


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

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	
Sustainability Appraisal		Paragraph number	2.3
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 yes	General Comment

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Paragraph 2.3 – The Vision.

Redrow Homes do not object to the generality of the vision that is proposed, including the principle of regenerating the identified 5 Strategic Locations. However, it is suggested that the identification of site specific locations for regeneration should be addressed elsewhere within the document and not within the general vision, especially as it is considered that the approach is in need of modification (as set out in other representations).

Furthermore, we note that the second bullet point in the list of means whereby the Vision will be achieved is that “all” of the most deprived areas will be regenerated. Once again, we do not object to the broad principle, but as this document is concerned with delivery we believe that this goal may be unduly ambitious and it would be better to refer to:


A strategy that meets the needs of Trafford for new development with a particular focus on the regeneration of the most deprived areas.

In a similar vein, we have concerns with the final bullet point relating to Carrington, we do not see why Carrington is identified separately from the regeneration locations in the second bullet point.

Whilst a vision, almost by definition, has an element of aspiration within it, in the context of an LDF it must be possible to demonstrate that the vision is also deliverable; it is a consistent theme of our representations that we question the genuine deliverability of the Vision and, in the event that our fears are proved correct, then it does not appear that there is at present a strategy which can come forward as may be required to provide the required level of development. Given the significant level of uncertainty, we do not believe that it is appropriate to rely upon a future review of policy to address this potential issue, the mechanism needs to be put in place in this Core Strategy.

In summary, we consider that the Vision and the means whereby it will be achieved need to be a little more general so as to allow greater flexibility elsewhere in the Plan.

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	18
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	Partington
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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Partington – Place Objectives.

Redrow Homes support the general objective of regenerating/developing Partington. However, we have the following comments in relation to some of the Objectives:

PA01 – We do not consider that merely arresting population decline will be sufficient. In order to move forward, a level of population growth is required that is sufficient to support enhanced facilities.

PA014 – If development in Partington is seen as a positive factor in reducing the physical isolation of Carrington, then this would suggest that Partington is in many respects a preferred location for development.

PA018, 19 and 20 – We do not understand why these general objectives are set out in relation to Partington, but not, apparently in relation to all other places. Surely, the objectives, insofar as they may be demonstrated to be justified (no detail is provided), should either be generally applicable or not applicable at all.

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	22 - 25
Sustainability Appraisal		Paragraph number	4.6 to 4.24
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	General approach
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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Strategic Locations – paragraphs 4.6 to 4.24.

Redrow Homes support the revised approach to the assessment of Strategic Locations and Strategic Sites since deliverability is obviously a fundamental requirement.

However, what the reassessment demonstrates is that there is insufficient knowledge and certainty in relation to any of the identified locations to justify them being identified as Strategic Sites and that only five locations can be identified as Strategic Locations in recognition of their emerging, but as yet inadequately established, potential.

Whilst welcoming what we regard as a more realistic assessment of the present knowledge and deliverability of these complex sites, the outcome is of genuine concern when it is fed through into the policies relating to the provision of the required levels of development.

We raise a specific concern in relation to paragraph 4.23. Our concerns with regard to deliverability are not addressed by a commitment to establishing project delivery teams, such an approach may, if appropriately managed, maximise the potential of a particular location, but it cannot deliver a fundamentally undeliverable project. The potential of any site will depend primarily on the nature of the project itself, market demand, the cost of infrastructure and land control; it is these factors that are likely to determine whether a particular site will come forward in whole or in part within the Plan period and not the existence of a project delivery team, albeit that it may prove helpful if the other factors are all positive.

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Sustainability Appraisal		Paragraph number	6.1 to 6.9
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL2
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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SL2 – Trafford Wharfside.

Redrow Homes make the following observations in relation to this proposal:

1. We have no objection to the principle of redevelopment in this area; it is clearly one within which there is significant potential for regeneration/redevelopment.
2. Given the need for the proposals to be taken forward through the Land Allocations Plan DPD, presumably with requirements for masterplanning and the submission and approval of applications thereafter, including what will clearly be complex S.106 obligations, the delivery of dwellings from 2011 onwards is clearly impractical. We would suggest that 2014/15 is more realistic as the earliest possible start date.
3. We note that the site is in multiple ownerships which will not assist in bringing the development forward.
4. The assumption that a significant number of the dwellings will be apartments raises particular problems in the current market conditions. The apartment market may improve, but this cannot at present be relied upon and certainly not to the extent that it would support a development of this nature which is so heavily skewed towards apartments; furthermore, in the current market a development with a large number of apartments within it would not even obtain finance, even if a developer was prepared to contemplate development.
5. It is clear that the infrastructure requirements, for which the costs are generally unspecified, will run into many millions of pounds, this places a major financial burden on the proposals and potentially introduces cash flow issues.

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Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	34
Sustainability Appraisal		Paragraph number	7.1 to 7.7
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL3
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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SL3 – Lancashire Cricket Club Quarter.

Redrow Homes make the following points in relation to this Strategic Location:

1. We have no objection to the principle of this regeneration proposal.
2. We note that the site is in multiple ownerships, both public and private, if the development is to be brought forward as a comprehensive strategy, then it is clearly important that the land is brought into a single ownership, the cooperation of individual owners in this respect cannot be relied upon.
3. Although the infrastructure requirements seem less than in relation to some of the other Strategic Locations they are, nevertheless, still very significant and the ability of the scheme to deliver the full package of proposals cannot be assured unless, or until, the masterplanning and feasibility exercises have been completed.
4. As the Background Note on the Strategic Location confirms that construction on the residential sites will not commence until 2018 (paragraph 4.25), it is clearly unrealistic to assume the delivery of houses from 2011/2012 onwards – 2018/19 is the earliest possible which would suggest that construction will run well over the end of the Plan period.

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	37
Sustainability Appraisal		Paragraph number	8.1 to 8.10
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL4
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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SL4 – Trafford Centre Rectangle.

Redrow Homes make the following comment in relation to this proposal:

1. The table of works required in relation to the development (paragraph 8.2) makes clear the need for works to the M60, including the provision of an additional eastbound lane. As this would be dependent upon DfT funding and delivery, they would, therefore, need to be party to any S.106 Agreement. We would suggest that in the current economic climate this factor, irrespective of the other infrastructure requirements, could place a fundamental block on the delivery of the project.

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	42
Sustainability Appraisal		Paragraph number	9.1 to 9.11
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL5
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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SL5 – Carrington.

Redrow Homes make the following comments in relation to this proposal:

1. We note that, whilst Shell may, indeed, be the principle landowner, it is acknowledged that there are other landowners who may not share the same vision for the site.
2. It is self-evident from the list of infrastructural requirements at paragraph 9.2 that there are massive costs associated with this development proposal, many of which relate to making it a sustainable location, which may render the project unviable.
3. In addressing the redevelopment of a former petrochemical site, particularly for residential development where 80% of the houses are intended to be family homes, we would have expected to see contamination as an issue that has been clearly addressed at the outset – it is not clear whether there has been any detailed work on this matter. Self-evidently, if there is a significant contamination issue then this could add to the costs of development in a massive fashion and, potentially, render the project unviable. This issue needs to be clearly resolved before the project progresses to the point that it becomes a key element of the LDF.
4. The relationship of existing and proposed uses to one another within a development of this nature is clearly a key element that we would expect, at the very least, to see identified within the 'Development Requirements' part of the Policy. However, the way in which the area is dominated by heavy industry raises a fundamental question as to whether this really is a suitable location for residential development, it appears that it would be very difficult, if not impossible, to create a high quality residential environment of the kind that is so clearly the objective of National policy.

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Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	47
Sustainability Appraisal		Paragraph number	11.1 onwards
Strategic Locations Background Note		Policy number	L1
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Table/Figure reference	L1
		Other (including omissions and suggestions for alternative approaches)	

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Policy L1 – Land for new homes.

Redrow Homes make the following points in relation to the proposals for delivering new housing:

1. It does not appear to be explained how it will in practical terms be possible to phase the delivery of housing so that in the period 2011 to 2016 the rate of building will more than double from that in the earlier period. Whilst it may be expected, if the Strategic Locations are successfully delivered, that housebuilding rates will rise around this time it is not something that can be managed in this controlled fashion.
2. Much more detailed explanation is required of the figures set out in Table L1. It is not clear, for example, to what extent there is double counting of sites which may presently be viewed as commitments, but which also fall within the general areas of the Strategic Locations; the SHLAA needs urgent revision since, of course, its information is based on the previous Core Strategy proposals and, therefore, does not provide an evidence base that explains Table L1.
3. However, what is clear from Table L1 is that the overall level of net new housing that it is anticipated that the LDF will deliver is just 3.5% more than the basic target requirement. As indicated in our representations in respect of the Strategic Locations, we have serious reservations as to whether these sites will be able to deliver the amount of housing proposed within them and especially within the time periods envisaged (some of which are, self-evidently, unachievable). It is of particular note that SL2, SL3 and SL4 (and arguably SL5 as well) fall within areas where redevelopment proposals involving residential redevelopment could have been promoted previously, but, despite the better economic climate previously, nothing has happened. The question to be asked, therefore, is how the specific allocation of a site can fundamentally change the reluctance of the development industry to tackle the problems in these areas and the simple point is that it cannot, especially in the current economic climate and with the massive infrastructural investment that the policies require to be delivered alongside the residential development. We emphasise that we do not oppose these sites (although we do have concerns about SL5), but we conclude that, despite best endeavours by all involved, these sites will not be delivered as expected and the 3.5% 'over-provision' will turn into a substantial under-provision.
4. The question, therefore, arises as to what will happen in these circumstances. We note that at paragraphs 11.13 to 11.15 it is indicated that the delivery of land will be monitored and, dependent on the findings, it will be decided whether a review of the Plan is necessary. This may be an appropriate strategy where in general terms a plan is considered to be robust with a strong expectation of delivery as planned, but in this case it is clear that the Plan is extremely vulnerable and it is very likely that at least some of the Strategic Locations (and other sites too, because there is always slippage) will either deliver at a much lower rate than expected, or will not deliver at all. Therefore, the problem we identify with the current strategy is that, having regard to the major challenges that it seeks to confront, it has no 'Plan B' to which it can resort if and when problems arise.

5. We do not accept that a formal review of the development plan is an appropriate way of addressing this issue in the current circumstances – by the time that monitoring establishes an emerging problem it will already be too late to address the problem, but to compound this situation by requiring a formal review of the development plan would only make matters much worse. Therefore, we propose that the strategy should incorporate a 'Plan B' so that if and when problems do arise, the Council is in a position to react quickly to keep the delivery of housing within the Borough on track.
6. We propose that the area of 'Other Protected Open Land' at Warburton to the south of Partington be identified as a reserve site within this Plan, with the potential for it to be brought forward in circumstances where it is clear that the sites identified in Table L1 are not delivering sufficient amounts of housing. We consider this site to be appropriate for the following reasons:
 - a. The exclusion of the site from the Green Belt is, of itself, recognition of its suitability for development at the appropriate time.
 - b. In the circumstances we identify, a greenfield site has the important advantage that it is more readily deliverable than a site involving previously developed land and it can, therefore, react far more quickly to an emerging land supply problem. We are not aware in any event that there are other brownfield sites that can realistically contribute as an alternative.
 - c. Development on this site will assist in the regeneration of Partington and reduce the physical isolation of Carrington, thereby encouraging its development prospects (see PA014).
7. We do not have an objection to the Council's strategy to concentrate its efforts on the regeneration of brownfield sites, but the strategy must be recognised for what it is, which is a high risk strategy with considerable uncertainty as to whether it can be delivered. In these circumstances, we consider that a far more balanced strategy is one that recognises the uncertainties and makes provision for 'Plan B' so that a speedy response to delivery problems can be brought forward if and when problems arise. As it stands, we have serious concerns with regard to the ability of the Core Strategy to meet its own aims and objectives, and those set out in National policy.

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	53
Sustainability Appraisal		Paragraph number	L3.4
Strategic Locations Background Note		Policy number	L3
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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Policy L3.

Redrow Homes support the objectives of Policy L3, especially insofar as they relate to Partington. However, we would make the following observations:

1. In accordance with our representations in relation to Policy L1, reference should be made to the potential for more than 850 dwellings at Partington if it proves necessary to bring forward the proposed reserve site south of Partington.
2. Whilst we acknowledge the objective of regenerating Partington, it does not appear that the requirement for development on greenfield land to make a contribution to the improvement of existing open space areas can possibly be viewed as being in compliance with Circular 02/2005 guidance.

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Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	75
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	R4
Other document, (please specify)		Vision reference	
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Policy R4 – Green Belt and other protected open land.

Redrow Homes do not object to the generality of this Policy.


However, having regard to our representations in relation to Policy L1, it is proposed that an additional point, R4.8(d) is inserted as follows:

Required to be developed in order to provide for the required rate of housing development through the Plan period.

Paragraphs 16.19 and 16.20 would also need to be amended to reflect the same change.

We do not understand paragraph 16.20, clearly, the final sentence needs revision. However, we do not understand the comment that they are being protected so as to provide for future development until the Green Belt is reviewed; a review is likely to require more land to be excluded to provide for medium to long term development needs, not less.

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	✓	Page number	73 75
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	24-4
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
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I feel the land at Davenport Green should be returned to ~~the~~ the green belt to preserve rights of way, to avoid excess traffic + to protect the character and rural aspect of the area.

Please continue on a separate sheet if required

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**Trafford Core Strategy: Further Consultation on the Vision,
Strategic Objectives, and Delivery Strategy, March 2010**

**Submission by Royal London Asset Management in relation to
Davenport Green**

**Case for Identifying Davenport Green as a Strategic Site in the TBC
Core Strategy**

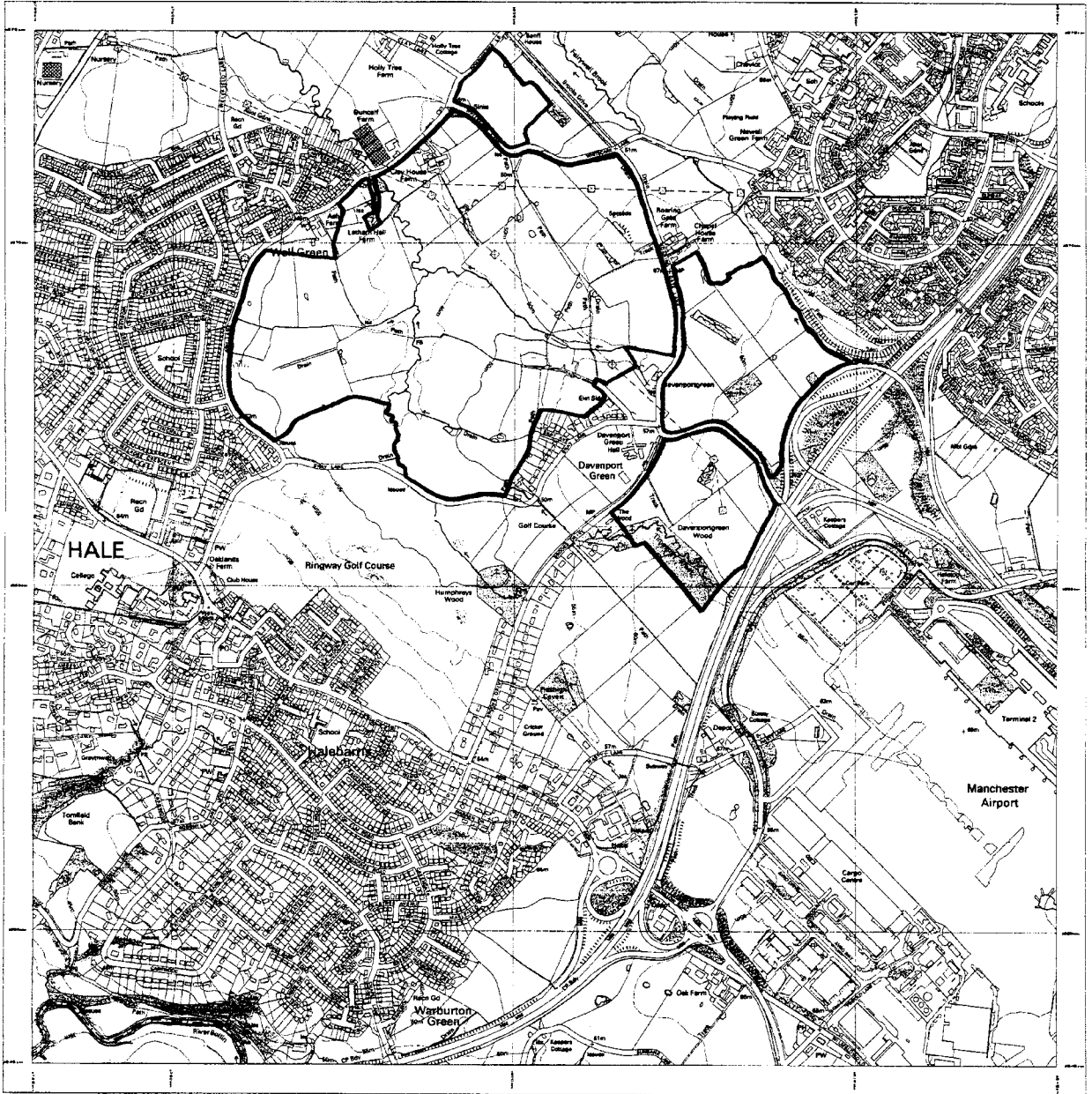
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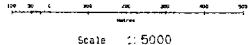
Site Plan



1:5000 scale Enlargement



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1. Introduction

This representation is made on behalf of Royal London Asset Management in response to Trafford Council's consultation on the Vision, Strategic Objectives, and Delivery Strategy of the Core Strategy.

Royal London Asset Management owns about 335 acres (135.6 has) of land at Davenport Green within the Borough of Trafford (see Site Plan). 90 acres (36.44 has) of the land was removed from the Green Belt in Trafford's 1996 UDP, a position confirmed for strategic reasons in the Council's Revised UDP adopted in 2006. Planning permission for half the planned development (500,000 sq.ft. or 46,468 sq.m.) was granted in 2000 and renewed in 2003 (expiring in 2009).

RLAM believes the case remains compelling for retaining employment land status on this land and maintaining it as being outside the Green Belt. Therefore, the Fund is making the case that Davenport Green should be designated as a Strategic Site within the Borough's new Core Strategy, one which is critical to delivery of the Council's strategic objectives.

RLAM wishes to bring forward modified development proposals for Davenport Green during the life of TBC's Core Strategy. These proposals will integrate with the vision for Airport City and with the wider arc of development either side of the Airport, and deliver opportunities to regenerate the local economy. The Fund remains firmly committed to creating a Rural Park. On the remainder of the site, RLAM wishes to create an exemplar and sustainable scheme in a mix of uses, one which meets the demands of the local and sub-regional economy.

Against this background RLAM are making this submission in order to demonstrate that:

1. the Draft Core Strategy for Trafford is unsound, which is a serious barrier to the programmed adoption of the Core Strategy
2. the designation of Davenport Green as a Strategic Site (for employment) would restore the soundness of the Core Strategy
3. the need to review how to restore sub-regional economic prosperity in the wake of the recession and the new City Region context of cooperation and devolution are creating major opportunities for Trafford to punch above its weight and realise major benefits for the Borough.

2. The Core Strategy: A New Start for Davenport Green, Trafford and the City Region

This chapter examines the factors which demand that Davenport Green be given close scrutiny for the contribution it can make to Trafford (and to the wider sub-region) at this critical time of change, for which the Core Strategy to 2026 is being prepared.

Local Development Frameworks, and Core Strategies as their central element, are a new approach to place shaping and delivery. The Council has seized this opportunity by giving a strong emphasis, in the objectives of the Core Strategy, to the many distinctive places that make up the Borough.

RLAM is conscious that the land, of which they now have 100% control, has not been developed in the manner intended in the UDP and the Revised UDP. Whilst there is still time for the proposals to be implemented within the timescale of the UDP (to 2016), the Core Strategy and the change of ownership have presented RLAM with a valuable opportunity to reflect on the future role of Davenport Green. A number of factors are encouraging RLAM to bring forward different proposals for Davenport Green:

- In a rapidly changing global market in which firms need to be nimble and flexible in their capital commitments, the place for large (over 100,000 sq.ft.) headquarters, one of the key target sectors for the current proposals, is much diminished; smaller units offering highly flexible space for “new ways of working” are more relevant. There is also a role for business communities where firms in related sectors (and even in unrelated sectors) can network to mutual advantage.
- There is a welcome emphasis in Core Strategies on deliverability of proposals. For Davenport Green there have been issues about delivering the infrastructure to serve the full development. In the wake of the recession there is a much greater spirit of cooperation amongst businesses and RLAM see real opportunities to work with other stakeholders, for example Manchester Airport and the key developers at Roundthorn Industrial Estate, to secure a coherent programme of development and infrastructure in the area.
- Single ownership of Davenport Green gives RLAM a new freedom of manoeuvre in relation to the development of the site.
- Concern about climate change has risen up the agenda, not only in public policy but also in the corporate strategies of companies of all sizes. The Core Strategy recognizes this and any proposals for Davenport Green need to aim for zero carbon emissions.
- The geography of deprivation in the conurbation and in Trafford is broadly the same as it was twenty and more years ago; economic development of the type anticipated at Davenport Green will not alone deliver escape routes from deprivation; new approaches are needed and RLAM wish to explore and implement these with partners, for example with the Council and with local secondary schools.
- City Region status (the Greater Manchester Combined Authority) gives Greater Manchester (along with only one other city, Leeds) a new opportunity for cross-border working with devolved funds and powers in relation to economic development. The arc of development around the Airport, which embraces transport, regeneration and environmental issues as well as economic development, is a good opportunity for an integrated approach on the part of Trafford BC, Manchester CC and Stockport BC. The clear aim of the City Region programme is to address the challenge of reducing the disparity in gross value added (GVA) per head between the City Region and the rest of the country; net additional investment and jobs are required, especially those with an export focus.

Whilst change is to be pursued where it is beneficial, there are some valuable constant features of Davenport Green that will be safeguarded in taking the proposals forward, for

example the rural park and its endowment and the commitment that occupiers at Davenport Green will represent net additional activity to the sub-region.

RLAM sees a growing need for an exemplar commercial development that will be competitive for nationally and internationally mobile investment and jobs:

- It was announced last week that Manchester had dropped two places in the UK Competitiveness Index.
- Midas have expressed serious concern about the loss of investment projects from the City Region. They, with the Business Leadership Council, are commissioning research to identify major employment sites, with a sharp focus on the competitiveness of the sites.
- Other major cities are taking action to compete more effectively for mobile business investment; for example Dusseldorf Airport, which has comparable passenger throughput to Manchester Airport and likewise lies in a regeneration region, has a Master Plan for 250,000 sq.m. of business space adjacent to the Airport.
- Despite significant physical regeneration successes in Greater Manchester, the conurbation has not attracted sufficient inward investment or generated sufficient productivity gains to reduce the GVA disparity. Reports underlying the City Region programme (e.g. work by NESTA) have suggested that the conurbation needs to raise its competitive game (in order to match cities such as Barcelona). A key component of this enhanced competitiveness should be, they say, the provision of sites where the demand arises, namely in the south of the conurbation near the major economic driver, the Airport, and accessible to the high quality labour supply in Trafford and Cheshire.
- Trafford BC has not been able in the life of the UDP to implement any highly competitive business sites. The Core Strategy misses the opportunity of the new start and appears to continue with business as usual: identifying areas of Trafford Park (Strategic Locations) which are often in multiple ownership, with a poor mix of uses and with significant infrastructure needs. The Council does not have the resources to deliver nationally competitive sites from this raw material.

