to our continued involvement in the plan-making process.


Regards.

Yours sincerely

Simon Artiss
Planning Manager
simon.artiss@bellway.co.uk
(Mobile 07855 337232)

Trafford's Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy

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Comment Form – March 2010  **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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Comment Sheet

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What are you commenting on? LAND FOR NEW HOMES			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	X	Page number	47
Sustainability Appraisal		Paragraph number	L1.2
Strategic Locations Background Note		Policy number	L1
		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Are you supporting, seeking change or do you have general comments about this specific part of the document?				
Support		Seeking a Change	X	General Comment
<p>Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document.</p> <p>We have previously expressed our concern at the voluntary uplift of 20% in the housing target for two reasons:-</p> <ol style="list-style-type: none"> 1. we do not consider the Council is following properly the spatial planning framework set out in RSS for the North West 2. it brings immense pressure to find residential units in the Other South City Region Sites. <p>Reason 2 has been made even worse by the loss of 1500 residential units planned for Pomona Island. In view of this recent development we consider the voluntary uplift should be abandoned, or at the very least reduced to 10%.</p> <p>We take comfort in SO1 under 'Altrincham & Neighbouring Communities' and the retention of the existing Green Belt but we believe these strategies will be put under a lot of pressure unless the voluntary uplift is abandoned</p>				

Please continue on a separate sheet if required

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Trafford's Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	X	Page number	66
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	W2.10
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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Support		Seeking a Change	X	General Comment	

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REPRESENTATION BY DRIVERS JONAS DELOITTE ON BEHALF OF CITYBRANCH LIMITED:

Policy W2.10 identifies a particular need for retail investment within Partington including a medium sized foodstore. This is justified due to the presence of a planning permission for a residential and retail scheme (see paragraph 14.5 and Core Policy L3) for the regeneration of Partington Local Centre.

The policy does not refer to any of the Borough's other local centres by name. However, Hale Barns Local Centre also has an extant Planning Permission (H/69733 – 8 December 2008) for the redevelopment of The Square for retail and residential uses, including a new foodstore (see Committee Report dated 17 September 2008). Hence Hale Barns should also be referred to explicitly by Policy W2.

Therefore, Policy W2.10 should be amended to include reference to this extant Planning Permission and the need for this investment to bolster the vitality and viability of Hale Barns Local Centre as follows: *“There is a particular need to redevelop the existing Local Centres in Partington **and Hale Barns** to create a modern shopping centre including a medium-sized supermarket and other retail units **in both locations.**”*

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	X	Page number	68
Sustainability Appraisal		Paragraph number	14.5
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Are you supporting, seeking change or do you have general comments about this specific part of the document?

Support	Seeking a Change	General Comment
	X	

Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document.

REPRESENTATION BY DRIVERS JONAS DELOITTE ON BEHALF OF CITYBRANCH LIMITED:

Paragraph 14.5 justifies the particular need for retail investment within Partington as set out by Policy W2.10. We have made representations to Policy W2.10 to seek to amend the wording to reflect the extant Planning Permission for the redevelopment of Hale Barns.

Hence, a new paragraph needs to be inserted following 14.5 to justify the need for investment within Hale Barns Local Centre.

We propose following text to be inserted: ***“The Square, Hale Barns has been the subject of a planning permission for is comprehensive regeneration, comprising of a retail foodstore and 14 additional retail units, plus residential development.”***

Trafford's Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy

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Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	X	Page number	68
Sustainability Appraisal		Paragraph number	14.9
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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Support		Seeking a Change	X	General Comment	

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REPRESENTATION BY DRIVERS JONAS DELOITTE ON BEHALF OF CITYBRANCH LIMITED:


Reflecting the representations made to Policy W2.10 and Paragraph 14.6 to include reference to Hale Barns Local Centre as well as Partington, the fourth bullet of Paragraph 14.9 should be amended as follows:

- Local Centres, including Partington and Hale Barns.

Please continue on a separate sheet if required

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Please indicate the document and the specific paragraph number, policy, map or table you are commenting on			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	✓	Page number	75
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	R4.4
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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Support	✓	Seeking a Change		General Comment
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This is a rare opportunity to restore / safeguard land that will enable many, particularly children and families, to enjoy and benefit from the 'great outdoors'. This theme provides the core of my support for the proposal for the restoration of this land to green belt.