3. The Core Strategy is Unsound

3.1. A brief review of relevant Government policy guidance

This section highlights Government guidance to Local Authorities on preparing “sound” Core Strategies, and concludes with an outline of six points on which we submit that the Core Strategy (CS) is unsound; each is covered in subsequent sections of this chapter.

PPS 12 is very clear about the need for a Core Strategy to comprise three elements:

“Every local planning authority should produce a core strategy which includes:

- (1) an overall vision which sets out how the area and the places within it should develop;
- (2) strategic objectives for the area focussing on the key issues to be addressed;
- (3) a delivery strategy for achieving these objectives.”(PPS12, para 4.1)

“The vision should be in general conformity with the RSS and it should closely relate to any Sustainable Community Strategy for the area.” (PPS12, para 4.2)

“The delivery strategy is central. It needs to show how the objectives will be delivered, whether through actions taken by the council as planning authority, such as determining planning applications, or through actions taken by other parts of the Council or other bodies.” (PPS12, para 4.4)

“Core strategies may allocate strategic sites for development. These should be those sites considered central to achievement of the strategy.” (PPS12, para 4.6)

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

“Justified” means that the document must be:

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

“Effective” means that the document must be:

- deliverable
- flexible
- able to be monitored” (PPS12, para 4.52)

In the remainder of this Chapter we set out our view that the Core Strategy is unsound on the following grounds:

1. It fails to be in general conformity with the RSS
2. It does not relate closely to the Sustainable Community Strategy for Trafford
3. The delivery strategy will not achieve the vision and objectives adopted for the Core Strategy
4. The Core Strategy fails to take adequate account of the plans and policies of the adjacent local planning authority

5. There are deficiencies in the ways in which the Sustainability Appraisal has been carried out and the evidence in relation to Davenport Green is inaccurate and inconsistent with the assessment of other locations.
6. The proposed alteration of the Green Belt has not followed Government policy.

3.2. Conformity of the Core Strategy with RSS

This section demonstrates that the vision for the Core Strategy is not in “general conformity” with the Regional Spatial Strategy (RSS), as required by PPS12. We consider first the Vision and Objectives of the Core Strategy, we then review relevant sections of the RSS and finally draw our conclusions on conformity.

3.2.1. Core Strategy Vision and Objectives

The vision for the Core Strategy states:

“By 2026 Trafford will have vibrant and inclusive, prosperous and well designed sustainable communities, served by an integrated transport network offering a choice of modes of travel.

The historic, natural and built environment, including the Green Belt, will be preserved, protected and enhanced.

The focus for economic and housing growth will be within the urban area, primarily in the north east of the Borough and in the principal town centre, Altrincham. The following 5 Strategic Locations are identified as areas for change:

- Pomona Island (SL1)
- Etc”

The vision is elaborated under the heading “To achieve this Vision” with explanatory phrases. The one relating to economic development reads:

“Trafford Park Core will be maintained and strengthened as a key place to work to support both the Local and City Region economies.”

In relation to the employment and the economy, the Vision is translated into Strategic Objective 3 (SO3):

“Meet Employment Need – Establish the right conditions to sustain employment sites for new and diverse investment to enable Trafford to remain competitive and contribute to the growth of the economy of the sub-region and to attract and retain employment opportunities.”

Further evidence of the economic aims of the Core Strategy is provided in the Place Objectives for Trafford Park which is seen by the Council as the principal location for strategic economic development in the Borough: “To ensure that future development of the core industrial area reflects its significant role within the Region’s economy” (TPO8, part). This objective recognises that the Borough has a role in the regional economy, a higher ambition than contributing to the growth of the sub region.

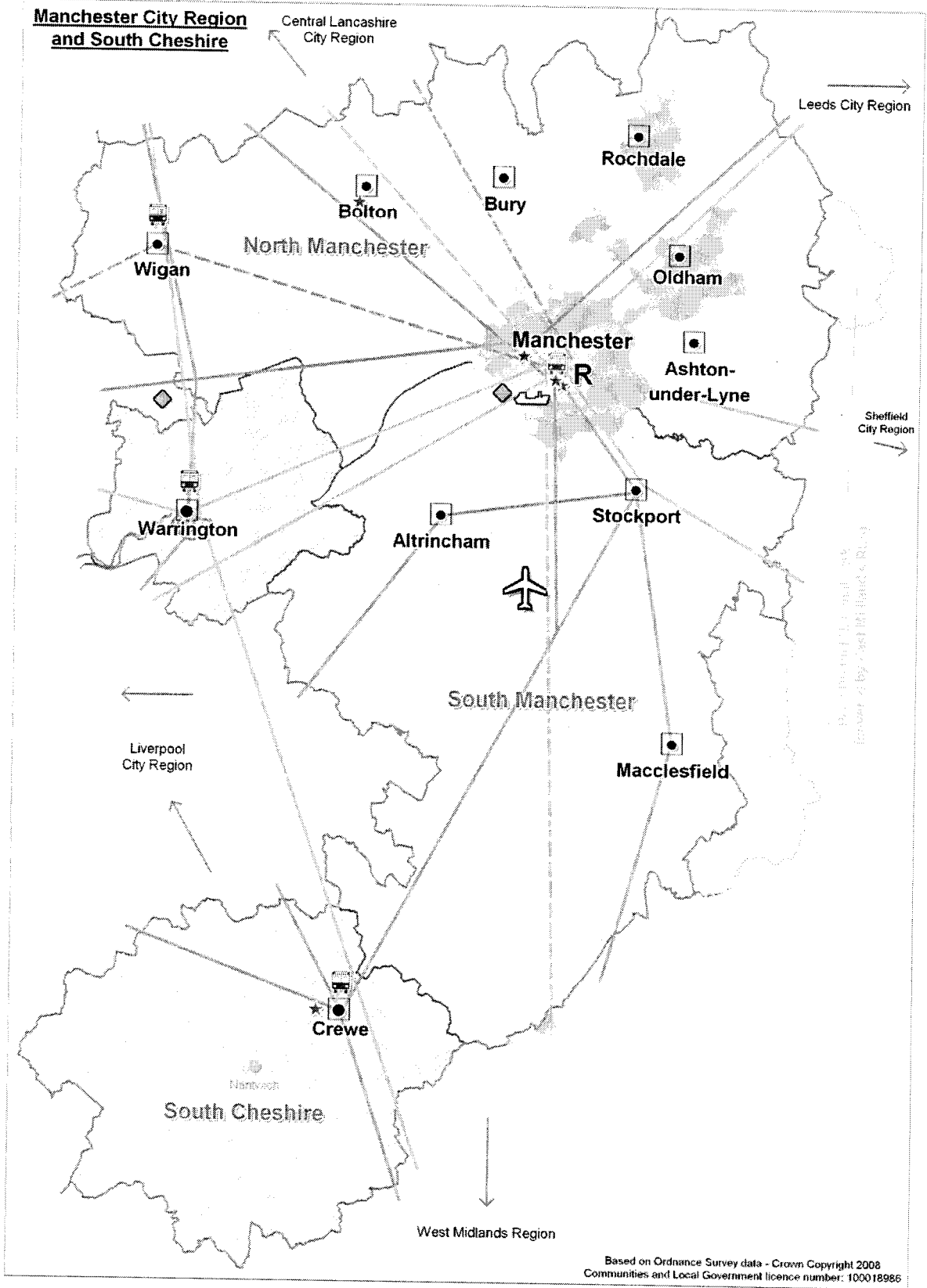
3.2.2. Regional Spatial Strategy (RSS)

This sub-section describes the consideration given to economic development in the RSS and in particular in relation to the Manchester City Region.

The RSS (paras 2.7 and 3.10), published in September 2008, recalls the national objective for both the region and the North (ern Way) to bridge the gap between regional GVA per head and the English figure (a 12% gap in the case of the NW Region). At para 2.8 it sets a high ambition for the economic development of the region:

“North West industry must be able to compete with its international rivals and this demands a first rate infrastructure, a highly skilled and adaptable workforce, and the best possible links to other parts of the UK, the rest of Europe and the world.”

At para 2.20 RSS recognises that the Manchester sub-region is the largest in economic output terms in the region and that it offers the greatest potential for boosting economic performance in both the NW and the North, having world class assets in the City Centre and the Airport. It is interesting to note that the Airport (about 2 kms from Davenport Green) lies at the centre of the Manchester City Region as shown in the Key Diagram below, a clear recognition of the importance of the adjacent Cheshire areas to the economic success of the City Region.



Spatial Definitions

It is appropriate to set out the different spatial definitions that are used in this submission:

1. Local: Trafford Borough
2. Sub-regional: normally the ten Greater Manchester authorities, but in the context of the RSS the sub-region extends south into Cheshire
3. City Region: the ten Greater Manchester authorities, but with specific reference to the Statutory City Region, which will be the responsibility of the Greater Manchester Combined Authority from 1st April 2011
4. Region: the NW administrative area covered by the Government Office, the Regional Spatial Strategy and the Regional Economic Strategy

Development Principle 1 (DP1) promotes sustainable economic development and a reduction in the gap in GVA per head. DP5 relates to managing travel demand and proposes locating growth in urban areas where there is good access to transport by different means. DP6 proposes that development should be located such that opportunities, e.g. for employment growth, are married to areas of need. Policy RDF1 sets out the Spatial Priorities for the Region.

Policies W1 and W2 commit local plans to strengthening the regional economy, including through the provision of sites, and in order to meet the needs of the identified growth sectors and through the provision of sites which will have a “significant role to play in the growth of the regional economy, as a result of the type of development accommodated and the location of the site....”(para 6.2). Policy W2 determines that “regionally significant economic development will be located close to sustainable transport nodes within the urban areas of Manchester, Liverpool and Central Lancashire City Regions and.....” It also includes a reminder that proposals for office development must be subjected to a sequential test as required by PPS6 (now PPS4).

Policy W3 asks LPA’s to comprehensively review land supply commitments including from the perspective of their market attractiveness (a consideration also for LPA’s in the identification of sites for regionally significant development (W2)).

Policy RT5 opens with a strong emphasis on the regional economic importance of the Airport: “Plans and strategies should support the economic activity generated and sustained by the Region’s airports, in particular, the importance of Manchester Airport as a key economic driver for the North of England....” It then refers back to Policy W2: “However, regionally significant business development that is not required for the operation of an airport should be located in accordance with the criteria set out in Policy W2 above” (para 8.20). It should be noted that links to and from Manchester Airport are identified as a national and regional public transport corridor and as an international and national gateway (Appendix RT). Whilst the text in Appendix RT identifies the public transport roles of the Airport and the City Centre/Piccadilly separately, Diagram 1 in the Appendix fails to maintain the distinction in spite of the considerable distance between the two. The important point is that the Airport is recognised in RSS as a major public transport interchange.

The Sub-Regional strategy for Manchester sets an ambitious target for the role of the city region and links the economic success of the city region to the well-being of its residents:

The vision is that by 2025 the Manchester City Region will be:

“A world class city region at the heart of a thriving North”

- one of Europe’s premier City Regions, at the forefront of the knowledge economy, and with

- outstanding commercial, cultural and creative activities;
- world class, successfully competing internationally for investment, jobs and visitors;
- an area where all people have the opportunity to participate in, and benefit from, the
- investment in and development of their city;
- an area known for, and distinguished by, the quality of life enjoyed by its residents; and
- an area with GVA levels to match those of London and the South East.”

Key phrases in this vision, in the context of economic development, are premier city region in Europe, competing internationally and GVA levels that match not only England, which of course reflect other lagging regions, but which match those of London and the South East.

Sub-regional policies MCR1 and MCR2 promote development in support of the vision and they refer back to the whole range of spatial priorities in Policy RDF1, including “other key locations which accord...”. MCR3 (southern part of the sub-region) provides for brownfield development of an appropriate scale and to meet local needs.

3.2.3. Conclusions

We now set out how the Core Strategy is not in “general conformity” with the RSS:

- In spite of making references to contributing to the sub-regional and even regional economies, the Core Strategy does not consider the possibility that any sites in Trafford may be potentially suitable for regionally significant economic development (a function of local planning authorities)
- In spite of forming part of the Manchester sub-region, one of the most fundamental assets of which is the Airport, the Core Strategy does not consider how Trafford might support the future development of the Airport, a facility that is a major source of employment for Trafford residents.
- The Council, as we will show when we examine the Strategic Locations identified in the Core Strategy, has not followed RSS advice to consider the market attractiveness of its employment land. The quality or use of sites or locations have not been considered.

3.3. Relation of Core Strategy to Sustainable Community Strategy

3.3.1. Sustainable Community Strategy (SCS)

The vision for the Core Strategy must, according to PPS12, “closely relate” to that of the SCS. However, the SCS creates a significantly different vision for the Borough from the Core Strategy:

“Trafford is thriving, diverse, prosperous, and culturally vibrant. A Borough at the heart of the Manchester City Region celebrated as the enterprise capital of the North West and home to internationally renowned sporting and cultural attractions.”

“Trafford businesses will be provided with all the tools and support to be able to continually and successfully compete for skills and investment on an international basis.”
(Trafford 2021, a Blueprint, Trafford Partnership)

3.3.2. Conclusions

Comparison of the vision and the economic objective of the Core Strategy with the vision of the SCS shows that the SCS goes further than the Core Strategy in two key dimensions: it introduces the concept of Trafford as the enterprise capital and puts Trafford’s economic role onto a regional plane, not just a sub-regional or City Regional plane. This higher ambition is confirmed in the view that Trafford businesses will compete for investment and skills on an international basis. The ambition of SO3 is however limited to “contribute(ing) to the growth

of the economy of the sub-region.” Given the outstanding locational advantages of the Borough, which we set out below, we suggest that the vision of the Core Strategy be amended to read as follows:

“Strategic sites and locations within the Borough will be identified and promoted as key places to work to support the Local, City Region and Regional economies.”

Growth of the Economy of the Sub-Region

The Core Strategy does not explain what is meant by “growth of the economy of the sub region”; Policy DP3 of the RSS provides some clarity:

“Promote Sustainable Economic Development

It is a fundamental principle of this Strategy to seek to improve productivity, and to close the gap in economic performance between the North West and other parts of the UK.

Sustainable economic growth should be supported and promoted, and so should reductions of economic, environmental, education, health and other social inequalities between different parts of the North West, within the sub-regions, and at local level.”

An important part of that growth will need to derive from businesses selling goods and/or services outside the sub-region. Such businesses are by definition not tied to a particular local or sub regional market (they may have other ties related to a pool of skilled labour, for example if the firm has been established in the sub-region for some time). If they are not tied in this way, they have choices over where to establish new or expanded facilities. If they are serving international markets, it may be more efficient for the firm to establish facilities outside the region or even outside the UK. If the gap between GVA per head in the region and the UK is to be narrowed through growth of the sub regional or regional economy, then the region will need to equip itself with locations and other resources, especially labour skills, that will enable Greater Manchester firms to be competitive on an international basis.

Landowners and developers such as RLAM have their part to play among the businesses identified in the SCS who will be attracting investment on an international basis. The Core Strategy fails to identify sites or locations that are capable of being competitive on this international scale. We examine this issue in the next section.

3.4. Effectiveness of the Core Strategy Delivery Strategy in Achieving the Vision and Objectives

This section demonstrates that the delivery strategy will not achieve the vision and objectives adopted for the Core Strategy. We highlight the relationship between the Council’s evolving proposals in the Core Strategy – in particular in relation to proposed site allocations – and the evidence base to support such proposals, which is not robust nor credible

3.4.1. The Council’s proposals for the Davenport Green in the Core Strategy: a Predetermined Decision

Much of the weakness in the evidence relating to the Council’s refusal to identify Davenport Green for strategic employment development (in spite of successive representations made by the landowners) derives from the fact that there appears to have been a prior decision made to return the land to the Green Belt. The result of this is a serious defect in the evidence underlying the Core Strategy: that judgments made about proposals for strategic employment development at Davenport Green in 1996 and confirmed by the Council in 2006 have been overturned without justification or evidence of changed circumstances. Indeed, as we have shown in Chapter 2, the case for exemplar employment development at Davenport Green has become stronger.

The Planning Inspectorate specifically warn against retrospective justification of planning proposals in development plan documents (PINS, Examining Development Plan Documents, Learning from Experience, Sept 2009, para 33).

3.4.2. The evolution of the Council's proposed site allocations within the Core Strategy

The identification of strategic sites is a key role of Core Strategies (PPS 12, para 4.1). The Draft Core Strategy distinguishes between Strategic Sites, which are "central to the achievement of the Core Strategy" and Strategic Locations, which are "an important element in the achievement of the Core Strategy". A different level of detail and commitment to their delivery is required in each case. Between the Preferred Option (June 2009) and the present draft, the Council has reduced the number of Strategic Sites from five to none and the number of Strategic Locations from 13 to five.

We question whether there is any merit in including Strategic Locations in a Core Strategy. They are not identified in Government Guidance, which only refers to strategic sites, as appropriate concepts to include in Core Strategies. (Inspectors have referred to locations in informal advice to other authorities.) Their identification in the Core Strategy is of no practical planning benefit in that they are not allocated for development; they have to be brought forward for development in a subsequent Development Plan Document, whereas Strategic Sites are allocations and can be brought forward through an SPD or Master Plan, that is without the need for another Development Plan Document. PPS12 was expressly amended to enable strategic sites to be brought forward more rapidly. The force of this point is endorsed by our examination below of the locations identified by the Council; their inclusion in the Core Strategy does not progress their implementation in that all those destined for significant employment use remain subject to major delivery constraints.

Apparently on the grounds that the Council does not have sufficient information about their delivery, the Core Strategy now contains no land allocations (for any use or purpose) that are central to the achievement of the Core Strategy. Having set out an objective to contribute to the growth of the sub-regional economy, the Core Strategy then fails to identify any sites that are central to the achievement of that objective. The reason for this omission is not that there is now any less importance attached to achieving this objective, only that the Council has not been able to provide sufficient evidence on the deliverability of the sites that might be suitable for strategic economic development. The allocation of land to achieve one of the key elements of the Core Strategy vision ("to support both the Local and City Region economies.") has been relegated to second (Strategic Location) or lower (policy provision) tier importance.

3.4.3. Deficiencies in the evidence base

Underlying the Draft Core Strategy are two important pieces of evidence: the Employment Land Study and the Sustainability Appraisal. Both are defective in our view. We address the first now and the second in section 6 of this Chapter.

The Employment Land Study failed to consider the quality of sites and their ability to compete with regional and national or international alternatives. In arriving at our views about the Strategic Locations identified by the Council and at our proposals for Davenport Green, we have examined competing developments at a number of sites in the UK and the rest of Europe, including Amsterdam, Dusseldorf, Barcelona, Madrid, Munich, Zurich, Copenhagen and Milan (all airport related developments) and Green Park, Reading and Chiswick Park, London (not airport related). We have found no evidence that the Council has considered either the requirements of mobile investors or the nature of the development offer made by locations that compete for such investment.

In the last two versions of the Core Strategy that have been published for consultation the Council have expressed their intention to discontinue the allocation of Davenport Green as a

major employment site. At the Preferred Options stage in June 2008 “the Council considers that in view of Trafford’s Economic Strategy and emerging RSS [Davenport Green] should revert to Green Belt in the Core Strategy”. (para 5.18) There was however nothing in the Trafford Economic Strategy or Manchester Economic Development Plan that justified the de-allocation of Davenport Green; and an Employment Land Review [Study] had not at that time been completed.

It should be noted that the Council’s reliance on the Economic Development Plan is undermined by the chronology of the publications concerned: the Council confirmed Davenport Green as a major high amenity site for employment in the Review of the UDP in 2006, which was **after** the publication of the Economic Development Plan in 2005.

In the Further Consultation on the Preferred Option in July 2009 the Council justified the non-allocation of Davenport Green by reference to the May 2009 Employment Land Study (ELS) in which it was found that there was a sufficient supply of land without Davenport Green and by reference to NWDA’s review of Strategic Sites which proposed – though at that point had not confirmed – elimination of Davenport Green because of its non-implementation. The latter (NWDA) point is addressed below.

The first point to note about the ELS is that it stated wrongly that Davenport Green is in the Green Belt. More generally the ELS focused principally on the quantitative need for additional land, not the need to identify particular classes of site, such as those (for regionally significant economic development) defined in Policy W2 of the RSS or sites which were capable of contributing to the sub-regional economy; the role and purpose of Davenport Green was not therefore appropriately considered. Furthermore the ELS, which was prepared by Ove Arup & Partners with Lambert Smith Hampton, was not itself the origin of the de-allocation of Davenport Green: paragraph 8.8 of the ELS reads: “A key site put forward by developers in Trafford is Davenport Green which is located within the Green Belt and performs poorly in planning policy and sustainability terms from the site assessment undertaken by Trafford Council (appended to the ELS). Based on the site assessments Trafford Council considers that this land should be released from its current, allocated employment use.” The Council ruled Davenport Green out on the basis of their own site assessment, which likewise takes no account of the special role and function of Davenport Green. The Council’s assessment scores Davenport Green differently from its own assessment at the time when it was an adopted Policy of the UDP, in most cases without any justification for the change of judgment; some key examples are given in the table below:

Issue	Site Appraisal Results appended to ELS, May 2009	TBC UDP 1996 Provisions
Suitability for employment development – surrounding uses	Agricultural land, M56, Manchester Airport, residential. Score 0	The Planning Brief for Davenport Green (appended to the UDP)(PB) had as its express purpose: “to achieve development which is well integrated with the total site and its Green Belt setting.”
Access to public transport	Score 1	PB provided for additional public transport services to be made available by the

		developer to the satisfaction of the Council.
Pedestrian and cycle access	Score 0	Ditto
Environmental impact	High, Score 0, but no supporting evidence provided	PB addressed the development form, car parking (numbers of spaces and location (95% underground), landscaping, highway layout and traffic impact, and development guidelines for the rural park including new woodland and habitat enhancement.
Site within an area for priority regeneration, improvement or protection	No, Score 0	Justification for the Policy in the UDP states: "The development of Davenport Green.....will complement the development of sites in existing urban areas, and thereby promote urban regeneration, by stimulating indirect and spin-off development and jobs in other parts of the conurbation. It will further promote urban regeneration by directly creating jobs of a high quality that are readily accessible to disadvantaged communities in the former Urban Programme target areas of Greater Manchester."

3.4.4. Five Strategic Locations

We now examine the extent to which the delivery strategy is likely to achieve the identified objectives, especially those relating to the economy of the sub-region or region. Whilst our focus is on the economic development objectives of the Core Strategy, we endorse the clear acknowledgement in the Core Strategy that economic development is important mainly for the benefits that it offers for increased employment opportunities, for supporting regeneration and for an improved quality of life for the people of Trafford.

Examination of the five Strategic Locations reveals that they are poorly equipped to deliver the vision and objectives of the Core Strategy. The five locations are Pomona, Wharfside, LCCC area, Carrington and Trafford Centre rectangle. We consider the potential contribution of each to the economic development objectives of the Core Strategy in turn.