Please continue on a separate sheet if required

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What are you commenting on?		
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.		
Document		Section
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	✓	Page number 75 (16 R 4)
Sustainability Appraisal		Paragraph number
Strategic Locations Background Note		Policy number
Other document, (please specify)		Vision reference
		Strategic Objective reference
		Spatial Strategy reference
		Strategic Location reference
		Table/Figure reference
		Other (including omissions and suggestions for alternative approaches)

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Support	Seeking a Change	General Comment
✓		


Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document.

Having lived for many years in the vicinity of the Davenport Green area, I fully support its return to a green belt status, separating the very distinctive types of settlement that has grown up over the years. Further I do not believe one council should even attempt to build up against another council's boundary as was envisaged by previous development plans.

Please continue on a separate sheet if required

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Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	X	Page number	Page 75
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	R4.4
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
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Support		Seeking a Change		General Comment	
	X				

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- I live in Hale and travel to Wythenshawe, the Airport and other areas beyond. I consider that I would be affected by extra traffic if the area were developed
 - Development of Davenport Green would significantly reduce the green belt or possibly take away an important and valued green area that helps to off set the heavily populated areas and the airport that surround it
 - I think that any commercial development of the site will have an overall negative impact on the area given the under utilised office and commercial facilities in the surrounding areas
- I therefore support the Trafford 's proposal (R4.4) which will remove my concerns over the threats to my neighbourhood and the environment

Please continue on a separate sheet if required

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	✓	Page number	75
Sustainability Appraisal		Paragraph number	16.1
Strategic Locations Background Note		Policy number	R4.4
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Are you supporting, seeking change or do you have general comments about this specific part of the document?


Support	Seeking a Change	General Comment
✓		

Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document. *POLICY NO R4.4.*

*Please keep the plan to return Davenport Green Development land to the Green Belt.
 This land is only 50 metres from the housing at Newall Green Mans.
 Traffic congestion in the area would be caused by any employment development on this land.
 The site should be used for Farming as it used to be kept, so that we can keep some clean air and open space for all.*

Please continue on a separate sheet if required

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	✓	Page number	75
Sustainability Appraisal		Paragraph number	100
Strategic Locations Background Note		Policy number	R4-4
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Table/Figure reference	
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Support	Seeking a Change	General Comment
✓		


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I support the policy for the following reasons:
 TO MAKE ATRAINHAM AND MSC W/B ACCESSIBLE TO NEWALL GREEN.
 TO AVOID BARRIERS TO COUNTRYSIDE BEING SEVERED FROM NEWALL GREEN, TO PREVENT FURTHER TRAFFIC POLLUTION, TO PROTECT WILDLIFE, TO PREVENT TRAFFIC CONGESTION ON SURROUNDING ROADS, TO PRESERVE A RURAL HAVEN, TO STOP NEWALL GREEN AND HALE BAINS Merging TOGETHER, TO ALLOW PERSISTENCE IN THE COUNTRYSIDE, TO MAINTAIN THE RURAL CHARACTER OF THE AREA AND STOP UNWARRANTED DEVELOPMENTS.

Please continue on a separate sheet if required

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Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	Page number
Sustainability Appraisal	Paragraph number
Strategic Locations Background Note	Policy number
Other document, (please specify)	Vision reference
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	Strategic Location reference
	Table/Figure reference
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Support	Seeking a Change	General Comment
YES		

Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document.

As I objected & spoke against the original Enquiry twenty years or so ago I am very pleased that Council has decided on this course. To put back the area intended for Office Buildings into 'Green Belt' Designation. I also hope that all of that area of Dilworth Green will be included. It is the last 'Green lung' left on the Timperley side of the Motorway. It is particularly needed because of the proposed huge Storage Depot, to be built on the Airport side & accompanying new roadway to it. As a lifetime resident I enjoyed the open space as a child and still do at 52. May I say thank you now in the hope that it will be left open for future generations.

Please continue on a separate sheet if required

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

1096

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

Our ref: SO/2006/000285/CS-
02/PO1-L01
Your ref:
Date: 28 April 2010

Dear Sir/Madam

**TRAFFORD CORE STRATEGY: FURTHER CONSULTATION ON THE VISION,
STRATEGIC OBJECTIVES AND DELIVERY STRATEGY**

Thank you for referring the above consultation to the Environment Agency for review.
We would like to make the following comments:

We note that changes that have been made to the strategic locations, we have no objections to raise on sequential or exception grounds as the principles of PPS25 have been followed.

SL5 - Carrington

One of the development requirements for this location is that development must demonstrate high standards of sustainable design. However it is not clear from current policy or the background documents, what this definition of high standards means for this strategic location.

We support the inclusion of the development requirement of protection and enhancement of the Mossland as a carbon sink to mitigate the impact of climate change.

For information, the Environment Agency is currently heading a project called Mersey Life which aims to build on the benefits that improvements in water quality have brought about.

This is an aspirational project that will address new challenges we now face. It aims to realise the socio-economic and ecological potential of our rivers by restoring degraded habitats, developing sustainable fisheries and improving access & recreation. We have begun by looking at the River Bollin, the River Goyt & the non-

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Appleton House, 430 Birchwood Boulevard, Birchwood, Warrington, Cheshire, WA3 7WD.
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Cont/d..

tidal section of the River Mersey.

To help guide our actions, we have produced a Portfolio of potential projects which we will deliver through a phased programme of river restoration, working in partnership with businesses, local authorities, public bodies and communities.

This is particularly relevant to Carrington as it adjoins the River Mersey. There may be opportunities to link the objectives of the Mersey Life Project with detailed development proposals in the future.

More information on this can be found on our website: www.environment-agency.gov.uk/merseylife

R3 – Green Infrastructure

We support the inclusion of this policy within the Core Strategy DPD, particularly in its relation to its function as a flood storage and biodiversity asset.

Other Comments

Further to previous consultations on the Core Strategy the Strategic Flood Risk Assessment has been finalised by the Council. As part of this Critical Drainage Areas have been identified within the borough and there is now a requirement for developments over 0.5 hectares in these areas to provide a flood risk assessment. Furthermore there should be strict requirements for reducing surface water run off in critical drainage above the requirements of PPS25 (i.e. Paragraph F5).

Therefore in light of this we would request that the Council considers the policy wording of L5 (Climate Change) to reflect the recommendations of the SFRA in setting standards for surface water run off.

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

Yours faithfully

Helen Telfer
Planning Liaison Officer


Direct dial 01925 543363

Direct fax 01925 852260

Direct e-mail helen.telfer@environment-agency.gov.uk

Trafford's Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy

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Comment Form – March 2010  **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:** strategic.planning@trafford.gov.uk

Comment Sheet

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

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	X	Page number	All
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	


Are you supporting, seeking change or do you have general comments about this specific part of the document?				
Support		Seeking a Change		General Comment
				X

Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document.

a) has there been an equality impact assessment in regards to this strategy ? This is a very significant piece of work with long term implications for the people of Trafford, but there seems to little or no reference to equalities within the document, nor any evidence of an EIA being commenced/ completed. Failure to undertake an EIA would be a significant risk, given the Council's duties around equality. What steps are going to be taken to ensure that this strategy does take into account the Council's responsibilities and aspirations around promoting equality

b) Has there been any involvement of disabled people in the development of the strategy, as required under the Disability Equality Duty. Under the DED it is required that there is involvement (not just consultation), and it would be expected that this would be both in terms of developing the strategy, and in designing involvement and consultation processes. There seems to be no reference to promotion of disability equality within the document, despite the fact that such

Trafford's Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy

Comment Form – March 2010  PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO strategic.planning@trafford.gov.uk

things as housing and transport are central to the meeting the needs of disabled residents in terms of independent living. What steps are going to be taken to ensure that the Council meets its duties under the DED in regards to developing and implementing this strategy.

- c) The document refers to working with CYPS and the PCT over social infrastructure – but no reference to engaging with Adult Social Services, or the voluntary sector (eg via VCAT). Why is this ? There are significant challenges in meeting the demographic changes over the next 10 – 20 years, which will be a major challenge to the Council.