SL1 Pomona

Pomona is identified as having potential for 10 hectares of employment development. It is shown as meeting SO3 and TPO8 objectives. However there is considerable uncertainty over its future development in this role:

1. It has planning permission for 546 residential units; the permission does not expire until May 2012.
2. The Strategic Flood Risk Assessment has shown the site to be unsuitable for vulnerable uses such as residential, health, education and some leisure activities
3. Concern over the viability of the site is aroused in the Phasing and Milestones section on Pomona in Trafford Core Strategy, Background Note on the 5 Proposed Strategic Locations, March 2010, (the Background Note) para 2.21, where reference is made to seeking funding from HCA.
4. Other threats to the viability of the site are posed by the constraints that need to be addressed: rendering the site safe from a flood risk point of view, assessment of potential contamination and remediation if necessary, provision of pedestrian and links to the two nearby Metrolink stations, improvements to the local highway network and to public transport, provision of community facilities and additional infrastructure capacity and other works set out in the Background Note, para 2.19.
5. The commercial role of the site is very unclear: it is described in the Background Note:
 - a. For mixed employment uses (para. 2.11)
 - b. Opportunity to make a marked improvement in the stock of quality office accommodation in Trafford (para. 2.11 d)
 - c. Serve to enhance Trafford's image as a tourist destination (para. 2.11 e)
 - d. Future success of Media City and/or within the City Centre will have an impact on the marketability of this site (para. 2.11 f); it should be noted that in terms of market perceptions Pomona is a considerable distance from and unrelated to either of these locations.
6. The justification for the designation of this location describes it as promoting local economies, not the sub-regional or regional economy

Overall we conclude that this Strategic Location

- a. Has major uncertainties about its delivery at any time in the plan period.
- b. Is unlikely to be attractive for business investment that can choose between this and alternative locations within or beyond Greater Manchester.
- c. Will not contribute to the growth of the sub regional or regional economies.

SL2 Trafford Wharfside

This location is shown as having the potential for up to 15 hectares of mainly B1 offices and light industrial development, leisure (hotels) and residential (900 units) development, an opportunity to create "a major mixed use area of regional and international significance" where the focus will be on opportunities for new economic (particularly digital and media) industries (Policy SL2).

There are doubts about whether the B1 development is likely to deliver sub regional growth:

1. The B1 mixed use development is described as being in the Mediacity:uk area, the implication (Draft Core Strategy, SL2, para 6.3) being that development will be stimulated by Mediacity:uk. However no part of Mediacity:uk is located in Trafford and Trafford Wharfside is separated from it by the Ship Canal. Furthermore 950,000 sq.m. of office and studio space are planned in Phase 1 alone. Phase 1 accounts for only one fifth of the land available in Salford for Mediacity:uk. For the foreseeable future it is more likely that Mediacity:uk will be a very effective competitor for the targeted digital and media industries at the expense of Trafford Wharfside.
2. The regional and international significance to which the Policy refers relates to MUFC (SL2, para. 6.1), which lies within the area, not to the quality of the B1 development.
3. There are major development requirements to be met:
 - a. Provision of a new high-frequency public transport system for the area; this is said to be required by 2016 (para 6.1, Implementation); however the phasing proposal indicates that more than a third of the B1 land will be developed before 2016 (and nearly half the residential units), which is inconsistent with the Priority 2 (“needed to ensure sustainability of growth proposed in Core Strategy”) attaching to the public transport improvements.
 - b. Provision of a strategic processional route from Mediacity:uk to Irwell City Park, MUFC and LCCC.
 - c. Two new pedestrian crossings of the Ship Canal.
 - d. A new primary school and a new secondary school.
 - e. The location is in multiple ownership.
 - f. There is no reference to how issues of land assembly for either infrastructure or development are to be resolved; the last time that major progress was made in securing restructuring on this scale in Trafford Park was when an Urban Development Corporation was in place with planning and compulsory purchase powers and major capital funding.

Overall we conclude that this location is unlikely to deliver sub-regional growth:

- a. The commercial development objectives are unrealistic and unjustified.
- b. There are major constraints on bringing forward sites for development and infrastructure.
- c. There are no effective measures proposed for addressing the identified constraints.

SL3 Lancashire County Cricket Club Quarter

This Strategic Location is primarily focused on the redevelopment of the stadium for LCCC, the development of 900 residential units, the redevelopment of the Town Hall and improvements to educational, community and commercial facilities; it contains no significant employment development proposals. Its contribution to Strategic Objective 3 is through the improvement of the cricket ground as a visitor destination.

SL4 Trafford Centre Rectangle

This location is a broad area centred on the Trafford Centre and extending to the Trafford Quays area. Development in the Trafford Quays area will comprise 1050 residential units and unquantified B1 accommodation. Elsewhere it is proposed that there will be “up to 10

hectares of land for employment activity providing high quality commercial B1 development, and including a landmark building, not exceeding 30,000 sq.m. at the former Kratos site” (for which planning permission has been granted) (Policy SL4). Other development planned includes a 4* hotel, a museum facility and new community facilities.

There is a number of concerns about the ability to deliver Policy SL4: the need to provide an integrated frequent public transit system (the phasing of which is not identified) and the need for significant but uncosted contributions to motorway and highway capacity, to additional education, open space and sports facilities and to additional utilities capacity.

The public transport requirement is very significant (Implementation, para 8.2): either the extension of Metrolink to Trafford Park or some alternative form of public transport, which is accorded Priority 2, but for which there are no costs and no phasing, but for which private developers are assumed to be responsible. In spite of the total uncertainty surrounding these proposals, it is claimed in the justification for the Policy (para 8.7) that the “proposals to improve highway and public transport infrastructure serving the area will improve sustainability of the location as a focus for development, making it accessible by a choice of modes of transport”. It cannot be that infrastructure, that is needed to enable the development to take place but for which no implementation plan exists, can be claimed as a benefit of the Policy.

However our main concern relates to the ability of Trafford Park to deliver sites for employment development of sufficient quality to achieve the vision and objectives of the Core Strategy. In the justification for the Policy it is stated that the “location has the potential to provide a range of employment opportunities to meet the economic regeneration and development needs of the Borough and to contribute towards the economic prosperity of the City Region” (para 8.3). However in the Background Note on the 5 Proposed Locations at para 5.15, Key Issues (from Evidence Base) there is reported from the Trafford Other Town Centre Uses Study a number of concerns about Trafford Park as a viable location for office development:

1. “Whilst Trafford Park has not historically been considered a key office location, it has seen increased office development in recent years.
2. One of the Park’s major issues relates to the availability of suitable sites.
3. In relation to the 63,000 sq.m. of floorspace across some 19.3 hectares of land that will contribute a proportion of Trafford’s office requirements, the report concludes that:
 - a. The committed office developments may not necessarily be suitable for Trafford’s growth sectors
 - b. Not all of the 19.29 has of land identified is proposed for office use: a number of sites are proposed for mixed use development incorporating both office and other uses.
 - c. Not all of the office development commitments will come forward for development.”

Given that the Council see Trafford Park as the major focus for strategic employment development (Draft Core Strategy, March 2010, para 2.9), these quotes from the evidence base give no confidence that Trafford Park (or therefore the Borough) will be able to provide office accommodation of sufficient quality to be competitive and attractive for investors and occupiers that are able to choose between a range of locations within and beyond the City Region.

We conclude from the above that the delivery strategy will fail to achieve the vision and strategic objectives for economic development (and hence undermine achievement of the objectives for regeneration and other ends).

SL5 Carrington

The proposal is described as a move from a primary focus on employment (the former Shell operations) to large scale mixed use development: 1560 residential units, up to 75 hectares of land for employment activities, community facilities and green infrastructure. Whilst the justification suggests that the location will provide a range of employment opportunities, there is no indication of what the mix of industrial, distribution, sui generis and office/R & D will be. It is therefore not possible to assess the claim that the range of employment opportunities will meet the economic regeneration and development needs of the Borough or contribute towards the economic prosperity of the City Region (para 9.3). Carrington has however traditionally been a location for heavy industry; there is no evidence that it is being or will be transformed into an attractive location for modern business activity.

Delivery of this location is dependent on several, major and often uncoded infrastructure investments: power generation and distribution capacity, highway works including a by-pass costed at £24m., a primary school (£10m) and other community and utility investments. Most of this is to be funded by the private sector but there is no indication whether the proposals are viable.

We conclude in relation to Carrington that it is unlikely to deliver the quality of business premises to attract mobile investment to the City Region and that there are major uncertainties (unresolved in the Core Strategy) relating to the delivery of the proposals within the life of the Core Strategy.

Overall our view is that the Council may have fallen into the practice identified by the Planning Inspectorate in their advice on Development Plan Documents:

“In some instances the weakness derives from a failure to identify sufficient and/or appropriate land for development. Sometimes this appears to derive from a reluctance to accept that unpopular decisions about allocating land, possibly green field land, for development have to be made. Simply claiming that development needs will be met within the urban areas and that the position will be reviewed if necessary in the future is not likely to be acceptable unless there is a evidence that the “urban areas only” approach is likely to be realistic.” (PINS, Examining Development Plan Documents, Learning from Experience, Sept 2009, para 21)

This criticism echoes the comment reported in Technical Note on Strategic Locations and Sites Selection, which forms part of this consultation:

“One recurring comment questioned whether the change proposed in some Locations was significant enough to justify it being identified especially. For example, it was considered that the strategy proposed for the Trafford Park Core area of continuing to focus employment development here was really just ‘business as usual’ and didn’t constitute significant enough change to justify identifying it as a Location.” (para 4.2)

Our view, having reviewed the Council’s evidence and inspected the Locations, is that the Locations identified in Trafford Park and at Carrington represent a “business as usual” approach, with little “significant change” and a “failure to identify appropriate land”.

Furthermore we believe this deficiency derives from a more fundamental fault of the Core Strategy: that it starts with a set of assumptions which have not been tested in spite of many years experience of promoting development for employment. In the Vision Trafford Park is

described as “a key place to work to support both the local and City Region economies” and SO3 refers to Trafford remaining competitive.

The Council’s Economic Development Plan 2005 sets out a number of historic measures of the economic performance of the Borough. There is however no evidence of enquiry into how the Borough will maintain its competitiveness in a changing global climate in the future, how different external factors will impinge on the economic performance of the Borough e.g. the City Centre and the Airport, or how competitiveness will be reconciled with the demands of climate change e.g. reducing the need to travel. (The Trafford Centre and related development is a different issue.) The Council, when considering the City Region programme (Report to Members 17th March 2010) identified the labour supply in the Borough as a special factor in Trafford’s contribution to the Sub Region, but there is no evidence that this has been taken into account, its spatial distribution (which relates closely to housing markets) and the implications it might have for the spatial distribution of employment. Equally there is no evidence relating to the housing and labour supply beyond the Borough boundary and how that might impact on future travel to work patterns, carbon emissions and the distribution of employment land. No real alternatives have been tested in arriving at the Preferred Option.

3.4.5. Infrastructure Implementation

The requirement for Strategic Locations (Draft Core Strategy, para 4.7) is that they should be “supported by information of what is being provided, when it will be provided, who will provide it, how it will be delivered. This information has been outlined, with general costs and funding sources identified, and will be agreed in principle by all delivery partners”. However the infrastructure requirements for the five identified locations are only expressed in terms of the priority attaching to their status, the priorities being explained in para 4.19 of the Draft Core Strategy: apart from Priority 1 (committed and needed now) the priorities (2-4) are all stated simply as needed or desirable. This falls far short of the requirement in para 4.7.

Furthermore a total of 60 infrastructure projects are listed as being needed for the five Strategic Locations: only six of these are described as Priority 1/committed and the costs of these six are unknown except in two cases. It is clear that the proposals for the five Strategic Locations are very uncertain; whilst they are described as important for the delivery of the Core Strategy, there is no evidence that the identified locations pass the second test set out by the Council for Strategic Locations: that they will be “supported by information of what is being provided, when it will be will provided, how it will be delivered.”

3.4.6. Conclusion

We suggest that the Core Strategy is unsound on the grounds that the delivery strategy, specifically the designation of Strategic Locations, is extremely unlikely to deliver the objectives and vision of the Core Strategy in relation to the growth of sub regional economy (PPS12, para 4.4).

3.5. The Strategic Context of the Trafford Core Strategy

This section demonstrates that the Core Strategy fails to consider important cross-boundary issues and is not coherent with the emerging Core Strategy of the neighbouring City of Manchester.

PPS12 makes it clear that local authorities’ areas cannot be planned in isolation. At para 4.17 the Government urges local authorities to consider joint working on Core Strategies:

“Many issues critical to spatial planning do not respect local planning authority boundaries. Housing markets and commuting catchments often cover larger areas,

which makes planning an individual district in isolation a difficult task, even where the Regional Spatial Strategy gives a strong steer.”

In the southern part of the Borough there are two issues of major importance that should be taken into account in the Trafford Core Strategy:

1. Manchester Airport, which lies immediately east of the Trafford Borough boundary, and economic development related to the Airport
2. Wythenshawe, which has important regeneration needs and the western part of which, Newall Green, lies immediately adjacent to Trafford’s boundary.

We conclude this section with a recommended amendment to the Trafford Core Strategy to rectify deficiencies in the current draft.

3.5.1. Airport Master Plan

Manchester Airport, in conformity with Government guidance, has produced a Master Plan for the future development of the Airport. Whilst this is not a statutory plan, the Government expects them to be taken into account in the preparation of local plans and in the making of planning decisions (Future of Air Transport, White Paper, 2003). The Core Strategy fails, in its economic development policies, to take any account of the development plans of the Airport or of the opportunities offered by the Airport for Trafford communities, in spite of the fact that:

1. The Airport lies immediately adjacent to the boundary of Trafford Borough
2. It is the single most important factor in the future economic growth of the City Region and the region as it is the principal hub for international (i.e. export) communications
3. It employs some 18,000 people directly on the site, of whom about 10% are estimated to be resident in Trafford (Airport figures), making the Airport one of the largest employers of Trafford residents
4. It is a major factor in the fact that the south of the conurbation is a very highly valued location for business in Greater Manchester.

Furthermore representations have been made to the Council by the Airport to consider the possibility of locating within Trafford business activities related to the Airport, for example logistics.

The Master Plan for the Airport (“Manchester Airport Master Plan to 2030, November 2007”) sets out its objectives as including:

1. Inform the plans and strategies of others, especially regional economic, transport and spatial strategies.
2. Provide information on the likely physical development of the Airport site and the land required for that development.
3. Provide the basis for discussion with our customers, neighbours, partners and all those with an interest in our activities.
4. Provide a framework for managing the positive and negative effects of the Airport’s growth and spreading the economic benefits.

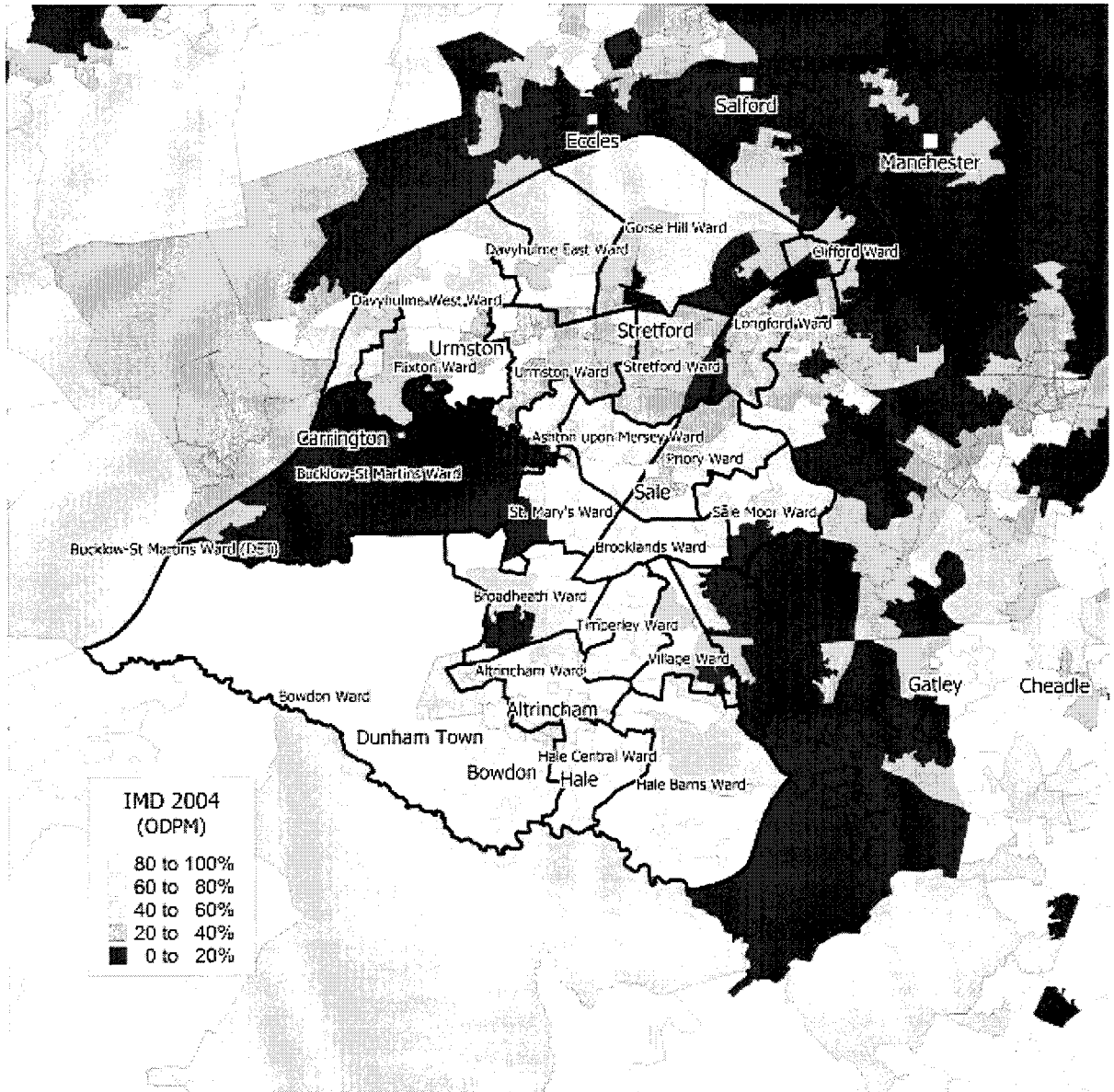
The Master Plan takes an integrated approach to the development of the Airport:

- it considers the future operational needs to accommodate the growth in traffic set out in the Future of Air Transport White Paper 2003;
- it sets out an environmental strategy to minimise the negative impacts of the Airport;
- it identifies the opportunities for economic development to exploit the locational advantages offered by the Airport;
- it sets out proposals for developing further the means of accessing the Airport by means other than the private car and
- it identifies the potential for the Airport and related economic development to assist in addressing the regeneration needs of the adjacent and very large Wythenshawe communities.

The Master Plan identifies an arc of development extending from Roundthorn Industrial Estate in the west, via Wythenshawe Hospital and Davenport Green to the Airport and beyond to the east. This arc wraps round Wythenshawe and is designed to maximise the opportunities for Wythenshawe residents, amongst others, to benefit from access to the employment opportunities in the Airport and in related sites.

3.5.2. Wythenshawe

The concept of linking development opportunities related to the Airport to the regeneration needs of the Wythenshawe communities (see attached diagram from Trafford Council's Economic Development Plan, 2005, which shows the extent and intensity of deprivation in and immediately adjacent to the Borough, including adjacent to Davenport Green) is also developed in the Wythenshawe Strategic Regeneration Framework, produced by Manchester City Council in December 2004. The spatial framework set out in Chapter 6 and illustrated in Figures 1-7 (see in particular the Strategic Master Plan, Figure 3, below) is an excellent example of an integrated approach to planning and development: integration of issues across LA boundaries (Manchester, Trafford and Stockport) and integration between the key topics of residential communities, employment, movement, green space, property market factors (the south Manchester effect), economic linkages and service centres.



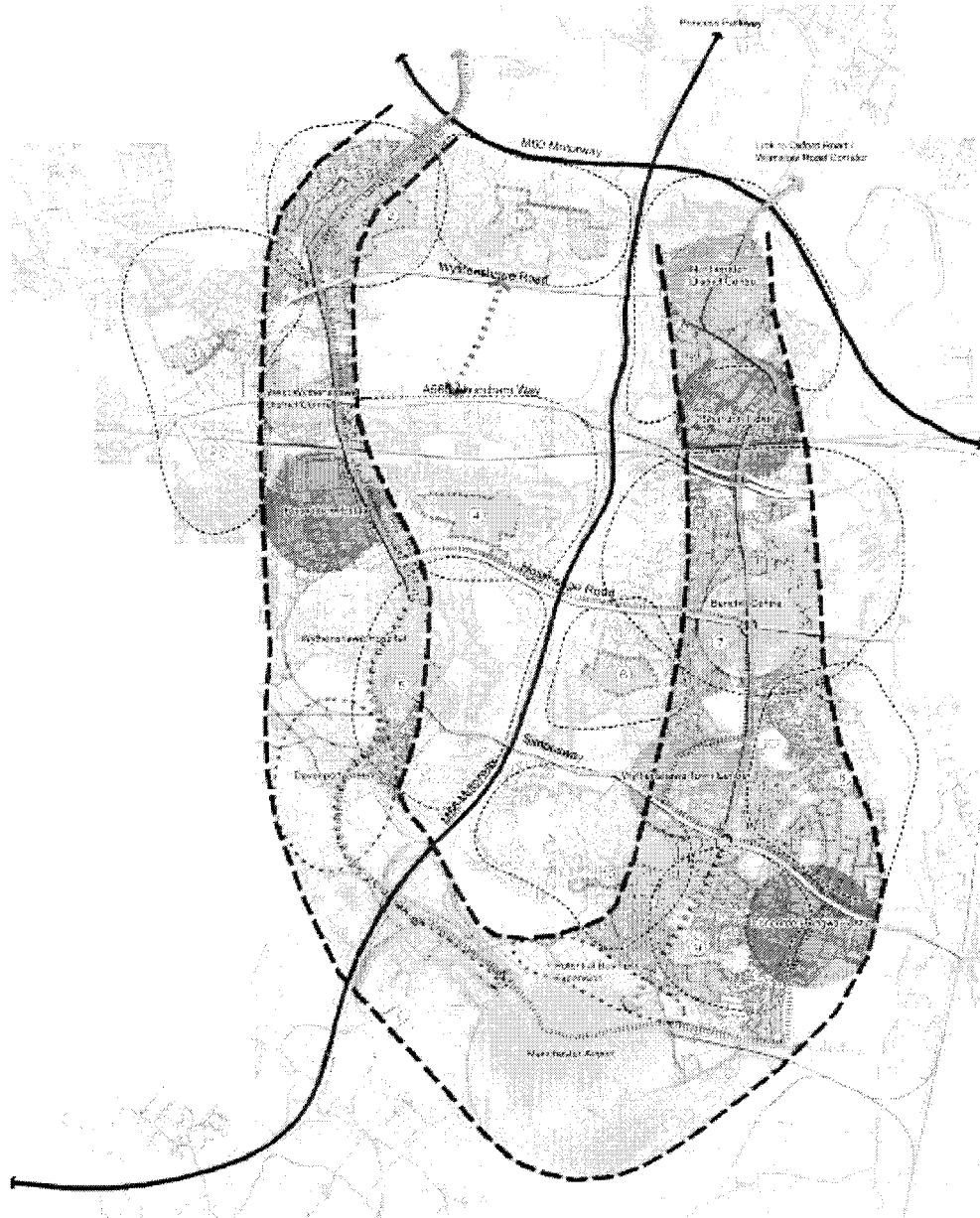


figure 3. strategic masterplan

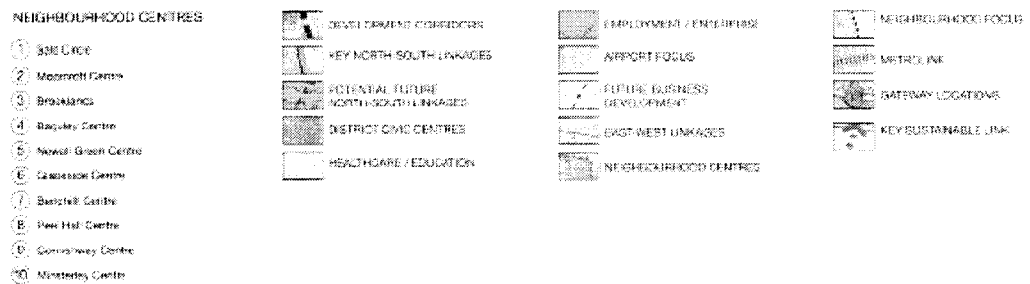
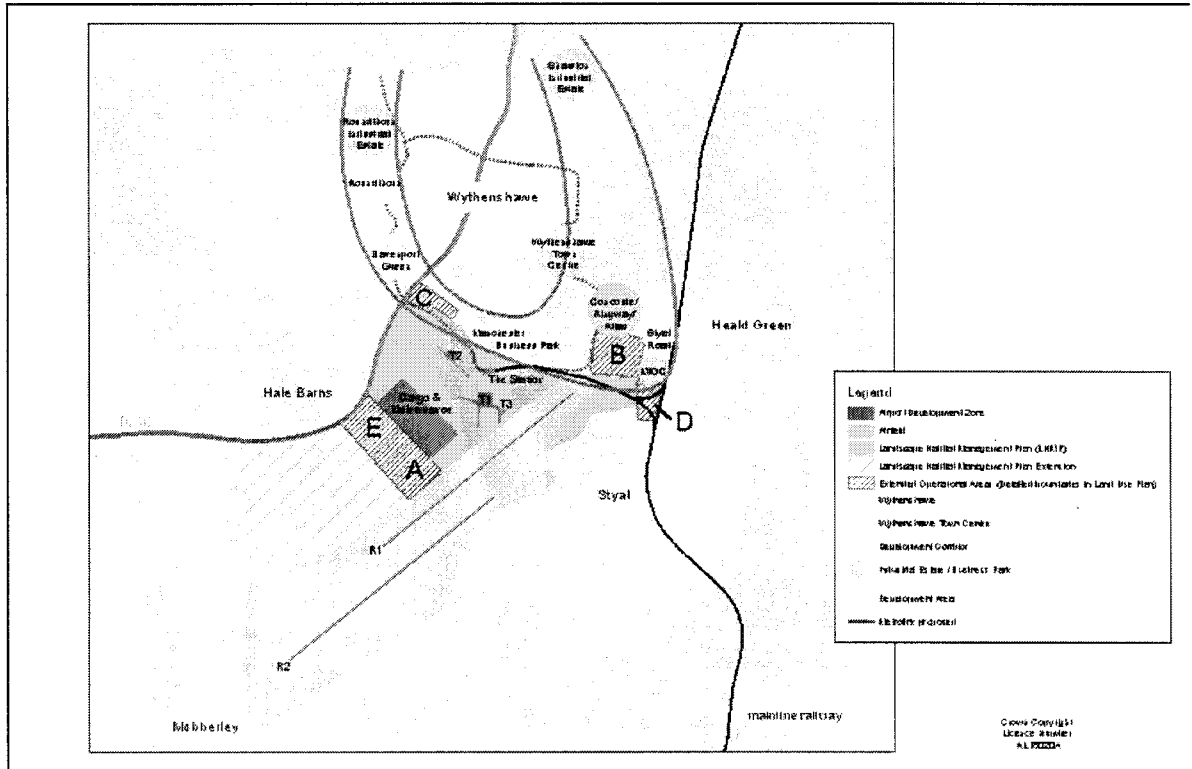