Please continue on a separate sheet if required

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

e-letter



Dennis Smith
Head of Strategic Planning & Housing
Strategy
Planning & Building Control
Trafford MBC
PO Box 96
Waterside House
Sale Waterside
Sale
M33 7ZF

Our ref: P2110/4.1.2/09/005

Your ref:

Contact: Rosie Ollé
Senior Land Use Planner

Direct line: 0161 244 1280

Email: rosemary.olle@gmpte.gov.uk

Date: 10 May 2010

Dear Mr Smith,

**Trafford Core Strategy: Further consultation on the Vision,
Strategic Objectives and Delivery Strategy**

Thank you for notifying GMPTe of this further consultation.

GMPTe considers it important for all future developments to be located in areas of high accessibility by public transport, and therefore welcomes Strategic Objective SO6 which states the intention to:

'Promote significant levels of development in the most sustainable locations in the Borough and make less sustainable locations accessible by improving transport links, particularly public transport.'

It is important that if new development is to be located in areas with low accessibility, policies are put in place to ensure that adequate public transport is provided (this principle is set out in section 4 of GMPTe's 'Land Use Planning and Public Transport' guidance document www.gmpte.com/landuse).

In an earlier consultation on Trafford's Core Strategy GMPTe provided you with an Accessibility Plan showing the areas of Trafford that currently meet the accessibility standards that GMPTe applies to new development (see paragraph 6.1. in GMPTe's 'Land Use Planning and Public Transport' guidance). This current consultation includes '5 proposed strategic locations' and, if at a future date you would be able to provide us with detailed plans, we can overlay these on the accessibility plan so as to identify areas of poor accessibility where improvements to public transport are required.



SPECIFIC COMMENTS ABOUT THE PROPOSED FIVE STRATEGIC LOCATIONS:

POLICY SL1 - POMONA ISLAND

Whilst this location is well accessed by Metrolink, there will be a need to improve pedestrian links to the site and it is therefore to be welcomed that Policy SL-1 identifies the need to provide 'suitable pedestrian and cycle links to and from existing Metrolink Stops at Combrook and Pomona'. However pedestrian and links should also be provided to key bus routes to give access to a wider range of destinations.

POLICY SL2 - TRAFFORD WHARFSIDE

This location also requires improved pedestrian links, and the requirement to provide pedestrian bridge crossings at Clippers Quay and Mediacity are to be welcomed.

Both Pomona Island (SL1) and the Wharfside areas will benefit from the increase in Metrolink services following the introduction of the Metrolink Mediacity:uk extension in 2010.

POLICY SL3 – LANCASHIRE COUNTY CRICKET CLUB QUARTER

This location is well-served by bus and Metrolink, and whilst capacity problems would otherwise have become an issue, additional trams are now being introduced on the adjacent line. However the proposed intensification of use at this location may cause problems with capacity in the future as passenger demand grows.

POLICY SL4 – TRAFFORD CENTRE RECTANGLE

Some sections of this location site have good access to Trafford Centre Bus Station, but other parts currently have poor access by public transport. Improved public transport is essential, given the congestion problems on the M60.

Greater Manchester Integrated Transport Authority indicated its policy preference for a future Metrolink extension to serve Trafford Park leading to the Trafford Centre and Trafford Quays. However, the route of the Trafford Park Metrolink extension is currently unfunded and has yet to be confirmed via the process of public consultation and a Transport and Works Act order application.

The future Metrolink Trafford Park extension has the potential to improve public transport access to three of the Strategic Locations (Policies SL1, SL2 and SL4).

POLICY SL5 – CARRINGTON

This location is currently poorly served by public transport, and it takes an hour by bus to Manchester. The provision of fast high quality public transport links to the main local trip attractors would be essential in the development of this location. The development of infrastructure and provision of services would need financial support from future developers.

e-letter



All five Strategic Locations, identified for future new development, include requirements for 'Improvements to Local Highway Network and Public Transport Provision,' but given that funding for transport is likely to be limited in the foreseeable future, delivery may well depend on the extent to which the developers themselves can provide funding. The Local Infrastructure Plan will need to show that the phasing of sites reflects the timescales within which any essential infrastructure can be delivered and explicitly identify how it will be funded. I understand that Trafford's SPD1 'Developer Contributions to Highway and Public Transport Schemes' is under review and it is important that the public transport schemes included in this are related to the 5 Strategic Locations, so that funding can be allocated accordingly.

If you require any further information please contact Rosie Ollé on the above extension / email.

Yours sincerely

Moira Percy
Transport Planning Section Manager