Figure 4: Airport Site and Development Corridor



A fundamental part of the Framework is the concept of development corridors (one East and one West), the relevant one for present purposes being the West Wythenshawe Development Corridor (para 6.5), which corresponds to the western part of the arc identified in the Airport Master Plan. It is described as “incorporating the new retail/services centre proposal at Baguley, Roundthorn Industrial Estate, Wythenshawe Hospital and any future development at Davenport Green.” The extension of Metrolink to the Airport is seen as fundamental to the Framework in the medium term (10-15 years, para. 6.22). The Framework suggests that bus routes provide improved accessibility in the interim, mirroring Metrolink routes as far as possible.

One of four opportunities identified in the Framework is “capturing the South Manchester effect by extending the strong employment and property markets to Wythenshawe”. It is noteworthy that the “effect” is twofold: employment, in that the area has access to a wide range of skills in the south Manchester and adjacent Cheshire areas, and property, in that it is an area in which commercial occupiers wish to locate, and investors and developers are consequently willing to invest and develop. One of the objectives of the Framework is to “make Wythenshawe the location of choice for investors and employers.....to meet the needs of inward and indigenous employers, particularly those linked to Manchester Airport” (Summary, Objectives, bullet 4).

The clear message is that Davenport Green is an outstanding location at which to marry opportunity and need, as targeted in the RSS at Policy DP6.

Whilst the Wythenshawe Framework is not a statutory plan, it is the basis for the City Council’s investment and planning for the area and key components of the Framework are being incorporated into the emerging Core Strategy for the City. In the Core Strategy Proposed Option both the Airport and Roundthorn Industrial Estate are identified as Strategic Employment Sites. Roundthorn is seen as having the potential to act as a focus for

growth in Manchester and to help tackle deprivation due to close proximity to deprived communities in Wythenshawe.

3.5.3. MCC Draft Core Strategy

In relation to the Airport the City's Core Strategy Proposed Option confirms it as a key economic driver for Greater Manchester, North West and the North and it recognises the opportunity to capitalise on good public transport and highway access. Policy Approach EC7 endorses development within the two economic development corridors (east and west) radiating from the Airport north through Wythenshawe. Policy Approach C2 states that "Regeneration of Wythenshawe will incorporate high density housing and replacement of outdated office space." Para 7.7 states that "Wythenshawe has similar economic and social challenges to the Inner Areas, albeit with a distinct housing market." The supporting text at para 10.87 acknowledges the need for better access for both Roundthorn and the Hospital, which is recorded as having plans to continue development of the hospital as a major research and treatment centre.

3.5.4. Trafford Draft Core Strategy

Against this background it is important to note that none of the vision, the strategic objectives nor the place objectives in the Draft Core Strategy mention Manchester Airport at all, in spite of the fact that the need for additional employment and the need to support international business both figure largely in the objectives of the Core Strategy. Manchester Airport is a major employer (18,600 directly employed on the site), a very important factor for the competitiveness of firms operating in international markets and a major public transport interchange in its own right. The Key Diagram in the Draft Core Strategy shows Manchester Airport as a "Significant Neighbouring Place" but there is no reference to the factors that make the Airport significant for Trafford. Furthermore the Place Objectives for Altrincham, the adjacent area of Trafford, make no reference to the Airport; neither do the Place Objectives for Sale where (at Sale West) there is a significant concentration of deprivation and need for additional employment; nor is there any reference to the Airport in the Place Objectives for Trafford Park, for which the Airport's roles as an international cargo facility and a gateway for the national and international movement of staff involved in import and export business are very important.

This neglect of the Airport as a key economic driver next to major concentrations of deprivation conflicts directly with the RSS at Policy DP6:

"Marry Opportunity and Need

Priority should be given, in locational choices and investment decisions, to linking areas of economic opportunity with areas in greatest need of economic, social and physical restructuring and regeneration. Proximity to, and access via public transport from, such areas will be important considerations in the choice of employment locations and sites."

The emerging Core Strategy of the City of Manchester provides for the growth of the Airport. Against this background it is unjustifiable that Trafford Council show no major sites for economic development in the south of the Borough, which has excellent accessibility by road and public transport, which is highly accessible to the large and skilled work force resident there and in adjacent Cheshire areas and which has very good access to the Airport. Altrincham is the only location identified in Policy W1 (W1.3) for office development, but the Council's "Trafford Other Main Town Centre Uses" Study concluded in relation to land for office uses that:

"Due to a low number of suitable and available sites in town centre locations, even if the Altair planning permission is implemented, it may be necessary to consider further sites situated in regeneration areas of the Borough (in accordance with PPS4)

where offices could form part of mixed-use developments, or are ancillary to other forms of economic development.” (para 9.2, confirmed at para 13.13 of Draft Core Strategy)

3.5.5. Conclusion and proposed amendment

This omission on the part of Trafford conflicts with the advice in PPS12 at para 4.45 that the evidence behind Core Strategies “should be coherent with the core strategies prepared by neighbouring authorities, where cross boundary issues are relevant.” More importantly, as described above it means that major opportunities for delivering benefits for the communities in Trafford are omitted from consideration in the Core Strategy.

In the context of the major importance of the Airport for Trafford and for the region it is a very significant gap in the Trafford Draft Core Strategy that the only policy reference to development related to the Airport is an exceptional provision in para W1.4 of Policy W1. We propose that, in the light of RLAM’s proposal that Davenport Green should be designated as a Strategic Site (see Chapter 4), the bracketed reference to development related to the Airport in para W1.4 be deleted. This would still be in conformity with the RSS which provides (RDF1) for “development elsewhere.....”

3.6. Sustainability Appraisal

RLAM submit that the Core Strategy is unsound because of shortcomings in the sustainability appraisal :

1. The shortcomings in the evidence base mean the evidence on which the Core Strategy is founded can be considered neither robust, nor credible; therefore the Core Strategy is not fully justified. For example, sites for economic development have not been assessed sufficiently in terms of market attractiveness; nor have sites been given equal treatment in the assessment.
2. The shortcomings in the Sustainability Appraisal at various stages of drafting mean that reasonable alternative options have not been adequately considered, therefore the Core Strategy is not fully justified.

3.6.1. Sustainability Appraisal: purpose

The Government in PPS12 has set down clear guidance on the purpose and importance of Sustainability Appraisal:

“4.43 The Sustainability Appraisal should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. Sustainability Assessment should inform the evaluation of alternatives. Sustainability Assessment should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.” (PPS12)

Para 6.6 and 6.7 of the Sustainability Appraisal Scoping Report state that it is advisable to carry out a comparison of the sustainability objectives with the key spatial objectives at the Issues and Options stage and that this will be undertaken

3.6.2. Issues and Options

The *Core Strategy: Issues and Options Paper* (July 2007) provides three Spatial Options “that could be followed in order to address the issues and challenges that we face and to achieve our spatial aims and objectives.” (Para 5.5). A summary of the sustainability appraisal is provided in the *Issues and Options Paper*, but the full Sustainability Appraisal

was not published for consultation. It cannot be asserted, therefore, that the evidence on which the assessment of the sustainability of each of the three options in *Issues and Options* is made, is robust or credible, because this evidence was not made public. The comparison of the sustainability objectives with the key spatial objectives is not available for this stage. Given that the Council had backed Davenport Green as a strategic employment site in the original and revised UDP, it is surprising that there was no option that assessed employment development at Davenport Green; it would seem to be an eminently reasonable alternative. The Council chose not to assess it.

3.6.3. Preferred Options

At the *Core Strategy: Preferred Options* (July 2008) stage, a Sustainability Appraisal was published for consultation. However no comparison of the spatial objectives against the sustainability objectives is provided, contrary to guidance. The SA only tests the Spatial Options; there is no SA of Davenport Green, the Key Strategic Sites, or the Core Policies.

The *Core Strategy: Preferred Options* that the land at Davenport Green revert to the Green Belt (para 5.18), but this proposal is not mentioned as being part of any of the three Spatial Options which were the subject of Sustainability Appraisal. Diagrams of all three Spatial Options in the *Preferred Options* document show the development land at Davenport Green to be in the Green Belt, whereas diagrams for each of the three options at the *Issues and Options* stage indicated this land to be outside the Green Belt. It is also peculiar that the Green Belt policy in this version does not mention the removal of Davenport Green (see para 7.66 and 7.67 and Core Policy Direction R2). The proposal to extend the Green Belt to Davenport Green has not been included in the assessment of any of the three Spatial Options. The retention of the existing Green Belt boundary, and the retention of Davenport Green as an allocated employment site has not been considered, despite being a reasonable alternative. The special circumstances relating to Davenport Green are demonstrated by the fact that at the subsequent draft of the Core Strategy, Trafford Council included Davenport Green in the Sustainability Appraisal as the only site not included in the Core Strategy as a Strategic Site or Location.

3.6.4. Further Consultation on the Preferred Option

The successor draft Core Strategy to *Preferred Options* was *Further Consultation on the Preferred Option* (July 2009). In the Sustainability Appraisal to this draft, Davenport Green was assessed alongside five Strategic Sites and eight Strategic Locations (11 Key Strategic Sites were proposed at the *Preferred Options* stage).

Further Consultation reaffirms the proposal for Davenport Green to be included in the Green Belt. The document erroneously uses the phrase “retained within” (Para 20.9); whereas in fact the site is outside the Green Belt and designated as employment land..

The Sustainability Appraisal report states that “taking into account the uncertain and negative impacts, national and regional policy and having duly considered all representations made Trafford Council have considered that there is insufficient evidence or justification to put Davenport Green forward as a Strategic Location or Site.” (Page 29).

As was submitted in a response to the consultation on the *Further Consultation* version of Core Strategy, we articulate several concerns on whether the Sustainability Appraisal which is quoted as providing evidence against the allocation of Davenport Green as a Strategic Site or Strategic Location in *Further Consultation*, formed a robust and credible evidence base:

1. The Sustainability Appraisal (SA) suggests measures to mitigate negative impacts, however it is unclear whether the assessment for each site is inclusive of the mitigation measures proposed. Against a number of the criteria, the SA (Appendix) envisages negative impacts from development at Davenport Green due to the lack of existing public

transport. However, development at the scale proposed for Davenport Green is likely to be sufficient to support new public transport links, and the site benefits from close proximity to Manchester Airport – described in the RSS as a “key international gateway” and a significant multi-modal interchange for sub-regional rail, bus and coach services, with Metrolink due to arrive in 2012. It is surprising that the SA assessment is so negative against criteria S3, S5 and EC2, given that the UDP stated – in supporting text to justify Policy E14 – Major High Amenity Site – Davenport Green – that development at Davenport Green “will further promote urban regeneration by directly creating jobs of a high quality that are readily accessible to disadvantaged communities in the former Urban Programme target areas of Greater Manchester.”

2. The main SA report, which summarise the detailed content in the Appendix, is inconsistent between sites. In the summaries for SL5 Trafford Park and SL6 Trafford Centre Rectangle (pages 26 and 27 of the SA), the SA notes that “key mitigation actions relate to improving access by public transport” and “improving public transport access will be a key mitigation measure”, respectively. No such assurances are provided in the summary for Davenport Green (page 29 of the SA), despite the existence of the Planning Brief in which the Council indicated that it could be satisfied on the question of public transport accessibility; it was left to the developer to make suitable proposals. The SA ignores the possibility of such mitigation in the case of Davenport Green but not in the case of the Trafford Park locations.
3. The SA assesses the performance of Davenport Green against criterion E6 “Conserve land resources and reduce land contamination”. The assessment is made that “the site comprises entirely of greenfield land and is situated in the Green Belt”. The recommended mitigation is “do not develop the site”. This assessment is wrong. The site is not situated in the Green Belt; it has been outside the Green Belt since 1996.

Overall, the results of SA to the *Further Consultation* do not suggest that other identified Strategic Sites and Locations would necessarily be more sustainable particularly with regard to flooding, infrastructure provision, contamination, transport, air quality etc. In fact the results for Davenport Green shown at Appendix A3 to the Sustainability Appraisal are very similar and in some instances better.

The *Further Consultation* relies upon both the results of the SA and other documents from the evidence base, to justify its proposal to include Davenport Green within a revised Green Belt, rather than allocate the site for strategic employment development (see below).

3.6.5. Further Consultation on Core Policies L2, L4, L5, W1 and R5

Policy W1 is developed, in this consultation, to list sites where employment development will come forward:

“W1.3 In accordance with the Spatial Strategy, the Council will focus employment uses in the following places:

- a. Pomona;
- b. Wharfside;
- c. Trafford Park Core;
- d. Trafford Centre Rectangle;
- e. Carrington;
- f. Broadheath;
- g. Altrincham Town Centre; and
- h. Trafford’s Other Town Centres.”

The first five places on this list were Strategic Locations in the portfolio then proposed of Strategic Sites / Locations. Davenport Green was not included in the Sustainability Appraisal

to this consultation, despite the fact that it was the largest employment site allocated in the UDP, and that Trafford Council, concurrent to this consultation, invited the site promoters to submit evidence in support of its designation as a Strategic Site / Location.

3.6.6. Further Consultation on the Vision, Strategic Objectives and Delivery Strategy

The SA for Policy R4 Green Belt states that “the policy will provide long-term protection against development that would have a detrimental impact on the diversity and distinctiveness of landscapes in the Green Belt, including land at Davenport Green.” This statement is misleading in its neglect of the true situation relating to the Davenport Green development site:

1. the site lies outside the Green Belt
2. detrimental impacts on the Green Belt had already been dealt with to the satisfaction of the UDP Inspector and the Council when the land was taken out of the Green Belt
3. subsequent changes on the site and in its surroundings have diminished any impacts of development of the site yet further (see Green Belt section below).
4. Development of the site for employment enables the creation and endowment of the rural park, which will provide long term support to the purposes and objectives of the Green Belt

3.6.7. Conclusion

The Sustainability Appraisal is supposed to perform a key role in providing a sound evidence base for the plan and to form an integrated part of the plan preparation process. Sustainability Assessment should inform the evaluation of alternatives. It is clear that in relation to the Trafford Core Strategy, and in particular the future of the Davenport Green site:

1. The SA has not formed an integrated part of the plan preparation process: no SA was published to support the *Issues and Options* document. The *Preferred Options* version proposed that the site at Davenport Green be included in the Green Belt without any published assessment of the sustainability impacts of this proposal.
2. The Sustainability Appraisal process has not informed the evaluation of alternatives: none of the Spatial Options in the SA to the *Preferred Option* considered Davenport Green for any development. All featured the proposal to extend the Green Belt to include Davenport Green, despite the fact that the present planning policy framework allocated the site for strategic scale employment development.
3. The SA has not provided a sound (robust and credible) evidence base: at various stages the SA has made errors and omissions and has not treated sites in a consistent manner. At the *Further Consultation* stage, the treatment of potential mitigation measures and the summary of impacts provided do not address Davenport Green on the same terms as other sites.

3.7. Proposed Alteration to the Green Belt

RLAM consider that the proposed change to the Green Belt at Davenport Green is contrary to Government Policy in respect of Green Belts, is inconsistent with the Regional Spatial Strategy, and is, moreover, unjustified within the terms of the Core Strategy. The explanation for this is set out below.

3.7.1. The proposed position

In its document “Trafford Core Strategy: Further Consultation on the Vision, Strategic Objectives, and delivery strategy”, the Council state that:

“Through this plan the land previously identified at Davenport Green is to be returned to the Green Belt” (Policy R4.4, page 75)

By way of justification, the following is offered:

“The land at Davenport Green was removed from the Green Belt by way of the 1996 Trafford Unitary Development Plan (UDP). It was removed to enable a scheme of sub-regional significance to deliver a strategic high amenity employment site of 36.4ha. Outline planning approval was granted for half of the site, however detailed proposals were never submitted, and the outline consent has now lapsed. Therefore there does not appear to be any realistic prospect of this development going ahead.” (para 16.10)

The proposed addition to the Green Belt is not therefore justified on positive Green Belt grounds but is predicated wholly on a negative assumption regarding employment, namely that the prospect of a scheme of sub-regional significance being developed here has gone. The justification is thus silent on the very issue that Policy R4 addresses. It is implicit that Green Belt purposes and objectives will be supported by the change. The Council, it is presumed, regard this latter point as self-evident (or, possibly, irrelevant) for there is no explanation or even assertion of how Green Belt purposes and objectives will be affected this proposed change.

If soundness of the Core Strategy rests on the demonstration of its justification by reference to a robust and credible evidence base, then Policy R4 is clearly defective. This is a very significant defect because a major change to the Green Belt boundary is not a matter which can be dealt with so briefly and inadequately. It raises issues that affect Government and regional policy, and will have sub-regional economic implications. This Green Belt, after all, is not the Trafford Green Belt but the Greater Manchester Green Belt (part of which happens to be in Trafford), and modifications to it need to be viewed in this context.

3.7.2. Current policy and Guidance

Paragraph 2.1 of PPG2 states that:

“The essential characteristic of Green Belts is their permanence”.

Paragraph 2.6 amplifies this point by saying that:

“Once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances . . . Similarly, detailed boundaries approved in local plans or earlier approved development plans should be altered only exceptionally.”

There is no ambiguity in this. There is nothing to suggest that adding land to the Green Belt, as opposed to removing land from it, is subject to any other policy direction. There is therefore need to demonstrate exceptional circumstances to warrant change in either direction.

The Regional Spatial Strategy (RSS) for the North West was approved in 2008 and says, in terms, that:

“There is no need for any exceptional substantial change to Green Belt and its boundaries in the North West within the timescales set out below:

- Within Cheshire, Greater Manchester, Lancashire or Merseyside before 2011

After 2010 the presumption will be against exceptional strategic change to the Green Belt in Cheshire, Greater Manchester, Lancashire or Merseyside. Strategic Studies, undertaken by the Regional Planning Body, together with relevant stakeholders should investigate both the need for change and options for implementation.” (Policy RDF 4)

The Planning Inspectorate, with their accumulated experience of dealing with Local Development Frameworks, have addressed this particular issue, and have advised:

“In the absence of a requirement in the RSS to review the Green Belt boundary, any change must be justified by exceptional circumstances”. (PINS, ‘Examining Development Plan Documents: Learning from Experience’, paragraph 44, page 11)

There is thus a twin requirement to permit a local authority to make major modifications to Green Belt boundaries. The first is the acknowledgement of the need so to do in the RSS. The second is the demonstration of exceptional circumstances. In this instance the first requirement has manifestly not been met, and it falls to the Council to set out the exceptional circumstances that necessitate changes that are at odds with Regional Policy RDF4. This has not been done.

3.7.3. Exceptional Circumstances

The land at Davenport Green was taken out of the Green Belt in 1996, with the adoption of the Council’s UDP, and confirmed in 2006 with the adoption of the Revised UDP. This was considered to be an important strategic move, to facilitate the development of a major high amenity employment site. In both economic and Green Belt terms it was seen as having strategic (sub-regional) implications and justification.

Axiomatically, reversal of that position has strategic and sub-regional implications.

It would be quite wrong to assume that the non-implementation of the previous owner’s planning consent is the only indicator of the site’s value as a strategic, high amenity employment site. From the Council’s perspective that might be a convenient nexus, but it is not evidenced in any way. Since the strategic value of the land is a sub-regional matter, that evidence needs to call upon a wider context than Trafford BC (see above, where the requirement for ‘strategic studies’ to test this very point is set out in regional Policy RDF4).

Equally, it would be quite wrong to see the Council’s current proposal in Policy R4.4 as some form of minor tinkering with the Green Belt boundary. It affects 36.4ha (90ac) of land. This is a major change to the extent of the Green Belt.

To justify this change two matters would need to be addressed:

1. Is there any sub-regional economic case for the removal, irrevocably and permanently, of a site that has the acknowledged attributes of Davenport Green?
2. Are there exceptional benefits that would accrue to the Green Belt by extending it?

It is only if both of these two questions can be answered affirmatively that exceptional circumstances might be considered to have arisen in this instance.

The first question is dealt with in detail in the earlier part of this submission. The second is addressed here.

3.7.4. Development at Davenport Green and its effect on the Green Belt

At a fundamental level, it must be remembered that Davenport Green is not any longer in the Green Belt. The development of the High Amenity Employment site would not therefore

constitute 'inappropriate development'. It would not, in consequence, give rise to any harm to the Green Belt by virtue of its inappropriateness.

This is an important point when considering the exceptional circumstances which might warrant a change of Green Belt status and boundary, since the circumstances now are different in this regard from when the UDP was adopted.

When the land was first considered by the inspector at the Local Plan Inquiry in 1994, he had to take account of the fact that the development of Davenport Green would be inappropriate development, for the site was in the Green Belt. He considered that the exceptional circumstances outweighed the harm that arose by virtue of this inappropriateness and his response was to recommend change to the Green Belt boundary to allow the development to take place.

The Inspector took account of many factors to arrive at the judgment he did. Of particular relevance to the Green Belt were:

- the scale of the buildings, and the nature of the landscaping (which would affect the visual impact of the development, the perception of openness, and thereby the purposes of the Green Belt as set out in paragraph 1.5 of PPG2) and
- the management of a large tract of countryside adjacent to the development area as a Rural Park (which would underpin the land use objectives of the Green Belt as set out in Paragraph 1.6 of PPG2)

He reached a conclusion that the development of the land would be harmful to three of the Green Belt purposes, but that the nature of the proposals would mitigate that harm to a considerable degree. A Development Brief encapsulated the key parameters of the scheme and was appended to the UDP when it was adopted. There is no doubt that the Inspector was influenced by the content and specificity of the Development Brief.

Overall, the Inspector was satisfied that 1m ft sq of development could be satisfactorily accommodated on this site, taking account of all of these factors. The harm from inappropriateness could be removed by taking the land out of the Green Belt altogether, and the harm to the remaining Green Belt could be avoided through the controls set out in the Development Brief.

This is a conclusion that the Council readily accepted. The UDP was adopted in 1996 and the Council have confirmed the position by reaffirming, as recently as 2006, the Revised UDP. Furthermore, planning permission was granted for one half of the development in 2000; this consent was extended in 2003 to 2009.

RLAM now have now acquired the whole site. Their previous joint venture partner has no further interest in the land and their outline consent has lapsed. These are, however, circumstances that relate to ownership, and should not be confused with matters that relate to the land and/or its development:

The land: The condition and character of the land has changed somewhat over the years:

- The woodlands and hedgerows are still there, but the latter are now very much taller and constitute even stronger dividing elements within the site.
- Bramble and thorn scrub have invaded the field edges.
- The majority of the land is not farmed and the informal recreational use continues.
- The hedgerows and trees along Roaring Gate Lane visually insulate the development area to a greater degree than was the case in 1994;

The site has not changed in a way or to a degree that radically alters the baseline that the Inspector evaluated in 1994, but the changes could well have made it easier for him to reach the conclusion he did.

The development: As to the development, RLAM do not seek to from any of the commitments to scale and landscaping set out in the Development Brief, nor to the Rural Park.

This being the case, there is no reason to assume that the retention and development of the Davenport Green site outside the Green Belt, would not continue to satisfy Green Belt purposes and objectives to the same degree as has been the case since the UDP was adopted.

It follows that there would, in consequence, be no particular benefit to the Green Belt in putting the land back into the Green Belt. Indeed, so far as the land in the Rural Park is concerned, there are grounds for suggesting that Green Belt objectives would not be well served by the change.

Whether or not this is accepted by the Council, the economic consequences of putting this land back into the Green Belt need to be examined, for, here too, the Core Strategy is lacking in evidence and rigour.

3.7.5. Conclusions

RLAM submit that the Council's policy to put the development site into the Green Belt is not justified and is therefore contrary to Government policy, making the Core Strategy unsound in this important respect " (PPS12, para 4.50).

4. Designation of Davenport Green as a Strategic Site and Remedying the Unsoundness of the Core Strategy

In this section we set out RLAM's suggested amendment to the Core Strategy in the form of a Policy providing for Davenport Green to be identified as a Strategic Site for employment , together with the justification for the policy and then a description of how the suggested policy amendments will restore soundness to the Core Strategy.

Policy SS1 – Davenport Green

Davenport Green is in a pivotal position where the opportunity of a South Manchester location is married with the need to address deprived communities in adjacent areas of Trafford and Manchester. It offers the opportunity to generate net additional business and jobs to the sub-region and thereby reduce GVA disparities.

Policy SS1 – Strategic Site: Davenport Green

Strategic Proposal

An exemplar mixed use development of business space with supporting services and infrastructure is anticipated, the proposals being designed to integrate with the wider strategy for airport-related development (the arc of development) and with local and cross border regeneration programmes.

Specifically, development of this Site will deliver:

- a. B1 a and b: a minimum of 600,000 sq.ft. with potential, subject to detailed transport studies and viability assessment, to expand to 1m. sq.ft.
- b. Supporting uses: A1-A5, D1 to maximum of 50,000 sq.ft. for the 600,000 sq.ft. scheme and a maximum of 75,000 sq.ft. within a 1 m. sq.ft. scheme i.e. meeting, recreational, retail and restaurant facilities to meet the needs of staff and business visitors
- c. Community facilities, if appropriate to meet the needs of adjacent communities;
- d. A new rural park devoted to community food production, nature conservation and informal recreation.
- e. New and improved pedestrian and cycle links.
- f. New and extended bus services in the short term, including links to nearby regeneration areas in Trafford and Manchester; possible long term development of new public transport links between Roundthorn Industrial Estate, Wythenshawe Hospital, Davenport Green and the Airport, which is a major interchange for buses, coaches, trains and taxis as well as national and international flight connections.
- g. Access to the site will be to the east via the existing Thorley Lane bridge over the M56; capacity will be expanded at Junction 6 and on other local roads.

The proposals will be taken forward through planning applications and master plans for succeeding phases of development.

Development Requirements

In order for development on this Site to be acceptable the following will be required:

- a. Environmental Impact Assessment
- b. Improved pedestrian and cycle routes
- c. Exemplary sustainability standards –Outstanding BREEAM as an aim
- d. Sensitive treatment of landscape and buildings
- e. Improvements to local highway network and public transport infrastructure and development of travel plan.
- f. Development of programmes to assist disadvantaged people to access the jobs created.
- g. Laying out of the rural park, creation of the trust and transfer of the completed park to the trust together with appropriate endowment funds for its future maintenance and management
- h. The provision of appropriate retail, catering, meeting and community facilities to support those people using the development.
- i. Contributions towards the provision of additional utility capacities
- j. An assessment of biodiversity must be carried out prior to development and appropriate sites for nature conservation must be provided to compensate for any loss.

Phasing

	2011-12-2015/6	2016/7-2020/1	2020/1-2025/5	Total
Employment**	55,000	19,000	18,900	92,900

Implementation

Implementation will be through private sector development with support from infrastructure providers and public sector where necessary.

Infrastructure Requirements / Funding Sources

Project	Status	Costs	Phasing	Responsibility	Funding Source
M-way and trunk road works: Phase1	Required for Phase 1	DK*	2011/12-15/16	Highways Agency	RLAM s.106/s.278
M-way and trunk road works: Phase2	Required for Phase 2	DK	2016/7-20/1	Highways Agency	RLAM s.106/s.278
Local road works Phase 1	Required for Phase 1	DK	2011/12-15/16	Trafford BC and Manchester CC	RLAM s.106/s.278
Local road works Phase 2	Required for Phase 2	DK	2016-21	Trafford BC and Manchester CC	RLAM s.106/s.278
Rural Park	To be laid out before occupation of first building	DK	2011/12-15/16	RLAM	RLAM s.106
Additional utility capacity Phase 1	Required for Phase 1	DK	2016/17-20/21	Various	RLAM s.106

*DK = don't know

Justification

Davenport Green is singularly well placed to address RSS Policy DP6, marrying opportunity and need:

1. It will contribute to the regional, sub-regional and local objectives of improving their economic performance and narrowing the gap in GVA per head between the North West and the rest of the country.
2. It is in the south of the conurbation which has long been recognized as the most attractive location within Greater Manchester for business investment.
3. It gives good access to the Airport public transport interchange, the second most important interchange in the conurbation.
4. It has good access to the high quality housing markets of south Trafford and Cheshire, which in turn provides good access to skilled professional and managerial staff.
5. It is immediately adjacent to Wythenshawe, a very large area of deprivation, close to smaller areas of deprivation in Trafford (e.g. around Broomwood Primary School) and readily accessible (with planned transport improvements) to areas such as Sale West.
6. It is adjacent to the Airport and could integrate well with Manchester Airport's Master Plan, Manchester City Council's draft Core Strategy and the West Wythenshawe Local Plan, which are promoting a comprehensive approach to economic development, the development of the Airport, transport, improvements in environmental performance and regeneration.
7. It will support the objectives and purposes of Green Belts in relation to the adjacent Green Belt land, creating a new rural park for community food production, nature conservation and public recreation.
8. The Trafford Other Main Town Centre Uses Study (2009) concluded that due to a low number of suitable and available sites in town centre locations, it may be necessary to consider further sites situated in regeneration areas. However those sites will not be deliverable and competitive for the quality of regionally significant investment that Davenport Green will attract.

9. RLAM is looking to create an exemplar scheme and will be examining new ways of addressing some of the challenges that have persisted in the Borough, for example:
 - a. New ways of engaging deprived communities and individuals in the benefits of the construction phase, the long term business activities and the rural park; this will include working with local partners e.g. the Council, local schools, other employers such as the Airport.
 - b. Radical initiatives to address climate change (which will also be a priority for the class of occupier being targeted) e.g. a cordon charge for vehicles entering the site (graded according to emissions), the proceeds being devoted to improved public transport services and the introduction of a low carbon people mover (along the alignment reserved for Metrolink to the Airport) such as Ultra which is being introduced at Heathrow Airport.
 - c. Working with local communities in both Trafford and Manchester to identify ways to engage local people in the creation and use of the rural park.

Other Suggested Amendments to Core Strategy

We suggest that the vision of the Core Strategy be amended to read as follows:

“Strategic sites and locations within the Borough will be identified and promoted as key places to work to support the Local, City Region and Regional economies.”

We propose that, in the light of RLAM’s proposal that Davenport Green should be designated as a Strategic Site (see Chapter 4), the bracketed reference to development related to the Airport in para W1.4 be deleted.

Restoring the Soundness of the Core Strategy

Designating Davenport Green as a strategic site will restore the soundness of the Core Strategy by enabling:

1. The Core Strategy to be in general conformity with the Regional Spatial Strategy by offering realistic means of achieving :
 - Development Principle 1, which promotes sustainable economic development and a reduction in the gap in GVA per head
 - Policies W1 and W2, which commit local plans to strengthening the regional economy, including through the provision of sites which will have a “significant role to play in the growth of the regional economy, as a result of the type of development accommodated and the location of the site....”(para 6.2).
 - The vision that by 2025 the Manchester City Region will be:

“A world class city region at the heart of a thriving North...one of Europe’s premier City Regions, at the forefront of the knowledge economy,...world class, successfully competing internationally for investment, jobs and visitors...an area with GVA levels to match those of London and the South East”

Clearly Trafford does not alone have to deliver these outcomes. The key point is that Trafford, as the Council has recognised in the past, contains, at Davenport Green, the only site, which with RLAM’s development ambitions, will be capable of competing on the international stage set out by RSS.

2. The Core Strategy to relate closely to the Sustainable Community Strategy (SCS) by delivering on the Vision set out in the SCS:

“Trafford is thriving, diverse, prosperous, and culturally vibrant. A Borough at the heart of the Manchester City Region celebrated as the enterprise capital of the North West and home to internationally renowned sporting and cultural attractions.”

“Trafford businesses will be provided with all the tools and support to be able to continually and successfully compete for skills and investment on an international basis.”

(Trafford 2021, a Blueprint, Trafford Partnership)

In order to relate closely to the SCS we suggest that the relevant phrase in the Core Strategy Vision be amended, as follows:

“Strategic sites and locations within the Borough will be identified and promoted as key places to work to support the Local, City Region and Regional economies.”

3. Enabling the Core Strategy to deliver its vision: “support both the Local and City Region economies” and to deliver the strategic economic development objective of the Core Strategy:

“SO3 Meet Employment Need – Establish the right conditions to sustain employment sites for new and diverse investment to enable Trafford to remain competitive and contribute to the growth of the economy of the sub-region and to attract and retain employment opportunities.”

and other Strategic Objectives which depend at least in part on SO3 (SO2, SO5, SO7) .

Davenport Green will achieve this by creating a very high quality business development in a location that is acknowledged to be the most favoured in the conurbation, and which marries that opportunity with addressing deprivation that is both extensive and persistent in Trafford and Manchester. It also makes possible the creation and endowment of a new rural park that will underwrite the purposes and objectives of the Green Belt.

4. Enabling the Core Strategy to follow Government guidance (PPS12, para 4.17) that core strategies need to take account of issues that do not respect local planning authority boundaries, a need that is emphasized by Greater Manchester being accorded City Region status. The key issues that have been largely neglected in the Core Strategy are the Airport and the regeneration needs of Wythenshawe, both of which are the subject of current plans and strategies. Davenport Green is very well located to enable the Council to address these two issues, for the benefit of the Borough and of the wider sub-regional economy and regeneration needs.
5. Enabling the Sustainability Appraisal to be made sound by rectifying the treatment of Davenport Green, both in the consideration of alternatives and in the scoring of sites.
6. Re-establishing compliance with Government policy through leaving Davenport Green outside the Green Belt. The Council has failed to show the exceptional circumstances that justify an alteration to the Green Belt boundary. The need to do so falls away if Davenport Green remains outside the Green Belt.

Appended to this submission is the information about Davenport Green and its delivery that is required by the Council in relation to Strategic Sites and which is set out in the present consultation.

5. Seizing the Moment for Trafford and the City Region

City Region status presents extraordinary opportunities for Greater Manchester to regain its competitiveness as a global city and for Trafford to play a major part in that endeavour. Davenport Green represents the Council's best chance to address the challenges of sustainable economic development, to address regeneration needs in and outside the Borough and to gain a new rural park.

Greater Manchester is seizing the opportunities presented by the Government's recent Sub National Review, which has been designed to boost national economic growth by reducing the disparities in gross value added (GVA) per head between regions such as the North West and the rest of the UK. Devolution of powers over programmes and spending relating to economic development has been agreed for the first two city-regions: Greater Manchester and Leeds. (The Greater Manchester Combined Authority will come into effect on 1st April 2011).

Recent evidence indicates that, despite the major progress made in regenerating the sub-region, especially the regional core, there remains much to be done for the city region to become competitive on an international scale:

- It was announced early in April 2010 that Manchester had dropped two places in the UK Competitiveness Index.
- Comparable European cities are exploiting their economic assets to the full in order to compete effectively for international investment; for example Dusseldorf, a major city in the Ruhrgebiet industrial regeneration region, which benefits from EU Objective 2 support, and whose airport has a passenger throughput of about 18 millions p.a. (similar to Manchester's), is implementing a Master Plan to build some 250,000 sq.m. of prime business space, with supporting retail and catering services, adjacent to the airport. Other European cities developing major business facilities adjacent to their airports include Barcelona, Madrid, and Munich
- In Greater Manchester the Business Leadership Council, supported by MIDAS, are so concerned about the loss of business investment from the city region that they are commissioning a study to identify major employment sites; the overriding emphasis of the study is on the competitiveness of the sites.
- "It is a sign of Manchester's recent achievements that it must adopt different yardsticks to measure its future efforts. Manchester must widen its horizons beyond a parochial competition with Leeds, Birmingham and Liverpool. Instead it must compare itself with successful second cities around the world: Melbourne, Barcelona, Lyon, Osaka, Shanghai, [and Milan]. By that measure Manchester still has a long way to go." Original Modern: Manchester's journey to innovation and growth, Charles Leadbeater, NESTA Provocation 11, September 2009, p.6

An important dimension of the renewed focus on the competitiveness of the sub-region is a continuing emphasis on the need to offer sites in the south of the conurbation where the demand from many mobile business investors arises.

One of four opportunities identified in the West Wythenshawe Local Plan is "capturing the South Manchester effect by extending the strong employment and property markets to Wythenshawe". It is noteworthy that the "effect" is twofold: employment, in that the area has access to a wide range of skills in the south Manchester and adjacent Cheshire areas, and property, in that it is an area in which commercial occupiers wish to locate, and investors and developers are consequently willing to invest and develop. One of the objectives of the Framework is to "make Wythenshawe the location of choice for investors and employers.....to meet the needs of inward and indigenous employers, particularly those linked to Manchester Airport" (Summary, Objectives, bullet 4).

For most of the recent past regional and sub-regional policy has recognised the advantages of the south of the conurbation as a location for business:

- The Submitted Draft RSS (2007) identified three classes of regionally significant sites and broad locations in which sites should be identified through Local Development Frameworks. Specifically in the case of South Manchester, RSS sought identification of one of two Knowledge Nuclei Sites (KNS) for Manchester City Region, which is shown as a Reserve Site (to be kept for large scale HQ functions that might otherwise be lost to the region)
- The text of the Draft RSS referred to the NWDA's list of 25 strategic regional sites, which included Davenport Green. This gave support for Davenport Green being identified as the KNS Reserve Site for South Manchester. The Technical Appendix to the Draft RSS, January 2006, identified Davenport Green as the Reserve Site for South Manchester.
- Furthermore:
 1. The Regional Economic Strategy, 2006, listed 25 Strategic Regional Sites, including Davenport Green
 2. Trafford's UDP 1996, revised in 2006, showed Davenport Green as a High Amenity Site for Employment

This recognition of the advantages of the south of the conurbation as a location for business investment is expressed very clearly in the arc of development concept that originated in the Airport Master Plan and which has now been incorporated into the West Wythenshawe Local Plan/Wythenshawe Strategic Regeneration Framework. More recently the Airport, with the backing of Manchester City Council, has published proposals for Airport City, which could "include manufacturing, conference facilities, shops and entertainment amenities" (Manchester Evening News 10/3/09 reporting a press release by the Airport); the acquisition of 30 acres of land by the Airport has enabled the Airport to progress a key phase of the arc of development. A factor in the establishment of Manchester Airport Group Developments has been a change in the business model of airports generally, whereby traditional revenue sources from airlines have been put under pressure by the rise of budget airlines and airports have had to seek new sources of revenue.

Whilst it would not be appropriate for either the Airport or the City Council to make proposals for land lying outside their areas, they have both taken an appropriately strategic view of their area and shown Davenport Green as a major employment site within the arc of development in their plans; this quite properly reflected Trafford's commitment in the UDP to see the site developed as a High Amenity site for Employment.

Against this competitive background City Region status presents extraordinary opportunities for Greater Manchester to regain its competitiveness as a global city and for Trafford to play a major part in that endeavour. Powers and resources are being devolved to the ten authorities to facilitate a more effective and collaborative economic development strategy. Trafford has focused on the Regional Core but risks missing out on the opportunities presented by the Airport and the south of the conurbation. Davenport Green represents the Council's best chance to address the challenges of sustainable economic development, to address regeneration needs in and outside the Borough and to gain a new rural park.

Appendix: Trafford Core Strategy: Background Note on Davenport Green Proposed Strategic Site

Trafford Core Strategy: Background Note on Davenport Green Proposed Strategic Site

Davenport Green is identified as a Strategic Site for business use development in the Core Strategy for the Borough. It plays a significant role at the regional level as it will enable Trafford to contribute to the growth of the City Regional. It lies within the arc of development identified in the Manchester Airport Master Plan, in Manchester City Council's West Wythenshawe Local Plan, and in Manchester's emerging Core Strategy.

What

Location Description

The Davenport Green Strategic Site is defined as the area between Roaring Gate Lane, the M56, Davenport Green Wood and the boundary between Trafford BC and Manchester CC. The Strategic Site (90 acres) forms an integral part of a much larger site of some 335 acres, the remainder of which will be laid out as a Rural Park.

Land Ownership

The majority of the site is in a single ownership, that of Royal London Asset Management, the Fund having acquired the balance of 50% of the interest in December 2009.

Site Constraints

- a. The site is not in the Green Belt. The development would not therefore constitute inappropriate development (PPG2 paragraph 3.2), and accordingly would not be harmful to the Green Belt by virtue of inappropriateness.
- b. The effect on the adjacent Green Belt needs however to be carefully assessed and managed through planning controls to ensure that the Green Belt purposes (PPG2 paragraph 1.5) are not prejudiced .
- c. The land use objectives of the adjacent Green Belt (PPG2 paragraph 1.6) need additionally to be strongly supported by the development. The establishment and management of a Rural Park on 99ha (245ac) of land west of Roaring Gate Lane, and including Davenport Green Wood, will be a fundamental requirement of a Development Brief.
- d. The visual amenity of the adjacent Green Belt needs to be specifically safeguarded to meet the requirement of PPG2 paragraph 3.15. The height and massing of the development need to be carefully regulated to minimise visual impact.
- e. The land contains substantial hedgerows and three woodland blocks. These will be specifically protected and used to assimilate the development into the landscape, and protect the network of wildlife corridors that connect with the landscape beyond the site. The management of these features will be secured through appropriate s106 obligations. The site and the Rural Park lie within the Red Rose Forest area and present a major opportunity to establish new woodland and thereby further the Green Infrastructure objectives of this regional initiative.
- f. Davenport Green Wood borders the site. The woodland is a Site of Biological Importance and there should be no development within 30m of its northern edge.
- g. Other habitats within the site include unimproved grassland and small ponds, although informal recreational use, and invasive bramble and thorn scrub has

reduced their value. A re-assessment of the site's ecology should be undertaken to inform and update the Development Brief.

- h. The site, apart for that portion south of Thorley Lane, is no longer in agricultural use. None of the soils anywhere within the site fall within the higher ALC grades. There are thus no agricultural or soil quality constraints to the development of the site.
- i. A public footpath (FP26) runs across the northern part of the site connecting Newall Green with Roaring Gate Lane. The amenity of that route needs to be protected.
- j. New access needs to be provided to the east for public transport and road vehicles.
- k. In other respects the site is subject to few development constraints.

Generally the constraints and management of Davenport Green have been addressed in the Planning Brief attached to the UDP and in the Management Plan attached to the s.106 relating to the planning permission. These need to be updated to take account of changes on the land and of higher current environmental ambitions.

Existing Infrastructure

- a. In terms of public transport, the major public transport interchange at Manchester Airport, the second largest in the City Region, is located approximately 2 kms to the east of the Strategic Site and there are 25 bus routes serving areas adjacent to the Site. Direct rail services from Manchester Airport connect to the City Centre, Sheffield, York, Newcastle, Leeds, Huddersfield, Bolton, Preston, Blackpool, The Lake District, Chester, North Wales and (via Manchester Piccadilly) to London, Birmingham and many other national destinations.
- b. In relation to utility services it is not anticipated that any abnormal increases in capacity will be required; as recently as 2003, when planning permission for 500,000 sq.ft. of B1 space was renewed, the Council acknowledged that sufficient infrastructure capacity existed or could viably be created.

Development Proposal

An exemplar development of business space with supporting services and infrastructure is anticipated, the proposals being designed to integrate with the wider strategy for airport-related development (the arc of development identified in the Airport Master Plan and in the West Wythenshawe Local Plan)

Specifically, development of this Site will deliver:

- a. B1 a and b: a minimum of 600,000 sq.ft. with potential, subject to detailed transport studies and viability assessment, to expand to 1m. sq.ft.
- b. Supporting uses: A1-A5, D1 to maximum of 50,000 sq.ft. for the 600,000 sq.ft. scheme and a maximum of 75,000 sq.ft. within a 1 m. sq.ft. scheme i.e. meeting, recreational, retail and restaurant facilities to meet the needs of staff and business visitors
- c. Community facilities, if appropriate, to meet the needs of adjacent communities;
- d. A new rural park devoted to landscape enhancement, community food production, nature conservation and informal recreation.
- e. New and improved pedestrian and cycle links.

- f. New and extended bus services in the short term, including links to nearby regeneration areas in Trafford and Manchester; RLAM will explore the possibility of using the safeguarded Metrolink route (the western link of the Wythenshawe Loop) for a people mover, such as Ultra which is currently being installed at Heathrow T5, between Davenport Green and the Airport.
- g. Possible long term development of new public transport links between Roundthorn Industrial Estate, Wythenshawe Hospital, Davenport Green and the Airport, which is a major interchange for buses, coaches, trains and taxis as well as national and international flight connections. This will need to be explored with partners.
- h. Access to the site will be to the east of the M56 via the existing Thorley Lane bridge over the motorway; capacity will be expanded at Junction 6 and on other, local roads.

Why

Policy Justification – National / Regional

- a. An exemplar development is supported through general policies and principles defined within PPS1: Delivering Sustainable Development (2005), including the policies relating to climate change.
- b. The B1 development is compatible with the locational policies of PPS4 in that the Council's Other Town Centre Uses Study has demonstrated the lack of attractive sites within the Borough's town centres for significant office development. It has also been shown (in RLAM's Submission to which this is appended) that the next most favoured location, within the Regional Core, is also unsuitable for the class of business investment that will contribute net additional employment and investment to the City Region
- c. The retail and catering component is in accordance with recommendations in PPS4 in that it is designed principally to serve the users of the new development with facilities within walking distance, reducing the need to travel.
- d. The proposal will contribute to the growth of the regional and sub-regional economies and as such it is in accordance with the RSS policy framework for the Region including Policies DP1, 2, 3, 5, 6, 7, 9. The proposals do not conform to the priorities set out in RDF1 or W2, but they fit well with the conditions set down in RDF1 for "other development": "development elsewhere may be acceptable if it satisfies other policies, notably DP1 to 9. Emphasis should be placed on addressing regeneration and housing market renewal and restructuring."
- e. The proposals fit particularly well with Policy DP 6: "Marry Opportunity and Need. Priority should be given, in locational choices and investment decisions, to linking areas of economic opportunity with areas in greatest need of economic, social and physical restructuring and regeneration. Proximity to, and access via public transport from, such areas will be important considerations in the choice of employment locations and sites." Davenport Green enjoys an unusual and highly advantageous location in relation to areas of both opportunity and need:
 - a. Very accessible to the excellent housing stock of south Trafford, north Cheshire and parts of Manchester and Stockport which are a very good source of professional and management skills.
 - b. Adjacent to Manchester Airport, which is both an international gateway and a major public transport interchange.
 - c. Adjacent to Newall Green, the western part of the Wythenshawe regeneration area.
 - d. Highly accessible to the national motorway network via the M56.

- e. Good access, which will be improved by the developer's proposals, to other important parts of the conurbation e.g. regeneration areas in Trafford such as Old Trafford and West Sale.
- f. RLAM's proposal complies well with RDF4, Green Belts, which proposes no changes to the Greater Manchester Green Belt and with Policy W1 Strengthening the Regional Economy. The proposals will make a significant contribution to W3, Supply of Employment Land, in that they address a sector of demand (c.f. "market attractiveness") that is poorly provided for in the region (land in the south of the Manchester conurbation near the Airport).
- g. The integral rural park component of the scheme will make a major contribution to the achievement of Policy L 1, Health, Sport, Recreation, Cultural and Education Services Provision. Being located within two kilometers of Manchester Airport public transport interchange (the second largest in the conurbation after Manchester City Centre), the Davenport Green proposals, which will include expanded public transport provision, are well placed to support Policy RT1, Integrated Transport Networks, by "enhancing the accessibility of the region's gateways and interchanges, particularly the international ones." The development will also support Transport Policies RT2, Managing Travel Demand, RT4, Managing the Highway Network, RT5 Airports (Manchester Airport recognized as a major regional economic driver) and RT2, Walking and Cycling
- h. Davenport Green will be designed as an exemplar scheme in terms of the environmental, energy, waste and water policies set out in Chapter 9 of RSS
- i. In relation to RSS policies for Manchester City Region Davenport Green will contribute significantly to the "The vision (is) that by 2025 the Manchester City Region will be: *A world class city region at the heart of a thriving North*"
- j. The proposals will support Policy MCR1, Manchester City Region Priorities. Policy MCR2. provides that the Regional Centre should be the primary economic driver; it does not rule out other locations for economic development. Policy MCR3 repeats the same spatial priorities as in the main regional strategy including, by implication, the same allowance for "other development".

Contribution to Sustainable Community Strategy and Core Strategy Objectives

Which Objective(s) delivered by this Strategic Location/Policy	Reference Number(s)
Key Objective(s) of the Refreshed SCS	18, 20, 22, 24, 25, 26, 27, 29, 30, 31, 32, 34, 35, 37, 38, 40, 41, 42, 43.
Strategic Objective(s)	<u>SO2, SO3, SO5, SO6, SO7</u>
Place Objective(s)	<u>OTO9, STO7, SAO10, ALO3, ALO4, ALO10, ALO11, ALO17, ALO18, ALO19, ALO20, ALO25, ALO26, ALO27, ALO28,</u>

Key Issues:

- a. **Accessibility:** Unsurprisingly, given that Davenport Green is mainly open land served by country roads, it is located within the *Least Accessible Area* in accordance

with the Accessibility Plan in Appendix 4 of SPD1: Developer Contributions to Highway and Public Transport Schemes. Future accessibility of the Site by public transport will be built on two key advantages: the 25 bus routes that serve adjacent areas and the proximity of the major public transport interchange at the Airport. The developer will address both the need to travel and the provision of more attractive non-car options for travel:

- a. Consideration will be given to a cordon charge (or employee parking charge) applicable to all vehicles entering the site, the proceeds being applied to public transport improvements
- b. Through the travel plan consideration will be given to other measures to reduce the number of carbon fuel trips made to and from the site e.g. privileged access to parking spaces for small, shared and electric vehicles
- c. Incentives for firms and employees for staff who walk or cycle to work
- d. Extended and additional bus routes to the Airport interchange and to key destinations in Trafford and Manchester
- e. Examination with other stakeholders of the possibility of a dedicated public transport facility from Roundthorn Industrial Estate, via Wythenshawe Hospital and Davenport Green to the Airport, using the alignment reserved for the western link of the Wythenshawe Metrolink Loop.

Works will be required to Junction 6 of the M56 and other roads in order to secure vehicular access to the site without allowing Davenport Green traffic to use the local roads in Trafford. Additional and improved footpaths and cycleways will facilitate sustainable access to the Site from adjacent residential areas. In the case of Trafford this will facilitate access to a wide range of jobs for a small deprived community near to Broomwood Primary School to the west of Roundthorn Industrial Estate (Super Output Area Trafford 22C is in the 17th percentile of the English Index of Multiple Deprivation 2007). In the case of Wythenshawe this will improve access to high quality jobs for a large number of residents in this recognized regeneration area.

- b. **Housing Supply:** Not applicable
- c. **Family Housing / Affordable Housing:** Not applicable
- d. **Employment Land Supply:** The commercial (office) components of the proposals provide an opportunity to make a marked improvement in the stock of quality office accommodation in Trafford and will assist in ensuring that the Borough achieves its full potential within the City Region. The creation of new employment on this Site, both in terms of construction work and permanent positions will provide opportunities for people living in the nearby disadvantaged communities in Trafford and Manchester. Given its location and high degree of visibility from the M56 and the approaches to the airport this will have a very positive impact on the image of Trafford as an employment location and visitor destination.
- e. **Town Centre Uses:** The Trafford Other Main Town Centre Uses Study (2009) concluded that due to a low number of suitable and available sites in town centre locations, it may be necessary to consider further sites for office development situated in regeneration areas. It has been shown in RLAM's submission that the identified Locations in Trafford Park will fail to deliver the quality of sites and premises that are commensurate with the regional and sub-regional economic role for Trafford set out in the Vision and Objectives.
- f. **Market Conditions:** The Site is located in the south of the conurbation near to the Airport, one of the main economic drivers of the region, an area that has long been acknowledged as a favoured location for business activity, particularly for firms with national and international trading links.
- g. **Flood Risk:** Not a risk within the Strategic Site
- h. **Environmental Protection:** Any proposals should give consideration to the impact on air quality of new development and any specific mitigation measures, in particular transport related schemes, which may be appropriate.

i. **Davenport Green** provides an opportunity to provide major benefits for the **Natural Environment**:

- Neither the site, nor the area of the Rural Park is a genuinely natural environment.
- Their habitat value is limited by the current activities on the land and has steadily declined over the years. This value is however capable of significant enhancement as part of a concerted programme of improvement and appropriate management. A Development Brief would secure the former, and a s106 obligation the latter. The principles underpinning both have been spelt out in detail in the UDP.
- It is RLAM's intention that ownership and control of the Rural Park would be transferred to a suitably endowed Charitable Trust with clear objectives in the public interest, which would, inter alia, bring about material enhancement to the natural environment.

Principal amongst the benefits of this would be:

- the protection and enhancement of established habitats (notably woodland, hedgerows, stream courses and ponds);
- the establishment of a wider range and greater spread of habits (from woodland to grassland, and including wetlands and ponds), notably woodland to make a major contribution to the Red Rose Forest;
- the securing of a network of unbroken wildlife corridors through the site and the Rural Park;
- an environmentally friendly management regime.

j. **Green Infrastructure**: There are major opportunities for enhancement:

- The Rural Park would provide enhanced public access through new footpaths and bridleways to augment the existing PROWs in the area, and new lengths of cycleway. These would address deficiencies in the current network and allow the area to play a strategically important role in connecting the Timperley and Altrincham areas to the Bollin Valley, through the Timperley Wedge.
- The land would be managed to balance the interests of public access, habitat value and variety, and sustainable pastoral agriculture. In all senses this would support the objectives of Green Belt policy (PPG2 paragraph 1.6). It is doubtful if any other strategic site or location could bring about such significant green infrastructure benefits.

k. **Open Space**: There will also be benefits:

- The Rural Park is not public open space. It has always been conceived as an attractive tract of farmland and woodland, where physical access is made more widespread than it is today, but nevertheless limited to public rights of way (existing and proposed).
- The need to establish farm unit of sufficient critical mass to be viable, together with a requirement to establish Red Rose woodland over at least a third of the area were two of the most important determinants of the Rural Park configuration,

and detailed proposals for the Park were prepared and costed to support the outline planning application in 1999.

- That proposal is capable of being re-visited to optimise the public value of the Rural Park, and, inter alia, to increase the proportion of land that becomes public open space to serve the recreational requirements of the communities nearby.

1. **Historic Environment:**

- Davenport Green Hall and Davenport Green Farm are, or contain, Grade II listed buildings. These lie adjacent to the site, beyond Brooks Drive and Roaring Gate Lane respectively. Their visual setting is protected by the planting along these two roads, but should be reinforced by further screening within the site.
- The site of a medieval moated farmhouse exists just off Buttery House Lane (in the Rural Park). Whilst none of the superstructure exists today its site is marked by earthworks, and the Rural Park design and management could aid in its interpretation and public awareness of the local history of this area
- m. **Utilities and Waste:** RLAM does not anticipate any abnormal expansion of utility capacities to be required to service the planned scale and nature of the development. The developers and the Council were satisfied as recently as 2003, when planning permission for 0.5 m.sq.ft. of B1 space was extended to 2009, that such a scale of development could be serviced.
- n. **Education:** Not applicable given that Davenport Green is not identified as a location for residential uses. RLAM does see interesting opportunities for collaboration with nearby local secondary schools e.g. South Trafford College, Altrincham College of Arts and St Ambrose College in Trafford and the two nearby academies in Manchester: Manchester Health Academy and Manchester Enterprise Academy. RLAM will also want to explore opportunities for collaboration with the Manchester Higher Education Institutions in order to promote Davenport Green for the regional growth sectors.
- o. **Social Infrastructure:** At the Master Planning stage it will be appropriate to consider whether the proposals should include provision of social facilities, not only for employees on the Site but also for residents of neighbouring communities.
- p. **Other Relevant Issues:** None.

Sustainability Appraisal

The Council's Sustainability Appraisal (SA) of June 2009 has assessed Davenport Green; we comment briefly on the key elements of the Appraisal below:

- a. Greenfield, Green Belt site: Davenport Green is not in the Green Belt, a fundamental flaw in the SA. Whilst the Site is greenfield, the Council nevertheless has repeatedly accepted the benefits of developing the Site. The Council's justification was that brownfield sites failed to offer the necessary quality for mobile investment and jobs and because the development of the site would be a source of employment for people in regeneration areas, a stimulus for the development of brownfield sites and a contributor to the growth of the sub-regional economy. Furthermore we have not seen in the SA any evidence of the costs of remediation of brownfield sites which would enable a sound judgment to be made about their viability and deliverability; there must therefore be a doubt about the deliverability of the brownfield sites on which the Core Strategy places such reliance.
- b. Inaccessible by public transport and not close to existing amenities: we have set out above under "Key Issues: Accessibility" how RLAM intends to reduce the need to travel and how they see the Site being made very accessible by public transport, building on the advantages of the proximity of the Airport

public transport interchange and the 25 bus routes serving adjacent areas; the issue of amenities will be addressed by providing a limited range of shops, consumer services, catering and meeting facilities on site in order to reduce the need for staff and business visitors to travel to such amenities. The Council has in the past acknowledged that Davenport Green could be adequately served by public transport; accessibility since that time has improved with the expansion of rail services to Manchester Airport.

- c. Effects of traffic on the environment: Manchester's Air Quality Management Area extends over the Airport and along the M56 corridor up to the Borough boundary; it will therefore be important for air quality and the impacts of the development to be assessed and mitigation measures provided if necessary.
- d. Contributions to climate change: the SA acknowledges the benefits of the woodland and planting upon air quality. In addition Davenport Green's environmental sustainability features will include:
 - Zero carbon in anticipation of the 2019 definition for the building regulations. This will involve greatly enhanced on-site renewable power generation working with 3rd party renewable specialist partners who will use the new Feed-in-Tariff mechanisms to help fund and maintain a long term interest in the development. The renewable energy generation combination is expected to be selected from photovoltaics, solar thermal, biomass (clear burn types), modest sized wind turbines, and ground source heat-pumps. In anticipation of the 2019 'Allowable Solutions' any site limit on renewable generation will be made up with off-site purchased renewable capacity (satisfying the 'Additionality' criteria) or associated allowable investments.
 - Energy supply efficiency is to be considered with a particular focus on on-site Combined Heat & Power (CHP) for generating electricity and heat. The feasibility will be tested against the energy demand profiles on the site's buildings. The building systems will then be chosen to maximise the proportion of heat demand to best match the CHP heat to electricity output proportions. It is anticipated that that excess heat will still be available offering the potential to provide low or zero carbon heat to other adjacent developments e.g. the Hospital or refurbished existing homes and properties in the close locality.
 - Energy efficiency measures will be key to reducing the overall demand for energy and hence the overall carbon emissions. This will involve both the tenants and the developments systems. The aim is to achieve 'A' grade building energy performance certificates (EPCs).
 - Provision to potential tenants of not only best practice advice and building tailored designs for their fit out, but to work with them to procure very low energy IT and associated systems. With both tenants and landlords now exposed to Carbon Reduction Commitment (CRC) costs related to their own energy uses, it is to the advantage of both to ensure their respective systems are higher efficiency.
 - Energy efficiency of the base buildings will include reduced size and capacity systems reflecting the reduced tenant demands, enhanced fabric standards, and low solar overheating architecture.
 - BREEAM 'Excellent' is proposed as a means for quantifying and delivering similar standards for water, waste, materials, storm water management and associated environmental aspects. Consideration will be given to the potential of achieving the new BREEAM 'Outstanding' for selected buildings in the development.
 - 'Green leases' will form a key element of the on-going cooperation between the tenant and landlord covering energy, water, waste and other environmental impacts. The green leases (of which RLAM has its own proforma) will outline the dependency of both tenant and landlord on each other for their respective CRC, energy and other related running

costs. These with outline responsibilities, including mutual reporting and working together on the basis of continuous improvement. It is expected that part of this will include offering tenants the direct benefits of the on-wide renewably generated energy.

- e. Long term sustainability of Trafford's town centres: the Council has undertaken its own study "Trafford Other main Town Centre Uses Study" 2010, which concluded in relation to the location of land for offices: "Due to a low number of suitable and available sites in town centre locations, even if the Altair planning permission is implemented, it may be necessary to consider further sites situated in regeneration areas of the Borough (in accordance with PPS4) where offices could form part of mixed-use developments, or are ancillary to other forms of economic development." The Council has already accepted in the evidence for the Core Strategy that development of the scale and quality proposed at Davenport Green cannot be accommodated in town centres.
- f. Reduce poverty and social exclusion; reducing disparities by releasing the potential of all residents particularly in areas of disadvantage: the persistence of disadvantage in areas adjacent to concentrations of jobs, for example in the ring around the City Centre, in Old Trafford adjacent to Trafford Park and in Wythenshawe next to the Airport, indicates that physical proximity to employment is insufficient to address long term deprivation. It is important that jobs are physically accessible, but additional measures are needed. RLAM will work with partners e.g. the firms that occupy Davenport Green and the Airport to examine and develop effective measures to maximize the opportunities for deprived people to access the jobs at Davenport Green and in the wider arc of development. A particular focus will be on local secondary schools in Trafford and Manchester to encourage young people to consider jobs in growth sectors and to gain experience in growing enterprises. In "Key Issues: Accessibility" we have set out how the proposals will offer jobs accessible to not only Trafford communities but also the major Wythenshawe regeneration area, which must be a factor in the planning for Trafford in the context of the integrated approach to economic development being introduced by the City Region programme.
- g. Improve the social and environmental performance of the economy: RLAM sees this development as an exemplar scheme, not least because that will be the expectation of companies to whom the premises will be marketed.

Other aspects of sustainability are addressed in the Summary of Benefits and Disbenefits below.

Summary of Benefits / Disbenefits of Proposal

Benefits

- a. A major contribution to the achievement of the Core Strategy Strategic Objective 3: "Establish the right conditions to sustain employment sites for new and diverse investment to enable Trafford to remain competitive and contribute to the growth of the economy of the sub-region and to attract and retain employment opportunities."
- b. Flagship development on southern gateway to Trafford that will improve the image of Trafford as a business destination
- c. Significant opportunity for job/skills/training creation for the benefit of communities in regeneration areas in Trafford and Manchester
- d. Transport infrastructure will be enhanced improving connectivity throughout and beyond the Borough
- e. Management of rural park will enhance and improve natural landscape setting and provide opportunities for leisure, recreation, health and education
- f. Improvement of green infrastructure and opportunities for biodiversity and habitat creation

- g. Underwriting the future of a major tract of landscape by bringing the rural park into public/trust ownership and control
- h. Enhancing, in a strategic way, the role of that landscape as part of Greater Manchester's Green Infrastructure
- i. Connectivity will be improved for pedestrians, cyclists and wildlife
- j. The area is not at risk of flooding and does not require expensive remediation, enabling it to be brought forward for development more quickly.
- k. A major contribution to the Red Rose Forest

Disbenefits

- a. Increase in development likely to result in an increase in traffic and worsening of air quality, which will be mitigated through a range of radical measures
- b. Development on greenfield land – mitigation will be provided through the careful landscape treatment of the site, new planting (including woodland) and improvements to the existing green infrastructure, particularly the rural park
- c. Development will result in an increase in carbon emissions. Suitable mitigation will be needed through the application of exemplary sustainability standards in the treatment of the development
- d. Displacing unfarmed areas adjacent to Newall Green that have been used by local residents as casual open space.

Who

Implementation will be through private sector development with support from infrastructure providers and public sector where necessary.

How

Planning Mechanism (LADPD, SPD, Masterplan)

The controls accompanying the designation of Davenport Green in the UDP demonstrate how key elements of the proposal can be delivered. An SPD or Master Plan to accompany a planning application will be appropriate instruments to take the proposal forward.

Development Requirements:

In order for development on this Site to be acceptable the following will be required:

- a. Environmental Impact Assessment
- b. Improved pedestrian and cycle routes
- c. Exemplary sustainability standards
- d. Sensitive treatment of landscape and buildings
- e. Improvements to local highway network and public transport infrastructure and development of travel plan
- f. Development of programmes to assist disadvantaged people to access the jobs created
- g. Laying out of the rural park, creation of the trust and transfer of the completed park to the trust together with appropriate endowment funds for its future maintenance and management
- h. The provision of appropriate retail, catering, meeting and community facilities to support those people using the development
- i. Contributions towards the provision of additional utility capacities
- j. An assessment of biodiversity must be carried out prior to development

Infrastructure Requirements / Funding Sources

N.B. The phasing proposals set out below are RLAM's best estimates; they may be subject to change.

Project	Status	Costs	Phasing	Responsibility	Funding Source
M-way and trunk road works: Phase1	Required for Phase 1	DK*	2011/12-15/16	Highways Agency	RLAM s.106/s.278
M-way and trunk road works: Phase2	Required for Phase 2	DK	2016/7-20/21	Highways Agency	RLAM s.106/s.278
Local road works Phase 1	Required for Phase 1	DK	2011/12-15/16	Trafford BC & Manchester CC	RLAM s.106/s.278
Local road works Phase 2	Required for Phase 2	DK	2016-21	Trafford BC & Manchester CC	RLAM s.106/s.278
Rural Park	To be laid out before occupation of first building	DK	2011/12-15/16	RLAM	RLAM s.106
Additional utility capacity Phase 1	Required for Phase 1	DK	2016/17-20/21	Various	RLAM s.106

*DK = don't know

When

Phasing & Milestones

	2011/12-2015/6	2016/7-2020/1	2021/2-2025/6	Total
Employment**	55,000	19,000	18,900	92,900

**Employment expressed in terms of floorspace (sq.m.)

Action Category	Key Actions	Timing	Lead
Managing Delivery	Establish project delivery team with landowner/developer and key stakeholders	2010	TMBC
Feasibility	Continuing liaison with TMBC and stakeholders on content and timing of proposals including rural park and trust Continuing dialogue with TMBC (planning performance agreement?) Prepare Master Plan Confirm off-site infrastructure requirements and costs Secure agreement of infrastructure providers Confirm viability of proposals especially Phase 1	2010-12	RLAM
Planning	Prepare planning application, Environmental Assessment etc for Phase 1 Draft and negotiate s.106/s.278 agreements	2012-13	RLAM
Site preparation	Works needed for Phase 1	2013-	RLAM

and servicing		14	
Development of Phase 1	Construct 55,000 sq.m. B1 and supporting services	2014-16	RLAM

1106

TURLEYASSOCIATES

The Chancery
58 Spring Gardens
Manchester
M2 1EW

T: 0161 831 1300
F: 0161 831 1301

www.turleyassociates.co.uk

14 April 2010

Delivered by Post

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

Our ref: SAIM0010

E: gdickson@turleyassociates.co.uk

Dear Sir/ Madam

TRAFFORD CORE STRATEGY: INTERIM CONSULTATION 2010

This letter details written representations made by Turley Associates, on behalf of Sainsbury's Supermarkets Ltd, in relation to the Trafford Core Strategy: Further Consultation on the Vision, Strategic Objectives, and Delivery Strategy.


Having reviewed the above document, Sainsbury's maintain support for Core Policy W2 which seeks to maintain and enhance the role of Altrincham as the main town centre, and Sale, Urmston and Stretford as town centres; to ensure the long term vitality and viability of these centres.

I look forward to receiving your confirmation of receipt. If you have any queries please do not hesitate to contact me.

Greg Dickson
Assistant Planner

Enc.

STRATEGIC PLANNING AND DEVELOPMENTS	
19 APR 2010	
Rec	
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Ans	
Coord	

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	/	Page number	75
Sustainability Appraisal		Paragraph number	16:1
Strategic Locations Background Note		Policy number	24.4
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
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

I LIVE LOCALLY AND FEEL THAT TAKING AWAY THE GREENBELT WOULD BE DETRIMENTAL TO LOCAL RESIDENTS. IT PROVIDES A NATURAL AND BEAUTIFUL BARRIER BETWEEN WITHERSHAW AND WALE BARNS. THE CURRENT ROADS GOING THROUGH THE AREA PROVIDE AN ANTIDOTE TO EXCESS TRAFFIC JAMS. I BELIEVE THIS IS AN AREA WHICH PROVIDES A NATURAL ENVIRONMENT FOR PLANT AND ANIMAL SPECIES AND GIVES A MORE RURAL APPEARANCE TO AN OTHERWISE BUILT UP AREA.

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.



**BNP PARIBAS
REAL ESTATE**

STRATEGIC PLANNING
AND DEVELOPMENTS

16 APR 2010

c/o Strategic Planning and Developments
1st Floor, Waterside House
Sale Waterside
Sale
M33 7ZF

Justin Cove
Senior Planner
BNP Paribas Real Estate
6th Floor, Aurora
55 Princess Street
Manchester, M2 4EW

Tel: +44 (0) 161 242 2633
Fax: +44 (0) 161 242 2626
Email: justin.cove@bnpparibas.com

16 April 2010

Your ref:
Our ref:

1209

Dear Sir/Madam

Trafford Core Strategy: Further Consultation

Thank you for the opportunity to provide comment towards the Trafford Core Strategy: Further Consultation on the Vision, Strategic, Objectives, and Deliver Strategy. We act on behalf of SEGRO who are a major landowner at Trafford Park. Our representations are set out under the same chapter headings set out in the Core Strategy document.

Chapter 2 - The Vision for Trafford

SEGRO generally support the Vision as set out in Chapter 2 and welcome the significant reduction in the number of identified Strategic Locations with one major reservation noted below. We do appreciate that the reduction in the number of Strategic Locations will help to focus the key objectives of the Core Strategy and in our opinion the five locations identified all provide the opportunity to bring about significant change and help rejuvenate Trafford's economic standing.

However, there is significant concern that Trafford Park Core has not been retained as a Strategic Location given its importance to the regions economy both now and in the future. We are of the view that it should be retained as a Strategic Location. We believe Trafford Park Core is a key component for the delivery of economic prosperity at Trafford Park and the region as a whole. The strategic nature of Trafford Park Core was reflected within the recent 'Trafford Park – Vision and Implementation Report' (October 2008), which sets out its future potential to accommodate emerging technologies by creating informal zones to help embrace this transition and continue to support the traditional core of industries located at Trafford Park.

BNP Paribas Real Estate Advisory & Property Management UK Limited

Registered office: 90 Chancery Lane, London WC2A 1EU

Registered in England No. 4176965

www.realestate.bnpparibas.co.uk



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Strategic Objectives and Place Objectives

SEGRO are generally supportive of the Place Objectives outlined for Trafford Park and offer comments on the following.

TPO1 – The acknowledgement that Trafford Wharfside and Trafford Centre Rectangle have an important role to play in terms of meeting Trafford's housing needs is a positive objective. An overly prescriptive approach to alternative development in these locations should also be avoided. The removal of site boundaries from the Strategic Locations has gone some way towards achieving this.

TPO2 – SEGRO strongly support the objective to maximize the re-use or redevelopment of unused, under used or derelict land as this will help to protect and further enhance the status of Trafford Park as a premier location for business and industry.

TPO3 – Whilst our client welcomes the intentions of this objective to ensure that Trafford Park as a whole is well served by public transport, the mechanism for delivering this will require some further consideration. Trafford Park is a strategic location within the Regional Centre and as such the demand for public transport links extends far beyond the Park boundary. Public Transport provision in this location therefore needs to be planned and provided at the strategic level and should not be entirely dependent upon contributions from new development coming forward within the Park boundary.

TPO6 – SEGRO strongly support this objective as ensuring access to a locally available skilled workforce will help to support the continued viability of businesses located on Trafford Park and in turn regenerate the local economy.

TPO8 – SEGRO strongly support this objective as it will help Trafford Park to respond to the needs of emerging economic and business sectors whilst continuing to support the traditional core business and industrial area.

Strategic Locations

The reduction in the number of Strategic Locations from 13 to 5 and the removal of site boundaries are changes SEGRO support. The removal of site boundaries advocates a more flexible and realistic approach towards alternative mixed use development encouraged in Trafford Wharfside and Trafford Centre Rectangle. However as noted above, SEGRO has reservations about the demotion of Trafford Park Core as a Strategic Location.

Our comments in relation to the Strategic Locations will concentrate on those in which SEGRO have land ownership interests or close to areas where they have such interests, namely SL2 Trafford Wharfside and SL4 Trafford Centre Rectangle.



BNP PARIBAS REAL ESTATE

SL2 Trafford Wharfside

SEGRO support the principle of retaining Trafford Wharfside as a Strategic Location as the area clearly has an important role to play not only to Trafford, but the region as a whole.

Following the removal of Victoria Warehouse as a Strategic Site, our client welcomes its inclusion as a key element of the Trafford Wharfside Strategic Location. The Victoria Warehouse site in part or as a whole represents a unique opportunity to provide a landmark high density development in a gateway location for the Regional Centre.

In relation to the supporting text we offer the following comments.

The following subtext related to 'Development Requirements' requires clarification - *'In order for development in this Location to be acceptable, the following will be required to contribute to:'* A series of infrastructure requirements and design criteria are then listed, the purpose of which is not entirely clear. Is it a list of pre-requisites for development, the identified infrastructure needs for the Wharfside Location, a 'wish-list', or a combination of all these factors? Our client would be grateful for clarification on this issue.

Notwithstanding the above comment, some of the infrastructure requirements referred to clearly have a greater impact and role than the Wharfside Location itself and should be considered at a strategic borough wide level. It would be unreasonable to rely solely upon developments within the Wharfside Location to provide this infrastructure or be reliant upon its completion before development is able to commence. Further clarification of the wording used in this section may alleviate our clients concerns in this respect.

SL4 Trafford Centre Rectangle

SEGRO support the continued inclusion of the Trafford Centre Rectangle as a Strategic Location as a number of sites may exist at the periphery of this area that could contribute towards the identified need for family housing.

Core Policies

L1 - Land for New Homes

SEGRO support the hierarchy for the delivery of new housing throughout the plan period in that the priority is derelict, vacant or under-used land within the Regional Centre and Inner Areas.

Table L1 provides a prescriptive approach to housing supply throughout the plan period, which contradicts with the 5 year monitoring approach advocated elsewhere in the wording of Core Policy L1. The Table in effect 'allocates' individual sites for residential development without identifying them as Strategic Sites. This approach requires a substantial set of criteria to be fulfilled in relation to evidence base work and demonstrating delivery. Our client suggests that in the Core Strategy, any reference to housing supply should refer to broad locations, with specific housing numbers for individual sites being dealt with through the Site Allocations DPD and other monitoring evidence



BNP PARIBAS REAL ESTATE

base documents such as the Strategic Housing Land Availability Assessment or the emerging Trafford Park masterplan.

W1 – Economy

Trafford Park Core is no longer identified as a Strategic Location and we have concerns about its demotion. However the additional reference and further emphasis of its important role as a key regional employment location within Policy W1 is strongly supported and would go some way to addressing our concerns should the decision be taken that it is no longer a Strategic Location.

We believe the Trafford Park Core is a key component to delivering economic prosperity to Trafford Park and the Region's economy. We note and welcome that the focus in the Trafford Park Core will be on the provision of modern industrial accommodation, storage and distribution and where appropriate, supporting office accommodation. We believe the range of uses considered suitable for development at Trafford Park should also include ancillary uses to support the primary purpose of Trafford Park. Such uses could include car showrooms, small scale retailing, trade counters, leisure and A3 uses.

SEGRO strongly supports the continued inclusion of Trafford Wharfside, Trafford Park Core and Trafford Centre Rectangle as locations to focus employment uses.

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

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

Yours sincerely

Justin Cove
Development & Residential Consulting

cc. John Thompson, SEGRO



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**Trafford Core Strategy – Further Consultation on the Vision, Strategic Objectives and Delivery Strategy – March 2010
Representations on Behalf of Shell International Ltd**

Introduction

We are instructed by Shell International Ltd to submit representations to the further consultation on the Trafford Core Strategy published in March 2010. In principle Shell support the published Strategy and the identification of Carrington as a strategic location for a new mixed use sustainable community however we do have a number of detailed comments and we will make these with reference to the document in which they are contained and the section of that document where they appear.

Development Plan Document – Trafford Core Strategy: the Vision, Strategic Objectives, and Delivery Strategy.

The Vision for Trafford

We support the Vision for 2026 and the focus of economic and housing growth in the 5 Strategic Locations including Carrington (SL5) and its identification as a sustainable area of brown-field land that will be transformed into a new sustainable mixed-use community.

Strategic Objectives and Place Objectives

We support the strategic objectives set out in the Plan and note the place objectives for Carrington and how these relate to the strategic objectives. Our comments on the place objectives are minor and relate to the following;

CAO12 – whilst any development at Carrington will help to revitalise the local shopping centre at Partington because of the scale of the development proposed and, to minimise car journeys, it is likely that and new community at Carrington will have its own centre and shopping facilities.

CAO21 – whilst an investigation of a link to Salford can be looked at it is very unlikely that any development at Carrington will be able to deliver such a link because of land ownership and the significant cost of such a link. It is more likely that any link to Salford will be delivered as part of a regional strategic infrastructure investment initiative as this is not required for the release of land at Carrington.

The Delivery Strategy

We support the revised Strategic Locations Strategy reducing the Strategic Locations from 13 to 5 and the retention of Carrington as a Strategic Location. We also agree that a Local Infrastructure Plan will be important for the delivery of the strategy and look forward to having the opportunity to comment upon it once it is available. We welcome the establishment of project delivery teams and, together with the preparation of Action Area Plans suggest that this is the way forward to ensure timely delivery of development throughout the lifetime of the Plan.



We note the comments regarding the on-going work on the transport and flood risk assessment and trust that this work will form part of the Local Infrastructure plan once it is available but will not prejudice the delivery of the strategic locations in the short to medium term.

SL5 – Carrington

We support the identification of Carrington as a key strategic location in the strategy and the identification of the opportunity to introduce a large-scale mixed use development during the lifetime of the plan. We would suggest that because of the scale and nature of the proposals for Carrington together with the work done to date it may be worth considering an Action Area Plan as an alternative to inclusion in the Land Allocations DPD.

With regard to development requirements we would suggest that some of these are re-drafted because as they currently appear they introduce possible ransom scenarios if either third parties decide not to co-operate and/or the delivery of one particular requirement is seen as fundamental to the Strategy. In particular access to the Ship Canal for transportation purposes, if access is made freely available and can be delivered during the plan period this could be achieved however if it is not then this development requirement may need to be re-worded. We are of the opinion that the requirement for " a contribution towards the provision of additional utility capacity" is too open ended and that this requirement should also be re-worded or linked into the Local Infrastructure Plan.

Implementation

At this stage in the process we would suggest that the details included within this section are deleted, particularly the costs and funding sources as these may change over time, may be required at a different stage in the process and may be delivered by a different body. We would also question the source and accuracy of these costs at this time which at best can only be estimates and have no regard to other sources of funding that may become available. Particular attention is drawn to the Carrington By Pass which is not required to service the release of the land at Carrington and, the provision of a new ship canal crossing which is within the gift of others and will probably be linked to a wider regional transport strategy.

Justification

At Carrington, having regard to the existing neighbouring communities at Partington and Sale West, the scale and timescale of the development it may be more appropriate to negotiate the levels of affordable housing to be included rather than impose a blanket percentage which could result in an unbalanced community that, if too high, may not achieve the regeneration objectives for the sustainable mixed use community on the site.

Core Policies.

Policy L1

We support policy L1

Policy L3

We support Policy L3

Policy W1

We support Policy W1

Policy W2

We support Policy W2 and would suggest that it should also make specific provision for the development of a new local centre to serve the emerging new community at Carrington.



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Policy R3

We support Policy R3

Policy R4

We would suggest that Policy R4 is revised to allow the Council to consider local changes to the Green Belt where this facilitates sustainable development and can be justified with regard to the scale and phasing of the development proposed.

With regard to the protection of open land whilst we do not object to the protection of the land south of shell in the short term we would suggest that this allocation is reviewed within the next 10 years as this land forms a natural and long term extension of the proposed sustainable community at Carrington.


Policy R6

We support this policy

Conclusion

Carrington is a major brownfield development opportunity that is central to the Core Strategy. The majority of the land is within a single ownership and can be delivered during the plan period. With the exception of the points raised above Shell supports the Vision, Strategic Objectives and Delivery Strategy and will continue to work with the Council to deliver a viable sustainable mixed use community at Carrington.

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

Comment Sheet

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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	
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	YES	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. I am supporting the policy decision to return the area referred to as Davenport Green back to its status as Greenbelt. I think that it is important to retain this green belt area and not to develop it commercially as has been proposed. This is one of the few remaining green areas close to where I live and it would be devastating to lose it. There are already areas set aside for commercial activity which are underused. The former proposal to develop this area would have a detrimental effect on development and employment in other industrial areas in Wythenshawe. These areas have already suffered by the decline in the economy. Another reason is the increase in traffic that would accompany any commercial development. The completion of the M60 ring road and, I suspect, the increased use of car satellite navigation systems, has increased traffic in this area. Development would make the traffic in this area and the accompanying noise, fumes and dirt and risk of accidents, more unbearable. I support the proposal to return this area to Green Belt.

Please continue on a separate sheet if required

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

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

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	19
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	
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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.

Place Objective CAO3 is to “To maximise the re-use or redevelopment of previously developed/derelict land.” whilst objective **CAO8** is “To maximise the re-use or redevelopment of the substantial amounts (of) brownfield land.” Although they are cross referenced with two separate Strategic Objectives, there is no apparent reason for the different wording and there is no reason why the same Place Objective should not appear under more than one Strategic Objective in a coherent Core Strategy.

Stevenor Investments supports objectives **CAO23** and **CAO24** to “maximise opportunities to locate low-carbon / decentralised energy facilities as part of the new sustainable community” and to “support the development of waste management facilities”. However, the first of these objectives should not be defined narrowly as only relating to the proposed residential community, but to the wider mixed-use development of the whole Strategic Location.

Furthermore, there is a potential link between these two objectives which should be highlighted. The objective should not be simply to support waste management facilities, but to maximise opportunities to create energy from waste and to exploit linkages between this and end users of energy, which might include both new employment and residential uses. Such an approach would be in accordance with the new draft PPS ‘Planning for a Low Carbon Future in a

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Changing Climate' which aims "to identify strategic opportunities for marrying up heat suppliers and consumers" (parag. 11). Policy LCF1.4 of the draft PPS recommends that, in plan making, local authorities should look for opportunities to secure (our emphasis):

- i. decentralised energy to meet the needs of new development;
- ii. **greater integration of waste management with the provision of decentralised energy;**
- iii. **co-location of potential heat suppliers and users;** and,
- iv. **district heating networks based on renewable energy from waste,** surplus heat and biomass, or which could be economically converted to such sources in the future.


In addition, our client's site, which is a draft allocation in the Greater Manchester Waste Plan, is located next to the two power stations referred to in the table at paragraph 9.2. There is thus the opportunity to create a wider energy and waste park, utilising advanced technologies and enabling co-location with end users within the Strategic Location.

We would therefore request that the Place Objectives are modified to add references to power generation, waste management and the co-location of potential heat suppliers and users.

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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Strategic Locations Background Note		Policy number
Other document, (please specify)		Vision reference
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		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.

Supporting Growth

W1.1 discusses the definition of employment and refers to B1, B2, B8 and 'similar appropriate uses'. In our response to Policy SL5–Carrington in the present consultation, and in our earlier representations to economic policies, we have argued that certain types of waste management facilities are compatible with such land uses. This is backed up by 'Planning for Waste Management Facilities' (ODPM: 2004), which states for example that centralised and enclosed anaerobic digestion facilities are "suited to areas allocated for business use and traditional commercial/industrial urban areas, and are compatible with the more intensive Class B1/B2 activities".

Our concern is that our client, or a potential end user, should not have to submit a statement under paragraph W1.4 to justify a 'non employment use' at the 15 ha Carrington Vehicle Storage site which is currently identified as part of an employment location under Policy E15 in the Trafford UDP, if the proposed use is power generation and/or a waste to energy facility, which we would regard as a 'similar appropriate use'. Such examples are not comparable with alternatives like residential or retail, in which cases we would fully expect the Council to require justification.

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It is possible that such a need for justification would be overridden by the site's possible specific allocation for waste treatment, which is contained in the Preferred Option of the Greater Manchester Waste Plan. However, this is not a guaranteed outcome and the principle of our argument remains regardless.

Distribution

Our client would like the final paragraph on page 59 to be altered in accordance with our representations to Policy SL5, to refer to complimentary power generation and waste to energy uses. This would reflect the existing power station projects which are at an advanced stage, and the draft allocation allowing waste to energy in the Greater Manchester Waste Plan. This is of specific relevance to B1//B2/B8 economic development not only because of the characteristics in common, but due to the potential for co-location supported by the new draft PPS 'Planning for a Low Carbon Future in a Changing Climate' through its Policy LCF1.4.

Paragraph 13.5 refers to waste management facilities as a one of several 'other key growth sectors' and cites the separate waste policy that covers these, but is not contained in the present consultation. Given the relationship between more conventional B1/B2/B8 uses and waste to energy, it is essential that both policies are properly cross referenced to deal with the highly likely scenario of co-location.

Policy W1.6 continues to refer to 'bad neighbour' industries. However, we have previously pointed out that this term does not have a formal definition, and there is no further explanation of it in paragraph 13.12.

Stevenor Investments welcomes the reference to uses associated with Manchester Airport in paragraph 13.11 and accepts that proposals will need to be determined in relation to RSS policy RT5. However, if discussion of airport parking is not considered appropriate under the Economy policy, it should be considered elsewhere in the Core Strategy. This is the existing use of our client's site and criteria need to be in place to assess any redevelopment for the same purpose.

Implementation

We have commented on the phasing of the supply of employment land at Carrington under Policy SL5: "The phasing of employment land development appears to be somewhat arbitrary, as it is assumed to be equal for each of the 5 year periods used. In reality, this will depend on the economic climate, funding and the availability of essential infrastructure. We do not consider it appropriate for the plan to be over-prescriptive and it should make it clear that such targets are only indicative and will not constrain viable development proposals of which the impacts have been demonstrated to be acceptable.."

PPS4 Testing

Stevenor Investments supports the pragmatic approach advocated by the Council in allowing some office development in Carrington where it will involve previously developed land, link to existing employment uses, and provide access to jobs for local residents. In order to secure progress in Carrington and adjoining Partington, allowing for maximum flexibility of occupiers

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within the B1, B2 and B8 use classes will provide the maximum confidence for developers to secure the implementation of the Council's regeneration aspirations.

Please continue on a separate sheet if required

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Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL5
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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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.


Strategic Proposal

Our views on this section reflect our comments on the Carrington Place Objectives. We note that the list of development to be delivered does not include the two power stations listed in the table at paragraph 9.2. Notwithstanding that the PPS 'Planning for a Low Carbon Future in a Changing Climate' remains a draft document, the proposed approach in its Policy LCF1.4 is consistent with the current approach in the supplement to PPS1 'Planning and Climate Change' and with Regional Spatial Strategy for the North West (policies EM17 and EM18).

Stevenor Investments considers that the Strategic Proposal should make specific reference to both power generation and energy from waste, to reflect both the existing advanced power station proposals and the potential of our client's adjacent 15 ha site, which has a draft allocation for waste treatment in the Greater Manchester Waste Plan. This is based on a Sustainability Appraisal which identified it as being suitable for a wide range of waste treatment processes ranging from anaerobic digestion to advanced thermal treatments.

The energy produced by these sources will have the potential to both supply the mixed-use development for the proposed Shell site, and additional waste treatment processes and

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employment development on our client's site.

Development Requirements

The wording implies that no development whatsoever will be acceptable in this Location without all of the items listed being required. This would clearly be disproportionate in relation to any specific development proposal, whilst some of the items will not be relevant. The wording should be clarified to say "In order for the overall scale of development proposed in this Location to be acceptable..."

The phasing of employment land development appears to be somewhat arbitrary, as it is assumed to be equal for each of the 5 year periods used. In reality, this will depend on the economic climate, funding and the availability of essential infrastructure. We do not consider it appropriate for the plan to be over-prescriptive and it should make it clear that such targets are only indicative and will not constrain viable development proposals of which the impacts have been demonstrated to be acceptable.

Implementation

Whilst there is a single landowner who controls the majority of the Strategic Location, this does not mean that there are not other significant land ownerships which should be acknowledged. For example our client owns some 15 hectares at the Carrington Vehicle Storage site. This is of relevance to Implementation as it is probable that planning proposals will come forward on our client's site which do not require the infrastructure works that the more comprehensive mixed-use development would.

The viability of the Shell proposal is a matter for testing by the landowner and the Council, but it would be wrong for other more readily deliverable opportunities to be held up pending progress with the implementation of this. We note that the consultation document makes various references to a future Land Allocations DPD, but it is not clear whether this is the same DPD for Carrington as is referred to in paragraph 9.2. In any event, the timescales are such that the Core Strategy should acknowledge that the Strategic Location does not exclusively consist of the Shell opportunity and reflect the fact that applications may be need to be determined on other sites before these documents have progressed.


Justification

This would need to be modified should the Council accept our case to cover power generation, energy from waste and the co-location of potential heat suppliers and users.

Please continue on a separate sheet if required

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

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

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Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	✓	Page number	R 4.4
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	
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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.

I think the land should be returned to the open belt because once land is built on, it is lost for ever and access to green land ensures a better quality of life for the local communities, less traffic, pollution and noise.

Please continue on a separate sheet if required

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

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

Comment Form – March 2010

1081

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Ack	

 PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

Name:		Agent (if applicable):	Mike Baker
Organisation (if applicable):	Tesco Stores Limited and Maloneyview (Sale) Limited	Organisation (if applicable):	GL Hearn
Address:		Address:	1 St James's Square Manchester
Postcode:		Postcode:	M2 6DN
Tel:		Tel:	0161 829 7800
Fax:		Fax:	0161 829 7810
Email:		Email:	Mike_baker@glhearn.com

strategic.planning@trafford.gov.uk

Please use the consultation comment form to make a representation on the Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy, the Sustainability Appraisal or the related evidence base. You should consider what it is you wish to comment on and let us know whether you support or are seeking a change to this particular element of the document. Please explain your reasons and suggest any improvements.

Please use a separate comment form for each specific policy, paragraph, figure or table you wish to comment on and attach this to the contact details sheet.

You only need to fill out one copy of your contact details if you are submitting all your comments at the same time, but please indicate the total number of comment sheets enclosed in the box below:

Total number of comment sheets enclosed:	3
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 The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Responses can be submitted online or alternatively an electronic version of the comment form can be found on the Council's web site at: www.trafford.gov.uk. **This form is in 'Word' format and you can type in your response and return it as an e-mail attachment to strategic.planning@trafford.gov.uk.**

Alternatively, completed comment forms can be returned by post to the address below by no later than **5.00pm on Friday 16th April 2010**.


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

The form can also be **faxed** to: 0161 912 3128.

Data Protection Notice:

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

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

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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
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
			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.

The following comments are made in response to the consultation exercise on the Trafford Metropolitan Borough Council Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy.

Core Policy W2: Town Centres and Retail

It is noted that Trafford Metropolitan Borough Council have produced a Technical Note on Strategic Locations and Site Selection. This identifies Sale Town Centre as Strategic Location SL11 and provides the justification for its removal at paragraphs 7.48-7.50. It is noted that paragraph 7.48 states that “there will be a focus on the consolidation and improvement of the convenience and comparison retail offer, with the potential to strengthen and enhance the retail offer where suitable”.

Core Policy W2 identifies the future strategy for centres within Trafford, with paragraph W2.5 referring specifically to Sale Town Centre.

In relation to Sale we consider that paragraph W2.5 should support the “strengthening and

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

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enhancement” of the centre, rather than the “consolidation and improvement” which is proposed. This approach would increase the economic and social benefits and assist in enhancing the vitality and viability of the centre.

With regards to the options to achieve a strengthening and enhancement, we support an improvement to the mix and general quality of the existing retail offer; however we believe that the new retail floorspace should be focused around “The Square” and serve to improve the quality of both convenience and comparison provision within the centre, which can be best achieved through increasing the scale of the unit shops and enlarging the Tesco foodstore. As such, a maximum level of retail floorspace should not be contemplated, as it may unnecessarily restrict the appropriate level of development required.

Accordingly we consider that Paragraph W2.5 should be amended to be read as follows:

In Sale the aim is to strengthen and enhance the town centre through:

- Improvements to the mix and quality of the existing retail offer;
- New retail floorspace focused around The Square to increase the range and size of the unit shops, and extension of the Tesco foodstore to improve the quality and choice of the retail offer;
- New commercial office accommodation;
- Additional leisure and community facility development; and
- Additional residential accommodation.

Please continue on a separate sheet if required

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

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

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MONITORING INFORMATION

Please complete the following if you are responding as an individual, by ticking the relevant option. This information will be used for statistical purposes only and will not be kept with your comments form. Please complete one form per person, not per representation.

What gender are you?

Male	<input type="checkbox"/>	Female	<input type="checkbox"/>
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What is your age?

Under 16	<input type="checkbox"/>	16-25	<input type="checkbox"/>	26-35	<input type="checkbox"/>	36-45	<input type="checkbox"/>
46-55	<input type="checkbox"/>	56-65	<input type="checkbox"/>	66-75	<input type="checkbox"/>	76+	<input type="checkbox"/>

What do you do in Trafford? (tick those which apply)

Live	<input type="checkbox"/>	Work	<input type="checkbox"/>	Study	<input type="checkbox"/>
Other (please state) _____					

Do you consider yourself to have a disability or impairment, as defined in the Disability and Discrimination Act 1995*?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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* The Disability and Discrimination Act 1995 defines a disabled person as someone with a physical or mental impairment, which has substantial long term adverse effects on his/her ability to carry out normal day to day activities.

What is your ethnic group? Please tick the box that you believe best describes your ethnic origin.

White British _____ Irish _____ Any other white background (please specify) _____ _____ _____	<input type="checkbox"/>	Mixed White and Black Caribbean _____ White and Black African _____ White and Asian _____ Any other mixed background (please specify) _____ _____ _____	<input type="checkbox"/>
Asian or Asian British Indian _____ Pakistani _____ Bangladeshi _____ Kashmiri _____ Sikh _____ Any other Asian background (please specify) _____ _____	<input type="checkbox"/>	Black or Black British Caribbean _____ African _____ Any other Black background, (please specify) _____ _____ _____	<input type="checkbox"/>
Chinese or other ethnic group _____ Chinese _____ Any other ethnic background (please specify) _____ _____	<input type="checkbox"/>		<input type="checkbox"/>

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	22
Sustainability Appraisal		Paragraph number	4.14
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL11
		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.

The following comments are made in response to the consultation exercise on the Trafford Metropolitan Borough Council Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy.

Our previous comments on the Core Strategy: Further Consultation on the Preferred Options supported the identification of Sale Town Centre as a Strategic Location (SL11). Our previous comments suggested that the Policy should be worded to provide for “strengthening and enhancement of the centre” in order to provide increased economic and social benefits and assist in positively enhancing the vitality and viability of the centre.

It is noted that Trafford Metropolitan Borough Council have produced a Technical Note on Strategic Locations and Site Selection. This justifies the change of status for a number of Strategic Locations including Sale Town Centre. Strategic Locations are now identified in accordance with the following three bullet points:

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

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- An important element in the achievement of the Core Strategy;
- Supported by information of what is being provided, when it will be provided, who will provide it, how it will be delivered. This information has been outlined, with the general costs and funding sources identified, and will be agreed in principle by all delivery partners; and
- Programmed for delivery through the Land Allocations Plan DPD.

The Technical Note identifies Sale Town Centre as Strategic Location SL11 and provides the justification for its removal at paragraphs 7.48-7.50. Paragraph 7.49 of the Technical Note confirms that development and regeneration of sale is 'important'. This satisfies the first bullet point of the Strategic Locations identification.

Paragraph 7.50 then goes on to confirm that proposals for future allocations can be identified through the Land Allocations Plan DPD, which accords with the third bullet point of the identification of Strategic Locations.

The second bullet point relates to the delivery of the proposals. In preparing the Technical Note, It is understood that Trafford Metropolitan Borough Council have not discussed the strengthening and enhancement of Sale Town Centre with any interested party.

Following this consultation on the Core Strategy a delivery strategy can be discussed with the Council in order to provide additional information to detail when, how and who can strengthen and enhance Sale Town Centre before the preparation of the Publication Draft of the Core Strategy. This information would provide the Council with the details of the delivery proposals for Sale Town Centre, sufficient to address the second Strategic Locations identification bullet point.

We consider that Sale Town Centre meets the criteria and should therefore be reinstated as a Strategic Location

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.



1103.

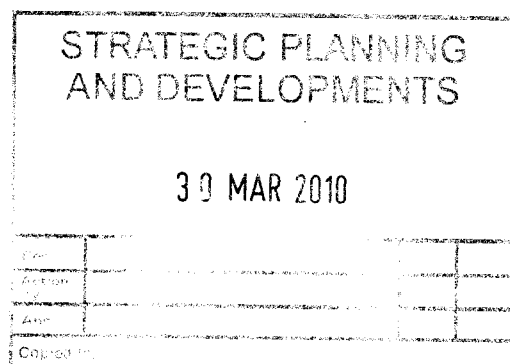
LDF Team
Strategic Planning and Developments
Trafford Council

30 March 2010

[sent via email: strategic.planning@trafford.gov.uk]

Dear Sirs

Trafford Core Strategy – Further Consultation



Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.

We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.

Alternatively, please mark all paper consultation documents and correspondence for the attention of the Planning and Local Authority Liaison Department.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our departmental direct line (01623 637119).


With kind regards

Yours sincerely

Miss Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MIPSM, MRTPI*
Deputy Head of Planning and Local Authority Liaison

In line with Government led initiatives the Coal Authority is committed to the delivery of efficient, high quality services supported by information technology. To support this we prefer communication in electronic format wherever possible.

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

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Comment Sheet

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	X	Page number	6 to 7
Sustainability Appraisal		Paragraph number	2.3
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	Overall Vision
		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	
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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.

It is unclear whether the current proposed wording of the Vision has fully considered comments submitted in response to the June 2009 'further consultation'; however, the Trust remains concerned that the Vision does not encompass the consideration of the Borough's landscapes or the overall approach to the prudent use of natural resources. In detail:

Trafford has a number of distinctive landscape types, such as those associated with its important river valleys and the mosses. These are important for the natural environmental resources that they contain, but in addition they also represent an important layer of landform that has shaped and defined the Borough, its communities and its character. At present this element is missing from the Vision. It is suggested that the second paragraph is re-worded to make specific reference to landscape, e.g. "*The historic, built and natural **environment, and landscapes (including strategic Green Infrastructure and the Green Belt), will be preserved, protected and enhanced***"

Secondly, the draft Vision remains silent on how the Borough will ensure the prudent use of natural resources – this might best be addressed by adding a new paragraph relating to sustainable construction, e.g. "*All new development will encompass the principles of sustainable construction, and in particular will ensure that the recycling of materials is maximised and that natural resources are used prudently.*"

Please continue on a separate sheet if required

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

Trafford's Core Strategy: 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	8
Sustainability Appraisal		Paragraph number	3:1
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	SO2
		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	X	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.

The change that has been made to this Strategic Objective addresses the concerns raised by the National Trust in June 2009 – this is welcomed accordingly and the revised SO2 is supported.

Please continue on a separate sheet if required

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

Trafford's Core Strategy: 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	8
Sustainability Appraisal		Paragraph number	3.1
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	SO7
		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.

The incorporation into the Climate Change element of this Strategic Objective of reference to adapting to climate change is helpful and supported.

Please continue on a separate sheet if required

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

Trafford's Core Strategy: 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	8
Sustainability Appraisal		Paragraph number	3.1
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	SO8
		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.

This amended Strategic Objective now includes specific reference to 'enhancement' in accordance with the Trust's previous representations, this is welcomed and the revised SO8 is supported.

Please continue on a separate sheet if required

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

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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	21
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)	Place Objective RCO1

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

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.

Generally the National Trust remains supportive of the Place Objectives for the Rural Communities. However, it is unclear why RCO1 has been re-formulated so that its intention to safeguard and protect the character and appearance of rural settlements and the Green Belt is only in respect of "inappropriate residential development". It is considered that these locations also need to be safeguarded and protected from all forms of inappropriate development, whatever use category they might fall into. This is not to say that no development should take place under any circumstances, but rather that the assessment of all proposals, not just residential schemes, should ensure that local character and appearance is safeguarded, protected, and indeed where possible enhanced.

This can be achieved by deleting the word "residential" from RCO1; and replacing "safeguard and protect" with "safeguard, protect and enhance".

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	59 - 64
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	W1
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
			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.

Attention is drawn to the National Trust's previous comments on Policy W1 and also to the helpful subsequent discussions with officers regarding sites in Broadheath and in particular the Trust's investment land in the area. It is noted that the relevant Evidence Base is likely to be reviewed, in particular the Employment Land Study. In practice it is likely to be necessary to incorporate additional land at Broadheath beyond that identified in the Study as this amounts to a little less than the 10 hectares identified in Table W1 in order ensure that an appropriate quantum and choice of land is available (as referred to at W1.7).

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	65 - 69
Sustainability Appraisal		Paragraph number	14.10
Strategic Locations Background Note		Policy number	W2
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.


The comments previously submitted by the Trust continue to apply, i.e.:

“No objection to the Policy wording but in terms of Local Centres it is important that these are clearly defined somewhere. At present it is unclear which locations are being classified as Local Centres (although the intention to define their boundaries in the Land Allocations DPD is noted it is considered that they need to be identified by name/general location at this stage). From the National Trust’s perspective it is considered that the new retail and related facilities at Stamford Brook do constitute a Local Centre.”

Please continue on a separate sheet if required

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

Trafford's Core Strategy: 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	70 – 71
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	R3
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.

The Trust continues to support this Policy and in particular welcomes the addition of the second bullet point at R3.1 which specifically recognises the health and well-being benefits provided by Green Infrastructure.

Please continue on a separate sheet if required

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

Trafford's Core Strategy: 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	75 - 76
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	R4
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.

The National Trust continues to support this Policy in line with its earlier comments, i.e.:

“The National Trust especially welcomes the recognition in the latest document of the role of agriculture within the Borough and the need to look positively at opportunities for rural diversification (especially if viable uses are to be found for important historic and vernacular buildings in such areas).”

Please continue on a separate sheet if required

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

Trafford's Core Strategy: 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	79
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	R6
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.

The comments previously submitted continue to apply, i.e.:

“Whilst the inclusion of Dunham Massey as a cultural and tourism resource is welcomed it is noted that, as per earlier submissions, the significance is wider than just the Hall and Registered Park & Garden –rather it encompasses the significance of the wider agricultural estate (including related buildings) and the ownership interests in the settlements of Dunham Town and Dunham Woodhouses, as well as related features such as the Mill at Bollington, the Estate Office in Altrincham and woodland areas.”

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.

Edwards, Andrea

From: Rose Freeman [rose.freeman@theatrust.org.uk]

Sent: 13 April 2010 13:19

To: Strategic Planning

1035

Our Ref.: RF/2900

Core Strategy Revised Policies

Thank you for your email of 8 March consulting The Theatres Trust on a revised Vision, Strategic Objectives and Delivery Strategy together with revised locations and amended policies for the Core Strategy DPD.

The Theatres Trust is The National Advisory Public Body for Theatres. The Town & Country Planning (General Development Procedure) Order 1995, Article 10, Para (v) requires the Trust to be consulted on planning applications which include '*development involving any land on which there is a theatre.*' It was established by The Theatres Trust Act 1976 '*to promote the better protection of theatres.*' This applies to all buildings that were either built as theatres or are used for theatre presentations, in current use, in other uses, or disused.

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.

Policy W1 Economy

Although ¶13.4 on page 62 states that one of the key economic growth factors is the cultural and creative industry, this item is now omitted from the policy. Please note that the subsidised arts play a major role in attracting inbound tourism (worth £16.3bn in the UK) and that four million overseas visitors to Britain went to the theatre, ballet, opera or a concert (in 2008). Support for both subsidised and commercial arts is vital in maintaining the quality and access that makes the arts, culture and the creative industries so successful.

Policy W2 Town Centres and Retail

We are pleased that the cultural offer has been retained within W2.4 although the expanded policy is in danger of being too detailed.

Policy R6 Culture and Tourism

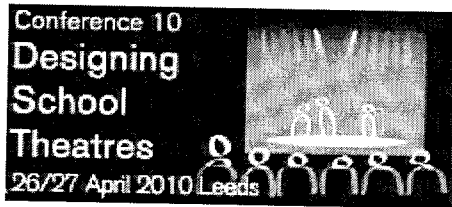
Thank you for improving this policy to include the protection of existing theatre venues. Protection of theatre use contributes to the Government's programme of creating sustainable communities and are their cultural anchors, offering opportunities for residents, businesses and visitors to be entertained, informed, challenged and educated and we believe that theatres are therefore essential for the maintenance of sustainable communities.

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

Rose Freeman
 Planning Policy Officer
 The Theatres Trust
 22 Charing Cross Road
 London WC2H 0QL
 Tel: 020 7836 8591
 Fax: 020 7836 3302

planning@theatrust.org.uk

13/04/2010



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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

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	✓	Page number	75
Sustainability Appraisal		Paragraph number	R 4.4
Strategic Locations Background Note		Policy number	16. R 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.

The reasoning at the six paragraphs 16.3 then 16.10 to 16.14 is fully supported.

The return to green belt of the land removed in the 1996 UDP will restore the integrity of Davenport Green as a whole, and will enable it to better fulfil its role specified at para 16.3, especially given the presence of the Airport and the heavily built up areas of Wythenshawe, Hale/Halebarns and Timperley.

This return to green belt reinforces the beneficial view that new development should be located in areas already provided with the various supporting infrastructures (para. 16.12).

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.

1019.

Direct Line 01925 537494
01925 537208

Direct Fax
David.Sherratt@uuplc.co.uk

Dennis Smith
c/o Strategic Planning & Developments
1st Floor Waterside House
Sale, Waterside
M33 7ZF

Your ref	LDF Team
Our ref	DC/10/803
Date	22-APR-10

Dear Mr. Smith

Re: Trafford Core Strategy: Further Consultation on the Vision, Strategic Objectives and Delivery Strategy

Thank you for your planning consultation of 5th March 2010, I must apologise for the delay in our response.

Generic Comments

Capacity

United Utilities Water plc (UW) will provide information in response to enquiries by developers, in response to Planning Applications and Local Authority Strategic consultations, however, capacity can not be reserved for a particular development. UW reserves the right to revise our comments at the time that a formal application is made, in order to take account of possible changes between the date of the enquiry and the date of the connection application.

For all SO7 references

All new development should be constructed in accordance with the latest environmental standards, not just large scale developments.

Wastewater Issues

Policy SL2 Trafford Wharfside

In view of the significant development in this area there is a potential need to invest in the wastewater infrastructure.

Policy SL4 Trafford Centre

I note there is a requirement for all new homes to have renewable heating by 2016. In view of this requirement, it is worth noting the proximity of our Wastewater Treatment Works at Davyhulme to the Trafford Centre Rectangle Development Area. There may be opportunities in the future to export renewable heat from Davyhulme to such a development. At this stage a significant amount of investigation would be required to determine the viability of this.

Policy SL5 Carrington

This area would require significant investment in wastewater assets in order to support the development outlined in this plan as there is limited infrastructure in this area.

Surface water

In line with PPS25, no surface water shall connect into the public sewer either directly or indirectly; developers and local authorities should seek opportunities to reduce the overall level of

flood risk in the area and beyond. Throughout the layout the appropriate application of sustainable drainage techniques should be employed.

Land and subsoil drainage

Land drainage or subsoil drainage water must not be connected into the public sewer system directly or by way of private drainage pipes. It is the developer's responsibility to provide adequate drainage without recourse to the use of the public sewer system.

Wastewater Issues

Water Supply Issues

Policy SL1-5

There is insufficient detail to give a meaningful response to water infrastructure requirements but in general there do not seem to be an issue with supporting the domestic population with the necessary supplies.

Policy SL1 & 2

UUW would also like to take the opportunity to mention the increased level of development in the Pomona and Trafford Wharfside development areas

The Media City development is moving at a fast pace, and on current form will approach its, supply limits (first trigger) sometime in 2013/14. This trigger will necessitate additional reinforcements to be put in place before additional expansion can progress.

In the light of the above proposals it may be that insufficient network flexibility will remain and extensive supply reinforcements may need to be implemented in advance of 2014. Detailed planning for this will be required prior to any future approval for additional supplies.

Policy SL3 - 5

The remaining SL sites have some network connectivity issues but should not require major bulk transfer systems to support proposals

Yours Sincerely

Regards

Dave Sherratt
Asset Protection Manager
Supply, Demand & Asset Protection Team
United Utilities Water plc

Received By email 08/04/10

Strategic Planning and Developments
Trafford Council
1st Floor Waterside House
Sale Waterside
Sale
M33 7ZF

1193

08 April 2010

EPP ref: L25-7393-CT-de

Contact: Caroline Taylor
Direct dial: 01625 442798
CarolineTaylor@epp-planning.com

By email and post - strategic.planning@trafford.gov.uk

Dear Sir or Madam

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

We refer to the above document and to our previous representations made in connection with the Core Strategy. In general, we support the changes to that have been made to the Core Strategy since earlier consultation documents.

The revised Policy L1 states that approximately 30% of the housing land to be released will be within the Regional Centre and Inner Areas with the remaining 70% within the South City Region Area. Half will support key regeneration priorities set out in Policy L3 – Old Trafford, Partington and Sale West and strengthen and support Trafford's 4 town centres.

We are generally supportive of this revision however, we consider that specific mention should be given to Altrincham as it is recognised as a priority for growth in the RSS. It is essential that development is directed to the south of the Borough. The regeneration of the northern part of the borough and the regeneration areas should not take place at the expense of the southern part of the Borough. Furthermore, development in Altrincham town and the surrounding areas is necessary to provide a critical mass to support the development of the town.

We object however, to the order of priority for the development of sites set out at paragraph L1.6. The order of priority set out in paragraph L1.6 seeks to concentrate development firstly on derelict, vacant or under-used sites within the Regional Centre and Inner Areas, secondly on similar such land outside the Regional Centre and Inner Areas that can be shown to contribute to the regeneration priorities set out in Policy L3 and thirdly other land in the Regional Centre and Inner Areas that can be shown to be of benefit to the wider plan objectives.

This approach is overly restrictive given that approximately 70% of land to be released is to be within the South City Region Area. We consider that paragraph L1.6 should accord with the sequential approach set out in Policy DP4 of the RSS. This paragraph should be reworded as follows:

"To ensure that the indicative 80% target proportion of new housing provision to use brownfield land and buildings set out in RSS is achieved over the Plan period, the Council will release previously developed land before greenfield land in the following order of priority:

- *First, using existing buildings (including conversions) within settlements, and previously developed land within settlements;*
- *Second, using other suitable infill opportunities within settlements, where compatible with other RSS policies;*
- *Third, the development of other land where this is well-located in relation to housing, jobs, other services and infrastructure.*

We trust that these representations will be taken into account in the final Core Strategy.

Yours sincerely

EMERY PLANNING PARTNERSHIP LTD

Caroline Taylor BA (Hons) Dip TP MRTPI AIEMA
Associate Director

Copy to: client

STRATEGIC PLANNING AND DEVELOPMENTS			
20 APR 2010			
Recd			
Action			
By			
Ans			
Comments			

Warburton Parish Council

Mark Priestner,
Lands End,
Moss Lane,
Warburton, Lymm,
WA13 9TX.

19th April, 2010.

Strategic Planning & Housing Services,
First Floor, Waterside House,
Sale Waterside,
Sale, M33 7ZF.

1076

Dear Sirs,

Trafford Core Strategy: Further Consultation on The Vision, Strategic Objectives and Delivery Strategy.

Original consultation on the Core Strategy led to an emphasis on future development in the Regional Centre and Inner Area as well as the Regeneration Areas. The application for Housing Growth Point Status allowed for an uplift of 20% above RSS housing targets so long as this was in the Inner Areas. Paragraph 16.4 of this consultation states "The RSS spatial development strategy aims to create sustainable communities by concentrating new development in urban areas, particularly the regional centre and inner areas and town centres".

According to the June 2009 Consultation, 42% of new housing development was to be concentrated within the Regional Centre and Inner Areas of the borough in line with RSS policy. Suddenly this figure is now only 30% according to this latest consultation document. This is a huge strategic change in direction, making a lot of the previous consultation somewhat irrelevant.

In considering the proposed mixed use development at Carrington we have some concerns:

1. Paragraph 9.5 states "the scale of development proposed at this location is designed to be of such a level that it will assist in maintaining the viability of valuable community facilities in the neighbouring Priority Regeneration Area of Partington, such as the rejuvenated shopping centre and health and education facilities". We understood that the Partington Canal Side Development was to develop and sustain such facilities. If the proposed development of Carrington is to be a sustainable development, what link is there between the development of Carrington and that of Partington?
2. Our main concern with the proposed development of Carrington is the intrusion into the Green Belt and into the Protected Open Land as proposed by the Shell Carrington Delivery Statement (November 2009). There are proposals for development east of Isherwood Road into Green Belt land; south of Shell into Protected Open Land; SE of this Protected Open Land into more Green Belt and even more development SW of this Open Protected Land into even more Green Belt land.

Trafford Council is quite clear in its commitment to protecting the Green Belt and Protected Open Land. Policy R4.1 states “The council will continue to protect the Green Belt from inappropriate development”. Paragraph 16.9 states “PPG2 states that detailed Green Belt boundaries in development plans should be altered only exceptionally” and Policy R4.7 states “The council will protect the following areas of open land from development – land south of Shell, Carrington”.

Our biggest concern is the proposal to develop Green Belt land south of the Gasworks. This is totally inappropriate; it is outside the Brownfield area of Shell; it is an isolated area of land, not connected to anywhere; it is Green Belt land and some of the proposals (a link road and screening) are on National Trust Land.

We trust that when considering the development of Carrington, these proposed areas of development will be deleted from the Development Proposals

3. Paragraph 16.16 states that agriculture in Trafford only takes place within the Green Belt. This is not true; agriculture also takes place in Protected Open Land.

4. Summary of Responses Received to the Preferred Option – R4.


We would like to comment on Redrow’s Representation stating that the suitability for housing of the land in Warburton, south of Partington, has long been established. The Inspector’s Report on Alterations to the Adopted UDP in 2003 (HOU 21. 9.186) states “I express serious reservations about the sustainability of such a large peripheral housing development at Partington”. The Red Brook and its associated flood plain would prevent this area from assisting in the regeneration of Partington in becoming a more sustainable community.

So, in summary: although perplexed by the large change in direction towards the end of Consultation on the Core Strategy, we broadly support the proposed development of Carrington, provided that there is no encroachment from this development into the Green Belt and that improved Transport links to the M60 are developed.

Yours sincerely,

Mark Priestner
Warburton Parish Council

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

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Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	124.4
Other document, (please specify)		Vision reference	
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Support	✓	Seeking a Change		General Comment

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protecting the countryside, it is important to
 keep these areas undisturbed.

Please continue on a separate sheet if required

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